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NO. PR-11-3238-1

IN RE: ESTATE OF	§	IN THE PROBATE COURT
	§	
MAX D. HOPPER, DECEASED	§	
_____	§	
	§	
JO N. HOPPER,	§	
	§	
Plaintiff,	§	NO. 1
	§	
V.	§	
	§	
JP MORGAN CHASE, N.A.,	§	
STEPHEN B. HOPPER and	§	
LAURA S. WASSMER,	§	
	§	
Defendants.	§	DALLAS COUNTY, TEXAS

ORAL AND VIDEOTAPED DEPOSITION OF
 JO N. HOPPER
 MAY 5, 2016
 VOLUME 1

ORAL AND VIDEOTAPED DEPOSITION of
 JO N. HOPPER, produced as a witness at the instance of
 JPMorgan Chase Bank, N.A., and duly sworn, was taken
 in the above-styled and numbered cause on the 5th of
 May, 2016, from 9:40 a.m. to 4:58 p.m., before
 Jennifer Quick Davenport, CSR in and for the State of
 Texas, reported by machine shorthand, at the offices
 of Loewinsohn Flegle Deary, LLP, 12377 Merit Drive,
 Suite 900, in the City of Dallas, County of Dallas,
 State of Texas, pursuant to Notice and the Texas Rules
 of Civil Procedure.

13:58:35 1 A. I would have to say it's yet to be
2 determined.

3 Q. (By Mr. Eichman) So you're unable to
4 identify anything that Kal Grant told you, said to you
5 that you now believe was untrue?

6 MR. LOEWINSOHN: Objection; form.

13:59:03 7 A. I don't know how to answer your question.
8 I'm sorry.

9 Q. (By Mr. Eichman) Is there anything that you
10 believe -- strike that.

11 Is there any fact that you say Kal Grant
13:59:26 12 failed to disclose to you at any time that you now
13 believe she should have disclosed to you?

14 MR. LOEWINSOHN: Objection; form.

15 A. Yes.

16 Q. (By Mr. Eichman) What?

17 MR. LOEWINSOHN: Objection; form.

18 MR. EICHMAN: Let me rephrase the
19 question.

20 Q. (By Mr. Eichman) What fact do you say Kal
21 Grant should have disclosed to you but failed to
22 disclose?

23 MR. LOEWINSOHN: Objection; form.

13:59:56 24 A. Kal Grant made the statement to me that
25 JPMorgan, serving as Independent Administrator, would

1 not cost me a cent, her words. She did not disclose
2 that I might be responsible for third-party fees and
3 legal fees; and that, if it is true, should have been
14:00:29 4 disclosed.

5 Q. (By Mr. Eichman) Anything else that you say
6 Kal Grant did not disclose to you but should have
7 disclosed?

8 MR. LOEWINSOHN: Objection; form.

9 Q. (By Mr. Eichman) Are there any facts that
10 she did not disclose to you that you say she should
11 have disclosed other than what you just testified to?

12 MR. LOEWINSOHN: Objection; form.

13 A. Yes.

14 Q. (By Mr. Eichman) What?

15 MR. LOEWINSOHN: Objection; form.

14:00:56 16 A. She should have disclosed the connection
17 between John and Debra Round. That was -- in my
18 estimation, it should have been disclosed, and I
19 should have been able to make a choice, informed, that
20 I wanted to keep that relationship or not.

14:01:25 21 And Kal Grant did not tell me that the
22 bank was not equipped and did not understand legally
23 the rules of Texas probate law as replied to
24 intestate. It was as if you were more than prepared.

25 Q. (By Mr. Eichman) Is there any other fact