

# **EXHIBIT 15**



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1 (Witness sworn.)

2

3 MS. MUSE: Good morning, Mr. Leitner-Wise.

4 THE WITNESS: Good morning.

5 MS. MUSE: Thank you for being with us today.

6 Have you given a deposition before?

7 THE WITNESS: No, I haven't. This is the  
8 first for me.

9 MS. MUSE: Okay. So I'll explain some of the  
10 ground rules, and you should let me know if you have  
11 any questions. I want to make sure you understand  
12 them before we begin.

13 THE WITNESS: Okay.

14 MS. MUSE: Do you understand that you'll be  
15 testifying under oath today?

16 THE WITNESS: Yes, I do.

17 MS. MUSE: And you understand that that will  
18 be under the penalty of perjury?

19 THE WITNESS: Yes, I do.

20 MS. MUSE: So you'll answer my questions  
21 truthfully just like you are testifying in a  
22 courtroom?

23 THE WITNESS: I am.

24 MS. MUSE: Nick here is our court reporter.

1 He will be taking down what is said and transcribing  
2 it.

3 I will be asking questions, and  
4 then you will answer them. Because the court  
5 reporter has to write down everything we say, it's  
6 important that we try not to talk over each other.

7 I'm sure I will make a mistake  
8 and talk over you at some point, and I expect you to  
9 do the same; but we'll try to do our best so the  
10 court reporter is able to write everything down.

11 So you'll have to wait for me to  
12 finish my questions before you answering even if you  
13 think you know what I'm going to say.

14 Do you understand?

15 THE WITNESS: Yes.

16 MS. MUSE: Great.

17 THE WITNESS: Makes a lot of sense.

18 MS. MUSE: You may hear your attorney pipe in  
19 to state an objection after a question. We'll  
20 continue unless the attorney stops to discuss a  
21 privilege. You'll still have to answer my questions  
22 unless the attorneys instruct you otherwise.

23 Do you understand?

24 THE WITNESS: Yes, I do.

1 MS. MUSE: If you don't understand a question  
2 that I ask, please let me know. I want to make sure  
3 that you understand my questions before you answer  
4 them.

5  
6 PAUL A. LEITNER-WISE,  
7 called as a witness herein, having been first duly  
8 sworn, was examined upon oral interrogatories, and  
9 testified as follows:

10

11

EXAMINATION

12

by Ms. Muse:

13

14 Q And then there's a couple questions we  
15 ask of all witnesses. Are you on any medication  
16 today that would prevent you from giving untruthful,  
17 (sic.), testimony today?

18

A No, I'm not.

19

20 Q Is there anything else that would  
21 prevent from testifying truthfully and accurately  
today?

22

A No, there isn't.

23

Q Okay.

24

As you know, we're conducting



1 this deposition virtually today. I'm in an office  
2 in Chicago, Illinois. Where are you today?

3 A I'm actually located in our house in  
4 Northeast D.C.

5 Q In the District of Columbia?

6 A Disstrict of Columbia, Washington, D.C.

7 Q Okay. Is there anyone in the room with  
8 you today?

9 A My wife is at home at the moment. She  
10 will be leaving shortly.

11 Q Is she in the same room as you at the  
12 moment?

13 A She is, yes.

14 Q She is. Would...

15 A If I could explain -- and I didn't mean  
16 to talk -- it is -- the house is a very open plan.  
17 So she's not actually sitting next to me, but she's  
18 within what would be defined as a room.

19 Q Okay. Are you able to see her from  
20 where you're sitting?

21 A If I crane my head, yes.

22 Q Okay. I'm going to have to ask you to  
23 not interact with your wife during this deposition;  
24 and if she tries to interact with you, I'd like you

1 to let me know so that we can understand whether we  
2 are just speaking with you today or whether there's  
3 somebody else who is off camera who might be  
4 interacting with you.

5 Does that make sense?

6 A It does. And I'm using earphones. So  
7 there's no sound coming from the computer.

8 Q Great.

9 Is there any other applications  
10 open on your computer other than the one that you're  
11 using for this video call right now?

12 A Just e-mail. I can close that if you  
13 want.

14 Q Yes. If you could please close your  
15 e-mail. Thank you.

16 A All right. Bear with me.

17 That's it.

18 Q Okay. And do you have a phone or iPad  
19 or any other technology that's within your view at  
20 the moment?

21 A No. My phone is separate -- over  
22 there, and it's muted. So it's not going to  
23 interfere with us.

24 Q Wonderful. Okay. So if during the

1 deposition any of this changes, during a break you  
2 get your phone out or put it in front of you, you  
3 open an application on the computer, you need to let  
4 me know and not do that because -- it's very  
5 convenient for us to do this virtually, but we need  
6 to make sure that there's no distractions and that  
7 the only person you're communicating with during  
8 this deposition is me and the people who are on this  
9 call with you.

10 A Absolutely.

11 Q Does that make sense?

12 A Absolutely. I don't want any  
13 distractions.

14 Q Great. All right.

15 And then do you have any  
16 documents in front of you at the moment?

17 A No.

18 Q Okay.

19 A I have a coffee mug.

20 Q That's important.

21 A Absolutely.

22 Q All right. So the name of the lawsuit  
23 that you're being deposed in today is Barnett versus  
24 Raoul, number 23 dash CV dash 209, pending in the

1 U.S. District Court for the Southern District of  
2 Illinois.

3 There are three other cases that  
4 have been consolidated with this case, Harrel versus  
5 Raoul, number 23 dash CV 141; Langley versus Kelly,  
6 number 23 dash CV 192; and Federal Firearms  
7 Licensees of Illinois versus Pritzker, number 23  
8 dash CV dash 215.

9 Do you understand that the  
10 deposition you are giving today may be used in all  
11 four of those cases?

12 A I do now, yes.

13 Q Do you understand that the plaintiffs  
14 in all four of those cases have identified you as an  
15 expert?

16 A Yes.

17 Q Okay.

18 All right. Let's get another  
19 basic out of the way and make sure that you can see  
20 documents when I share them.

21 I'm going to share a document  
22 from my side. Do you see a document on your screen?

23 A Yes, I do. It's the expert witness  
24 report of Paul Leitner-Wise.

1 Q Great. I will mark this document for  
2 the record as Exhibit 1.

3 Do you recognize the document  
4 that I just marked as Exhibit 1?

5 A Yes, I do.

6 Q And what is it?

7 A It is the expert witness report I  
8 compiled for this case.

9 Q Okay. Did anyone help you write this  
10 report?

11 A No. I wrote it.

12 MR. BRADY: Objection to the extent it calls  
13 for communications with counsel.

14 You may answer.

15 MS. MUSE: Q Did anyone help you write this  
16 report?

17 THE WITNESS: A No. I provided the report.  
18 I did communicate with the attorney involved to  
19 ensure that it was concise and to the point.

20 Q And you were asked by the plaintiffs to  
21 prepare this report, correct?

22 A That is correct, yes.

23 Q Okay. And I'm going to scroll through  
24 this to page nine.

1                                   Is this your signature on the  
2                                   bottom of page nine?

3                   A           It's my electronic signature. That is  
4                   correct.

5                   Q           Okay. Is everything in this report  
6                   accurate?

7                   A           To the best of my knowledge, it's  
8                   accurate.

9                   Q           Is this report complete?

10                  A           In...

11                  MR. BRADY: Objection. Objection. Vague as  
12                  to complete.

13                  MS. MUSE: Q Is this this report complete?

14                  THE WITNESS: A As it stands, as I'm sitting  
15                  here, yes, it's complete.

16                  Q           Is this report a full summary of the  
17                  opinions that you will provide in this case?

18                  MR. BRADY: Objection. Vague as to full  
19                  summary.

20                  MS. MUSE: You still need to answer the  
21                  question.

22                  THE WITNESS: Yeah. I was just waiting for  
23                  you to.

24                  MS. MUSE: Thank you.

1 THE WITNESS: -- To ask a question again.

2 MS. MUSE: Okay.

3 THE WITNESS: A It is an overview. I can go  
4 in to more detail if required.

5 MS. MUSE: Q Are there opinions that you  
6 intend to offer in this case that are not included  
7 in this report?

8 A The opinions I offer are -- or the  
9 opinions that I offer require more detail. So the  
10 general -- the general -- I'm trying to use the  
11 correct word here.

12 How the report is drafted is  
13 correct. There may be additional information to  
14 back up the conclusions.

15 Q Is there other facts that you relied on  
16 that are not reflected in this report?

17 A Once again, there are details that I  
18 have not specifically included.

19 Q Is there any data that you relied on  
20 that you did not include in this report?

21 A There's substantial data that's  
22 experience. Once again, that can be provided if  
23 required.

24 Q Have you been retained to do any

1 further work in this litigation after today?

2 A I don't understand the question.

3 Q Have you been asked to do any work on  
4 this case other than testify today after this date?

5 A I don't have the information to answer  
6 that question. I don't know if this is going to  
7 proceed to trial. I don't know if I'm going to be  
8 involved in proceeding to trial.

9 So as far as I'm aware, what I'm  
10 doing today is what I'm doing. If it proceeds,  
11 that's up to the attorneys, the plaintiffs, the  
12 defendants. It's not my decision.

13 Q Have you been asked to draft anything  
14 in addition to this report?

15 A No, I have not.

16 Q Okay. And who retained -- I'm going to  
17 close this.

18 A You're back.

19 Q Sorry. It will make it a little easier  
20 to see me.

21 Who retained you to give an  
22 opinion in this case?

23 A Mr. Brady.

24 Q Mr. Brady. And by Mr. Brady do you



1 mean Sean Brady, one of plaintiff's counsel?

2 A That is correct.

3 Q Is that the only individual paying you  
4 for participating in this case?

5 A As far as...

6 MR. BRADY: Objection. Vague. I didn't hear  
7 the question.

8 MS. MUSE: Q Is Mr. Brady the only  
9 individual paying you for participating in this  
10 case?

11 MR. BRADY: Objection. Assume facts not in  
12 evidence.

13 MS. MUSE: Q Can you answer the question,  
14 Mr. Leitner-Wise.

15 THE WITNESS: A I -- I don't know who is  
16 paying me. I don't think it's Mr. Brady. I think  
17 it's the plaintiffs via his law firm. That's to the  
18 best of my knowledge. So...

19 Q Have you been paid by anyone for  
20 participating in this case?

21 A Not yet.

22 Q Do you have a contract to be paid by  
23 somebody for participating in this case?

24 A I have an agreement to be paid for my

1 expert witness opinion and for testifying.

2 Q Who is that agreement with?

3 A It's with Sean Brady's law firm, I  
4 believe.

5 Q Other than the agreement that you have  
6 with Sean Brady's law firm, do you have an agreement  
7 with anybody else to be paid for participating in  
8 this case?

9 A No, I do not.

10 Q How much has Mr. Brady's law firm  
11 agreed to pay you for participating in this case?

12 A I'm compensated at my standard rate of  
13 \$180 per hour.

14 Q And where -- when else have you used  
15 that standard rate?

16 A In design work we carry out for client  
17 companies.

18 Q Okay. Some of the plaintiffs in this  
19 case are organizations. Are you a member of any of  
20 the organizations that are plaintiffs in this case?

21 A No, I am not.

22 Q Do you have any -- other than the  
23 relationship we've discussed with Mr. Brady's law  
24 firm, do you have any other personal or financial

1 relationship with the plaintiff in this case?

2 A I do not.

3 Q Other than the agreement that you have  
4 with Mr. Brady's law firm, do you have any other  
5 financial relationship with any plaintiff -- with  
6 any -- let me retract the question and start again.

7 Other than the agreement that you  
8 have with Mr. Brady's law firm, do you have any  
9 other financial relationship with an attorney in  
10 this case?

11 A I do not have any financial  
12 relationships with any attorneys other than the law  
13 firm.

14 Q Okay.

15 A Mr. Brady's law firm.

16 Q Other than the payment that you're  
17 receiving for your report and testimony, do you have  
18 another financial interest in this case?

19 MR. BRADY: Objection --

20 THE WITNESS: A No, none --

21 MR. BRADY: -- To financial interest.

22 MS. MUSE: Could you please answer the  
23 question.

24 THE WITNESS: A None whatsoever.

1 MS. MUSE: Q Okay. All right.

2 And, Mr. Leitner-Wise, I think I  
3 failed to let you know in the beginning that we do  
4 take breaks during depositions. So I'll tend to  
5 take them every hour or so. But if at some point  
6 you need one, please let me know I'll ask you to  
7 sometimes to wait to finish the concurrent  
8 questioning that we're doing, but you should  
9 absolutely let me know if there's a reason on your  
10 end that comes up and you need to take one.

11 A I understand.

12 Q All right. Okay. Then we will start  
13 on your background here.

14 Did you graduate high school?

15 A Yes, I did.

16 Q Okay. And when was that?

17 A I got to think now.

18 A long time ago. That would be  
19 1978.

20 Q Okay.

21 A '78 --

22 Q All right.

23 A -- '79, something like that.

24 Q Did you obtain any degrees?

1 A I went to further education.

2 Q Okay. And what degrees did you obtain?

3 A I have a -- I have two degrees. I have  
4 a degree in industrial design and I have an M.B.A.,  
5 a business M.B.A.

6 So bachelor's in industrial  
7 design and a business M.B.A., both from the same  
8 university.

9 Q And what university is that?

10 A Stafford University in the United  
11 Kingdom.

12 Q Stafford.

13 A Yes.

14 Q -- University?

15 A I did -- I actually attended University  
16 of Sussex for one semester and then transferred.  
17 That's now -- as with a lot of things, it's now  
18 changed its name. It's the University of -- or  
19 Brighton University, I believe.

20 Q But both of your degrees are from  
21 Stanford?

22 A Stafford. Not Stanford.

23 Q Both degrees are from Stafford,  
24 S-t-a-f-f-o-r-d, University?

1 A That is correct.

2 Q Okay. Where is Stafford University  
3 located?

4 A Staffordshire in the United Kingdom.  
5 It's a county in the United Kingdom.

6 Q And is that -- is Stafford University  
7 still called Stafford University today?

8 A I do not know. I'm not -- I don't have  
9 that information. Obviously, I can find out.

10 Q At the -- when -- in what year did you  
11 receive your bachelor's degree from Stafford  
12 University?

13 A Probably 1986.

14 I know it's on my resume, but  
15 it's -- it's a long time ago. '85, '86, something  
16 like that.

17 Q So in 1985 or 1986 you received a  
18 bachelor's degree in industrial design from Stafford  
19 University in the United Kingdom?

20 A Correct.

21 Q And Stafford University is located in  
22 Staffordsure?

23 A Shire.

24 Q Shire?

1 A Yeah. It's a county.

2 Q Is there any relationship between  
3 Stafford University and Staffordshire University?

4 A It may be the same. I don't know.

5 Q So you're not aware of the name of the  
6 University that you attended -- what its name is  
7 today?

8 A No.

9 Q Do you have -- do you have a copy of  
10 your degree or --

11 A Yes, I do.

12 Q -- Or diploma?

13 A Yes.

14 Q And do you have access to it?

15 A Not right now. I mean, I would have to  
16 go and pull it out of files.

17 Q Is that something that you would be  
18 able to provide to your counsel?

19 A Yes, I would.

20 Q When you attended Stafford University  
21 to receive a bachelor's degree what were your major  
22 areas of study?

23 A The -- I mean, it was -- I'd have to  
24 pull the transcripts, but it was basically business

1 study. So -- I mean, we're talking quite a time  
2 ago.

3 But I still have my transcripts  
4 with my diplomas. I can provide those.

5 Q Did your study include firearms?

6 A No.

7 Q Did your study while you were at  
8 Stafford University to receive your M.B.A. include  
9 firearms?

10 A No.

11 Q Did your study during either of your  
12 time -- either of your degrees from Stafford  
13 University include history?

14 A That's very vague, but -- could you be  
15 more specific.

16 Q Did you study history when you were  
17 getting degrees from Stafford University?

18 A That's a very -- it's too broad.

19 The history of design -- we got  
20 involved with the history of design; but history  
21 wasn't part of the course. It wasn't part of the  
22 curriculum, in a perceived sense of history, like  
23 ancient Rome, you know, or stuff like that, no.  
24 That was part of my high school education.



1 Q Okay. So in high school you studied  
2 history, is that correct?

3 A History was part of the curriculum,  
4 yeah, geography.

5 Q But after high school you didn't  
6 receive higher education in history?

7 A Not in -- not specifically. Let's put  
8 it that way. It was tangential.

9 Q Did your post-high school study include  
10 engineering?

11 A As part of the industrial design  
12 process, yes.

13 And also at high school we were  
14 involved -- we had engineering study as well. So we  
15 had metal work classes, engineering science. Quite  
16 a comprehensive education.

17 Q Okay. Your bachelor's degree from  
18 Stafford University, was it in engineering?

19 A No, it's - it's an M.B.A.

20 Q Your bachelor's degree -- let me ask  
21 again.

22 A Oh, sorry. Yes.

23 Q Did -- your bachelor's degree from  
24 Stafford University, was it in engineering?

1           A       It was in industrial design. That  
2 encompasses engineering.

3           Q       How does it encompass engineering?

4           A       Because if -- so when you're designing  
5 products, which is essentially what industrial  
6 design is -- it's not like graphic design -- you  
7 need to understand how a product can be  
8 manufactured. It's pointless designing something  
9 that can't be manufactured.

10                   Technology at the time was  
11 totally different. The technology today, we have  
12 things like 3-D printers today, laser scanners.  
13 None of that existed then.

14                   So, yes, there was an  
15 understanding of how things are made.

16           Q       So your bachelor's of science was in  
17 industrial design from Stafford University?

18           A       Um-hum.

19           Q       Have you ever practiced as an engineer  
20 in United Kingdom?

21           A       Once again, that's a very broad  
22 question. Could you define "practiced as an  
23 engineer".

24           Q       Have you ever done anything in the

1 United Kingdom that you would consider practicing as  
2 an engineer?

3 A I would say yes.

4 Q And what credentials did you have to  
5 practice as an engineer in the United Kingdom?

6 A Purely my education and my experience.  
7 That's it.

8 Q Were you a chartered engineer in the  
9 United Kingdom?

10 A No, I wasn't.

11 Q Have you ever practiced as an engineer  
12 in the United States?

13 A As part of what I do, engineering is  
14 involved, yes.

15 Q Have you ever become licensed as an  
16 engineer in the United States?

17 A No, I have not.

18 Q Have you taken a Fundamentals of  
19 Engineering written exam?

20 A No, I haven't.

21 Q Have taken a Principles and Practice in  
22 engineering written exam?

23 A I have not.

24 Q Have you ever worked under the

1 supervision of a professional engineer?

2 A Yes, on numerous occasions.

3 Q Okay. When was the first time you  
4 worked under the supervision of a professional  
5 engineer?

6 A I can't answer that question.

7 Q Why can you not answer that question?

8 A Because it was a long time ago.

9 Probably, at a guess, it would  
10 have been in the -- in late 1998, 1999, then again  
11 in the 2000s.

12 Q And the first time in late 1998 and  
13 1999 what country were you in?

14 A I was in the United States.

15 Q Do you recall the name of the  
16 professional engineer you were supervised by?

17 A Not off the top of my head.

18 But as with most things,  
19 confidentiality agreements exist. So before  
20 disclosing that information I'd have to check  
21 whether or not I'm covered by a nondisclosure  
22 agreement.

23 Q Do you believe that you have ever  
24 worked under the supervision of an engineer in a way

1 that you can disclose to me today?

2 A Define "disclose".

3 Names, addresses, stuff like  
4 that, no, I can't provide that information without  
5 confirming whether or not a nondisclosure agreement  
6 still exists.

7 But, yes, I have worked with  
8 engineers in refining designs for production on  
9 behalf of third-party companies. If that makes  
10 sense.

11 Q Yeah, I think we'll come -- we'll  
12 revisit this issue because I would like to give you  
13 the opportunity to explain to me the basis of your  
14 qualifications, and so I'll -- we'll come back to  
15 this later --

16 A Okay.

17 Q -- When we're going through your  
18 employment here.

19 For now --

20 MR. BRADY: Objection. Misstates testimony.

21 MS. MUSE: Q For now we'll turn to firearms  
22 design. Did you study firearms design at any  
23 school?

24 THE WITNESS: A No.

1 Q Do you have any certifications in  
2 firearms design?

3 A No.

4 I don't believe any exist, but I  
5 might be wrong.

6 Q Have you ever manufactured a firearm?

7 A Yes.

8 Q When was the first time you  
9 manufactured a firearm?

10 A That would have been in the United  
11 Kingdom, probably around 1991.

12 Q And did you have a license to  
13 manufacture a firearm at that time?

14 A Yes, I did.

15 It's -- in the United Kingdom  
16 it's called a registered firearms dealer's license.  
17 Even if you're not a dealer, if you're a  
18 manufacturer, you're required to have a registered  
19 firearms dealer's license.

20 Q Okay. Have you ever manufactured a  
21 firearm in the United States?

22 A Yes, I have.

23 Q When was the first time you  
24 manufactured a firearm in the United States?

1           A       So that would probably be around 1999.  
2       But I need to clarify that, if you'll allow me to.

3           Q       Please go on.

4           A       So at the time I had a federal firearms  
5       license, manufacturer's license. I did not have my  
6       own facility for manufacturing. So it was  
7       manufactured at a business partner's facility.

8           Q       So in 1999 you had a federal firearms  
9       license, which I think we might both refer to as FFL  
10      for short --

11          A       Correct.

12          Q       -- In this deposition.

13                   So in 1999 you had an FFL in the  
14      United States and you manufactured a firearm but  
15      using someone else's facility, is that correct?

16          A       That would be correct, yes.

17          Q       Okay. When was the next time you  
18      manufactured a firearm in the United States?

19          A       It was continuously from then.

20          Q       What do you mean by continuously?

21          A       So we completed the first design. We  
22      then -- by "we" I'm referring to myself and the  
23      partner company -- then created additional firearms,  
24      different firearms.

1 Q When was your FFL license issued?

2 A Some time in -- between 1999 and -- in  
3 the 1999, 2000 time frame, something like that.

4 Maybe a bit before. I don't  
5 recall. I don't have a copy of it anymore.

6 Q For how long did you hold your -- that  
7 FFL license?

8 A Until 2006.

9 Q And what type of FFL license was that?

10 A That was a type zero seven, type seven,  
11 a manufacturer's -- manufacturer of destructive  
12 devices. Also had an SOT. So we pretty much could  
13 make anything.

14 Q By SOT do you mean that you had a  
15 special occupational tax status?

16 A That is correct.

17 Q And what was the -- was the FFL -- was  
18 the federal firearms license in your name?

19 A It was in the name of the company I  
20 owned -- or was co-owner at the time?

21 A And what was that?

22 A Leitner-Wise Rifle Company. So my last  
23 name, Leitner hyphen Wise, and then rifle company.

24 Q Okay. So you owned an FFL license from



1 1999 until 2006, but you have not held an FFL  
2 license after that time; is that correct?

3 A The -- there was a second FFL license  
4 issued and that, I believe -- I'm trying to think --  
5 Probably up until 2010, but it's a little vague --  
6 I'm just a little vague on that.

7 Q Yeah, no. I'm sorry. I don't think --  
8 I might not have heard exactly what you said.

9 Are you saying that the second  
10 FFL license you obtained was issued around 2010?

11 A No, 2010 -- that's when it ended.

12 Q And when did the second FFL license  
13 begin?

14 A 2007, 2008 time frame.

15 Q And what type of license was this FFL  
16 license that you held from about 2007 to about 2010?

17 A Type seven. I don't...

18 Q Did you have special occupational tax  
19 status?

20 A I knew you were going to ask that, and  
21 I can't honestly without reviewing the -- reviewing  
22 documentation.

23 Q The FFL license that you held from  
24 around 2007 to 2010, was that license in your name?

1           A       It was in the name of a company that I  
2       was an owner of.

3           Q       And what was the name of that company?

4           A       That was Leitner-Wise Defense.

5           Q       What was your title at Leitner-Wise  
6       Defense during the period of time when...

7           A       I believe it was chief technical  
8       designer.

9           Q       Other than the two FFL licenses we just  
10       discussed, were there any other FFL license that  
11       you've held?

12          A       No.

13          Q       Have you ever applied for an FFL  
14       license?

15          A       Obviously the two licenses I held, yes.

16          Q       You were the applicant for both of the  
17       FFL licenses that you applied for?

18          A       That is correct, yes.

19          Q       All right.

20                    Okay. Do you hold a license to  
21       carry firearms today?

22          A       No, I do not.

23          Q       Have you ever held a license to carry  
24       firearms in the United States?

1 A No, I have not.

2 Could I ask a question?

3 Q That's my job.

4 A I just wanted to clarify.

5 Q Do you have -- next time I ask a  
6 question --

7 A Sure.

8 Q -- If you have a question about my  
9 question that you don't understand, then let me  
10 know.

11 A Okay.

12 Q Sorry.

13 So why have you never held a  
14 license to carry firearms in the United States?

15 A Are you referring to a concealed carry  
16 license?

17 Q I'm asking about any license to carry  
18 firearms in the United States.

19 A So the only license I'm aware of would  
20 be a concealed carry license, and I don't have one  
21 of those.

22 Q And why do you not have a concealed  
23 carry license?

24 A Personal....

1 MR. BRADY: Objection. Beyond the scope --  
2 objection. Beyond the scope of what the witness is  
3 called to testify about.

4 MS. MUSE: Please answer the question.

5 THE WITNESS: A So personal choice would be  
6 one. Second one is I'm not a citizen of the United  
7 States.

8 While I have the -- I'm lawfully  
9 allowed to possess firearms. I'm not sure that I  
10 would qualify for a concealed carry license.

11 MS. MUSE: Q As someone who's not a citizen  
12 of the United States, why do you think you are able  
13 to lawfully possess firearms?

14 MR. BRADY: Objection. Calls for  
15 speculation. Calls for a legal conclusion. Beyond  
16 the scope of what the witness was called to testify  
17 about.

18 MS. MUSE: You may answer.

19 THE WITNESS: A Because I'm entitled to  
20 under the Gun Control Act of 1968.

21 MS. MUSE: Q What type of visa are you here  
22 in the United States on?

23 A I was initially on an nonimmigrant  
24 visa. Then we applied -- applied for an I-140,

1 pending green card.

2 Q So you initially came to the United  
3 States on an nonimmigrant visa?

4 A That is correct.

5 Q And then at some point you applied to  
6 become a permanent resident?

7 A That is correct.

8 Q Are you a permanent resident today?

9 A Not yet.

10 Q Are you on a nonimmigrant visa today?

11 A It's ambiguous. I've got -- we have a  
12 pending -- I forget the number, but it's a pending  
13 green card application.

14 Q When you initially came here on a  
15 nonimmigrant visa do you remember what type of visa  
16 it is specifically?

17 A It was an A-1.

18 Q An A-1?

19 A Sorry. An L-1.

20 Q Okay. When you initially entered the  
21 United States you came here on a L-1 nonimmigrant  
22 visa, correct?

23 A That is correct, yes.

24 Q And what year was that that you came to

1 the United States?

2 A 1990 -- 1999 -- 1999, 2000.

3 Prior to that I had been  
4 utilizing -- because I wasn't here full time, a  
5 company in the United Kingdom sponsored my -- we  
6 were opening -- the company in the United Kingdom  
7 was opening an office in the United States.

8 Q What company sponsored your immigration  
9 to the United States?

10 A That was Leitner-Wise Rifle Company in  
11 the UK. That was where the company was formed in  
12 1998.

13 Q Okay. So when you -- you came to the  
14 United States in 1999. A company in the UK called  
15 Leitner-Wise Rifle Company --

16 A Limited, yeah.

17 Q -- Sponsored...

18 A Leitner-Wise Rifle Company, Limited.

19 Q All right. I will start again.

20 When you came to the United  
21 States in 1999 a company in the United Kingdom named  
22 Leitner-Wise Rifle Company, Limited sponsored an L-1  
23 nonimmigrant visa for you to be able to come to the  
24 United States and work here, is that correct?

1           A       That is correct.

2           MR. BRADY:  Objection.  Misstates testimony.

3           MS. MUSE:  Q   And when did that initial L-1  
4 nonimmigrant visa expire?

5           THE WITNESS:  A   Probably 2007.

6           Q       And did you obtain another visa after  
7 that expired?

8           A       That's when I applied for an I-140.

9           Q       Have you applied for any other  
10 immigration status?

11          A       Well, we filed for a national interest  
12 waiver.

13                   I'm not sure if you know what  
14 that is.  You have to meet a series of requirements  
15 to ensure that your employment and your skills  
16 warrant a short cut of the immigration process to --  
17 because it's in the national interest.

18          Q       Have you filed for any other  
19 immigration status other than the I-140 or the  
20 national interest waiver?

21          A       So although I met and exceeded the  
22 criteria and was considered an expert in my field,  
23 the national interest waiver was denied.

24                   So the course of action when that

1 happens is to file for what's called a PERM,  
2 P-E-R-M. So that's what we did. By "we", I'm  
3 referring to myself and my attorneys.

4 Q Other than the I-140, the national  
5 interest waiver and the PERM, have you applied for  
6 any other immigration status since 2007?

7 A Not -- I don't believe so.

8 Q Have any of your applications to  
9 address your immigration status been granted?

10 A Yes.

11 Q Which one?

12 A So the I-140 was granted.

13 Q And when did that happen?

14 A Off the top of my head I -- probably --  
15 I can't say. Some time after 2012.

16 Q Was it before 2020?

17 A Yes.

18 Q Was it before 2017?

19 A I'm going to say probably -- it's very  
20 difficult to remember -- 2016.

21 Q You believe your I-140 was granted in  
22 approximately 2016?

23 A I would -- to the best of my  
24 recollection, while I'm -- you know, at this



1 particular moment, without the aid of my immigration  
2 documents, yes.

3 Q And so sitting here today you have an  
4 I-140?

5 A I have an approved I-140, yes.

6 Q Can you explain what an I-140 is?

7 A An I-140...

8 MR. BRADY: Objection. Calls for a legal  
9 conclusion. Vague.

10 MS. MUSE: Please answer.

11 THE WITNESS: A It's -- I'm not an  
12 immigration attorney. But an I-140 is necessary to  
13 allow the company sponsoring you to employ you and  
14 to adjust your status to that of a permanent  
15 resident.

16 MS. MUSE: Q Is it your understanding that  
17 an I-140 is sponsored by an employer?

18 A That is correct.

19 Q Okay. And what employer sponsored your  
20 I-40?

21 A That...

22 Q Let me correct that. Sorry. What  
23 employer sponsored your I-140?

24 A The employer that sponsored the I-140

1 would be Leitner-Wise Manufacturing, LLC. The --  
2 subsequently the -- because the immigration -- USCIS  
3 didn't act on that within 180 days, it was able to  
4 be ported to another company; and that company is  
5 Leitner-Wise, LLC.

6 Q So today is it your understanding that  
7 Leitner-Wise, LLC is sponsoring an I-140 for you?

8 A We're -- this is a very complex issue  
9 which would be better answered by my immigration  
10 attorney because we're in a -- by "we" I'm referring  
11 to myself and my wife -- are in a sort of gray area  
12 currently.

13 It wasn't helped by COVID. We  
14 actually sued the United States government in 2019.

15 We received work authorization.  
16 We started to move through the process of getting a  
17 green card, and then COVID hit and everything  
18 grounded to a halt again.

19 So we have a pending case in  
20 district -- a D.C. court and are awaiting a  
21 determination on that.

22 Q Is that case pending in the district  
23 court for the D.C....

24 A Yes, district court.

1 Q Do you recall what judge that case is  
2 assigned to?

3 A Not off the top of my head.

4 Once again, I can provide that  
5 information if required.

6 Q So going back -- why did you come to  
7 the United States?

8 A Because the opportunities with the  
9 skill set I possess were much greater in the United  
10 States that they were in the United Kingdom and  
11 Europe.

12 Q And what skill set is that?

13 A My ability to design firearms and  
14 firearms components.

15 Q Okay. Other than the education you've  
16 disclosed to me so far today, is there any other  
17 education that would help me understand why you're  
18 an expert in firearms design?

19 MR. BRADY: Objection. Vague. Calls for  
20 speculation.

21 You may answer.

22 MS. MUSE: Please answer.

23 THE WITNESS: Could you repeat the question.

24 MS. MUSE: Q Other than the education you've

1 described for me today, is there any other education  
2 that you've received that would help me understand  
3 why you believe you're an expert in firearms design?

4 MR. BRADY: Objection. Vague. Calls for  
5 speculation. The witness can't know what counsel  
6 would understand.

7 MS. MUSE: Okay.

8 THE WITNESS: A So I would like  
9 clarification. Are you talking about formal  
10 education?

11 MS. MUSE: Q I would like to know if you've  
12 received any education that you believe makes you an  
13 expert in firearms design which you have not  
14 described for me today.

15 A In that case, yes. Experience and  
16 observation.

17 Q Is there any education from any school  
18 that you've received that you have not described yet  
19 today that...

20 A No, there is not.

21 Q Okay.

22 Do you have any experience firing  
23 semi-automatic rifles?

24 A I do have experience firing

1 semi-automatic rifles.

2 Q What types of semi-automatic rifles do  
3 you have experience firing?

4 A Do you want me to list all of them or  
5 just say pretty much every semi-automatic rifle?

6 Q Why don't we start with an initial  
7 description, and we'll see how much further we need  
8 to go from there.

9 A Could you define "initial description",  
10 please.

11 Q Please let me know what experience you  
12 have firing semi-automatic rifles.

13 A Okay.

14 Q In your own words.

15 MR. BRADY: Objection. Calls for a  
16 narrative.

17 You may answer.

18 THE WITNESS: A I don't any understand the  
19 question. So could you clarify what...

20 MS. MUSE: Q Do you have any experience  
21 firing semi-automatic rifles?

22 A Yes.

23 Q What experience do you have firing  
24 semi-automatic rifles?

1           A       Firing semi-automatic rifles by default  
2           is experiencing firing semi-automatic rifles.

3           Q       How did you gain experience firing  
4           semi-automatic rifles?

5           A       So -- I'm sorry. I'm not being  
6           obstructive here. It's -- you pick up a  
7           semi-automatic rifle and you fire it.

8           Q       When did you first...

9           A       That in and of itself is experience.  
10                    You were going to ask when I  
11           first -- when I first fired a semi-automatic rifle,  
12           I couldn't tell you. I was in in my childhood.

13                    I've subsequently fired  
14           semi-automatic rifles in the Royal Marine Cadets.  
15           That would be the 762, NATO FAL it's known here or  
16           the self-loading rifle, as it was known in the UK  
17           forces, L1A1.

18                    Consequently, with the  
19           legislation changes in the United Kingdom, we  
20           developed -- I developed a 22-caliber -- so a  
21           Rimfire semi-automatic rifle which was and still is  
22           as far as I'm aware able to be legally owned there.

23                    When we opened the business in  
24           the United States we started developing

1 semi-automatic rifles in various calibers.  
2 Developing semi-automatic rifles has continued and  
3 continues to the present day.

4 I've fired competitors' rifles.  
5 I've competed in competition. Pretty much every  
6 semi-automatic firearm -- rifle available in the  
7 United States I've fired over the course of 25  
8 years.

9 Q When did you first learn how to use a  
10 semi-automatic rifle?

11 A That would be -- that would be in my  
12 childhood.

13 Q What's the fastest rate of fire you've  
14 been able to achieve with a semi-automatic rifle?

15 MR. BRADY: Objection. Vague as to fastest  
16 rate of fire. It calls for speculation.

17 You may answer if you know.

18 THE WITNESS: A Thank you. Yes. Rate of  
19 fire is not something that applies to semi-automatic  
20 rifles. It's -- it's a term that doesn't apply to  
21 semi-automatic rifles. It has no meaning. It's  
22 like asking gas mileage of an electric vehicle.

23 MS. MUSE: Q Do you believe semi-automatic  
24 rifles do not have a rate of fire?

1           A       In the -- in my understanding of what  
2           is meant by rate of fire, they do not.

3           Q       What do you understand rate of fire to  
4           mean?

5           A       I understand rate of fire to mean  
6           purely fully automatic fire. That's the only  
7           measure of rate of fire. It doesn't apply to a  
8           semi-automatic rifle.

9           Q       How many rounds have you been able to  
10          fire from a semi-automatic rifle in a minute?

11          MR. BRADY: Objection. Calls for  
12          speculation. Incomplete hypothetical. Vague as to  
13          rate of fire.

14                    You may answer.

15          THE WITNESS: A You would have to define  
16          what circumstances I was firing that rifle in. Was  
17          I firing it in a competition where I needed to get a  
18          certain amount of rounds fired off in a certain  
19          amount of time.

20          MS. MUSE: Q Has there ever been a time  
21          where you believe you fired more than 60 rounds in a  
22          minute from a semi-automatic rifle?

23          MR. BRADY: Objection. Calls for  
24          speculation. Incomplete hypothetical.



1                   You may answer.

2                   MS. MUSE: Okay. That's enough. If you  
3 could please answer the question.

4                   THE WITNESS: Yes, I can. No, I don't  
5 believe I've ever fired more than 60 rounds in a  
6 minute from a semi-automatic rifle.

7                   MS. MUSE: Q Do you believe you've ever  
8 fired more than 60 rounds in a minute from any  
9 firearm?

10                  A Fully automatic rifles, machine guns,  
11 yes.

12                  Q From which firearms do you believe  
13 you've fired more than 60 rounds a minute?

14                  A The exact definitions of them, I would  
15 say an M240, M249, probably an M4, a fully automatic  
16 M4 with one-mag change.

17                               Yeah, those type of firearm. I  
18 mean, we can get in to the weeds on various -- I  
19 mean FN2000, P90, fully automatic variance. Yeah,  
20 an infinite number of different firearms that I've  
21 been able to -- but I will clarify that those are  
22 fully automatic firearms, belt-fed firearms, RPKs,  
23 all the Soviet likee machine -- and heavy machine  
24 guns.

1 Q Are you familiar with the term "bump  
2 fire"?

3 A Yes.

4 Q What does bump fire mean?

5 A What is bump fire? Bump fire means --  
6 it's a technique of speeding up the cyclic rate of a  
7 firearm, a semi-automatic firearm, by -- as I  
8 understand it -- and I have not actually engaged in  
9 bump firing myself.

10 But as I understand it, it's by  
11 resting your finger against the trigger and pulling  
12 the weapon forward so that your finger is able to  
13 reset the trigger quicker than you can by normally  
14 squeezing the trigger and allowing the trigger to  
15 reset and then squeezing it again.

16 That's my understanding. I've  
17 not actually engaged in bump firing myself.

18 Q What do you mean by the cyclic rate of  
19 a semi-automatic firearm?

20 A So what we're getting in to is, for  
21 every pull of the trigger a -- the hammer moves  
22 forward. Strikes the firing pin. The firing pin  
23 ignites the primer. The primer ignites the  
24 cartilage. The gun fires.

1                   The gun automatically -- I'm  
2                   using the term "automatically" not in the context of  
3                   an automatic firearm -- automatically ejects the  
4                   spent case. Using spring pressure, the bolt moves  
5                   forward, picks up a new round, and loads it in the  
6                   chamber. And then you're able to fire the weapon  
7                   again.

8                   So what bump firing does is  
9                   increase the cadence of fire.

10                  Q        So, again, what is the cyclic rate?

11                  A        I can't give you the cyclic rate of  
12                  bump firing. It's inconsistent.

13                  Q        Not -- I'm not asking now about bump  
14                  firing. But when you use the phrase "cyclic rate",  
15                  and you said the cyclic rate of a semi-automatic  
16                  rifle, what exactly were you referring to?

17                  MR. BRADY: Objection. Misstates testimony.

18                                You may answer.

19                  THE WITNESS: A Thank you.

20                                I was referring purely to bump  
21                  firing.

22                                Bump firing is a totally  
23                  different -- as I understand it, it's a totally  
24                  different way of utilizing the weapon. So your --

1 the weapon is firing faster -- I don't to say --  
2 artificially, let's put it that way; but it's an  
3 inconsistent cyclic rate.

4 Just like the cyclic rate of a  
5 semi-automatic firearm used normally in the  
6 conventional way like anybody who has ever fired  
7 one, one squeeze of the trigger, there is no cyclic  
8 rate. It's variable. It depends on the user  
9 operating the weapon.

10 Does that make sense?

11 MS. MUSE: Q Well, you're the experts. So I  
12 might have to ask some questions to really  
13 understand what you're saying here??

14 A Absolutely. Please.

15 Q So are you saying that there is no --  
16 there is no rate of fire of a weapon. There's only  
17 a rate of fire of how a specific person uses a  
18 weapon?

19 A No, I'm not saying that. I'm saying  
20 inherently a semi-automatic rifle does not have a  
21 rate of fire.

22 I cannot -- in my experience and  
23 with my knowledge, I cannot give you a rate of fire  
24 of a semi-automatic rifle. It's an analogy that

1 doesn't work.

2 With a fully automatic rifle,  
3 when you pull the trigger, the system is operating  
4 until you either run out of ammunition or release  
5 the trigger; and it will reach a rate of fire that  
6 can be measurable.

7 So with military weapons -- we're  
8 talking purely machine guns -- higher rates of fire  
9 are desirable. You get -- it's a term called cone  
10 of denial which means that you're able to put down a  
11 lot of ammunition over a broad area at a high rate  
12 of fire to deny access to that area.

13 So from -- from a military  
14 perspective, if you're advancing on an enemy, you  
15 want the enemy not in front of you. You don't -- so  
16 you're denying -- you're denying access. And  
17 similarly, if you're retreating, you're retreating  
18 under fire.

19 So those are the applications for  
20 where you would want to measure the rate of fire, to  
21 get the highest rate of fire possible, with many  
22 other parameters for fully automatic weapons. It  
23 doesn't apply to semi-automatic weapons.

24 Q Have you ever served in the military?

1           A       I enlisted in the Royal Marines. I did  
2       not serve.

3           Q       Is there any other training that you've  
4       had on military weapons?

5           A       My....

6           MR. BRADY: Objection. Objection. Vague as  
7       to training, military weapons.

8                        You may answer.

9           THE WITNESS: Could you define "training",  
10       please.

11          MS. MUSE: Q Have you received anything that  
12       you would consider training regarding military  
13       weapons?

14          THE WITNESS: A I don't.

15          MR. BRADY: Objection. Vague as to military  
16       weapons.

17          THE WITNESS: May I ask if you're referring  
18       to machine guns or pistols or semi-automatic...

19          MS. MUSE: I would ask Mr. Brady to stop  
20       using the objections to coach the witness.

21          MR. BRADY: I'm sorry. What -- what was the  
22       objection?

23          MS. MUSE: I would ask you to refrain from  
24       coaching the witness through your objections.

1 MR. BRADY: Exactly how am I coaching the  
2 witness with my objections?

3 I made a vagueness objection as  
4 to military weapons. I can't just let the term  
5 "military weapons" go as if it's some known  
6 category.

7 So I'm not coaching the witness  
8 in any way, and I will continue to make vagueness  
9 objections to vague questions.

10 You may proceed.

11 MS. MUSE: I will continue to use the terms  
12 that the witness has used.

13 MR. BRADY: Counsel, just for the record, you  
14 introduced the term "military weapons". So...

15 THE WITNESS: A Would you like me to answer?

16 MS. MUSE: Q You can wait a moment. Thank  
17 you.

18 Okay. You testified earlier  
19 about the applications of automatic fire in a  
20 military context?

21 A Yes.

22 Q What was that testimony based on?

23 A Personal experience, observation,  
24 spending time with serving military, reading

1 after-action reports, analyzing weapons failures  
2 from sometimes confidential, sometimes publicly  
3 available documentation, studying -- studying  
4 military tactics.

5 All of that's necessary for an  
6 understanding of something if you're -- if you're  
7 designing something for a military application as  
8 opposed to a civilian application, you need to  
9 understand the context of how that is being used.

10 Q What personal experience do you have  
11 that that testimony is based on?

12 MR. BRADY: Objection. Vague as to "that  
13 testimony".

14 THE WITNESS: Should I answer?

15 MS. MUSE: Yes. Thank you.

16 THE WITNESS: A Observation, experience in  
17 actually utilizing the weapons, military weapons,  
18 including tanks, rocket launchers.

19 MS. MUSE: Q What observations do you have  
20 of military weapons?

21 MR. BRADY: Objection. Vague as to  
22 observations and military weapons.

23 THE WITNESS: Could you ask the question  
24 again, please.



1 MS. MUSE: Q What observations do you have  
2 of the use of military weapons?

3 MR. BRADY: Objection. Vague as to  
4 observations of military weapons.

5 THE WITNESS: A My observations are not from  
6 conflict. My observations are from training. So  
7 observing military training.

8 MS. MUSE: Q What military training have you  
9 observed?

10 A That's -- that's quite -- quite  
11 extensive. Military training in the European  
12 countries, in the former Soviet Union, in the United  
13 States, usually on military bases, ranges, on the  
14 water, in helicopters, vehicles, high-speed craft.

15 Quite extensive.

16 Q When's the first time you remember  
17 observing a United States military training?

18 A I'm going to say post 9/11. So 2000 --  
19 late 2000 -- probably November 2001 and then  
20 certainly the early part of 2002.

21 Q Where was this military training?

22 A It was in Jacksonville and in North  
23 Carolina.

24 Q Who did you observe training?

1 A United States Coast Guard.

2 Q How were you able to observe the  
3 military training?

4 A I was with them.

5 Q In what capacity were you with them?

6 A As a contractor.

7 Q Who were you contracting for?

8 A The United States Coast Guard.

9 Q What was the subject matter of your  
10 contract?

11 A Developing a weapon system for the  
12 United States Coast Guard in order for them to  
13 engage water-borne threats to the United States.

14 Q What employer were you working for?

15 A That was Leitner-Wise Rifle Company.

16 Q What rifles did you witness being used  
17 during this military training?

18 A A range of rifles that the Coast  
19 Guard -- rifles, machine guns that the Coast Guard  
20 utilized, shotguns, in their -- the course of their  
21 activities, shall we say.

22 Q Did you witness the use of anything in  
23 the M16 family?

24 A Specifically, at that time, no. Later,

1 yes.

2 MS. MUSE: Okay. I know we've been going a  
3 little over an hour. Would you like to take a  
4 break?

5 THE WITNESS: Only if you need to. I'm fine.

6 MS. MUSE: Anybody else -- let's just take a  
7 short break.

8

9 (Discussion kept off the record.)

10 (Short recess was taken.)

11

12 MS. MUSE: Q All right. So in your report  
13 you said that you founded Leitner-Wise Rifle Company  
14 in 1998, is that correct?

15 THE WITNESS: A That is correct, yes.

16 Q Okay. And when you founded  
17 Leitner-Wise Rifle Company in 1998 was that in the  
18 United Kingdom?

19 A That was in the United Kingdom. It was  
20 myself and a couple of partners.

21 Q And who were the partners?

22 A There were a number. Richard Peter  
23 West was one of them.

24 Martin Potter was another one.

1 Martin unfortunately died recently.

2 Brian Wadlow was a third one.

3 There were a number of other  
4 partners. We had, I believe, 13 to 20 employees,  
5 something like -- something like that.

6 Q And after founding the company what was  
7 your role in it?

8 A I was actually the -- I was actually a  
9 director, a board director.

10 So in the UK you don't have  
11 things like presidents or vice presidents or that  
12 sort of category within a limited -- within a  
13 limited company.

14 So I was a director, and I was  
15 responsible for the design and technical innovations  
16 the company was going to engage in.

17 Q And what services or products did that  
18 company sell?

19 A As I said, we initially developed a  
20 22-caliber Rimfire rifle. We also -- the company  
21 was also involved in the manufacture of bolt-action  
22 rifles. So magazine fit, bolt-action, single-shot  
23 rifles, not semi-automatic rifles.

24 But we also -- we also were

1 involved in the development of semi-automatic rifles  
2 and fully automatic submachine guns.

3 Q And does Leitner-Wise Rifle Company  
4 exist today in the United Kingdom?

5 A No, it doesn't.

6 Q And when did it cease to exist?

7 A I don't -- I couldn't tell you that,  
8 but some time -- I -- I don't know. I'd speculate  
9 probably 2006, 2007, something like that.

10 Q Well, I'll -- thank you. But for the  
11 future you don't need to speculate. I want to know  
12 what you know.

13 If sometimes you know an  
14 approximate year range, then that's fine to say; but  
15 I'll never ask you to speculate if you don't know.  
16 I'll ask for your best information, your best  
17 recollection.

18 A Okay. So, yeah, I mean, some time in  
19 the early 2000s would be my best guess.

20 Q So at some point you left Leitner-Wise  
21 Rifle Company in the United Kingdom to come to the  
22 United States to set up a U.S. subsidiary, is that  
23 correct?

24 A It's -- well, it's a little more -- I

1 didn't leave the company. I -- I came to the United  
2 States to set up the subsidiary, that's correct; but  
3 I was still employed by the parent company in the  
4 United Kingdom.

5 Q I see. So --

6 A Just clarifying.

7 Q -- In -- and I believe you said this  
8 earlier, but correct me if I'm wrong. But this was  
9 in 1999?

10 A Yes.

11 Q Okay. So in 1999 you were still  
12 employed by Leitner-Wise Rifle Company in the United  
13 Kingdom, but you moved to the United States to set  
14 up a U.S. subsidiary for that --

15 A That is --

16 Q -- Company, is that correct?

17 A That is correct, yes.

18 Q And what was the name of the U.S.  
19 subsidiary?

20 A Same name, Leitner-Wise Rifle Company,  
21 Incorporated -- Inc. -- or Leitner -- actually,  
22 Leitner-Wise Rifle Co., not company, Co., period,  
23 Inc.

24 Q And what was your job title at

1 Leitner-Wise Rifle Company in the United States?

2 A To be honest, I don't recall. I think  
3 I was like -- initially I was president.

4 Q Did anyone else set up the U.S.  
5 subsidiary with you?

6 A No, not -- not initially. It was kind  
7 of me on my own, and then we -- we brought in other  
8 employees as required, some from the United Kingdom,  
9 the majority, obviously, U.S. citizens.

10 Q Initially in 1999 who managed the U.S.  
11 subsidiary Leitner-Wise Rifle Company?

12 A I did.

13 Q And at that time how many employees did  
14 you have?

15 A There was me initially.

16 Q And for how long did you work at  
17 Leitner-Wise Rifle Company in the United States?

18 A Until 2006, late 2006.

19 Q So from 1999 to 2006 did your job title  
20 change?

21 A Yes. I ended up as, you know, senior  
22 designer.

23 Q Do you recall when you made the  
24 transition from president to senior designer?

1           A       That -- it's never simple when you're  
2       trying to answer it this way.

3                       There are -- certain changes  
4       happened in the company because of U.S. government  
5       contracts we received, and that required a different  
6       ownership structure.

7                       So I'm best as a designer, and  
8       that was the role I took when I left the -- we were  
9       actually acquired by a larger company, Native  
10      Alaskan Corporation. So they installed  
11      management -- people to handle certain aspects of  
12      management, like kind of professionalized us a bit,  
13      you know.

14           Q       What were your day-to-day duties as  
15      senior designer?

16           A       Thinking, coming up with ideas,  
17      scribbling on bits of paper and saying what do you  
18      think of this, drinking lots of coffee, trying to  
19      stay out of trouble, try not to scare people with  
20      crazy budget requirements.

21                       But, essentially, I'm -- you  
22      know, I'm being a little light-hearted there.  
23      Essentially designer. That was my function, and  
24      it's something I do exceptionally well and something



1 I find very easy to do.

2 So it's just a simple case of  
3 coming up with a concept, developing that concept  
4 through design and engineering processes, developing  
5 prototypes and then testing, testing, testing,  
6 testing.

7 So that's -- that's what I did on  
8 a day-to-day basis, and firing lots and lots and  
9 lots of ammunition.

10 Q When did you end your employment with  
11 Leitner-Wise Rifle Company?

12 A I believe it was, to the best of my  
13 recollection, October 2006.

14 Q And why did you leave?

15 A Fundamental disagreement over the  
16 direction the company was taking, the -- the owners  
17 of the company -- the Native Alaskan Corporation  
18 wanted to divest interest in it. It -- the  
19 management that they had installed did not have the  
20 company's best interests at heart.

21 Q Okay. Were you terminated from your  
22 employment?

23 A Yes, I was.

24 Q And why were you terminated?

1           A       I don't actually -- I don't actually  
2 know the reason why other than there were conflicts  
3 with personalities within the the company.

4           Q       Did your termination involve any  
5 accusations that you had engaged in dishonesty?

6           A       No, it didn't -- the -- one of the  
7 accusations was that I had a social media post  
8 persona. However, under the -- under my contract,  
9 any -- essentially it came down to breach of  
10 contract on the company's part.

11          Q       Did your termination involve any  
12 accusations that you had engaged in embezzlement?

13          A       No, it didn't. That came afterwards  
14 when I -- when the company realized that they had to  
15 pay a lot of money to get rid of me under the terms  
16 of my contract.

17                   After we signed our termination  
18 agreement the then president of the company, I would  
19 believe was his role, breached the terms of the  
20 termination agreement. Filed a fraudulent warrant,  
21 perjured himself in order to try and have me removed  
22 from the company -- or removed from the country and  
23 avoid the liabilities that the company had incurred  
24 in dismissing me.

1 Q Okay. So that was a lot. Let me make  
2 sure I got this.

3 So Leitner-Wise Rifle Company  
4 accused you of embezzlement after you were  
5 terminated, is that correct?

6 A I...

7 MR. BRADY: Objection. Misstates testimony.  
8 You may answer.

9 THE WITNESS: A Well, it's not as simple as  
10 that.

11 Yes, it occurred after I was  
12 terminated. It occurred after we signed a  
13 termination agreement, and I was accused of cashing  
14 my last paycheck. The charges were dropped three  
15 days later.

16 MS. MUSE: Q Okay. Does -- did Leitner-Wise  
17 Rifle Company accuse you of embezzlement?

18 A No.

19 Q No?

20 A No.

21 Q Did Leitner-Wise Rifle Company have you  
22 arrested?

23 A I'm going to need to clarify.

24 Leitner-Wise Rifle Company did

1 not exist at that time. It transitioned to an  
2 entity called Leitner-Wise Acquisition Group and  
3 the -- as I mentioned, the acting president of that  
4 company filed a complaint that accused me of  
5 embezzlement.

6 Q Okay. Did Leitner-Wise Rifle Company  
7 have you arrested?

8 A No. Leitner-Wise -- the president of  
9 the -- of Leitner-Wise Acquisition Group filed a  
10 complaint, a warrant. A magistrate signed off on  
11 that, and I was arrested.

12 Q And what were the charges you were  
13 arrested for?

14 A I was accused of embezzlement.

15 Q And what authority arrested you?

16 A Alexandria Police Department.

17 Q Did those charges ever result in a  
18 conviction?

19 A No. They were dropped three days later  
20 because it was patently false. The entire testimony  
21 was perjurous.

22 Q Did Leitner-Wise Rifle Company attempt  
23 to have you deported?

24 A Leitner-Wise Rifle Company did not.

1 Leitner-Wise the -- I believe he was the CCE. I'm  
2 going to use that term.

3 He attempted to use the United  
4 States Immigration Service, specifically ICE, to  
5 deport me to prevent me from engaging in a legal  
6 battle to enforce the terms of my contract.

7 Q Did Leitner-Wise Rifle Company attempt  
8 to have you removed from the United States?

9 A I believe I just answered that.

10 Q Okay. I'm going to show you a document  
11 here in a moment.

12 Do you see a document on your  
13 screen that says...

14 A Yes, I do.

15 Q Great. I'm going to mark this as  
16 Exhibit 2 for the record.

17 Do you recognize this document?

18 A No, not off the top of my head.

19 Q I'm going to go to the final page of  
20 this. Do you recognize the signature on page ten --

21 A Yes,

22 Q -- Of Exhibit 2?

23 A That is my signature, yes.

24 Q So that's your signature on page ten of

1 what's just now been marked as Exhibit 2.

2 A Yes.

3 Q I'm going to scroll back to the  
4 beginning and give you a moment to look at the first  
5 page to see if you recall this document.

6 A It's an appeal.

7 Q Is this a brief in an appeal in a  
8 bankruptcy court proceeding you were involved in?

9 A Yes.

10 MR. BRADY: Objection. Objection. Calls for  
11 a legal conclusion.

12 THE WITNESS: Sorry.

13 MS. MUSE: Q Did you draft this brief?

14 THE WITNESS: A I -- I haven't seen this for  
15 a long time. I -- I don't recall. I'd have to read  
16 it in detail.

17 Q Yeah. I can -- I will -- I'll allow  
18 you to take a look at it.

19 A Could you...

20 Q I'll go to the next page here.

21 A Could you go to the next one.

22 Could you scroll down.

23 Okay. Scroll down. Yep.

24 Okay. Could -- sorry.

1 Q Oh, sorry.

2 A Yeah. Yes. Yeah, I'm -- I'm familiar  
3 with the document.

4 Q Okay. Can you tell me what this  
5 document is?

6 A Well, it relates to -- it's -- on its  
7 face, it's an appeal against the dismissal of a  
8 bankruptcy proceeding.

9 Q And did you create this document?

10 A It bears my signature. I would be -- I  
11 did have assistance in creating the document.

12 Q Is everything in this document true?

13 A To the best of my knowledge and  
14 recollection, yes.

15 Q And what bankruptcy -- do you see at  
16 the top of this Exhibit 2 it says, in re:, Paul  
17 Andrew Leitner-Wise. Do you see where I'm reading?

18 A Yes, I do.

19 Q Are you Paul Andrew Leitner-Wise?

20 A Yes, I am.

21 Q Was this document filed in your  
22 bankruptcy proceeding?

23 A I would imagine so.

24 Q Have you ever filed for bankruptcy?

1 A Yes, I have.

2 Q How many times have you filed for  
3 bankruptcy?

4 A I think we filed three times in point  
5 of fact.

6 Q When was the first time you remember  
7 filing for bankruptcy?

8 A I -- I couldn't begin to tell you that.

9 Q Do you remember the last time you filed  
10 for bankruptcy?

11 A I couldn't give you a date, but  
12 probably around 2016, 2017.

13 Q Are you currently in bankruptcy  
14 proceedings?

15 A No.

16 Q Why did you file for bankruptcy three  
17 times?

18 A First two times, poor advice. Third  
19 time, in an effort to consolidate the debt and  
20 retain possession of our home and seek to start  
21 afresh, which is generally what people do with  
22 bankruptcy.

23 Q When you were arrested in August  
24 2006...



1 A It wasn't August 2006.

2 Q Oh, I apologize. When were you  
3 arrested in 2006?

4 A December.

5 Q When you were arrested in December 2006  
6 were you charged with obtaining money by false  
7 pretense?

8 A I...

9 MR. BRADY: Objection. Calls for a legal  
10 conclusion.

11 MS. MUSE: Please answer.

12 THE WITNESS: A I don't know.

13 MS. MUSE: Q Before your December 2006  
14 arrest had you ever been arrested before?

15 A No.

16 Q Have you been arrested since then?

17 A Once.

18 Q And what were you arrested for?

19 A Failure to attend court.

20 Q And when was that arrest?

21 A 2017, 2018, something like that.

22 Q What court hearing were you charged  
23 with failing to attend?

24 MR. BRADY: Objection. Vague.

1 MS. MUSE: Please go ahead.

2 THE WITNESS: A A matter in Henrico Court in  
3 Virginia.

4 MS. MUSE: Q What was the nature of the  
5 court proceeding in Henrico Court?

6 A It was a contract dispute.

7 Q Who were the parties in that claim?

8 A Beam and Leitner-Wise Manufacturing.

9 Q Beam, B-e-a-m?

10 A Correct.

11 Q And Leitner-Wise Manufacturing?

12 A LLC, yes.

13 Q Were you a named party in that lawsuit?

14 A I was.

15 Q Were you a plaintiff or defendant?

16 A A defendant.

17 Q What were the allegations of that  
18 lawsuit?

19 A It was a contract dispute.

20 Q Do you recall --

21 A I was -- I'm sorry.

22 Q Do you recall anything further about  
23 the contract allegations of the lawsuit?

24 MR. BRADY: Objection. Vague. Calls for a

1 narrative.

2 MS. MUSE: Please go ahead.

3 THE WITNESS: A There were allegations  
4 relating to the owners of the company. I was not an  
5 owner of the company. I was a consultant to the  
6 company.

7 It was a very strange affair.

8 MS. MUSE: Q Were you accused in that  
9 lawsuit of making defamatory statements?

10 A No, not to my knowledge.

11 Q I'm going to show you a document.

12 Can you see a document on your  
13 screen?

14 A Yes.

15 Q And I'll mark it for the record as  
16 Exhibit 3. Do you recognize this document?

17 A No. Never seen it before.

18 Q Are you aware of any news articles that  
19 were written about the litigation in Henrico  
20 Court --

21 A No I'm not.

22 Q -- Between -- okay.

23 What was the outcome of the  
24 lawsuit between -- that involved Beam, Leitner-Wise

1 Manufacturing and yourself?

2 A There was a judgment entered for Beam.

3 Q As a defendant, was it entered against  
4 you?

5 A Yes.

6 Q And what --

7 A And -- I'm sorry.

8 Q And what was that judgment that was  
9 entered against you?

10 A Judgment damages. I don't recall the  
11 exact figure.

12 Q Do you recall the approximate amount of  
13 damages?

14 A Oh, substantial, in the -- in the  
15 millions.

16 Q Have you paid that judgment?

17 A No.

18 Q What's the status of that judgment  
19 today?

20 A I have no idea.

21 Q Did this judgment - I'll withdraw that.

22 Was this judgment against you one  
23 reason why you filed for bankruptcy?

24 A One of the reasons, yes.

1                   Let me correct that. I had  
2 actually filed for bankruptcy prior to the judgment.

3           Q       Have you filed for bankruptcy since  
4 this judgment has been issued against you?

5           A       I -- I think -- to the best of my  
6 knowledge, I think that the bankruptcy that was  
7 filed prior to that judgment was the last one that I  
8 filed to the best of my knowledge.

9           Q       After you left Leitner-Wise Rifle  
10 Company in October 2006 when did you next find  
11 employment?

12           A       That's going to be -- that's going to  
13 be -- when did I next find employment? That's going  
14 to be in 2020.

15           Q       And what was the name of the -- who  
16 began to employ you in 2020?

17           A       That was Leitner-Wise, LLC.

18                   There was a brief spell during  
19 2011, 2012, if I recall.

20           Q       I'm sorry. I didn't follow that.  
21 There was a brief spell in 2011, 2012 that what?

22           A       Yes -- yeah, where I was authorized to  
23 actually earn a living in the United States. So  
24 employment authorization.

1 Q Okay. So let's go back because I think  
2 maybe you're answering different questions than I  
3 had thought I was asking.

4 So when you left Leitner-Wise  
5 Rifle Company in 2006 you next found employment in  
6 2020 with Leitner-Wise, LLC, is that correct?

7 A Yes, but then I recalled because  
8 this -- you're getting my brain working now -- that  
9 I also had employment authorization in the 2011,  
10 2012 period.

11 Q So in 2011 and 2012 you were authorized  
12 to work?

13 A Yes.

14 Q Did you, in fact, work?

15 A Yes.

16 Q Where did you work in 2011 and 2012?

17 A I'm going to say that was Leitner-Wise  
18 Defense.

19 Q And what was your work authorization  
20 based on?

21 A The -- the I-140.

22 Q What did Leitner...

23 A I -- sorry. I...

24 Q If you want to amend the I-140 answer,

1 please go ahead.

2 A I can't be specific because I don't  
3 have the immigration file to hand, which is quite  
4 extensive.

5 Q What is Leitner-Wise Defense?

6 A Well, it doesn't exist anymore; but at  
7 the time it was a company owned by a company based  
8 in the United Kingdom.

9 Q So in 2012 you were authorized to work  
10 in the United States and you worked for Leitner-Wise  
11 Defense which is company based in the United  
12 Kingdom?

13 A No. It was owned by a company based in  
14 the United Kingdom.

15 Q I see. And what is Leitner-Wise  
16 Defense?

17 A It isn't anything. It doesn't exist.

18 Q What was Leitner-Wise Defense in 2011  
19 to 2012 when you worked there?

20 A Well, actually I believe -- I believe  
21 it started in 20 -- 2008, and it was essentially a  
22 design -- firearms design company and a company that  
23 was set up to distribute products manufactured in  
24 the United Kingdom by the parent company.

1 Q What was your role at Leitner-Wise  
2 Defense?

3 A Designer.

4 Q Where was Leitner-Wise Defense located?

5 A In the United States. Alexandria,  
6 Virginia.

7 Q What was your job title?

8 A I believe designer.

9 Q Do you know whether Leitner-Wise  
10 Defense was registered to do business in Virginia?

11 A Yes, it was.

12 Q And why did you stop working for  
13 Leitner-Wise Defense after 2012?

14 A The owner of the company became  
15 frustrated at the delays of the immigration process  
16 and at that point did not wish to proceed.

17 Q To clarify, the owner became frustrated  
18 in the delay with the immigration process related to  
19 you and didn't want to proceed with your employment,  
20 is that correct?

21 A Correct, didn't want to proceed with  
22 the activities -- the business activities in the  
23 United States so withdrew from the United States  
24 market.



1 Q I see. So in 2012 you stopped working  
2 for Leitner-Wise Defense, is that correct?

3 A That is correct.

4 Q And in 2012 Leitner-Wise Defense also  
5 withdrew from doing business in the United States,  
6 is that correct?

7 A As best as I recall. I mean, I can't  
8 give you a definitive answer.

9 Q Okay. So after 2012 you -- you did not  
10 find employment again until 2020, is that correct?

11 A I was not authorized to -- I was not  
12 authorized for employment in the United States.  
13 That's -- that's the correct definition.

14 Q Did you in fact work in the United  
15 States between 2012 and 2020?

16 MR. BRADY: Objection.

17 MS. MUSE: You may answer.

18 THE WITNESS: A Please define "work".

19 MS. MUSE: Q Can you repeat that again. I  
20 didn't -- I didn't hear you.

21 A Please define "work".

22 Q Pleased?

23 A No. Please. Would you please define  
24 "work".

1 Q Oh, would I please define "work"?

2 A Yes.

3 Q I'm sorry. I really didn't hear that.

4 A My apologies.

5 Q Okay. Did -- between 2012 and 2020  
6 were you paid to perform services by anybody?

7 A No.

8 Q Did you -- between 2012 and 2020  
9 otherwise engage in work experience that you think  
10 is relevant to the opinion you're offering in this  
11 case today?

12 A So I would say -- I'm going to be  
13 careful using the term "work".

14 I work all the time. I don't get  
15 paid for it. I constantly design continually.

16 Q So between 2012 and 2020 did you engage  
17 in any paid labor that's relevant to the opinion  
18 that you're offering in this case?

19 A No.

20 MR. BRADY: Objection. Asked and answered.

21 MS. MUSE: Please answer.

22 THE WITNESS: A No.

23 MS. MUSE: Q Okay. So in 2020 you began  
24 working for Leitner-Wise, LLC, is that correct?

1 A That is correct.

2 Q And where is that located?

3 A That was located, actually, initially  
4 in Illinois.

5 Q Where in Illinois?

6 A Aurora.

7 Q Did you live in Illinois during your  
8 period of employment at Leitner-Wise, LLC?

9 A No, I did not.

10 I visited it frequently, but I  
11 did not live -- I did not retain a residence there.  
12 Let's put it that way.

13 Q Was -- did Leitner-Wise, LLC operate in  
14 other jurisdictions other than Illinois in 2020?

15 A We have...

16 MR. BRADY: Objection. Vague.

17 THE WITNESS: I'm sorry. I didn't hear that.

18 MR. BRADY: Oh, I just said, objection,  
19 vague.

20 THE WITNESS: A Okay.

21 We had a satellite office in  
22 Washington, D.C.

23 MS. MUSE: Q Was Leitner-Wise, LLC  
24 registered to do business in Illinois?

1 A Yes.

2 Q Was Leitner-Wise, LLC registered to do  
3 business in D.C.?

4 A It was -- so if I can step back  
5 slightly and explain this.

6 It was a Texas company initially.  
7 The company dissolved in Texas simultaneously with  
8 it transferring to D.C. and becoming a D.C. LLC.

9 And then, as I understand it, it  
10 was authorized to do business in Illinois. It was a  
11 subsidiary of a company called HST Group.

12 Q And did you found Leitner-Wise, LLC?

13 A No.

14 Q What was your role in Leitner-Wise,  
15 LLC?

16 A Senior designer.

17 Q What were your day-to-day duties as  
18 senior designer?

19 A Designing products.

20 Q Did Leitner-Wise, LLC sell firearms?

21 A HST Group did.

22 Q Did Leitner-Wise, LLC sell firearms?

23 A No.

24 Q Does Leitner-Wise, LLC sell firearms

1 components?

2 A Yes.

3 Q Does Leitner-Wise, LLC sell firearm  
4 attachments?

5 A Define "attachments".

6 Q Do you consider any of the products of  
7 Leitner-Wise, LLC to be something that you could  
8 attach to a firearm?

9 MR. BRADY: Objection. Vague.

10 THE WITNESS: A I'm having to think now.

11 Most of the components are  
12 internal components. I'm trying to think if  
13 anything attaches to the outside, and I don't  
14 believe it does, but I could be -- I could be.

15 MS. MUSE: Q Is there any relationship  
16 between the products sold by Leitner-Wise, LLC and  
17 the products sold by Leitner-Wise Rifle Company?

18 A No.

19 Q Who manages Leitner-Wise, LLC?

20 A The -- one of the owners of HST Group.

21 Q What's that person's name?

22 A First name Sam, Samuel, second name --  
23 last name Hwang, H-w-a-n-g.

24 Q Does Leitner-Wise, LLC have employees

1 other than you and Samuel Hwang?

2 A Yeah. Lathal, L-a-t-h-a-l, last name  
3 Wise, W-i-s-e.

4 Q Today where is the primary place of  
5 business for Leitner-Wise, LLC?

6 A That would be in -- it's either going  
7 to be in Aurora or it's going to be in California,  
8 but I'm never visited the California location.

9 So I can't -- I can't give any  
10 direct testimony on that.

11 Q Are there any offices for Leitner-Wise,  
12 LLC other than in Illinois or California?

13 A No.

14 Q Today is Leitner-Wise, LLC registered  
15 to do business in Illinois?

16 A I don't have that information. You'd  
17 have to address that with the owners of the company.

18 Q Do you know whether Leitner-Wise, LLC  
19 is registered to do business in any U.S. state?

20 A I do not off the top of my head.

21 Q Other than you, Samuel Hwang and Lathal  
22 Wise, who else works for Leitner-Wise, LLC?

23 A As of today, sitting here, I don't  
24 believe anybody else; but the -- the ownership

1 structure of HST is such that I believe they have  
2 employees that work for different entities at  
3 different times.

4 But I can't give you any  
5 definition on that. It's not my involvement.

6 Q Do you have any role in creating  
7 content for Leitner-Wise dot com?

8 A I did.

9 Q When did -- and especially for the  
10 court reporter, I want to make sure I'm identifying  
11 the URL correctly. When I say Leitner-Wise dot com,  
12 I'm speaking of L-e-i-t-n-e-r, hyphen, Wise,  
13 W-i-s-e, dot com.

14 So when did you have a role in  
15 creating content for Leitner-Wise dot com?

16 A When it was initially -- when the  
17 website initially went up, the latest iteration of  
18 the website.

19 Q When did the website initially go up?

20 A I couldn't tell you.

21 Q Did you...

22 A The Leitner-Wise website has been in  
23 existence since -- since -- I don't know -- 1999,  
24 perhaps, 1998. The current iteration probably dates

1 from 2018 maybe, 2018, something like that.

2 Q Who controls what is put on  
3 Leitner-Wise dot com?

4 A Who do you mean -- who controls...

5 Q Who in Leitner-Wise, LLC decides what  
6 content is put on Leitner-Wise dot com?

7 A That will be Sam.

8 Q Do you ever review Leitner-Wise dot  
9 com?

10 A I review for accuracy what is put up,  
11 yes.

12 Q When was the last time you believe you  
13 looked at Leitner-Wise dot com?

14 A I couldn't say.

15 Q Do you believe you looked at  
16 Leitner-Wise dot com in the past week?

17 A No, I haven't.

18 Q Are you aware that an image of you is  
19 used on Leitner-Wise dot com?

20 A Yes, I am. It's my last name.

21 Q I know it's been -- has it been an  
22 hour -- maybe not a full hour yet. Is everyone okay  
23 to keep going?

24 A We're two minutes short of when you



1 last asked that question.

2 Q Oh, I see.

3 Okay. Well, we're getting close  
4 to what would be like a lunch time too. So let me  
5 see if there's anything else I can do so that we can  
6 have a lunch break.

7 Give me one moment. Thank you.

8 All right. Do you think you're  
9 comfortable going for another half hour and having a  
10 longer lunch break or would you like to take a  
11 break -- shorter break now...

12

13 (Discussion kept off the record.)

14

15 MS. MUSE: Q All right.

16 Okay. Other than the litigation  
17 that we've discussed so far today, are there other  
18 cases that you've been a party to?

19 A Could you be more specific on cases?

20 Q Well, we can start with criminal.

21 Other than the litigation that we discussed so far  
22 today, are there other criminal cases where you have  
23 been a party?

24 A No.

1 Q Other than the cases you've discussed  
2 so far today, are there civil proceedings where you  
3 have been a party?

4 A To the best of my knowledge, no.

5 Q Do you understand what it means to be a  
6 party in litigation?

7 A Yes.

8 Q Have you ever been accused in a civil  
9 proceeding of making misrepresentations about your  
10 business?

11 A I -- I couldn't answer that question.

12 Q Why can't you answer that question?

13 A I -- I -- I don't know. You'd have to  
14 be more specific.

15 People make a lot of accusations.  
16 You know, it's the general -- the general way the  
17 legal system works.

18 Q Has a legal complaint been filed  
19 against you in a civil proceeding in which a  
20 plaintiff accused you of making misrepresentations  
21 about your business?

22 A I don't know.

23 MR. BRADY: Objection. Calls for a legal  
24 conclusion.

1 MS. MUSE: Q You don't know. Okay.

2 I'm going to share my screen with  
3 you. Do you see a document on your screen?

4 A Oh, yes, this one, yes.

5 Q I'm going to mark this document as  
6 Exhibit 4 for the record. What is this document?

7 A Well, it's a civil complaint -- so  
8 thank you for reminding me of that -- by a former  
9 partner of -- not of mine, but of the Leitner-Wise  
10 Manufacturing.

11 Q Who is Stephen Mark Mueller?

12 A He's a very interesting character.

13 Q Okay. Do you have any relationship to  
14 Mr. Mueller?

15 A None whatsoever.

16 Q Do you know Mr. Mueller?

17 A I have met him personally, yes.

18 Q Were you a defendant in a lawsuit filed  
19 by Mr. Mueller?

20 A Yes.

21 Q Did Mr. Mueller accuse you of making a  
22 series of misrepresentations?

23 A Mr. Mueller made many accusations.

24 Q Do you recall whether Mr. Mueller

1 accused you of making misrepresentations?

2 MR. BRADY: Objection. Asked and answered.

3 MS. MUSE: Please go ahead.

4 THE WITNESS: Could you repeat the question.

5 MS. MUSE: Q Do you recall whether Mr.  
6 Mueller accused you of making misrepresentations?

7 THE WITNESS: A I don't recall the specific  
8 allegations.

9 I do recall his behavior. I  
10 also --

11 Q Do you...

12 A Sorry.

13 Q No. I didn't mean to interrupt.  
14 Please go on.

15 A I also recall that the case was  
16 dismissed with prejudice and his attorney was  
17 threatened with sanctions by the judge if he ever  
18 brought a case again.

19 Q Do you recall whether Mr. Mueller  
20 accused you of lying about owning patents?

21 A I don't recall specifically.

22 Q Do you recall -- yeah. Do you recall  
23 whether Mr. Mueller accused you of lying about  
24 whether Leitner-Wise Rifle Company owed him

1 royalties?

2 A I have no idea.

3 Q Do you recall whether Mr. Mueller  
4 accused you of having fraudulent Twitter followers?

5 A I have no idea.

6 Q Okay. Were any of the accusations Mr.  
7 Mueller made against you in the Eastern District of  
8 Wisconsin true?

9 MR. BRADY: Objection. Vague.

10 THE WITNESS: A From what I recall of the  
11 case, it was, like most of Mr. Mueller's life,  
12 fantasy.

13 He claimed to have 43 CNC  
14 machines. He actually -- actually, he wrote that in  
15 a document that was filed as part my immigration  
16 case. In point of fact, he worked in a basement and  
17 had no machines; and at the time of this strange  
18 filing he was actually being sued by multiple  
19 companies for fraud.

20 MS. MUSE: Q So sitting here today do you  
21 recall whether he made accusations that were true?

22 A He made no accusations that were true.

23 Q Okay. Have you ever been sued by Bee  
24 Distributing, LLC?

1 A Who?

2 Q Bee Distributing, LLC.

3 A Not that I'm aware of.

4 Q Have you ever been accused in a civil  
5 proceeding of fraudulently transferring a patent?

6 A That was in the bankruptcy case.

7 Q Which bankruptcy case?

8 A One of them. The one -- the time that  
9 Beam was suing us.

10 Q Who accused you of fraudulently  
11 transferring a patent?

12 A I believe their attorney.

13 Q Whose attorney?

14 A Beam's attorney.

15 Q So the attorney for Beam Distributing  
16 accused you of fraudulently transferring a patent,  
17 is that right?

18 A Yes, that is correct.

19 Q Do you recall a lawsuit filed against  
20 you alleging that you had fraudulently transferred a  
21 patent --

22 A Yes.

23 Q -- To a phony buyer?

24 MR. BRADY: Objection. Calls for a legal

1 conclusion. Vague.

2 MS. MUSE: Q Subject to Mr. Brady's  
3 objection, I'm restating.

4 Do you recall a lawsuit filed  
5 against you alleging that you had fraudulently  
6 transferred a patent to a phony buyer?

7 THE WITNESS: A I --

8 MR. BRADY: Objection. Calls for a legal  
9 conclusion. Vague.

10 THE WITNESS: A I don't recall a specific  
11 lawsuit. I recall that an allegation was made to  
12 that effect in the Beam Distributing case, the  
13 patent was actually sold to a company based in  
14 France and the United Kingdom.

15 MS. MUSE: Q All right. So having...

16 A Proof of the -- excuse me a second.  
17 Proof of the purchaser was provided.

18 Q Okay.

19 Okay. Have you been a defendant  
20 in any other litigation other than this litigation  
21 we've talked about today so far?

22 MR. BRADY: Objection. Vague.

23 THE WITNESS: A I -- I can't recall off the  
24 top of my head, quite honestly, as I sit here. It's

1 possible.

2 MS. MUSE: Q Do you recall any other  
3 litigation brought against you regarding your  
4 patents?

5 MR. BRADY: Objection. Vague. Asked and  
6 answered.

7 THE WITNESS: Can I answer?

8 MS. MUSE: Yes.

9 THE WITNESS: A No, I do not.

10 MS. MUSE: Q Is it accurate to say that  
11 throughout your business career people have accused  
12 you of misrepresenting facts?

13 MR. BRADY: Argumentative. Vague.

14 MS. MUSE: Please answer.

15 THE WITNESS: A In my experience, the people  
16 who make such unproven accusations are generally  
17 guilty of that behavior themselves.

18 Do you need me to brighten the  
19 light in here? I look a little dark.

20

21 (Discussion kept off the record.)

22

23 MS. MUSE: Q Okay. Sitting here today, do  
24 you believe that you have little authorization that



1 would allow you to receive compensation to testify  
2 in this case?

3 MR. BRADY: Objection. Calls for a legal  
4 conclusion. Vague.

5 MS. MUSE: You can answer.

6 THE WITNESS: A I believe so.

7 MS. MUSE: Q And what is the basis for that  
8 belief?

9 MR. BRADY: Objection. Calls for a legal  
10 conclusion. Vague.

11 MS. MUSE: You may answer.

12 THE WITNESS: A I may answer.

13 Because such compensation would  
14 be paid to a company in the United Kingdom that  
15 currently funds expenses and which is accounted for  
16 in tax filings.

17 MS. MUSE: Q So it's your understanding that  
18 the compensation you'll receive for testifying today  
19 will not be provided directly to you?

20 A It would be provided to a company.

21 MR. BRADY: Objection. Objection. Calls for  
22 a legal conclusion. Vague. Calls for speculation.

23 MS. MUSE: Please answer.

24 THE WITNESS: A I -- I did, but I think we

1 kind of cross wires there.

2 It would be paid to a third-party  
3 company.

4 MS. MUSE: Q And what's the name of the  
5 third-party company that will be paid for your  
6 testimony today?

7 A Leitner-Wise AG, Limited.

8 Q What is that company?

9 A I'm sorry.

10 Q What is Leitner-Wise AG, Limited?

11 A It's a limited company based in the  
12 United Kingdom that owns all the intellectual  
13 property that I have generated, the patents,  
14 trademarks.

15 Q Who owns Leitner-Wise AG, Limited?

16 A It's a family-owned business. I am not  
17 an owner.

18 Q Who owns Leitner-Wise AG, Limited?

19 A It's a family-owned business. I am not  
20 an owner.

21 Q Does your wife own Leitner-Wise AG,  
22 Limited?

23 A She is one of the directors of the  
24 corporation, yes.

1 Q Is your son one of the owners of  
2 Leitner-Wise AG, Limited?

3 A That is correct.

4 Q Is there a third owner who is also a  
5 child of yours that is the owner of Leitner-Wise AG,  
6 Limited?

7 A That is correct, yes.

8 Q Other than your children and your wife,  
9 are there any other people who own or operate  
10 Leitner-Wise AG, Limited?

11 A No, there are not.

12 Q Where does your wife and children live?

13 A Well, my wife lives in Washington, D.C.  
14 with me. My oldest son lives in Richmond, Virginia.  
15 My youngest son lives in Philadelphia.

16 Q And what does Leitner-Wise AG, Limited  
17 do in the United Kingdom?

18 A They don't do anything in the United  
19 Kingdom. It's a holding company.

20 Q Does your wife have the same  
21 immigration status as you?

22 A She is tied to my immigration status,  
23 yes.

24 Q Do your children have the same

1 immigration status as you?

2 A No. They're green card holders, both  
3 applying for naturalization.

4 Q I'll show you a document. Do you see a  
5 document on your screen?

6 A Yes, I do.

7 Q Okay. I'm going to mark this document  
8 Exhibit 5.

9 Do you recognize this document?

10 A I'm vaguely familiar with it, yes.

11 Q Is this a letter that you received?

12 A I believe so, yes.

13 Q Who was the letter from?

14 MR. BRADY: Objection. Calls for  
15 speculation. The document speaks for itself.

16 THE WITNESS: A It states U.S. Citizen  
17 Immigration Services.

18 MS. MUSE: Q And did you in fact receive it  
19 on or around January 19, 2022?

20 A No. I -- certainly not on that date,  
21 but I don't know when it was received.

22 Q Did you receive this letter in 2022?

23 A I would presume so, yes.

24 Q Since receiving this letter have you

1 received authorization to remain in the United  
2 States?

3 A As I mentioned earlier, the case is  
4 pending in the D.C. district court; but that's  
5 something you would need to discuss with my  
6 immigration attorney.

7 Q After receiving this letter did you  
8 leave the United States?

9 A No.

10 Q After receiving this letter were  
11 removal proceedings commenced against you?

12 A No.

13 Q Are you in removal proceedings today?

14 A No.

15 Q What is the basis for your belief that  
16 you are authorized to remain in the United States?

17 MR. BRADY: Objection. Calls for a legal  
18 conclusion. Calls for speculation. Vague.

19 MS. MUSE: Please answer.

20 THE WITNESS: The advice of counsel.

21 MR. BRADY: I've stated my objections.

22 MS. MUSE: Q You understand that your  
23 attorneys are asking the State to pay for your  
24 testimony today?

1 THE WITNESS: A No, I am not of that  
2 understanding.

3 MS. MUSE: All right. Let me check my notes,  
4 and then I think we might be able to take an early  
5 lunch -- but I think you're on East Coast time. So  
6 it might not seem early to you anymore.

7 Okay. I think -- given that it's  
8 12:34 your time, I think it makes sense to have a  
9 lunch break now.

10 Would everybody be happy with an  
11 hour lunch break? Any objections?

12  
13 (Discussion kept off the record.)

14 (Lunch break was taken.)

15  
16 MS. MUSE: Q Okay. Mr. Leitner-Wise, when  
17 were you first contacted about this case?

18 THE WITNESS: A I was actually contacted by  
19 a mutual associate of Sean and myself, asking --  
20 because of my knowledge of firearms -- whether I  
21 would be willing to talk to one of the attorneys in  
22 this matter; and I affirmed, that, yes, I would be  
23 if it was felt that I could be of any use.

24 Q What was the name of that mutual

1 associate?

2 A Oh, I don't recall off the top of my  
3 head. I don't recall off the top of my head.  
4 It's -- it's a Facebook friend.

5 Q And when was this that you were first  
6 contacted?

7 A Few months ago, fairly -- fairly  
8 recent, I would say, in the scheme of things.  
9 Certainly not 12 months ago or -- or whatever.

10 Q And what was your assignment for this  
11 case?

12 A Assignment -- I was asked to provide  
13 expert testimony based on my knowledge of firearms  
14 and firearms design.

15 Q And what did they ask you to opine on?

16 A Basically, semi-automatic firearms.

17 Q Did they also ask you to opine on the  
18 difference between semi-automatic rifles and fully  
19 automatic rifles?

20 A That was understood.

21 Q Okay. Other than being asked to opine  
22 on the differences between semi-automatic rifles and  
23 fully automatic rifles, have you been asked to opine  
24 on anything else?

1           A       Not to my knowledge sitting here. I  
2       might have been, but -- no. I'm going to say no.

3           Q       And what did you do to reach your  
4       opinion in this matter?

5           MR. BRADY: Objection. Vague. Calls for a  
6       narrative.

7           THE WITNESS: A I basically -- I have a very  
8       good memory. So that was my first -- my first thing  
9       was to go through my memory, think about things.  
10      You know, it's kind of like a meditation process.

11                   The second stage was to go  
12      through my experience and really the summation of  
13      everything that I have personally done over the last  
14      25 years, the observations I've made, really my  
15      experience in utilizing weapons, my experience in  
16      designing weapons.

17                   That's the -- that's what I bring  
18      to the table, if I can use that expression.

19           MS. MUSE: Q Did you use any methodologies  
20      to develop your opinion?

21           MR. BRADY: Objection. Vague.

22           THE WITNESS: A Can you define "methodology"  
23      for me, please.

24           MS. MUSE: Q Anything -- did you use



1 anything that you would consider a methodology to  
2 arrive at your opinion in this case?

3 MR. BRADY: Objection. Vague.

4 THE WITNESS: A I'm not quite sure how to  
5 answer that.

6 I used my experience. I used  
7 data that I had generated during my career to define  
8 what I was actually stating in the report.

9 MS. MUSE: Q Are you aware of anyone who  
10 disagrees with the opinion that you've offered in  
11 this case?

12 A I'm not aware of anybody who disagrees.  
13 I've not been contacted. I've not seen any  
14 information relating to this matter.

15 And I personally steer clear of  
16 it. I don't want to know anything.

17 Q I'm going to refer to Exhibit 1, which  
18 we marked as your expert report in this case.

19 A Um-hum.

20 Q I have a few questions about it.

21 A Absolutely.

22 Q Okay. Do you see Exhibit 1, your  
23 expert report in this case?

24 A I do, Kathryn, yes.

1 Q Okay.

2 A Do you mind me calling you Kathryn or  
3 would you prefer Miss -- I mean...

4 Q Either works today.

5 Under background and  
6 qualifications, you see that it says -- you wrote  
7 formally recognized by the United States government  
8 as a leading expert in firearms design. What did  
9 you mean when you wrote that?

10 A It's self apparent.

11 When -- I mentioned earlier we --  
12 my immigration attorney filed for a national  
13 interest waiver, which was denied.

14 As part of the denial, the United  
15 States government -- which was USCIS, but it's the  
16 United States government -- recognized that had a  
17 exceptional ability in my field which opened me for  
18 what's called an EB -- I've got to get this right,  
19 please don't quote me -- an EB-1 visa, which is  
20 exceptional ability.

21 So it was on that basis that we  
22 filed the PERM application which resulted in the  
23 I-140 being approved. That document can be provided  
24 if requested.

1 Q So I'd like to move -- you included  
2 images in this report?

3 A Yes, I did

4 Q Let's see. So turning to page six of  
5 Exhibit 1 in your expert report in this case, on  
6 both page six, seven and eight there are images?

7 A There are.

8 Q Where did you get these images from?

9 A We maintain a database of all our  
10 designs, designs for companies and various other  
11 technical information. So I just pulled from that  
12 database something that was not the -- so it says  
13 M16 fully automatic lower receiver. It's -- how can  
14 I phrase this the right way?

15 It's not the government M16  
16 automatic lower receiver. It's a -- a  
17 non-government -- for want of a better word --  
18 representation. It's not a commercial market,  
19 obviously. There's no commercial market for this.

20 So this would be something  
21 that -- these would be technical data that we would  
22 use for companies wishing to make this type of lower  
23 receiver for an appropriate government contract, be  
24 that an export contract, be that a contract with the

1 United States Military, be it a contract with law  
2 enforcement, that's entitled to do it.

3 I cannot -- I would not show the  
4 technical data package -- the U.S. Army technical  
5 data package.

6 So while it's identical, it's not  
7 actually an M16. I know that's aroundabout way of  
8 saying. I just wanted to clarify exactly what that  
9 that was.

10 Q So that was a lot. I'm going to have  
11 go to back and unpack some of it.

12 A Sure.

13 Q So figure one is not an M16?

14 A It's --

15 MR. BRADY: Objection. Misstates testimony.

16 MS. MUSE: Q Okay. Can you please...

17 THE WITNESS: A It's -- it is an identical  
18 configured schematic image, of a fully automatic M16  
19 style lower receiver; but it is not the government  
20 M16 -- if I'm making myself clear on that.

21 So it's identical. It's just not  
22 their imagery because I'm not authorized to release  
23 their imagery.

24 Q Let's go back to the beginning of you

1           answering my question.

2                                You said we maintain a database.

3           Who's "we"?

4           A        Myself and my draftsman.

5           Q        Who is your draftsmen?

6           A        A draftsman.  It's an individual called  
7           David Higgs.

8           Q        Is David Higgs someone that works at  
9           Leitner-Wise, LLC?

10          A        We have been working together for  
11         approximately 20 years.

12                                And he is compensated by me  
13         directly.  So he's not employed by me.

14          Q        Does he work for Leitner-Wise, LLC?

15          A        No.

16          Q        Okay.  Who owns the database from which  
17         this image is pulled?

18          A        I own the database from which the  
19         imaging is pulled.

20          Q        What --

21          A        Personally, not corporately.

22          Q        And what software was used to generate  
23         this?

24          A        Solid -- Solid Edge probably.  It might

1 have been done in Solid Works. It depends.

2 I can't tell you from looking at  
3 the image. I'd have to actually go and look at the  
4 database, which I'm not going to do at this stage.

5 But I can clarify, if you  
6 require, whether it was Solid Edge or Solid Works.

7 Q Have you ever made a weapon from the  
8 schematics shown in either figure one or figure two?

9 A Have I ever made -- so let's backtrack.  
10 When Leitner-Wise Rifle Company...

11 Q Well, let's answer this question first  
12 and then I'll -- then I can give you some additional  
13 opportunity.

14 Have you ever made a weapon from  
15 these schematics that are shown in figure one and  
16 figure two?

17 MR. BRADY: Objection. Vague.

18 THE WITNESS: A I have made -- when I say  
19 "I", the company I was with have manufactured  
20 weapons utilizing those images, but not those  
21 specific images.

22 MS. MUSE: Q Okay. We'll break it up.

23 So, for figure one, have you or a  
24 company that you have worked with ever manufactured

1 a weapon using the schematic that is shown in figure  
2 one exactly as it is?

3 A Exactly as it is, no, not exactly --  
4 well, for example, this one has an integral trigger  
5 guard at the bottom. That is not -- that's a  
6 design. It's not actually been productionized which  
7 is why I've been able to sell it -- sell it -- show  
8 it here because it doesn't contradict any  
9 nondisclosure agreements we have.

10 But, in all other respects,  
11 internally it's exactly identical to products that  
12 have been manufactured by companies I have been  
13 either employed with or worked with.

14 MR. TRESNOWSKI: Can I interrupt real quick.

15 There's an unmuted caller on the  
16 Zoom call now. I don't know who that is.

17 MR. MAAG: Thomas Maag.

18 MS. MUSE: Hi, Mr. Maag. Could you please  
19 mute your line.

20 MR. MAAG: Give me one second.

21

22 (Discussion kept off the record.)

23

24 MR. MUSE: Mr. Maag, we are still hearing

1 some audio from you. So we appreciate your efforts,  
2 and we might have to stop again and ask you to join  
3 from a different, quieter area.

4 But for now we'll go forward and  
5 hope that you're able to find a solution.

6 MR. MAAG: Okay.

7 MS. MUSE: Q Thank you.

8 Okay. So, Mr. Leitner-Wise,  
9 turning back to your expert report which has been  
10 marked as Exhibit 1. We're looking at page six, and  
11 we're looking at figure one.

12 All right. Looking at figure  
13 one. Okay. Was this image created for your report?

14 THE WITNESS: A No.

15 Q When was this image created?

16 A Without looking at the file, I couldn't  
17 tell you. It was -- it was just a case of pulling  
18 out something that wouldn't necessarily cause a  
19 conflict with our nondisclosure agreements.

20 Q How many times has the image shown in  
21 figure one been used to manufacture a weapon?

22 A As I mentioned before, that particular  
23 image has not been. It's a generic image.

24 Q What does figure one depict?



1           A        It -- essentially it depicts the  
2           internal machining of an M16 style lower receiver.

3           Q        And what does figure two in your expert  
4           report depict?

5           A        It depicts the internal machining of a  
6           semi-automatic lower receiver.

7           Q        How did you decide which kind of  
8           AR-15 semi-automatic lower receiver to use in your  
9           report?

10          A        Could you explain "which kind".

11          Q        How did you decide which -- okay. I'll  
12          back up.

13                    Is there more than one kind of  
14          AR-15?

15          A        There are multiple kinds of AR-15s.

16          Q        So how did you decide which kind of  
17          AR-15 semi-automatic lower receiver to use?

18          A        Well, this is...

19          MR. BRADY:  Objection.  Vague.

20          THE WITNESS:  A  I'd like to point out this  
21          is not an AR-15 lower receiver.

22          MS. MUSE:  Q  I'm talking about figure two?

23          A        Yeah, so am I.

24          Q        Oh, I see.  I'm sorry.  Please, let's

1 back up.

2 So tell me again what figure two  
3 is.

4 A Figure two is a semi-automatic lower  
5 receiver, and it is basically a -- the patent -- the  
6 patent of machining in there is the SP-1, the Colt  
7 SP-1.

8 Q So is figure two a picture of a AR-15  
9 semi-automatic lower receiver?

10 A No. It's picture -- essentially the  
11 internal machining is a 1964 Colt SP-1.

12 Q Is a Colt SP-1 a type of AR-15?

13 A It's a semi-automatic rifle that was  
14 developed in 1964 by Colt.

15 Q Why does figure two say AR-15  
16 semi-automatic lower receiver above it?

17 A For the purposes of the report because  
18 we were -- basically I was showing the difference  
19 between an M16 and what is perceived to be an AR-15,  
20 without getting in to the weeds of what an actual  
21 civilian semi-automatic AR-15 is and adding two or  
22 three pages of explanation.

23 Q So is figure two an illustration of  
24 partially what an AR-15 semi-automatic lower

1 receiver looks like?

2 MR. BRADY: Objection. Vague.

3 THE WITNESS: A Let's back up a second so I  
4 can clarify what I'm saying. I'm trying not to  
5 confuse the issue or obfuscate in any way.

6 The -- all modern semi-automatic  
7 rifles that we refer to as AR-15, AR-15 Patton,  
8 Patton -- not patent -- Patton rifles are -- their  
9 origin goes back to the 1964 Colt SP-1.

10 MS. MUSE: Q Okay.

11 A It's a totally different weapon to an  
12 AR-15. An AR-15, to be 100 percent accurate, was  
13 never a semi-automatic weapon. It was fully  
14 automatic select fire from start, developed as a  
15 military weapon and has always been developed as a  
16 military weapon and has a completely different  
17 development path to the civilian SP-1.

18 Q Why did you include figure two in your  
19 report?

20 A To show the internal differences.

21 Q The internal differences of what?

22 A Of the machining of the inside of the  
23 lower receiver.

24 So one is a semi-automatic. The

1 other is a fully automatic. And in order for...

2 Q Is it true that semi-automatic lower  
3 receivers look different on different AR-15s?

4 A Define --

5 MR. BRADY: Objection, vague.

6 THE WITNESS: A Define -- sorry. Sorry,  
7 Sean.

8 Do you mean different colors,  
9 different styles...

10 MS. MUSE: Q Is this any way in which  
11 semi-automatic lower receivers can look different on  
12 one AR-15 compared to another?

13 A Internally or externally, please.

14 Q Internally in the area depicted in your  
15 figure two here.

16 A There are different ways of machining  
17 the inside of the semi-automatic version that still  
18 do not allow it to fire in a fully automatic way.

19 Q I think we're getting -- we're getting  
20 loss here.

21 I'm trying to ask very basic  
22 questions to understand why these images are in  
23 here. So I'll start again, but there's -- I'm  
24 not -- these aren't tricky -- I'm not trying to play

1 any tricks here. So I want to be clear.

2 Why do you include -- let's start  
3 what does figure two -- is it a visual -- okay.  
4 I'll start over.

5 Is figure two a visual  
6 representation of the semi-automatic lower receiver  
7 of an AR-15?

8 MR. BRADY: Objection. Asked and answered.  
9 Vague.

10 THE WITNESS: I'm going to have to come back  
11 to my statement on an AR-15, what is an AR-15. This  
12 is...

13 MS. MUSE: Q I want to give you the  
14 opportunity to elaborate, but I have to insist that  
15 you answer my questions, and so I just -- I would  
16 like to know, yes or no, is figure two a visual  
17 representation of a semi-automatic lower receiver  
18 for an AR-15.

19 MR. BRADY: Objection. Asked and answered.  
20 Vague.

21 THE WITNESS: A It's a visual representation  
22 of a semi-automatic lower receiver.

23 MS. MUSE: Q Thank you.

24 Which AR-15 is figure two a

1 visual representation of?

2 MR. BRADY: Objection. Misstates testimony.  
3 Vague.

4 THE WITNESS: A I'm going to try and answer  
5 that as best I can.

6 It's a visualization of the  
7 internals of an SP-1 and many other lower --  
8 semi-automatic lower receivers.

9 I can't possibly give you a list  
10 of which manufacturers make them this way. It  
11 depends on...

12 MS. MUSE: Q Do all -- that's fine.

13 Do all AR-15 semi-automatic lower  
14 receivers look like figure two?

15 MR. BRADY: Objection. Vague. Speculation.

16 THE WITNESS: A You're asking me to  
17 speculate and so...

18 MS. MUSE: A It's a yes, no...

19 A No. It's a gray area. I can't...

20 MR. BRADY: Objection. Argumentative. You  
21 can't direct the witness how to answer.

22 MS. MUSE: Okay.

23 THE WITNESS: A I cannot possibly say.

24 MS. MUSE: Q Are you aware of an AR-15

1 semi-automatic lower receiver that does not look  
2 like figure two?

3 A There are -- there are AR-15 -- well, I  
4 don't want to even use the word AR-15. There are  
5 plenty of semi-automatic lower receivers that are  
6 visually configured in different ways.

7 Every manufacturer tries to be a  
8 little bit different to distinguish themselves from  
9 the rest of the manufacturers. Asking me to state  
10 under oath that they are all like this is -- is  
11 something I'm not prepared to do because I -- I have  
12 knowledge that some may not be. Although I can't  
13 point to those.

14 Q So that's helpful. You know that there  
15 are some that may not be -- so you know -- okay.

16 So, for figure two, you are aware  
17 of some AR-15 semi-automatic lower receivers that do  
18 not look like figure two?

19 A Yes.

20 MR. BRADY: Objection. Misstates the  
21 testimony.

22 THE WITNESS: A I can answer that very  
23 simply. Yeah, some have trigger guards that are  
24 integral with the lower receiver. Others do not.

1                   Some have slightly different  
2 configurations for the bow catch mechanism. Some  
3 don't have the stops for the safety selectors.

4                   I -- these are matters that  
5 individual companies can use on their -- their  
6 products. What I've offered is a generic -- and I  
7 hate using the term. If you're involved in  
8 intellectual property, you absolutely loathe the  
9 term "generic", but it's a generic semi-automatic  
10 lower receiver.

11                   MS. MUSE: Q All right. What does figure  
12 five in your expert report depict?

13                   A Figure five depicts the position of the  
14 pinhole for the Auto Sear in a fully automatic  
15 configured fire control system.

16                   Q What does figure six depict?

17                   A Figure six depicts the absence of the  
18 hole for an Auto Sear in a semi-automatic lower  
19 receiver?

20                   A Does figure five and figure six depict  
21 different weapons?

22                   A Yes.

23                   Q Why do figure five and figure six have  
24 the same patent?



1           A           It's just part of the drawing that was  
2 utilized.

3                       I didn't -- to clarify, I didn't  
4 want to create an image specifically for this  
5 report, rather, an image from the series of images  
6 from our database that showed the machining  
7 differences between a fully automatic lower receiver  
8 and a semi-automatic lower receiver.

9                       And I think the fact that there  
10 are symbols on there which some companies use --  
11 there's a generic -- there's a patent number on  
12 there -- was nothing to do with intent of the -- of  
13 the illustrations.

14                      I also -- and I'm just going to  
15 add this. I also didn't want to give too -- because  
16 this is presumably going to be a public document or  
17 is a public document.

18                      I didn't want to give too much  
19 away in the differences that could possibly lead  
20 someone to try and do something they shouldn't do.  
21 If that makes sense.

22                      I -- you know, I can obviously  
23 provide more input if required. I'm just very  
24 cautious about putting --

1 Q Okay.

2 A -- Potentially -- information that  
3 could be potentially used criminally. I don't want  
4 to be doing that.

5 Q I'm just going to remind you that I  
6 need you to wait for me to ask questions to answer.

7 A Sure.

8 Q We'll get everybody home earlier  
9 tonight.

10 A You said tonight?

11 Q I appreciate you being forthcoming.

12 Okay. So is it your opinion that  
13 the firing process for an M16 is different than an  
14 AR-15 because of a component called the Auto Sear?

15 A Well, it's not as simple as that.  
16 There's a lot more than just an Auto Sear that is  
17 involved.

18 The -- the firing patent of the  
19 two -- the fully automatic and the semi-automatic  
20 are totally different, absolutely. And that's not  
21 speculation. That's not opinion -- that's -- it's  
22 my opinion based on observation.

23 Q Are you familiar with a Drop In Auto  
24 Sear?

1           A       I'm familiar with the -- what's called  
2           a registered Drop In Auto Sear which is actually  
3           classified as a machine gun.

4           Q       And what is that?

5           A       It is a -- it's -- it's an interesting  
6           device.

7                        It's a way of allowing the  
8           semi-automatic weapon to function as a fully  
9           automatic weapon, but in and of itself it won't work  
10          unless a number of other things are done to the  
11          weapon. So just...

12          Q       Are you familiar...

13          A       I was just going to say, to clarify, if  
14          I had a semi-automatic lower receiver and I put it  
15          in a registered Drop In Auto Sear -- so what is  
16          actually a machine gun -- and went to the range with  
17          it, the gun would not fire fully automatic.

18          Q       Why not?

19          A       Because there are a number of steps  
20          necessary to have a gun fire fully automatic, and a  
21          registered Drop In Auto Sear would not do that in  
22          and of itself.

23          Q       Are you familiar with a lightening  
24          link?

1           A        I'm heard of them. I've never actually  
2           seen one in my presence. I've obviously seen  
3           pictures. I'm never seen one utilized.

4                            Anything I say about those would  
5           be pure speculation on my part.

6           Q        Are you familiar with forced reset  
7           triggers?

8           A        Yes, I am. I haven't used one, but I  
9           am familiar with them.

10          Q        What is a forced reset trigger?

11          A        What -- it's probably best described as  
12          a -- I want to be -- word this carefully not for  
13          any, you know, untoward reasons.

14                            It's probably a more accurate  
15          attempt at doing what bump firing does. So -- and  
16          I've never actually utilized one. So I --  
17          there's -- I'm giving you my opinion based on my  
18          observations.

19                            It relies on the user having  
20          their finger in such a position that when the  
21          rifle -- using the recoil of the rifle, it resets  
22          the disconnecter, resets the trigger, quicker than  
23          releasing the trigger in the traditional sense and  
24          then pulling the trigger again.

1                   So if I'm firing a semi-automatic  
2                   rifle -- and I just want you to understand this --  
3                   I pull the trigger and I keep my finger on the  
4                   trigger, the gun only fires once because an item  
5                   within the trigger mechanism called the disconnecter  
6                   catches the hammer, hits the firing pin and stops is  
7                   that moving.

8                   When I release the trigger it --  
9                   the disconnecter catches the main part of the  
10                  hammer, and that's called the reset. So at that  
11                  point, once it's caught the main part of the  
12                  hammer -- oh...

13                  Q           When did you observe a forced reset  
14                  trigger being used?

15                  A           I've only observed them being used on  
16                  on-line videos.

17                  MR. BRADY: If I may, just for the record,  
18                  Mr. Leitner-Wise said, "oh", when I believe he was  
19                  in the middle of a response because there was a  
20                  beeping noise.

21                  THE WITNESS: Yes.

22                  MR. BRADY: Is that correct?

23                  MS. MUSE: I apologize.

24                  THE WITNESS: That is correct.

1 No, no need to apologize.

2 MR. BRADY: No need to apologize. I just  
3 wanted to make it clear because the record might  
4 show him saying "oh" and then -- in the middle of a  
5 response and then a new question. I just wanted to  
6 make clear that was the reason.

7 MS. MUSE: Yes.

8 THE WITNESS: A And essentially what I  
9 wanted to do before that beep distracted me was  
10 explain -- so that's how it works conventionally.  
11 You can't just keeping pulling the trigger.

12 If you reset the trigger earlier,  
13 it enables the trigger to be utilized again. But it  
14 is only under the definition of a machine gun. It  
15 is still operating as a semi-automatic trigger.

16 And, you know, I'm not going to  
17 talk about the law and Supreme Court rulings or  
18 anything like that because that's for you attorneys  
19 to talk about.

20 MS. MUSE: Q Are the on-line videos that  
21 you've viewed of forced reset triggers being used  
22 publicly available?

23 A They're on U-Tube. You know, a couple  
24 of people mentioned it. Obviously, I'm curious

1 about any developments in the firearm world and I  
2 observe them.

3 Sense you asked, I'm not going to  
4 say I haven't ever seen one being utilized. I've  
5 seen them on a video.

6 I have no direct experience.  
7 I've never used one. I've never examined one. I  
8 don't know actually know anyone who has one.

9 So my understanding is based on  
10 what is being said on U-Tube videos.

11 Q Have you -- scratch that.

12 Are you familiar with a gat  
13 crank?

14 A I --

15 Q G-a-t, gat.

16 A I think that's probably before my time.  
17 I -- I don't know what it is, but it would  
18 presumably be something to do with a Gatling gun.  
19 So some way of...

20 Q Okay. If you don't know, then that's  
21 fine. You...

22 A I don't know. I -- you hear so many  
23 things. I honestly -- I can honestly say I don't  
24 know.

1 Q Are you familiar with a binary trigger?

2 A I am -- I know what a binary trigger  
3 is. I've never used one.

4 Q What is a binary trigger?

5 A A binary trigger is -- and I actually  
6 don't know how they work. So -- but essentially the  
7 trigger fires when you pull the trigger rearward;  
8 and then if you are in the binary mode, it allows  
9 the trigger to fire as you release it.

10 But I don't understand the  
11 mechanism. I haven't examined one.

12 Q Is a binary trigger a way to modify a  
13 semi-automatic weapon?

14 MR. BRADY: Objection. Vague.

15 THE WITNESS: A If by modification you mean  
16 if I put a two-stage trigger -- a two-stage trigger  
17 has an initial pull; and then you reach a wall, and  
18 then you pull further and the trigger discharges --  
19 yeah, it's a modification.

20 MS. MUSE: Q Have you ever heard of someone  
21 modifying an AR-15 with a coat hanger to simulate  
22 automatic fire?

23 A I'm sorry. What an awful visual.

24 No, I -- I have personally no



1 experience of that. I haven't heard of it.

2 I think if you'd mention that in  
3 conversation, I would think it was some sort of, you  
4 know, internet lore or something, something not --  
5 no. So, in answer to your question, no, I have not  
6 heard of anybody using a coat hanger -- I'm sorry.  
7 Please --

8 Q Have you ever --

9 A -- Forgive me.

10 Q Have you ever heard an AR-15  
11 malfunctioning and firing automatically?

12 A There is a possibility that you can get  
13 a failure in the fire control group that will allow  
14 one or two rounds to discharge.

15 Automatically, fully  
16 automatically, no. It's -- it's -- generally either  
17 the disconnecter breaks or the spring fails. So  
18 it's -- it's very extremely rare, but it can happen.

19 Q Okay. In your report you said that  
20 commercial AR-15s have a similar visual appearance  
21 to select fire M16 family of weapons?

22 What did you mean when you said  
23 similar visual appearance?

24 A The silhouette is -- the silhouette is

1 identical -- or not identical. Very similar. Let's  
2 put it that way.

3 Q And what do you mean by silhouette?

4 A So if you -- you're familiar with --  
5 I'm not belittling you by saying this, but you're  
6 familiar with the term "silhouette".

7 So if I have an all-black image  
8 of an M16 or an M4 and an all-black image of a, you  
9 know, semi-automatic rifle, they would look similar.

10 But then most -- since probably  
11 the mid '70s, I would say most semi-automatics --  
12 semi-automatic rifles have a similar silhouette  
13 because the -- the very clever thing about Eugene  
14 Stoner's original idea or design were the ergonomics  
15 of the weapon; and because the ergonomics are so  
16 good, they have been duplicated across many, many,  
17 many semi-automatic weapons.

18 So they share a very -- the  
19 position of the magazine, for example, the -- the  
20 relation of the barrel height above the receiver,  
21 various elements like that, mean that there's a --  
22 even though they're totally different -- totally  
23 different weapons, there is a visual similarity.

24 Q So other than the barrel height above

1 the receiver and the position of magazine, is there  
2 anything else visually similar between commercial  
3 AR-15s and the M16 family of weapons?

4 MR. BRADY: Objection. Misstates testimony.  
5 Vague.

6 MS. MUSE: Q In addition to the  
7 silhouette -- let me state it again.

8 In addition to the silhouette,  
9 the barrel height above the receiver and the  
10 position of the magazine, is there anything else  
11 that has a similar visual appearance between  
12 commercial AR-15 rifles and the select fire M16  
13 family of weapons?

14 MR BRADY: Objection. Misstates testimony.  
15 Vague.

16 THE WITNESS: A Yeah, I mean, I try to  
17 clarify the -- essentially most European, Western  
18 European and North American semi-automatic rifles do  
19 have a similar silhouette to an M16; but they don't  
20 function the same.

21 So an average person who is not  
22 skilled in the art might see a Gallil, for example,  
23 which is an Isreali rifle and assume it's an M16,  
24 which it isn't, but it's -- they look the way they

1 are because they have evolved in to a very, once  
2 again, generic style.

3 It's like people look the way  
4 they are because we've evolved into what best suits  
5 us. It's why steering wheels are the shape they  
6 are.

7 MS. MUSE: Q So another thing you said in  
8 the report was that an AR-15 is a, quote, more  
9 developed product, end quote, than an M16.

10 Can you explain why you think an  
11 AR-15 is a more developed product than an M16?

12 A Well, that's -- that's -- that's kind  
13 of self evident.

14 The M16 -- so we start with the  
15 original AR-15 which was a fully automatic weapon.  
16 That then became the XM16, then the M16, then the  
17 M16A1, A2, A3, A4 and so on. Then the M4, then the  
18 M4A1.

19 They have a very specific  
20 purpose. They are military weapons supplied to the  
21 United States Military and lots of militaries around  
22 the world. In fact, Iran has M16s from the time of  
23 the Shah, and they have one specific purpose.

24 Semi-automatic AR-15 style

1 weapons are utilized in so many more activities than  
2 the military weapons.

3 When Colt developed the SP-1 they  
4 made no -- their marketing at the time made no  
5 references to the M16. They -- what they referenced  
6 was lightweight, a hunting rifle, space-age  
7 materials, you know, because it was made -- instead  
8 of wood and steel, it was made of aluminum and  
9 plastics so -- and, of course, this is early 1960s.  
10 We're looking at moon shots and things like that.

11 The M16 was developed to fight in  
12 the Cold War against the Soviet adversary or a  
13 Soviet-sponsored adversary. A totally different  
14 path.

15 Which means the twist rates in  
16 the barrel are different. The gun is so  
17 fundamentally different, when you get down to the  
18 DNA of the weapon that -- when I developed a method  
19 for the United States Army to accurately count how  
20 many shots were fired by a weapon without getting  
21 false positives -- this is -- this is one of my  
22 patents. We developed that technology, the hardware  
23 and software to do that.

24 The program for the M16 would not

1 work on a commercial AR-15. It would not identify  
2 shots being fired. And, likewise, the commercial  
3 AR-15 program could not be used on the M16 because  
4 it wouldn't accurately identify shots being fired.

5 And when you get down to that  
6 level, when you're actually looking at the data that  
7 is being produced during the firing, both in the  
8 M16, both semi-automatic and fully automatic firing,  
9 and an AR-15, a semi-automatic AR-15 Patton rifle,  
10 they're not the same.

11 Now, with artificial  
12 intelligence, could you load up the program so that  
13 it can be used on both, I don't know. That would be  
14 speculation on my part.

15 But that was -- you know, that  
16 was a definitive moment.

17 So when I say that I can -- you  
18 know, when I say by any metric in that report, I'm  
19 talking about at the absolute base level. What  
20 happens when that weapon functions is entirely  
21 different.

22 And it's not just because one  
23 isn't fully automatic. It's because the way the  
24 weapon is configured, the way it's manufactured, the

1 parts within that weapon give that weapon a totally  
2 different signature when it's being used.

3 So I'm sorry to dive into the  
4 weeds there, but -- so when I said -- when you --  
5 you mentioned how did I come to my conclusions, that  
6 was one of my experiences that I reached back in to  
7 because it was -- it was very interesting to find  
8 that and it -- you know, you'd have to have a  
9 different program for different calibers.

10 So the military generally  
11 speaking uses 5.56 ammunition. There are some, you  
12 know, small-frame M16s, M4s which shoot different  
13 calibers; but they're -- you know, they're really a  
14 very, very small part.

15 The semi-automatic weapon shoots  
16 a myriad of calibers, a myriad; but they're tailored  
17 for the application of the user.

18 Q Okay. Have you ever had a security  
19 clearance from the U.S. government?

20 A No. I have worked on secured programs,  
21 but I have not had security clear answer.

22 So that was -- that was an  
23 interesting experience.

24 Q Who provided access to military

1 facilities to you?

2 A The United States government.

3 Q Which part of the United States  
4 government?

5 A Could be the Department of Defense. It  
6 could be the individual -- individual unit, for  
7 example.

8 So when we were working with the  
9 Coast Guard, that was provided by the Coast Guard  
10 headquarters; and I attended their invite. They  
11 were fully aware of my nationality, had to bring,  
12 you know, appropriate U.S. government ID and  
13 appropriate -- my British ID, had to sign in. All  
14 the processes you go for -- through -- sorry -- go  
15 for -- go through in order to gain access.

16 Q How many times have you visited U.S.  
17 military facilities?

18 A I wouldn't -- I couldn't even begin to  
19 speculate. Lots.

20 You don't just walk in, one would  
21 hope.

22 MS. MUSE: I know we're running up on almost  
23 another hour.

24 Okay. Well I think this might be



1 a good time to take another short break.

2 THE WITNESS: Um-hum.

3

4 (Discussion kept off the record.)

5 (Short recess was taken.)

6

7 MS. MUSE: Q Okay. So thank you for your  
8 time, Mr. Leitner-Wise.

9 Is there any --

10 THE WITNESS: A Not a problem.

11 Q Is there any information that I've  
12 asked about in the deposition that you remember now  
13 but didn't recall when I asked about it earlier?

14 MR. BRADY: Objection. Vague. Calls for  
15 speculation. Narrative.

16 THE WITNESS: A Well that -- that needs me  
17 to remember what you specifically asked about. So  
18 I'm not sure how to answer that.

19 Possibly, but I don't -- I don't  
20 know. Sorry.

21 MS. MUSE: Q Are there any answers to my  
22 questions that you want to change before we close  
23 the deposition?

24 A I don't think I need to change

1 anything.

2 So, you know, based -- sitting  
3 here right now, I don't think I need to change  
4 anything.

5 MS. MUSE: Thank you. I have no further  
6 questions at this time.

7 Does any of the other attorneys  
8 have questions?

9 MR. BRADY: I do not.

10 MS. MUSE: We'll make sure everybody has time  
11 to come off mute. Does anyone in the audience  
12 here -- no.

13 Okay. Then, Mr. Brady, if I  
14 could ask from you and for -- to work with the  
15 witness to obtain the copy of the diplomas and  
16 transcripts that he mentioned for Stafford  
17 University and the copy of the immigration documents  
18 that you believe would have permitted the State of  
19 Illinois to pay the witness for his time today.

20 Okay?

21 Sorry. You disappeared from my  
22 video. So if you nodded, Mr. Brady, I didn't see  
23 you.

24 MR. BRADY: No. I will await your written

1 request for that information. I -- I don't recall  
2 there being a request for his being paid today.

3 So --

4 MS. MUSE: Oh.

5 MR. BRADY: -- I guess there might be. But I  
6 offered to...

7 MS. MUSE: I see. That was my understanding,  
8 that there was a request that we would be paying for  
9 his time today; but if there was no request, then...

10 MR. BRADY: My understanding -- I believe  
11 under the rules that we're entitled to seek  
12 compensation for his time today, but I don't if that  
13 demand has been made.

14 I recall there being -- and I  
15 don't want to go off on a tangent on all of the  
16 coordination stuff.

17 MS. MUSE: Right.

18 MR. BRADY: But I think there was like travel  
19 expenses discussed about others who might be going  
20 to Illinois.

21 MS. MUSE: Okay.

22 MR. BRADY: But that said, to be clear, I'm  
23 not waiving our right to recover said fees should we  
24 decide to; but I don't know if that demand has been

1 made.

2 MS. MUSE: Okay. I'll revise that to say, if  
3 any of the plaintiffs intend to request us to pay  
4 the witness for his time today, then we will ask for  
5 further documentation to be assured that we can  
6 lawfully do so.

7 MR. BRADY: Understood.

8 THE WITNESS: Absolutely. Absolutely.

9 MS. MUSE: All right. If no one has any  
10 other questions, the other attorneys, then the  
11 deposition is over.

12 Thank you very much for your  
13 time.

14 MR. REPORTER: If I can get orders on the  
15 records, that would be great.

16 MR. LOTHSON: One other thing. This is  
17 Andrew Lothson. Real quick.

18 I don't know if Sean did this  
19 already, but it's something that Sean can decide.  
20 The witness may want to read and sign the  
21 deposition. Sean, I'll leave that up to you and Mr.  
22 Leitner-Wise; but that's something that we should  
23 make record of.

24 MR. BRADY: Agreed.

1 I assume that that was going to  
2 be part of the process we are about to talk about  
3 with Nick in getting the rough to the witness, so  
4 that he would have an opportunity to review it.

5 And I'm open to hear any proposed  
6 timelines in light of the timing that the court has  
7 put us under. It's not really -- I don't know if  
8 we're doing anything to the full maximum length of  
9 the code right now because of the short timeline  
10 that we're under, but -- so I'm happy to hear from  
11 the State or anybody else on how quickly they want  
12 it turned around, and obviously that's subject to  
13 the witness' availability too.

14 But, yeah, we will definitely  
15 want the witness to be able to review a rough draft  
16 and provide any edits.

17 MR. REPORTER: Just for clarification...

18  
19 (Discussion kept off the record.)

20  
21 MR. REPORTER: Ms. Muse, I assume you're  
22 ordering the original?

23 MS. MUSE: Yes. Thank you.

24 MR. REPORTER: And then anybody else?

1 Mr. Brady?

2 MR. BRADY: Yes.

3 MR. REPORTER: And anybody else?

4 MR. YSURSA: This is Tom Ysursa. I am a no.  
5 I don't need anything.

6 MR. MAAG: Thomas Maag. I don't need  
7 anything.

8 MS. ASFOUR: Katherine Asfour. I don't need  
9 anything.

10 MR. LOTHSON: No.

11

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13 DEPOSITION CONCLUDED BY 1:25 P.M.

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1 STATE OF ILLINOIS)  
 ) ss:

2 COUNTY OF C O O K)

3 The within and foregoing deposition of  
4 the witness, PAUL A. LEITNER-WISE, was taken before  
5 Nick W. DiGiovanni, C.S.R., via Zoom  
6 videoconferencing, on the 27th day of June, the year  
7 2024.

8 There were present during the taking of  
9 this deposition the following counsel:

10 ANDREW A. LOTHSON,  
representing  
11 the Barnett Plaintiffs;

12 DAVID G. SEGALE,  
representing  
13 the Harrel Plaintiffs;

14 THOMAS G. MAAG,  
representing  
15 the Langley Plaintiffs;

16 KATHRYN HUNT MUSE,  
MIKE TRESNOWSKI,  
17 and

CHRISTOPHER WELLS,  
18 representing  
the State of Illinois;

19 SEAN A. BRADY,  
20 representing  
Federal Firearms Licensees of Illinois  
21 and Paul A. Leitner-Wise;

22 KATHERINE ASFOUR,  
representing  
23 the Randolph County Defendants;  
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and  
THOMAS R. YSURSA,  
representing  
the St. Clair County Defendants.

The said witness was first duly sworn and was then examined upon oral interrogatories. The questions and answers were taken down in shorthand by the undersigned, acting as stenographer; and the within and foregoing is a true, accurate and complete record of all of the questions asked of and answers made by the aforementioned witness at the time and place herein above referred to.

The signature of the witness was not waived and the deposition was submitted to the deponent as per copy of the attached letter. Pursuant to the rules of the Supreme Court of the State of Illinois, if deponent does not appear to read and sign the deposition within 30 days or make other arrangements for reading and signing, the deposition may be used as fully as though signed; and this certificate will then evidence such failure to appear as the reason for signature being waived.



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The undersigned is not interested in the within case, nor of kin or counsel to any of the parties. Witness my official signature in and for Cook County, Illinois on this 3rd day of July, the year 2024.



---

NICK W. DIGIOVANNI, C.S.R.

License No. 084-003060

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Telephone: 312.442.9087

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1100 Superior Ave  
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Cleveland, Ohio 44114  
Phone: 216-523-1313

July 10th, 2024

To: Sean A. Brady

Case Name: Barnett, Caleb, Et Al. v. Raoul, Kwame, Et Al.

Veritext Reference Number: 6770465

Witness: Paul A. Leitner-Wise                      Deposition Date: 6/27/2024

Dear Sir/Madam:

Enclosed please find a deposition transcript. Please have the witness review the transcript and note any changes or corrections on the included errata sheet, indicating the page, line number, change, and the reason for the change. Have the witness' signature notarized and forward the completed page(s) back to us at the Production address shown above, or email to [production-midwest@veritext.com](mailto:production-midwest@veritext.com).

If the errata is not returned within thirty days of your receipt of this letter, the reading and signing will be deemed waived.

Sincerely,  
Production Department

NO NOTARY REQUIRED IN CA

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DEPOSITION REVIEW  
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6770465  
CASE NAME: Barnett, Caleb, Et Al. v. Raoul, Kwame, Et Al.  
DATE OF DEPOSITION: 6/27/2024  
WITNESS' NAME: Paul A. Leitner-Wise

In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me.

I have made no changes to the testimony as transcribed by the court reporter.

\_\_\_\_\_  
Date Paul A. Leitner-Wise

Sworn to and subscribed before me, a Notary Public in and for the State and County, the referenced witness did personally appear and acknowledge that:

They have read the transcript;  
They signed the foregoing Sworn Statement; and  
Their execution of this Statement is of their free act and deed.

I have affixed my name and official seal  
this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

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Notary Public

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Commission Expiration Date

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DEPOSITION REVIEW  
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6770465  
CASE NAME: Barnett, Caleb, Et Al. v. Raoul, Kwame, Et Al.  
DATE OF DEPOSITION: 6/27/2024  
WITNESS' NAME: Paul A. Leitner-Wise

In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me.

I have listed my changes on the attached Errata Sheet, listing page and line numbers as well as the reason(s) for the change(s).

I request that these changes be entered as part of the record of my testimony.

I have executed the Errata Sheet, as well as this Certificate, and request and authorize that both be appended to the transcript of my testimony and be incorporated therein.

\_\_\_\_\_  
Date Paul A. Leitner-Wise

Sworn to and subscribed before me, a Notary Public in and for the State and County, the referenced witness did personally appear and acknowledge that:

- They have read the transcript;
- They have listed all of their corrections in the appended Errata Sheet;
- They signed the foregoing Sworn Statement; and
- Their execution of this Statement is of their free act and deed.

I have affixed my name and official seal this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

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Notary Public

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ERRATA SHEET  
VERITEXT LEGAL SOLUTIONS MIDWEST  
ASSIGNMENT NO: 6770465

PAGE/LINE(S) / CHANGE /REASON

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\_\_\_\_\_  
Date Paul A. Leitner-Wise

SUBSCRIBED AND SWORN TO BEFORE ME THIS \_\_\_\_\_  
DAY OF \_\_\_\_\_, 20\_\_\_\_\_ .

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Notary Public

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Commission Expiration Date

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Illinois Code of Civil Procedure

Article II, Part E

Rule 207, Signing and Filing Depositions

**Signing and Filing Depositions**

(a) Submission to Deponent; Changes; Signing.  
Unless signature is waived by the deponent, the officer shall instruct the deponent that if the testimony is transcribed the deponent will be afforded an opportunity to examine the deposition at the office of the officer or reporter, or elsewhere, by reasonable arrangement at the deponent's expense, and that corrections based on errors in reporting or transcription which the deponent desires to make will be entered upon the deposition with a statement by the deponent that the reporter erred in reporting or transcribing the answer or answers involved. The deponent may not otherwise change either the form or substance of his or her answers. The deponent shall provide the officer with an electronic or physical address to which notice is to be sent when the transcript is available for examination and signing. When the deposition is fully transcribed, the officer shall deliver to the deponent, at the address supplied,

notice that it is available and may be examined at a stated place at stated times, or pursuant to arrangement. After the deponent has examined the deposition, the officer shall enter upon it any changes the deponent desires to make, with the reasons the deponent gives for making them. If the deponent does not appear at the place specified in the notice within 28 days after the mailing of the notice, or within the same 28 days make other arrangements for examination of the deposition, or after examining the deposition refuses to sign it, or after it has been made available to the deponent by arrangement it remains unsigned for 28 days, the officer's certificate shall state the reason for the omission of the signature, including any reason given by the deponent for a refusal to sign. The deposition may then be used as fully as though signed, unless on a motion to suppress under Rule 211(d) the court holds that the reasons given by the deponent for a refusal to sign require rejection of the deposition in whole or in part.

(b) Certification, Filing, and Notice of Filing.

(1) If the testimony is transcribed, the officer

shall certify within the deposition transcript that the deponent was duly sworn by the officer and that the deposition is a true record of the testimony given by the deponent. A deposition so certified requires no further proof of authenticity

(2) Deposition transcripts shall not be filed with the clerk of the court as a matter of course. The party filing a deposition shall promptly serve notice thereof on the other parties and shall file the transcript and any exhibits in the form and manner specified by local rule.

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Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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