

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF LOS ANGELES

3 **CERTIFIED**
4 **COPY**

5 ALEXANDER BURTON; MARK RYAN; and)
6 MICHAEL E., a minor, by and through)
7 his Guardian ad Litem, BONNIE MOUND,)

8 Plaintiffs,) Case No.
9) LC 053 103

10 vs.)

11)
12 MARC COLLINS-RECTOR; CHAD SHACKLEY;)
13 BROCK PIERCE; DIGITAL ENTERTAINMENT)
14 NETWORK, INC.; et al.,)
15 Defendants.)

16 _____)

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19 DEPOSITION OF MICHAEL EGAN

20 TAKEN ON

21 Monday, November 24, 2003

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24 Reported by: Susan B. Sautman

25 C.S.R. No. 4770

1 DEPOSITION OF MICHAEL EGAN, taken on behalf of
2 the Defendant Brock Pierce at 2450 Colorado Avenue,
3 Suite 400E, Santa Monica, California, on Monday,
4 November 24, 2003, at 1:24 p.m., before Susan B.
5 Sautman, Certified Shorthand Reporter No. 4770, pursuant
6 to Notice.

7

8 APPEARANCES:

9

10 FOR THE PLAINTIFFS:

11 DANIEL J. CHEREN, ESQ.
12 16055 Ventura Boulevard
13 Suite 525
14 Encino, California 91436
15 (818) 990-7700

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18 FOR THE DEFENDANT BROCK PIERCE:

19 GREENBERG TRAUIG
20 BY: GREGORY D. TRIMARCHE, ESQ.
21 2450 Colorado Avenue
22 Suite 400E
23 Santa Monica, California 90404
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WITNESS

EXAMINATION

PAGE

MICHAEL EGAN

(By Mr. Trimarche)

4, 79

(By Mr. Cheren)

78

DEFENDANTS' EXHIBITS

PAGE

(None)

1 Q. We're talking about sometime in early 2000 when
2 everybody moved to Florida?

3 A. Correct.

4 Q. Did [REDACTED] move down there with them essentially?

5 A. They went down to Florida right away; they came
6 back and forth a couple of times. Went down to Florida
7 and then the next time they wouldn't let [REDACTED] stay in
8 the house at M&C by himself. They pretty much let him
9 have no decision but to go back down to wherever it was
10 in Florida. I think it was Miami Beach, South Beach.

11 Q. Do you know if [REDACTED] went to the Caribbean
12 with them at all?

13 A. I don't know.

14 Q. Did you ever take any trips with them?

15 A. Yes. Several trips.

16 Q. Where to?

17 A. Las Vegas, Lake Havasu.

18 Q. Anything outside the continental U.S.?

19 A. Never had any trips outside the continental
20 U.S., no.

21 Q. Do you know if [REDACTED] did?

22 A. Yes, I know he did.

23 Q. Where do you know that he went?

24 A. From what I recollect, I believe he went to
25 Hawaii, went to --

1 MR. CHEREN: That is technically part of the
2 United States.

3 BY MR. TRIMARCHE:

4 Q. I am talking about continental U.S. right now
5 so include Hawaii, Alaska, Caribbean.

6 A. Hawaii. Mexico. I don't remember. I know
7 they had a trip for one of their birthdays. I think it
8 was Chad's birthday in San Martin. I can't remember if
9 [REDACTED] was a part of it.

10 Q. Do you have any idea why [REDACTED] went on those
11 trips and you didn't?

12 A. Pretty much if we would go on a smaller trip to
13 maybe like Lake Havasu or Las Vegas I still had to go
14 and get the approval of my mom, still had to get her
15 approval which on certain times I was so out of my mind
16 that I would just -- they would make me leave and my mom
17 would think I disappeared for three days, two days. Any
18 trip that I ever asked to go anywhere within any far
19 amount of distance to Mexico, any of those my mom would
20 say no and pretty much lock the door and not let me go.

21 Q. This was before she knew what was going on?

22 A. She didn't want me going anywhere outside the
23 United States, really.

24 Q. So when Shackley, Pierce, and Collins-Rector
25 moved to Florida at the beginning of 2000, they didn't

1 I, SUSAN B. SAUTMAN, Certified Shorthand
2 Reporter, in and for the State of California, do hereby
3 certify:

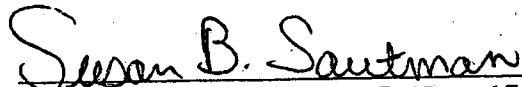
4 That prior to being examined, MICHAEL EGAN, the
5 witness named in the foregoing deposition, was by me
6 duly affirmed to testify the truth, the whole truth, and
7 nothing but the truth.

8 That said deposition was then taken before me
9 pursuant to Notice, at the time and place herein set
10 forth, that the testimony and proceedings were reported
11 stenographically by me and later transcribed into
12 typewriting via computer-aided transcription under my
13 direction.

14 I further certify that I am neither counsel
15 for, nor related to, any party to said action, nor in
16 anywise interested in the outcome thereof.

17 IN WITNESS WHEREOF, I have subscribed my name
18 this 2nd day of December, 2003.

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Susan B. Sautman, CSR No. 4770