

1 Q. Was it because of lack of funds?

2 A. I would say in my opinion it was because  
3 of lack of funds, yes.

4 Q. Are you aware of any instances where  
5 Eliot or Sy told Brian not to pay Proskauer because  
6 he had a actual problem with the bills?

Best deposition Freudian slip!!!

7 A. You know, I'm trying to recall events of  
8 my memory that I'm trying to erase. You know, it's  
9 hard sometimes to distinguish general complaining  
10 from specific - from specific telling somebody not to  
11 pay.

12 Was I ever present when they told him  
13 don't pay this bill? I don't recall. Was there  
14 general complaining? Yes. As I stated before, there  
15 was always general complaining. And that wasn't  
16 just -- You know, it was about everybody's bills.

17 Q. By the Bernsteins?

18 A. Yes. Yes. Not - not by - not by Brian.

19 Q. Do you know if Brian reviewed Proskauer's  
20 bills?

21 A. I think he did, yes.

22 Q. Did you ever review them?

23 A. No. Not that I recall. Let's put it

24 that way.

It sounds like he was aware of complaints with the work and the bill of his referral Proskauer and again he did nothing. Earlier he stated you are responsible for your referrals.

25 Q. What was Ray Hersh's role in the company?