

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

-----:
TAMARA GREEN, et al., :
:
Plaintiffs/Counterclaim :
Defendants, :
: Civil Action No.
vs. : 3:14-CV-30211-MGM
:
WILLIAM H. COSBY, JR., :
: Volume I
Defendant/Counterclaim : Pages 1 - 184
Plaintiff. :
-----:

HIGHLY CONFIDENTIAL MATERIAL REDACTED

Springfield, Massachusetts

Monday, February 22, 2016

VIDEOTAPED DEPOSITION OF:

CAMILLE COSBY,

called for oral examination by counsel for
Plaintiffs/Counterclaim Defendants, taken pursuant
to Federal Rules of Civil Procedure, before Nicole
E. Viens of Capital Reporting Company, a
Registered Professional Reporter and Notary Public
in and for the Commonwealth of Massachusetts, at
Springfield Marriott, 2 Boland Way, Springfield,
Massachusetts, beginning at 10:16 a.m. when were
present on behalf of the respective parties:

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Also Present: Shawn Budd, Legal Video Specialist

1 I N D E X

2 WITNESS EXAMINATION

3 CAMILLE COSBY
4 (By Mr. Cammarata) 75
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13 (Exhibits were retained by Attorney Cammarata.)

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

2 THE VIDEOGRAPHER: We are on the record.

3 This is the videographer speaking, Shawn Budd,
4 with Veritext Court Reporting.

5 Today's date is February 22, 2016. The
6 time is 10:16 a.m. We are here at the Marriott
7 Hotel, Springfield, Massachusetts, to take the
8 video deposition of Camille Cosby in the matter of
9 Green versus Cosby.

10 Would counsel please introduce
11 themselves.

12 MR. CAMMARATA: Joseph Cammarata along
13 with Ira Sherman, Matthew Tievsky, and Michael
14 Bressler on behalf of the plaintiffs, and one of
15 the plaintiffs, Therese Serignese.

16 MS. PRESSLEY: Monique Pressley of The
17 Pressley Firm on behalf of the witness, Mrs.
18 Cosby.

19 MR. TAYBACK: Christopher Tayback on
20 behalf of the witness and also the defendant.

21 MR. SEARCY: Marshall Searcy here for
22 Mrs. Cosby and the defendant.

23 MR. SPELMAN: Stephen Spelman here for
24 Mrs. Cosby and the defendant.

25 THE VIDEOGRAPHER: And would the court

1 reporter please swear in the witness.

2 WHEREUPON,

3 CAMILLE COSBY,

4 having been satisfactorily identified and duly

5 sworn by the Notary Public, was examined and

6 testified as follows in answer to direct

7 interrogatories:

8 EXAMINATION BY MR. CAMMARATA:

9 Q. Good morning, ma'am.

10 A. Good morning.

11 Q. We met before we started. Once again,
12 my name is Joseph Cammarata.

13 A. Yes.

14 Q. Please tell us your full name.

15 A. Camille Cosby.

16 Q. Thank you. Over the next several hours,
17 I'm going to have questions about various topics
18 and I appreciate your response, oral response, to
19 the questions I've put to you.

20 A. Mm-hmm.

21 Q. Back in the year 2000, you gave an
22 interview with Oprah. Do you remember giving an
23 interview with Oprah?

24 A. I do.

25 Q. And the transcript that's generally

1 conversation with your husband?

2 MS. PRESSLEY: Objection. Or with your
3 attorneys, privilege.

4 Q. (By Mr. Cammarata) Ma'am --

5 A. I'm not answering that.

6 MR. CAMMARATA: Would you read back the
7 question.

8 (The question was read.)

9 Q. (By Mr. Cammarata) Were you aware other
10 than with a private conversation with your husband
11 or counsel that there was a lawsuit filed against
12 your husband by these ladies in this case?

13 A. I don't know.

14 Q. Okay. All right. Do you know when it
15 was the first -- if I asked you this, I apologize,
16 but do you know when it was the first time that
17 you became aware of the allegations?

18 A. No, I don't know.

19 Q. All right. You became aware -- you were
20 aware that Andrea Constand sued your husband --

21 MS. PRESSLEY: Objection --

22 Q. (By Mr. Cammarata) -- were you not?

23 MS. PRESSLEY: -- privilege. Do not
24 answer.

25 MR. CAMMARATA: What is -- what's the

1 privilege?

2 MS. PRESSLEY: Marital and attorney-
3 client.

4 Q. (By Mr. Cammarata) Were you aware --
5 I'm not asking for what the --

6 MR. CAMMARATA: We're going to -- if
7 this continues, we're going to get the judge on
8 the phone. This is -- this is outrageous.

9 MS. PRESSLEY: I'm happy to get the
10 judge on the phone.

11 MR. CAMMARATA: Okay. Let's get the
12 judge on the phone.

13 MR. TAYBACK: Why don't we take a break?

14 MR. CAMMARATA: No. No. No. We're
15 going to get the judge -- you want to take a
16 break? We'll take a break. That's fine.

17 I'll buy you the break but then --

18 MR. TAYBACK: You're not buying me
19 anything. I'm asking to take a break.

20 MR. CAMMARATA: We're going to come back
21 and then either --

22 MR. TAYBACK: Let's take a break.

23 MR. CAMMARATA: Okay. We'll take a
24 five-minute break.

25 THE VIDEOGRAPHER: The time is 10:41.

1 We're off the record.

2 (A recess was taken.)

3 THE VIDEOGRAPHER: We are back on the
4 record. The time is nine minutes after eleven.

5 MR. CAMMARATA: We're going to move on
6 and I'm reserving my right to call the judge on
7 various questions that we've identified on the
8 break that were, I believe, inappropriately
9 asserted an instruction not to answer.

10 Q. (By Mr. Cammarata) Let me just say one
11 thing just to be clear, Mrs. Cosby, that your
12 refusal to answer as a witness, you just can't
13 refuse to answer a question. If there's an
14 instruction not to answer and if you want to
15 comply with that, then that's different, okay.
16 Just -- you understand that?

17 A. Yes.

18 Q. All right. Thank you, ma'am. Now,
19 before we took the break, I asked you if you were
20 aware that Andrea Constand had sued your husband,
21 and you didn't give me an answer. So I'm asking
22 you again, at some point you became aware that
23 Andrea Constand sued your husband; is that right?

24 A. Yes. At some point, yes.

25 Q. Okay. Do you recall when that was?

1 A. No.

2 Q. How did you become aware that Ms.

3 Constand sued your husband?

4 A. Through my husband.

5 Q. Okay. And did you ever read a copy of
6 the complaint that Ms. Constand filed against your
7 husband?

8 A. No.

9 Q. Have you ever been advised as to what
10 the allegations were that Mr. Constand -- Ms.
11 Constand had against your husband?

12 A. No.

13 Q. As you sit here today, do you have any
14 understanding of what the allegations Ms. Constand
15 made against your husband?

16 A. Somewhat.

17 Q. Okay. And can you tell us what that is,
18 that understanding is?

19 MS. PRESSLEY: Objection; privilege.

20 You don't have to answer.

21 Q. (By Mr. Cammarata) Is the only
22 information that you receive -- that you have
23 about your understanding about what the
24 allegations are, did that come from your husband?

25 A. It came from my husband.

1 Q. Okay. Did it come from your lawyer?

2 A. It did come from counsel.

3 Q. What counsel did it come from?

4 A. Jack Schmitt.

5 Q. Okay. Do you recall when that was?

6 A. No, I don't.

7 Q. Was it a meeting with Jack Schmitt?

8 A. I don't remember.

9 Q. Do you know if it was by telephone?

10 A. I don't remember.

11 Q. When you received information from your
12 husband about the allegations of Ms. Constand
13 against him, do you recall where you were when you
14 received that information?

15 A. No, I don't.

16 Q. Do you recall who was present other than
17 you and your husband?

18 A. No, I don't.

19 Q. Was anyone else present?

20 A. I don't recall.

21 Q. You are aware that your husband gave
22 sworn testimony, a deposition, were you not?

23 A. I am.

24 Q. Okay. In the Constand matter?

25 A. Yes.

1 Q. Okay. Because there's been other
2 circumstances where he's given a deposition. Have
3 you read that deposition?

4 A. No.

5 Q. Has anyone advised you as to what the
6 contents of the deposition testimony was?

7 A. No.

8 Q. Sitting here today you have no
9 understanding of what topics or what statements
10 your husband made at the deposition; is that your
11 testimony?

12 A. That is my testimony.

13 Q. You haven't -- have you discussed your
14 husband's deposition testimony with your husband?

15 A. I don't want to answer that. That is --

16 Q. Well, you can't not --

17 A. That is communication between me and my
18 husband.

19 Q. Okay. Well, you don't get that
20 privilege to just tell me --

21 MS. PRESSLEY: You can --

22 MR. CAMMARATA: Excuse me --

23 Q. (By Mr. Cammarata) You don't get that
24 privilege to just tell me that you're not going to
25 answer.

1 A. All right but I am telling you that that
2 is communication between my husband and me.

3 MR. CAMMARATA: Okay. Well, let's read
4 back the question, please.

5 (The question was read.)

6 Q. (By Mr. Cammarata) I'm not asking for
7 the substance. I'm just asking whether or not you
8 had a discussion about the substance of his
9 deposition testimony? That's all I want to know.

10 A. That is just communication between my
11 husband and me.

12 MR. CAMMARATA: Okay. Counsel, are you
13 instructing her not to answer?

14 MS. PRESSLEY: No, I wasn't and I was
15 going to try to say to the witness before you
16 interrupted me, you can answer yes or no whether
17 you've discussed it without divulging any of what
18 it was.

19 THE WITNESS: Okay. Yes.

20 Q. (By Mr. Cammarata) The answer to my
21 question, just so we're all on the same --

22 A. Yes.

23 Q. -- page here is that you did have a
24 conversation with your husband regarding the
25 substance of his deposition testimony?

1 A. That is correct.

2 Q. Okay. Do you recall when that was in
3 time relative to when he gave a deposition?

4 A. No.

5 Q. Do you recall was anyone present when
6 you had that conversation?

7 A. I don't remember.

8 Q. Do you recall where you were when you
9 had that conversation?

10 A. I don't remember that.

11 Q. Do you recall how long it was that you
12 spoke?

13 A. No.

14 Q. Do you recall the subject matters upon
15 which you spoke?

16 A. No.

17 MR. CAMMARATA: Okay. Let me mark a
18 couple things here.

19 MR. SHERMAN: Could you mark that page,
20 please.

21 (Exhibit 1, Transcript from Oprah
22 Interview, marked for identification.)

23 Q. (By Mr. Cammarata) Mrs. Cosby, let me
24 show you what's been marked -- I'm just going to
25 slide it because I can't reach you -- Deposition

EXHIBIT E