

Exhibit 3

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CAUSE NO. PR-11-3238-3

IN RE: ESTATE OF MAX D.	§	IN THE PROBATE COURT
HOPPER, DECEASED,	§	
_____	§	
JO N. HOPPER,	§	
	§	
Plaintiff,	§	
	§	NO. 3
v.	§	
	§	
JPMORGAN CHASE BANK, N.A.,	§	
STEPHEN B. HOPPER and LAURA	§	
S. WASSMER,	§	
	§	
Defendants.	§	DALLAS COUNTY, TEXAS

ORAL & VIDEOTAPED DEPOSITION OF
WENDY W. BESSETTE, INDIVIDUALLY AND AS CORPORATE
REPRESENTATIVE OF JPMORGAN CHASE BANK, N.A.
APRIL 5, 2016 - VOLUME 1

ORAL & VIDEOTAPED DEPOSITION OF WENDY W. BESSETTE,
produced as a witness at the instance of the Plaintiff,
and duly sworn, was taken in the above-styled and
numbered cause on April 5, 2016, from 9:04 a.m. to 5:08
p.m., before James M. Shaw, RMR, CSR No. 1694, in and for
the State of Texas, reported by computerized stenotype
machine at Hunton & Williams, LLP, 1445 Ross Avenue,
Suite 3700, Dallas, Texas 75202, pursuant to Jo N.
Hopper's Amended Cross Notice of Intent to Take Oral
Deposition of Corporate Representative of JPMorgan Chase
Bank, N.A., the Texas Rules of Civil Procedure and the
provisions stated on the record or attached hereto.

1 A. Correct.

2 Q. Why does it say Last Updated 3/29/2016? What
3 had existed prior to that?

4 A. Where are you looking?

5 Q. Upper right-hand corner of the first page,
6 ma'am, of tab 7.

7 A. I don't know because, honestly, we were talking
8 about this from -- as we began to prepare for deposition,
9 and so I don't know what that means, other than maybe
10 they added something. I don't know.

11 Q. Okay. What is -- Who prepared tab 8?

12 A. Same answer.

13 Q. Who prepared tab 9?

14 A. Hunton & Williams based on billing statements.

15 Q. What is tab 10?

16 A. That is a summary of intestate administrations
17 firmwide since 2004.

18 Q. Are all of the officers that are listed here
19 all officers not based in Texas?

20 A. Some are based in Texas.

21 Q. Which ones?

22 A. Trudy Romor. Actually, she's the only one.

23 Q. And how long has Trudy Romor worked at the
24 bank?


25 A. I think about ten years. And she's from our

1 related to, nor employed by any of the parties in the
2 action in which this proceeding was taken, and further
3 that I am not financially or otherwise interested in the
4 outcome of this action.

5 Further certification requirements pursuant to
6 Rule 203 of the Texas Code of Civil Procedure will be
7 complied with after they have occurred.

8 Certified to by me on this 21st day of April, 2016.

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James M. Shaw, RMR, Texas CSR
Expiration date: 12/31/2016
Firm Registration No. 348



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