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CAUSE NO. PR-011-03238-1

IN RE: ESTATE OF MAX D. HOPPER, DECEASED,	§	IN THE PROBATE COURT
	§	
<hr/>		
JO N. HOPPER,	§	
	§	
Plaintiff,	§	
	§	NO. 1
v.	§	
	§	
JPMORGAN CHASE BANK, N.A., WENDY W. BESSETTE and LAURA S. WASSMER,	§	
	§	
Defendants.	§	DALLAS COUNTY, TEXAS

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

I, James M. Shaw, RMR, Certified Shorthand Reporter
No. 1694 in and for the State of Texas, hereby certify to
the following:

That the witness, WENDY W. BESSETTE, was duly sworn
by the officer and that the transcript of the oral
deposition is a true record of the testimony given by the
witness;

That the deposition transcript was duly submitted on
April 22, 2016 to the witness or to the attorney for the
witness for examination, signature, and return to Shaw

1 Reporting & Digital Video Services by May 12, 2016.

2 That pursuant to information given to the deposition
3 officer at the time said testimony was taken, the
4 following includes all parties of record and the amount
5 of time used by each party at the time of the deposition:

6 FOR THE PLAINTIFF:

7 ALAN S. LOEWINSOHN, ESQ. - 4 hours 7 minutes
alanl@LFDlaw.com
8 KERRY SCHONWALD, ESQ.
kerrys@LFDlaw.com
9 JIM L. FLEGLE, ESQ.
jimf@LFDlaw.com
10 LOEWINSOHN FLEGLE DEARY, LLP
12377 Merit Drive, Suite 900
11 Dallas, Texas 75251
Telephone: 214.572.1700
12 Fax: 214.572.1717

13 FOR THE DEFENDANTS WENDY W. BESSETTE and
14 LAURA S. WASSMER:

15 ANTHONY L. VITULLO, ESQ. - 1 hour 56 minutes
lvitullo@feesmith.com
16 FEE, SMITH, SHARP & VITULLO, LLP
Three Galleria Tower, Suite 1000
13155 Noel Road
17 Dallas, Texas 75240
Telephone: 972.980.3254
18 Fax: 972.934.9200

19 FOR THE DEFENDANT JPMORGAN CHASE BANK:

20 JOHN C. EICHMAN, ESQ. - 0 hours 0 minutes
jeichman@hunton.com
21 HUNTON & WILLIAMS LLP
1445 Ross Avenue, Suite 3700
22 Dallas, Texas 75202-2700
Telephone: 214.468.3300
23 Fax: 214.468.3599

24

25 I further certify that I am neither counsel for,

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.

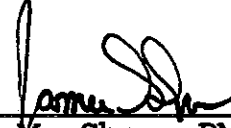
5 Further certification requirements pursuant to
6 Rule 203 of the Texas Code of Civil Procedure will be
7 complied with after they have occurred.

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

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James M. Shaw, RMR, Texas CSR No. 1694
Expiration date: 12/31/2016
Firm Registration No. 348

12

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14 SHAW REPORTING & DIGITAL VIDEO SERVICES
15 4441 Carolina Street
16 Grand Prairie, Texas 75052
17 Toll Free: 877.223.2997
18 Metro: 972.263.4353
19 Fax: 972.642.9167
20 E-mail: jmshaw@sbcglobal.net

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1 FURTHER CERTIFICATION UNDER TRCP RULE 203

2 The original deposition was/was not returned to the
3 deposition officer on 5/19/2016.


4 If returned, the attached Changes and Signature
5 page(s) contain(s) any changes and the reasons therefor.

6 If returned, the original deposition was delivered
7 to Alan S. Lewinsh, custodial Attorney.

8 That \$ 2338.70 is the deposition officer's charges
9 to the attorney(s) representing the Plaintiff for
10 preparing the original deposition and any copies of
11 exhibits;

12 That the deposition was delivered in accordance with
13 Rule 203.3, and that a copy of this certificate, served
14 on all parties shown herein and filed with the Clerk.

15 Certified to by me on this 25th day of
16 May, 2016.

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19 
20 James M. Shaw, RMR, Texas CSR No. 1694
21 Expiration date: 12/31/2016
22 Firm Registration No. 348

22 SHAW REPORTING & DIGITAL VIDEO SERVICES
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**CHANGES TO
DEPOSITION OF WENDY W. BESSETTE – VOL. 1**

April 5, 2016

<u>PAGE</u>	<u>LINE</u>	<u>CHANGE</u>	<u>REASON</u>
10	3	“protective” to “protected”	Correction
28	23	“I don’t recall” to “I don’t recall the names of the other companies.”	Clarification
90	24-25	“I do not know. I don't have a lot of contact with the group that's not the fiduciary group” to “No”	Correction
92	9-11	“I don't know. I'd be -- I will -- I will be glad to give you an answer. I will check on that for you. I truly don't know” to “No”	Correction
137	23	“but it's not shocking shocking” to “but it's not “shocking” shocking”	Clarification
140	15-16	“I can't even imagine all the letters that I saw that were substantive went to everybody” to “I saw many letters that were substantive that went to everybody”	Clarification
157	7	“As I recall, four to six” to “As I recall, four to six but it may have been fewer.”	Clarification
173-174	173:25-174:1	“We should have put her on potentially. She's -- she's Susan's supervisor” to “We should have put her on potentially, but she had no involvement in the administration of the estate. Since April 2012, she has been Susan's supervisor”	Clarification
174	11-13	“I'm not part of that -- I don't know what her day-to-day has been with this. She is Susan's supervisor, and so she should be on here” to “she had no involvement in the administration of the estate, but she is currently Susan’s supervisor”	Clarification

**CHANGES TO
DEPOSITION OF WENDY W. BESSETTE – VOL. 1**

April 5, 2016

<u>PAGE</u>	<u>LINE</u>	<u>CHANGE</u>	<u>REASON</u>
174	19	“It was an oversight. It wasn't deliberate” to “Correct”	Clarification
175	23	“It was an oversight” to “It was an oversight, in that there was not a conscious decision to exclude her from this list. She has been Susan's supervisor since April 2012”	Clarification
176	1	“said” to “hid”	Correction
186	16-17	“That is a summary of intestate administrations firmwide since 2004” to “That is a summary of intestate administrations firmwide since 2004 based upon input received from estate officers employed by the Bank in March 2016, using their recollection.”	Clarification
186	22	“Romor” to “Romer”	Correction
187	18	“Yes” to “No”	
188	2-4	“To my knowledge, and I think it's good, we have not. I can't say that we never handle one, but not since 2004” to “To my knowledge, and I think it's good, we have not other than one handled by Susan Novak in addition to this one, based upon input received from estate officers employed by the Bank in March 2016, using their recollection”	Correction
188	17-19	“And I would have to say it was very close to another matter that Trudy Romer handled and which was 10 million 500, based upon input received	Clarification

**CHANGES TO
DEPOSITION OF WENDY W. BESSETTE – VOL. 1**

April 5, 2016

<u>PAGE</u>	<u>LINE</u>	<u>CHANGE</u>	<u>REASON</u>
		from estate officers employed by the Bank in March 2016, using their recollection”	
189	2-3	“It was very close, but technically, yes, by -- by a little bit” to “It was very close, but technically, yes, by -- by a little bit, based upon input received from estate officers employed by the Bank in March 2016, using their recollection”	Clarification
194	10	“prior to when” to “after”	Correction
276	21-22	“Laura and Stephen and Jo are suing us, so we are forced to deal with it” to “Laura and Stephen and Jo are suing us, so we are forced to deal with it. Work that has been done in the litigation is summarized in Exhibit 1, tab 8”	Clarification
277	21	“common law” to “statutory and common law”	Correction

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SIGNATURE PAGE


I, WENDY W. BESSETTE, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.


WENDY W. BESSETTE

THE STATE OF Texas
COUNTY OF Dallas

Before me, May 19th 2016, on this day personally appeared WENDY W. BESSETTE, known to me or proved to me on the oath of _____ or through Drivers License (description of identity card or other document) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that she executed the same for the purpose and consideration therein expressed.

Given under my hand and seal of office on this 19th day of May, 2016.


NOTARY PUBLIC IN AND FOR
THE STATE OF Texas

My Commission Expires: July 16, 2020

