

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

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CASE NO.:  
5:24-cv-00625-  
JSM-PRL

LAURA LOOMER,

Plaintiff,

vs.

BILL MAHER, et al.,

Defendant(s).

~~~~~

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF
BILL MAHER

APRIL 4, 2025
12:02 P.M. TO 4:45 P.M.

9150 WILSHIRE BOULEVARD, SUITE 350
BEVERLY HILLS, CALIFORNIA 90212

Deidre Young, RPR, CSR No. 11461

1 APPEARANCES OF COUNSEL

2

3 FOR THE DEFENDANTS:

4 Davis Wright Tremaine
By: Katherine M. Bolger, Esq.
5 1251 Avenue of the Americas
21st Floor
6 New York, New York 10020-1104
+1 212.402.4068
7 Katebolger@dwt.com

8

9 FOR THE PLAINTIFF:

10 Klayman Law Group, P.A.
By: Larry Klayman, Esq.
11 7050 West Palmetto Park Road
Boca Raton, Florida 33433
12 +1 561.558.5336
Leklayman@gmail.com

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THE VIDEOGRAPHER: Kirill Davidoff

16

ALSO PRESENT:

17 Jessica Davidovich, In-house counsel for HBO

18 Laura Loomer

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INFORMATION REQUESTED

NONE

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1 DEPOSITION OF BILL MAHER

2 FRIDAY, APRIL 4, 2025

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THE VIDEOGRAPHER: Here begins media Number 1
in the deposition of Bill Maher in the matter of Laura
Loomer versus Bill Maher, et al., in the United States
District Court, Middle District of Florida. The case 12:01:41
number is 524 CV 00625JSMPRL.

Today's date is April 4, 2025. The time on the
video monitor is 12:02 p.m. Pacific time. The
videographer today is Kirill Davidoff representing Legal
Video of California. This video deposition is taking 12:02:14
place at 9150 Wilshire Boulevard, Suite 350, Beverly
Hills, California 90212. And it was noticed by
plaintiff's counsel.

Counsel, please voice identify yourselves and
the state whom you represent. 12:02:33

MR. KLAYMAN: Larry Klayman on behalf of Laura
Loomer, the plaintiff.

MS. BOLGER: Katherine Bolger from Davis Wright
Tremaine on behalf of Mr. Maher and HBO. And with me is
Jessica Davidovitch from HBO. 12:02:48

1 MR. KLAYMAN: Can you pan to the counsel so --
2 just to -- pan the camera? You can identify.

3 Great. Thank you.

4 MS. BOLGER: So -- sorry, go ahead.

5 THE VIDEOGRAPHER: The court reporter today is 12:03:04
6 Deidre Young from Apex Court Reporters. Will the
7 reporter please swear in the witness.

8 THE REPORTER: My name is Deidre Young. My CSR
9 number is 11461. I will now swear in the witness.

10

11 BILL MAHER,
12 having been duly administered an oath by the Court
13 Reporter, was examined and testified as follows:

14

15 BY MR. KLAYMAN:

16 Q Could you please state --

17 MS. BOLGER: Sorry, just before we begin, as I
18 mentioned before we went on the record, I want to, on
19 the record, confirm our agreement that this -- the
20 deposition, the videotape, and the contents of this 12:03:36
21 deposition will be kept confidential for 15 days. And
22 if we choose to seek it longer, we'll go to the court.
23 But you've agreed to keep it confidential, the video,
24 the transcript, and the content, correct?

25 MR. KLAYMAN: I'm looking upon your good faith 12:03:48

1 not to overly designate things as confidential. And if
2 you do, we'll have to go to the court ourselves to break
3 that impasse. But what we're trying to do is to avoid
4 running up the costs of litigation and burdening the
5 court in terms of its time, because these kinds of 12:04:03
6 agreements, and I'm trying to be accommodating to you
7 and your client, can get very, very costly if you overly
8 designate. There's going to be very little, if
9 anything, that I ask today that is of confidential
10 nature. 12:04:17

11 MS. BOLGER: To be clear, I just am confirming
12 our agreement.

13 MR. KLAYMAN: That's fine.

14 MS. BOLGER: Okay. I would also ask that --
15 that -- make a representation to me that there's no 12:04:23
16 recording of a surreptitious or other nature other than
17 that by the videographer and the stenographer. We are
18 in California. It is an all-party consent state. I do
19 not agree to be recorded. So I'd just like your
20 representation that there is no surreptitious recording 12:04:37
21 by you or by Ms. Loomer.

22 MR. KLAYMAN: We're not doing that nor would we
23 do that. We rely upon the court reporter --

24 MS. LOOMER: I'm also happy, just for the
25 record too, to turn my phone off too to, you know... 12:04:48

1 MS. BOLGER: I'll accept a representation. I
2 just want a representation.

3 MS. LOOMER: It's off just so you see.

4 THE WITNESS: Good.

5 MS. BOLGER: All right. With that 12:04:54
6 representation and that agreement, I think we can go.

7

8 EXAMINATION

9 BY MR. KLAYMAN:

10 Q Will you please state your name? 12:04:57

11 A Bill Maher.

12 MR. KLAYMAN: I'm going to ask that the court
13 reporter mark as Exhibit 1 to your deposition the
14 amended notice of deposition.

15 MS. BOLGER: Do you have a copy for me? 12:05:09

16 (Deposition Exhibit 1 was marked for
17 identification by the Court Reporter and is
18 attached hereto.)

19 MR. KLAYMAN: If I can get one back that I gave
20 you. I take it this is -- okay. Here we go.

21 MS. BOLGER: Thank you.

22 THE WITNESS: Here you go.

23 MR. KLAYMAN: Thank you.

24 BY MR. KLAYMAN:

25 Q Mr. Maher, I don't mean this in an offensive 12:05:36

1 way at all, but you have talked about taking marijuana,
2 cannabis, before. Have you taken anything prior to this
3 deposition?

4 A No, just coffee.

5 Q Just coffee? 12:05:50

6 A Probably too much, yes.

7 Q You look kind of wired.

8 MS. BOLGER: Object to the form of the
9 question.

10 THE WITNESS: I'm not -- 12:05:57

11 MS. BOLGER: Don't answer that. Ask a real
12 question.

13 BY MR. KLAYMAN:

14 Q Okay. When were you born?

15 A January 20, 1956. 12:06:02

16 Q And where were you born?

17 A New York City.

18 Q Run us briefly through your educational
19 background.

20 A Well, I went to school in New Jersey where I 12:06:13

21 grew up, Bergen County. The town was River Vale. I
22 believe the first school was called Holdrum, and the
23 second one's called Woodside. Then I went to Pascack
24 Hills High School in Montvale, New Jersey. And then I
25 went to Cornell University. 12:06:33

1 Q What did you major in, if anything, at Cornell?

2 A First, I was a history major. I believe I
3 graduated an English major.

4 Q Where were you ever disciplined at Cornell?

5 A No, not to my knowledge. 12:06:45

6 Q When did you graduate?

7 A I graduated in 1978.

8 Q And what, if anything, did you do then?

9 A Then I moved to New York City to start my
10 career as a stand-up comedian. 12:07:00

11 Q And how long did you come -- how long did you
12 do stand-up comedy in New York City?

13 MS. BOLGER: Object to the form.

14 You can answer.

15 BY MR. KLAYMAN: 12:07:12

16 Q I'm going to run through this quickly.

17 MS. BOLGER: I said object to the form.

18 You can answer.

19 BY MR. KLAYMAN:

20 Q Okay. How long were you in New York City doing 12:07:16
21 stand-up comedy?

22 A Okay. I arrived, to my best recollection, in
23 the fall -- yes, of 1978, so I think that was October is
24 when I moved into the city. I moved to California right
25 at the beginning of 1983. So those were the years I was 12:07:35

1 in New York working at the comedy clubs. And then I
2 moved out to California in '93[SIC] and kept going with
3 my comedy career.

4 Q And where did you keep going with your comedy
5 career in LA? 12:07:52

6 A Well, I was -- by that time, I started doing
7 The Tonight Show, which was important to a comedian and
8 also was trying to get on sitcoms, which is what young
9 comics did in those days. I did that. Did some movies
10 in the 80s. I mostly made my living as an actor doing 12:08:10
11 comedy movies and sitcoms. But I never stopped doing
12 stand-up and continued that up until, you know, a few
13 months ago.

14 Q You're not doing, as you claim, comedy up to
15 two months ago? 12:08:30

16 MS. BOLGER: Object to the form.

17 You can answer.

18 BY MR. KLAYMAN:

19 Q Go ahead.

20 A I'm not -- I'm not doing stand-up anymore. 12:08:34

21 Q You're not really a comedian, are you?

22 MS. BOLGER: Object to the form.

23 You can answer the question.

24 THE WITNESS: Everyone has their own opinion
25 about someone's art form. I would say after doing 12 -- 12:08:45

1 no, 13 stand-up specials for HBO, and I don't know how
2 many appearances on other people's shows and doing a
3 monologue every night on a show that has lasted on
4 television -- two shows for 32 years, I would think a
5 lot of people would consider me not just a comedian but 12:09:05
6 a very good one.

7 BY MR. KLAYMAN:

8 Q In fact you're more of a political pundit,
9 aren't you?

10 MS. BOLGER: Object to the form. 12:09:14
11 You can answer.

12 THE WITNESS: Politics is part of what the
13 fodder I use for comedy and stand-up. Just watch my
14 latest special; it's partly about politics and it's
15 partly about everything else that goes on. There are 12:09:25
16 many parts of my stand-up that have nothing to do with
17 politics.

18 BY MR. KLAYMAN:

19 Q I've been on your show, correct, when it was --

20 MS. BOLGER: Object to the form. What show? 12:09:39

21 MR. KLAYMAN: When it was Politically
22 Incorrect.

23 THE WITNESS: Correct, yes, I recall.

24 BY MR. KLAYMAN:

25 Q Long time ago? 12:09:45

1 A Yeah.

2 Q And I haven't been invited back for 20 years,
3 correct?

4 A It's a different show. You were invited back
5 to Politically Incorrect. The show we do now is a 12:09:52
6 different show. That show, Politically Incorrect, was
7 five nights a week, four guests a night. That's 20
8 guests a week. Now I do a show once a week with three
9 guests.

10 Q I don't take any offense. I just want to -- 12:10:04

11 A I'm just --

12 Q -- to confirm because what I observed and what
13 I've observed when I've seen you on TV today is that you
14 read your lines that you have a teleprompter and you're
15 reading them? 12:10:17

16 MS. BOLGER: Object. Is there a question there
17 or are you testifying?

18 BY MR. KLAYMAN:

19 Q That's accurate; is it not?

20 A It is not -- 12:10:23

21 MS. BOLGER: Stop. Object to the form. You
22 don't get to testify, Mr. Klayman. You can ask
23 questions.

24 Now you can answer.

25 THE WITNESS: The show has written elements and 12:10:30

1 it also has ad-lib elements. Here are the written
2 elements. The monologue: For that there are bullet
3 points in the prompter, so those jokes are written and
4 then I rewrite them to suit my voice and put the bullet
5 points in the prompter. So if you want to call that 12:10:50
6 written, yes, there is prewriting there.

7 Then there are -- there is what we call a desk
8 piece. That's a comedy bit in the middle of the show.
9 That is prewritten and I'm reading off the prompter.
10 And then there are new rules, our signature comedy piece 12:11:05
11 at the end, that is also prewritten and in the prompter.
12 In between the panel discussion is completely ad-lib.

13 BY MR. KLAYMAN:

14 Q You have writers, don't you, for your show,
15 Real -- 12:11:21

16 A Correct. I just mentioned that those -- there
17 are written elements to it.

18 Q At the time of the subject publication here of
19 September 13, 2024, who were your writers?

20 A You want me to name all -- 12:11:35

21 Q I want you to name them.

22 A Okay. Billy Martin, Chris Kelly, Brian
23 Jacobsmeier, Jay Jaroch, Matt Gunn, Amy Holmes, Samantha
24 Matti, Danny Vermont, Nick Vatterot. I think I'm not
25 leaving out anybody. I apologize to them if I -- if I 12:12:09

1 am.

2 Q Did any of those individuals participate in
3 writing anything with regard to the show of
4 September 13, 2024?

5 A Of course. 12:12:21

6 MS. BOLGER: Object to the form.

7 You can answer.

8 THE WITNESS: Of course. They contribute to
9 every show. I just told you that we have written
10 elements on the show. 12:12:28

11 BY MR. KLAYMAN:

12 Q And did they write with regard to Laura Loomer?

13 A We certainly discussed Laura Loomer because she
14 was all in the news that week. My show is a show that
15 catches people up on all the important events that 12:12:41
16 happen that week. So I'm sure she was discussed in the
17 meeting.

18 Q Meeting or meetings?

19 MS. BOLGER: Object to the form. He was -- let
20 him answer his question. You don't get to interrupt 12:12:53
21 him.

22 You can finish.

23 THE WITNESS: I forget what we were talking
24 about. We -- yes, we discussed Laura Loomer. I'm
25 guessing -- well, we have one in-person meeting a week. 12:13:04

1 That's where we discuss events that we -- probably will
2 come up on the panel. So I'm guessing -- I don't
3 remember for a fact, but I'm guessing we discussed her
4 in that meeting. We definitely did not discuss what
5 we're here talking about today. 12:13:29

6 BY MR. KLAYMAN:

7 Q So you are saying that -- you are saying that
8 was an ad-lib?

9 MS. BOLGER: Object. Stop interrupting the
10 witness, Mr. Klayman. Let him -- 12:13:37

11 MR. KLAYMAN: I didn't interrupt him. I
12 thought he was done. You're interrupting me.

13 MS. BOLGER: That's two in a row, my friend.
14 You can answer the question.

15 MR. KLAYMAN: Thank you for keeping score. 12:13:42

16 THE WITNESS: That was an ad-lib. The writers
17 have nothing to do with that.

18 BY MR. KLAYMAN:

19 Q The subsequent show of September 20, 2024 --

20 A That was written. 12:13:52

21 Q That was written by your writers?

22 A That's -- I mentioned the desk piece, the
23 comedy bit in the middle of the show, that was 24 things
24 you don't know about, which is a bit we do many times
25 about -- we've done it about many different people. And 12:14:06

1 it's especially something we do when there's somebody in
2 the news who is new to the audience and it's a way we
3 comedically inform them of who that person is.

4 Q What did you discuss with your staff prior to
5 the broadcast of September 13, 2024, with regard to 12:14:28
6 Laura Loomer?

7 MS. BOLGER: Object to the form.

8 You can answer.

9 THE WITNESS: I don't remember anything
10 except -- I don't remember -- I -- at all. Like -- as I 12:14:39
11 say, because she was in the news so much that week, I
12 can't imagine that we didn't discuss her in the meeting.
13 But she was not a topic that we I don't think prepared
14 the guests to talk about. It was just -- but that
15 happens often is that there are topics that just come up 12:15:01
16 on the panel or I bring up because I think that is
17 something the audience should be aware of.

18 This show is on Friday night. It is, as I've
19 always said, a catch-up show for people who possibly
20 don't have time to follow the news all week and they 12:15:23
21 watch my show to catch up on the news and to have it
22 delivered in a way that's comedic and goes down easier
23 than dry news.

24 It's also a show for people who are political
25 junkies who know all these topics. But I don't deliver 12:15:40

1 the show to those people especially. I want people
2 watching this show who perhaps don't have time in their
3 lives to watch the news as us news junkies do. And so
4 I'm telling them all the things that happened that week
5 that I think they should be aware of.

12:15:58

6 BY MR. KLAYMAN:

7 Q What do you recollect in terms of Ms. Loomer
8 that she was in the news?

9 A She was everywhere that week.

10 Q In what respect?

12:16:06

11 A Suddenly, there was this very attractive young
12 woman who was at the side of the president everywhere.
13 For me not to have commented on that, I would have been
14 remiss in doing my job. I was hardly the only one
15 commenting on it. It was everywhere. She seemed to be
16 everywhere suddenly. She was blowing kisses at him or
17 saying "I love you. I love you. I love you," and he
18 was blowing kisses back at her. He had his arm around
19 her saying "She's softer than you think she is." They
20 went to the 9/11 memorial together. She was his guest.
21 She was his guest at the debate.

12:16:22

12:16:40

22 I mean -- I mean, you can hardly imagine any
23 other presidential candidate ever suddenly appearing
24 with a very attractive young woman at his side
25 everywhere. You're asking me a question. I'm answering 12:16:56

1 it.

2 MR. KLAYMAN: I'm not --

3 MS. BOLGER: No, no, you interrupted him again.

4 Finish the answer.

5 MR. KLAYMAN: Well, I'm not interested in 12:17:01

6 coached responses. Okay?

7 MS. BOLGER: Finish -- finish the answer.

8 MR. KLAYMAN: I want answers to the question.

9 MS. BOLGER: Finish the answer.

10 THE WITNESS: You're not interested in my 12:17:07

11 answers. You're interested in yours.

12 BY MR. KLAYMAN:

13 Q This wasn't an answer.

14 A What was the question again?

15 MS. BOLGER: No, no, no, don't fight. 12:17:13

16 BY MR. KLAYMAN:

17 Q What was discussed, not your observation, what
18 was discussed with your writers and your staff? That's
19 my question.

20 MS. BOLGER: So that's not the question you 12:17:20
21 asked.

22 MR. KLAYMAN: It is.

23 MS. BOLGER: It's not the question --

24 THE WITNESS: No, it wasn't.

25 MR. KLAYMAN: It is. 12:17:24

1 MS. BOLGER: Can you read back the question
2 that he asked, that Bill was responding --

3 MR. KLAYMAN: You want to delay this thing or
4 just move on, Ms. Bolger?

5 MS. BOLGER: I would like -- I would like to 12:17:28
6 have --

7 MR. KLAYMAN: Yeah, why don't we delay --

8 MS. BOLGER: Why don't you --

9 (Reporter clarification.)

10 MS. BOLGER: Can you please -- can you please 12:17:34
11 read back the question he asked?

12 THE REPORTER: Yes.

13 MR. KLAYMAN: I'll rephrase the question just
14 to move forward.

15 MS. BOLGER: I'd like you to read the question,
16 please?

17 MR. KLAYMAN: Of course, let's run him off the
18 clock.

19 (The record was read by the reporter as
20 follows:

21 Q "What do you recollect in terms of
22 Ms. Loomer that she was in the news?

23 A "She was everywhere" --)

24 BY MR. KLAYMAN:

25 Q Are you finished with that response? 12:18:08

1 A Sure.

2 Q So what was discussed with your staff
3 concerning Ms. Loomer?

4 MS. BOLGER: Objection. Asked and answered.

5 You may answer again. 12:18:19

6 THE WITNESS: As I told you, I don't remember,
7 but I can't imagine that we didn't discuss her because
8 she was everywhere in the news. But what I -- what I
9 know we did not plan was what we're here discussing,
10 that I was intimating that there was a relationship with 12:18:36
11 him, which other people were discussing as well. It
12 was -- it was hard not to make that joke.

13 BY MR. KLAYMAN:

14 Q I didn't ask for that answer, but you can leave
15 your answer, that's fine. The fact is there a lot of 12:18:49
16 attractive women in Beverly Hills, aren't there?

17 MS. BOLGER: Object to the form.

18 You can answer.

19 THE WITNESS: I suppose there are, yes.

20 BY MR. KLAYMAN: 12:18:58

21 Q Do they all become subjects of your show?

22 A No, but all --

23 Q So because someone's attractive, that's why
24 you're going --

25 MS. BOLGER: He -- 12:19:05

1 THE WITNESS: No. But all of them weren't at
2 the side of the president everywhere he was going that
3 week.

4 BY MR. KLAYMAN:

5 Q And the president has a lot of attractive 12:19:10
6 people by his side on a regular basis, based upon your
7 observation, correct?

8 A I never said --

9 MS. BOLGER: Object to the form.

10 You've got to let me object, Bill. Object to 12:19:16
11 the form.

12 You can answer now.

13 THE WITNESS: I never saw anything like that
14 and neither did anybody else.

15 BY MR. KLAYMAN: 12:19:24

16 Q So you decided to defame Ms. Loomer because
17 she's attractive, correct?

18 A I made a joke. I made a joke based on their
19 sudden closeness in the news that week. I could have
20 shown a video of them together and all the places they 12:19:39
21 were together and all the things that were going on, the
22 "I love you" the "I love you," the blowing of the
23 kisses, you're very special, all this stuff, and then
24 just said, "Hey, get a room." It's just -- this is just
25 comedy. This is -- these are jokes. And this is what 12:19:57

1 we do in America. We're allowed to tell jokes.

2 Q Apparently the court didn't think so.

3 MS. BOLGER: Object to the characterization.

4 He has not asked you a question. Do not respond. You

5 can ask a question if you'd like. 12:20:12

6 BY MR. KLAYMAN:

7 Q You don't have any information, do you, that

8 Ms. Loomer had sex with Donald Trump, do you?

9 A No, that's why it's a joke.

10 Q You don't have any information that she 12:20:22

11 committed adultery behind the back of Melania Trump, do
12 you?

13 A Nor did I say I did. I said "I think she
14 might." Those are very important words, "I think" and
15 "she might." 12:20:37

16 That's quite different than what Ms. Loomer
17 said about Kamala Harris when she said "I know she sucks
18 dick to get where she got."

19 Q Ms. Loomer is not a part of this case in that
20 regard. 12:20:51

21 A I know, but I feel like it's relevant.

22 MS. BOLGER: I'm sorry.

23 THE WITNESS: I feel like it's relevant.

24 BY MR. KLAYMAN:

25 Q Well, anything that's off color is relevant to 12:20:55

1 you, isn't it, Mr. Maher?

2 A No. The fact that she said "I know" and I said
3 "I think she might" and she said "I know that she sucked
4 dick to get where she's got -- gotten to."

5 Q How long did you meet with counsel to prepare 12:21:10
6 for this deposition?

7 A Once.

8 Q When was that?

9 A Yesterday.

10 Q And how long was that? 12:21:16

11 A Couple of hours.

12 Q Who was present? I'm not going to ask you what
13 was discussed, but who was present?

14 A Kate and Jessica.

15 Q Kate Bolger? 12:21:27

16 A Yes.

17 Q And Jessica Davidovitz(phonetic)?

18 MS. BOLGER: Davidovitch.

19 MR. KLAYMAN: Davidovitch. How is that

20 spelled? 12:21:36

21 MS. BOLGER: There's no reason for you to be
22 talking to her. She's my client. It's D-A-V -- it's on
23 the record, D-A-V-I-D -- sorry, D-A-V-I-D-O-V-I-T-C-H,
24 sorry, Jessica, I did that too quickly.

25 ///

1 BY MR. KLAYMAN:

2 Q Why was it necessary for you to talk about
3 using that vulgar language, sucking dick? Why is that
4 necessary, Mr. Maher?

5 MS. BOLGER: So object to the form. Those were 12:22:00
6 not his words. Those were Ms. Loomer's words.

7 But you may answer.

8 BY MR. KLAYMAN:

9 Q It was -- it was not part of my question,
10 correct? 12:22:08

11 A Well, again, Larry, I don't have to give the
12 answer you want to the questions you ask. I give
13 answers that I think are relevant to the questions you
14 asked. That seemed very relevant.

15 Q [REDACTED]
[REDACTED]

17 MS. BOLGER: [REDACTED]
[REDACTED]
[REDACTED]
20 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] 12:22:40

1 [REDACTED].

2 MR. KLAYMAN: [REDACTED]

3 [REDACTED]

4 MS. BOLGER: [REDACTED]

5 THE WITNESS: [REDACTED] 12:22:47

6 BY MR. KLAYMAN:

7 Q [REDACTED]

8 [REDACTED]

9 MS. BOLGER: [REDACTED]

10 [REDACTED] 12:22:57

11 [REDACTED]

12 MR. KLAYMAN: [REDACTED]

13 MS. BOLGER: [REDACTED]

14 THE WITNESS: [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED] 12:23:19

21 [REDACTED]

22 BY MR. KLAYMAN:

23 Q By using that kind of language in your claimed

24 comedy, you create more clicks and profitability for

25 yourself and HBO, correct? 12:23:39

1 MS. BOLGER: Object to the form and foundation.

2 You may answer.

3 THE WITNESS: Which language?

4 BY MR. KLAYMAN:

5 Q To deal in the salacious? 12:23:44

6 A Which language are we talking about, suck dick?

7 Q Yes.

8 A Well, that wasn't mine. That was hers.

9 Q I'm talking about -- but you use that kind of
10 language on your show, don't you? 12:23:55

11 A If I'm quoting Laura Loomer.

12 Q And you've used it otherwise, correct? You've
13 disparaged Melania Trump; you've disparaged Trump's
14 family?

15 MS. BOLGER: Object to the form. 12:24:04

16 BY MR. KLAYMAN:

17 Q Correct?

18 MS. BOLGER: First of all, this is no
19 relevance. It's also -- it's also compound and I don't
20 know how Bill can answer it. 12:24:09

21 But you can answer it.

22 THE WITNESS: Public figures in this country,
23 this is America, they get made fun of. When you're a
24 public figure, that's part of it. In America, we take
25 pride in that we take the piss out of the powerful, 12:24:25

1 that's why we're not China or Russia.

2 BY MR. KLAYMAN:

3 Q You didn't have any compunction in trying to
4 harm a woman like Ms. Loomer, did you, when you made the
5 statements on September 13, 2024? 12:24:40

6 MS. BOLGER: Object to the form.

7 BY MR. KLAYMAN:

8 Q Didn't bother you?

9 A No, I make jokes about people who have injected
10 themselves into the public debate by being so present. 12:24:49
11 If you -- if you want to get to the top of the tree,
12 you're going to have people staring at your rear end and
13 commenting on it, metaphorically.

14 Q It's one thing to comment. It's another thing
15 to try to destroy somebody's reputation; is it not? 12:25:07

16 A I wasn't trying to destroy anybody's reputation
17 nor did I destroy anybody's reputation. She's the one
18 who made all of this a big deal. She's the one looking
19 for publicity by filing this lawsuit. Nobody was
20 talking about it until she did that. 12:25:24

21 Q You think this lawsuit is just about publicity?

22 A Yes.

23 Q You -- and you're aware that you lost a motion
24 to dismiss, correct?

25 A That's why we're here. 12:25:36

1 Q Apparently, the judge didn't think it was just
2 publicity.

3 MS. BOLGER: Object to the form. First of all,
4 he's not a lawyer. Second of all, that's not true.

5 You may answer. 12:25:45

6 THE WITNESS: What's the question?

7 BY MR. KLAYMAN:

8 Q Apparently the judge didn't just view this as
9 publicity, correct?

10 MS. BOLGER: Object to the form. 12:25:51

11 THE WITNESS: I can't look into the judge's
12 mind or why judges rule what they do. I just follow
13 them because, again, we're in America, judges rule, we
14 follow.

15 BY MR. KLAYMAN: 12:26:01

16 Q Have you ever been deposed before?

17 A Never.

18 Q Have you ever been sued before?

19 MS. BOLGER: I'm going to ask you to limit that
20 question to based on publication. What happens to 12:26:11
21 Mr. Maher in his private life is not relevant. So let's
22 base it based upon professional life.

23 BY MR. KLAYMAN:

24 Q No, I'm not -- I'm talking about any lawsuit
25 that was filed in a court. Have you ever been sued 12:26:19

1 before?

2 MS. BOLGER: Again, based on his professional
3 life, right? We're not asking for personal matters.

4 MR. KLAYMAN: I'm asking for all matters.

5 MS. BOLGER: Well, he's not going to answer his 12:26:29
6 personal matters. They're not relevant.

7 MR. KLAYMAN: That's inappropriate.

8 MS. BOLGER: But you can answer as to
9 professional matters.

10 THE WITNESS: [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14 BY MR. KLAYMAN:

15 Q [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19 MS. BOLGER: [REDACTED]

20 THE WITNESS: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

24 BY MR. KLAYMAN:

25 Q [REDACTED] 12:27:21

1 MS. BOLGER: [REDACTED]

■ [REDACTED]

3 BY MR. KLAYMAN:

4 Q [REDACTED]

5 A [REDACTED] 12:27:28

6 Q [REDACTED]

■ [REDACTED]

8 MS. BOLGER: [REDACTED]

■ [REDACTED]

10 MR. KLAYMAN: [REDACTED] 12:27:37

11 THE WITNESS: [REDACTED]

12 MS. BOLGER: [REDACTED]

13 THE WITNESS: [REDACTED]

14 MS. BOLGER: [REDACTED]

15 BY MR. KLAYMAN: 12:27:44

16 Q [REDACTED]

17 MR. KLAYMAN: [REDACTED]

18 BY MR. KLAYMAN:

19 Q [REDACTED]

20 MS. BOLGER: [REDACTED] [REDACTED]

■ [REDACTED]

22 THE WITNESS: [REDACTED].

23 MS. BOLGER: [REDACTED]

■ [REDACTED]

25 ///

1 BY MR. KLAYMAN:

2 Q [REDACTED]

3 MS. BOLGER: [REDACTED]

■ [REDACTED]

■ [REDACTED]

12:28:02

6

7 THE WITNESS: [REDACTED]

8 BY MR. KLAYMAN:

9 Q [REDACTED]

10 A [REDACTED]

■ [REDACTED]

12 MS. BOLGER: [REDACTED]

■ [REDACTED]

14 BY MR. KLAYMAN:

15 Q [REDACTED]

12:28:20

16 MS. BOLGER: [REDACTED]

■ [REDACTED]

18

19 BY MR. KLAYMAN:

20 Q [REDACTED]

■ [REDACTED]

22 MS. BOLGER: [REDACTED]

■ [REDACTED]

24 MR. KLAYMAN: [REDACTED]

■ [REDACTED]

12:28:41

1 BY MR. KLAYMAN:

2 Q Have you ever disparaged Kamala Harris over an
3 alleged sexual relationship with Willie Brown? Have you
4 ever -- I'll let the word disparage out.

5 Have you ever made a joke about Kamala Harris 12:29:01
6 having an alleged sexual relationship with Willie Brown?

7 A Not that I recall, but I know Laura Loomer has.

8 Q Kamala Harris has a reputation for promiscuity,
9 does she not?

10 MS. BOLGER: Oh, my God. Object to the form of 12:29:18
11 the question.

12 THE WITNESS: She does not to my knowledge.
13 She does not to my knowledge.

14 BY MR. KLAYMAN:

15 Q [REDACTED] [REDACTED]

[REDACTED]

17 A [REDACTED]

[REDACTED]

[REDACTED]

20 Q [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

23 MS. BOLGER: [REDACTED]

24 MR. KLAYMAN: [REDACTED]

25 [REDACTED] 12:29:46

1 [REDACTED]

2 MS. BOLGER: [REDACTED]

3 [REDACTED]

4 THE REPORTER: [REDACTED]

5 MS. BOLGER: [REDACTED] 12:30:06

6 THE WITNESS: [REDACTED]

7 (Deposition Exhibit 2 was marked for
8 identification by the Court Reporter and is
9 attached hereto.)

10 MS. BOLGER: [REDACTED] - 12:30:17

11 THE WITNESS: [REDACTED]

12 MS. BOLGER: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19 MR. KLAYMAN: [REDACTED]

20 MS. BOLGER: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

25 MR. KLAYMAN: [REDACTED] 12:30:46

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BY MR. KLAYMAN:

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Q

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MS. BOLGER:

■

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MR. KLAYMAN:

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■

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THE WITNESS:

19

MS. BOLGER:

20

BY MR. KLAYMAN:

12:31:49

21

Q

22

A

23

MS. BOLGER:

■

25

MR. KLAYMAN:

12:32:00

36

1

2

BY MR. KLAYMAN:

3

Q

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■

7

MS. BOLGER:

■

■

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12:32:19

11

MR. KLAYMAN:

12

THE WITNESS:

■

14

BY MR. KLAYMAN:

15

Q

■

■

18

A

19

Q

■

12:32:43

21

A

■

23

Q

By publishing what you did in the -- on the

24

show of September 13th, and we'll get to that

25

specifically, you were trying to help Kamala Harris

12:33:08

1 become president of the United States, correct?

2 A It's not my job to help people become president
3 or not. It's part of my job to render my opinion on the
4 passing parade of American politics.

5 Q You, in fact, made a prediction that Donald 12:33:32
6 Trump would never become president again, correct? Do
7 you remember that?

8 A No, but so what?

9 Q You don't remember that?

10 A When? 12:33:45

11 Q I don't know. I don't watch your show anymore,
12 so -- but I read it. I read it.

13 A Well, you read a lot of things on the internet
14 that aren't true.

15 Q Well, I'm asking you. 12:33:57

16 A Here's what I remember. When he was running
17 the first time, I was one of the few people who said
18 "This guy could win" when everybody else said it was
19 impossible to win.

20 In the period between his presidencies, there 12:34:19
21 was a time, probably right around the show we're talking
22 about, when I did think his goose was cooked
23 politically. I think it was after the debate about
24 the -- they're eating the pets, they're eating the pets.

25 I did think that that was something that was too crazy 12:34:44

1 even for his folks, but apparently it didn't bother
2 people and he got elected again.

3 Q You recently met with President Trump in the
4 White House, correct?

5 A Correct. 12:35:01

6 Q Who arranged for that meeting?

7 A Kid Rock.

8 Q What did you say to Kid Rock that would
9 convince Kid Rock to set up the meeting?

10 A I didn't say anything to him. He suggested it 12:35:09
11 completely. He was on my podcast. We got to be
12 friends. He said "I think you and Donald Trump should
13 meet. I think it's a way to start to heal America."
14 And I said, "Well, if you set it up, I'll go." And he
15 called him right after the podcast and it was set up 12:35:30
16 rather quickly.

17 Q In fact, this meeting in the White House with
18 Donald Trump was timed to try to blunt the impact of
19 this deposition, correct?

20 A Completely false. It had nothing to do with 12:35:40
21 it. And nobody ever raised the issue. I didn't mention
22 it and he didn't mention --

23 Q In fact, you used --

24 MS. BOLGER: Hey, let him talk.

25 ///

1 BY MR. KLAYMAN:

2 Q In fact, you used Laura Loomer as a way to get
3 to Donald Trump by saying the things that you said about
4 her on September 13, 2024?

5 A Complete -- 12:36:00

6 MS. BOLGER: Object to the form. You're also
7 harassing the witness.

8 You can answer.

9 THE WITNESS: Completely incorrect. You're
10 making this up. You're pulling it out of your ass. It 12:36:06
11 has nothing to do -- one has nothing to do with the
12 other.

13 From what I had read about Laura Loomer until
14 today when she's back in the news was that she was out
15 of favor with the White House. I hadn't read about her 12:36:22
16 since. She suddenly was there that week that we're
17 talking about and then she was just gone, because a lot
18 of other Republicans apparently didn't even like her.
19 So it had nothing to do with this meeting.

20 We didn't talk -- Kid Rock and I didn't talk 12:36:39
21 about her. The name never came up at the podcast. The
22 name never came up when he suggested this meeting. And
23 the name never came up during my two-and-a-half hours at
24 dinner at the White House this past Monday.

25 ///

1 BY MR. KLAYMAN:

2 Q But to blunt the effect of this deposition when
3 it becomes public, and a lot of it will become public
4 regardless because I'm not asking confidential questions
5 primarily, you wanted to meet with Trump to blunt the 12:37:03
6 reaction -- public reaction, correct?

7 MS. BOLGER: Asked and answered.

8 You can answer.

9 THE WITNESS: I just told you no. I just told
10 you one had absolutely nothing to do with the other. 12:37:12
11 Once again, it wasn't mentioned with Kid Rock when we
12 were planning to have this. It wasn't mentioned during
13 the dinner at the White House. It just wasn't part of
14 anything that had to do with me meeting with Trump.

15 That was completely an attempt to have two 12:37:33
16 former adversaries, possibly future adversaries, people
17 who don't agree politically meet together to show that
18 we can be civil and friendly to each other even though
19 we don't agree in an attempt to heal this terrible
20 divide that goes on in America, this terrible hatred. 12:37:56

21 BY MR. KLAYMAN:

22 Q Have you always been civil towards Donald
23 Trump?

24 MS. BOLGER: Object to the form.

25 I don't know what that means. But if you do, 12:38:03

1 you can answer it.

2 THE WITNESS: I don't know what it means
3 either. He's a public figure. He's the president.
4 He's out there every day. He does things which many
5 people -- and I'm one of them -- often don't agree with. 12:38:14
6 Am I going to ridicule some of those things? Of course
7 I am, as do hundreds and hundreds of other people, as is
8 our right as Americans.

9 BY MR. KLAYMAN:

10 Q So it's your view that if you're a public 12:38:28
11 figure that you can say anything you want about a public
12 figure?

13 MS. BOLGER: Object to the form.

14 THE WITNESS: I'm not a lawyer, so I don't know
15 the answer to that question exactly. What I do know is 12:38:38
16 that I've been on the air for 32 years and nobody has
17 ever deposed me or sued me for anything that I've said
18 on the air. So my radar on this must be pretty good.

19 BY MR. KLAYMAN:

20 Q Have you had discussions with HBO about why 12:38:56
21 you're here today in terms of what you said? I'm not
22 asking what was discussed. But have you had discussions
23 with HBO? Did they question you why you said what you
24 said?

25 MS. BOLGER: So I'm going to -- I'm going 12:39:11

1 to object and tell you that if you've had conversations
2 with a lawyer or at the direction of a lawyer, you
3 should not answer that question. That would be
4 privileged. I'm sure Mr. Klayman would agree with me on
5 that. 12:39:24

6 I have to confess I'm not sure what the
7 question called for. But if the only conversations
8 you've had with someone from HBO have been with a
9 lawyer, you should not -- you should not answer that
10 question. 12:39:32

11 MR. KLAYMAN: I'm not asking about a
12 conversation with a lawyer.

13 BY MR. KLAYMAN:

14 Q But has anyone at HBO questioned you or wanted
15 to discuss with you what happened with regard to Laura 12:39:41
16 Loomer on the show of September 13, 2024?

17 MS. BOLGER: Same instruction.

18 BY MR. KLAYMAN:

19 Q Any nonlawyer at HBO.

20 A My recollection is my producers at one point 12:39:55
21 said she's suing us and we didn't talk about a hell of a
22 lot more than that and then they got the lawyers
23 involved.

24 Q Well, tell me what you talked about.

25 MS. BOLGER: Object to the form. Not with the 12:40:13

1 lawyers.

2 BY MR. KLAYMAN:

3 Q "Hell of a lot" is a subjective phrase. What
4 did you talk about with your producer?

5 MS. BOLGER: Not -- 12:40:19

6 THE WITNESS: Just that we were going to have
7 to deal with this, that she was suing and get the
8 lawyers involved. That's about it.

9 BY MR. KLAYMAN:

10 Q Who is your producer? Who was the producer 12:40:27
11 you're referencing?

12 A Sheila Griffiths and Dean Johnsen are my
13 executive producers.

14 Q Did they refer you to the lawyers?

15 MS. BOLGER: Object to the form. 12:40:43

16 THE WITNESS: I didn't find them myself, so
17 they must have.

18 BY MR. KLAYMAN:

19 Q Is an insurance carrier paying for your defense
20 in this case? 12:40:56

21 MS. BOLGER: If you know.

22 THE WITNESS: I don't know. I mean, I'm not.

23 BY MR. KLAYMAN:

24 Q You're aware --

25 A HBO is. 12:41:02

1 Q You're aware HBO does have insurance?

2 A Of course.

3 MS. BOLGER: Object to the form. Lack of
4 foundation.

5 You can answer. 12:41:07

6 THE WITNESS: Yeah, I assume.

7 MS. BOLGER: Don't assume. Mr. Klayman doesn't
8 want you to guess and I don't want you to guess. Just
9 testify as to what you know.

10 BY MR. KLAYMAN: 12:41:16

11 Q How did -- how did it come to pass that that
12 Davis Wright Tremaine came to represent you in this case
13 as well as your Florida counsel?

14 A That who what?

15 Q As well as your Florida counsel. How did it 12:41:29
16 occur, if you know, how Davis Wright Tremaine became
17 your lawyer in this case along with your Florida counsel
18 Shullman Fugate?

19 MS. BOLGER: You can answer that question
20 without talking about privileged communications, that's 12:41:40
21 fine.

22 But I'd like to know why you asked that
23 question? Why does what -- who represents Mr. Maher
24 have any relevance to this lawsuit?

25 MR. KLAYMAN: I want to see -- I want to see if 12:41:47

1 there --

2 MS. BOLGER: No, I want an answer the -- I want
3 to hear the answer to that question. What does Davis
4 Wright Tremaine have to do with anything in this
5 lawsuit? 12:41:54

6 MR. KLAYMAN: We'll see.

7 MS. BOLGER: No, I'd like to know the answer to
8 your question. I'd like to know the answer to your
9 question.

10 MR. KLAYMAN: I'm asking -- I want to know what 12:41:59
11 his knowledge is in terms of what -- why he's here.

12 THE WITNESS: This is the first time I've heard
13 the term -- the words Davis Wright Tremaine. So if
14 that's my lawyers, then thank you, Davis Wright
15 Tremaine -- 12:42:13

16 MS. BOLGER: That's me, Bill.

17 THE WITNESS: -- for recommending. That's you?
18 Okay. I didn't know what firm you were with, sorry.

19 BY MR. KLAYMAN:

20 Q Besides meeting with Ms. Bolger yesterday, had 12:42:20
21 you ever talked to her before?

22 A Yeah, we met. When was it?

23 MS. BOLGER: About a month ago.

24 THE WITNESS: About a month ago.

25 ///

1 BY MR. KLAYMAN:

2 Q Have you talked to any other lawyer with regard
3 to this case before a month ago?

4 A No.

5 Q Including in-house counsel for HBO? 12:42:40

6 A No.

7 Q What did you discuss with Donald Trump at your
8 dinner for two hours?

9 MS. BOLGER: So this portion of the transcript
10 is going to be marked as confidential. And I'm going to 12:42:55
11 ask Mr. Maher to be thoughtful about this.

12 Mr. Maher has publicly said that he's going to
13 talk about this on April 11th on his show, that HBO
14 would take the position that this is a trade secret,
15 what he's going to say. So I'm going to ask that this 12:43:09
16 information be kept confidential at least until the show
17 is over. But Mr. Maher can answer the question.

18 MR. KLAYMAN: That's not a trade secret.

19 MS. BOLGER: I didn't ask your opinion.

20 Mr. Maher can still answer the question. 12:43:18

21 THE WITNESS: It was not an interview. It was
22 just a dinner. It was, you know, anything and
23 everything. There was no agenda, and it was -- it
24 wasn't always political. Sometimes it was.

25 He was incredibly gracious, took me on a tour 12:43:36

1 of the White House, an extensive tour. We looked at the
2 paintings and talked about that and had dinner and he
3 often turned the conversation to asking me what I
4 thought about things.

5 BY MR. KLAYMAN: 12:43:59

6 Q Did you apologize to him at that dinner?

7 A No.

8 Q Did you say "I regret the things I've said
9 about you"?

10 A No. It wasn't presented that way. The dinner 12:44:09
11 was to heal America. I --

12 Q But --

13 MS. BOLGER: Don't interrupt the witness.

14 MR. KLAYMAN: Don't scream at me.

15 MS. BOLGER: You can answer. 12:44:25

16 THE WITNESS: I did bring him a piece of paper
17 upon which my staff had collected and printed almost 60
18 insulting epithets he has said about me through his
19 social media or at his rallies and asked him to sign it,
20 which he graciously did and with good humor. 12:44:49

21 And it was a harbinger for what became a most
22 pleasant evening, that we were able to sort of laugh at
23 the fact that we have hurled insults at each other from
24 3,000 miles away and now we were trying to start a new
25 beginning. 12:45:11

1 BY MR. KLAYMAN:

2 Q So you're not going to give a full response to
3 what was discussed at that dinner because you're going
4 to monetize that dinner on April 11th with your show?

5 MS. BOLGER: I didn't tell him he couldn't 12:45:22
6 answer the questions. I told him it was -- I told you
7 to keep it confidential. You can give whatever response
8 you'd like, Mr. Maher.

9 THE WITNESS: I'm not monetizing. They pay me
10 every week to do my show on HBO anyway. The fact that 12:45:31
11 it has to do with this this week -- this coming week is
12 not monetizing anything. I'm not making any more money
13 on this than I normally would by doing my show.

14 A lot of stickies you got there, Larry.

15 BY MR. KLAYMAN: 12:45:49

16 Q Don't you think that apologizing or saying you
17 regret what you've said before with regard to Donald
18 Trump would be a way to heal the nation?

19 MS. BOLGER: Oh, my gosh. Object to the form.

20 You can answer that. 12:46:00

21 THE WITNESS: Yeah, you know, he signed that
22 list. I think at some point I did say, you know, "I
23 probably have taken some cheap shots" and, look, we're
24 talking about years and years and years of commentary
25 and some of its ad-lib. Not everything I say every 12:46:22

1 night do I look back and think "Oh, that was exactly the
2 way I would have planned it or would have said it."
3 We're all human. We don't always say it exactly the way
4 we want. And I think that that's a great example for
5 this country is that we need to stop hating each other. 12:46:45

6 BY MR. KLAYMAN:

7 Q So you're going to change your routine on your
8 shows to not create hate? Is that what you're saying?

9 A I don't create hate.

10 Q Before you do a show, such as September 13, 12:47:02
11 2024, do you rehearse it with yourself?

12 MS. BOLGER: Object to the form.

13 BY MR. KLAYMAN:

14 Q In other words, do you -- do you go over it?
15 Do you talk to yourself in a mirror? Do you try to 12:47:24
16 prepare for it?

17 MS. BOLGER: Object to the form.

18 THE WITNESS: Well --

19 MS. BOLGER: You can answer.

20 THE WITNESS: Well, of course I prepare for it. 12:47:31
21 I don't use a mirror.

22 BY MR. KLAYMAN:

23 Q [REDACTED]

[REDACTED]

[REDACTED]

12:47:39

50

1 A [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12:48:05

6 MS. BOLGER: [REDACTED]

[REDACTED]

8 MR. KLAYMAN: [REDACTED]

[REDACTED]

10 MS. BOLGER: [REDACTED]

[REDACTED]

12 MR. KLAYMAN: [REDACTED]

13 MS. BOLGER: [REDACTED]

[REDACTED]

15 MR. KLAYMAN: W [REDACTED]

[REDACTED]

[REDACTED]

18 MS. BOLGER: [REDACTED]

[REDACTED]

[REDACTED]

12:48:27

21 MR. KLAYMAN: [REDACTED]

[REDACTED]

23 MS. BOLGER: [REDACTED]

[REDACTED]

[REDACTED]

12:48:36

1 THE WITNESS: [REDACTED]

2 BY MR. KLAYMAN:

3 Q Did you ever find me funny when I was on your
4 show?

5 A I'm not smiling. I'm laughing at you. 12:48:39

6 Q Did you ever find me funny when I was on your
7 show?

8 A I don't remember. Were you?

9 Q I thought I was pretty funny.

10 A We had you on enough. You must have done well. 12:48:47

11 Q Well, that's before you veered away from having
12 real conservatives on, correct?

13 A Could not be further from the truth. We are in
14 fact probably the only show that consistently has on
15 conservatives. And I don't just mean conservatives; I 12:49:03
16 mean Trump people. It'd be hard to name someone who
17 wasn't a Trump person who we haven't had on. And I'm
18 talking about we've had on people in the cabinet. We've
19 had on RFK. We've had on Tulsi Gabbard. We've had on
20 Attorney General William Barr, Kellyanne Conway. All 12:49:21
21 these people have been on my show --

22 Q You have -- you have RINOS on --

23 MS. BOLGER: He's not done talking.

24 THE WITNESS: RINOS. They're in the cabinet.

25 These people were in Trump's cabinet. You call that a 12:49:31

1 RINO? I think you've -- I think you've pretty much
2 illustrated to us where your politics are.

3 BY MR. KLAYMAN:

4 Q No. Bill Barr --

5 MS. BOLGER: Interrupt for a second. I'd like 12:49:41
6 to also point out that whether -- this is not a
7 political debate. This is a deposition. So why don't
8 you stop making a political debate and ask Mr. Maher
9 relevant questions.

10 BY MR. KLAYMAN: 12:49:51

11 Q People like Laura Loomer you don't want to have
12 on your show, correct?

13 MS. BOLGER: Object to the form. What does it
14 mean to be a person like Laura Loomer?

15 You can answer if you understand. 12:50:00

16 THE WITNESS: I don't know what you mean "like
17 Laura Loomer." There's Laura Loomer as a person and I
18 don't think she deserves to be compared with anybody
19 else. She's her own person. We make our decisions
20 individually on who gets on the show. 12:50:16

21 BY MR. KLAYMAN:

22 Q Who's your booker? Who was your booker on
23 September 13, 2024?

24 A Well, the producers I mentioned oversee the
25 booking. I don't generally get involved in the booking. 12:50:27

1 I've told them many times you do the booking. I can't
2 do everything on this show. I will show up and talk to
3 the people who you put on that panel.

4 Now, do we have meetings where names come up?
5 Of course. And they ask me. I don't remember them ever 12:50:49
6 asking whether -- I don't think it ever occurred to them
7 to book Laura Loomer on the show.

8 Q Did you ever request to have her booked?

9 A I did not.

10 Q I'm going to show you what I'll ask the court 12:51:04
11 reporter to mark as Exhibit 3.

12 (Deposition Exhibit 3 was marked for
13 identification by the Court Reporter and is
14 attached hereto.)

15 (A discussion was held off the record.) 12:51:07

16 THE WITNESS: What is it?

17 BY MR. KLAYMAN:

18 Q Take a look at it. Take your time to review
19 it.

20 A Yeah, I saw this. It's your letter. 12:52:27

21 Q Did you see it on or about September 16, 2024?

22 A No, I saw it last night.

23 Q And that's the first time you saw it?

24 A Yeah.

25 Q The letter is addressed to you; is it not? 12:52:43

1 A I guess. Someone must have summarized it for
2 me.

3 Q So you're saying it was never forwarded by
4 William Morris to you?

5 MS. BOLGER: Object to the form. That's not 12:52:58
6 what he's saying.

7 THE WITNESS: William Morris? What does that
8 have to do with it?

9 BY MR. KLAYMAN:

10 Q Who's your agent? Who was your agent on or 12:53:03
11 about September 13, 2024? Agency?

12 A William Morris Endeavor.

13 Q Okay. So they were your agency?

14 A Yeah.

15 Q Okay. And -- 12:53:15

16 A Why are they involved?

17 Q This letter is written attention Bill Maher and
18 Home Box Office.

19 A Yeah.

20 Q And I'm going to ask you some questions about 12:53:29
21 it.

22 A Okay.

23 Q "This letter is to put you on notice of false,
24 malicious, and defamatory statements of and concerning
25 my client, Laura Loomer, made by Bill Maher on the 12:53:37

1 September 13, 2024, episode of Real Time with Bill
2 Maher, which was broadcasted by Home Box Office, Inc.
3 and to demand a correction or retraction of these
4 statements along with a published apology on an episode
5 of Real Time with Bill Maher featuring Ms. Loomer as a 12:53:55
6 guest. These false, malicious, and defamatory
7 statements are set forth below."

8 Quote -- from your broadcast of September 13,
9 2024. "I think maybe Laura Loomer" -- "I think maybe
10 Laura Loomer is in an arranged relationship to affect 12:54:15
11 the election because she's very close to Trump. She's
12 31, looks like his type. We did an editorial here a few
13 years ago. It was basically who's Trump fucking.
14 Because I said, you know, it's not nobody. He's been a
15 dog for too long and it's not Melania. I think we may 12:54:33
16 have our answer this week. I think it might be Laura
17 Loomer," unquote.

18 "Maher has falsely, and without any factual
19 basis, accused Ms. Loomer of having committed adultery
20 with Mr. Trump, who is married to Melania Trump. These 12:54:52
21 statements are highly damaging to Ms. Loomer's
22 reputation and goodwill and are, in fact, defamatory per
23 se, '...words which falsely accuse a woman of adultery,
24 which are libelous, per se, and that a plaintiff need
25 not allege or prove general or specific -- or special 12:55:09

1 damages.'" I cite a case, Bobenhausen,
2 B-o-b-e-n-h-a-u-s-e-n versus Cassat, C-a-s-s-a-t, Avenue
3 Mobile Homes, Inc., 344 So. 2d 279, 281 (Florida
4 District Court of Appeal 1977.)

5 "Accordingly, with full reservation of all 12:55:29
6 rights to pursue legal remedies including but not
7 limited to filing suit, Ms. Loomer demands correction or
8 retraction of these false, malicious, and defamatory
9 statements within five days pursuant to Florida Statute
10 section 770.01, along with a public apology on an 12:55:45
11 episode of Real Time with Bill Maher featuring
12 Ms. Loomer as a guest." Larry Klayman, counsel for
13 Laura Loomer, September 16, 2024.

14 Now having seen this letter for the first
15 time -- 12:56:05

16 MS. BOLGER: Objection. That's not what he
17 testified.

18 BY MR. KLAYMAN:

19 Q Just yesterday --

20 MS. BOLGER: Okay. There you go. 12:56:09

21 BY MR. KLAYMAN:

22 Q If you had seen this letter, would you have
23 considered issuing a retraction of what you said on your
24 show of September 13, 2024?

25 A No, because I knew what was in this letter. I 12:56:19

1 knew the -- what this was about. The fact that I saw it
2 in your words didn't change anything.

3 Q If you never saw the letter, you didn't know
4 what was in my letter, correct?

5 A They told me what was in the letter. They said 12:56:33
6 she's suing you because you said this on the show. I
7 knew what it was about, Larry. I'm an American
8 comedian. I have the right to say the things that you
9 quoted me saying. The audience was enjoying them. It's
10 a joke. We get to make jokes about people who inject 12:56:52
11 themselves into the national debate.

12 Q Look, you can -- asked and answered. Please
13 don't waste time. In fact --

14 A Who's wasting time?

15 Q You just said that you knew that you were being 12:57:06
16 sued. And in fact, this letter doesn't say you're being
17 sued. It's trying to avoid being sued, correct?

18 MS. BOLGER: This letter is not signed. I'm
19 not confident that this is a letter as was sent. But
20 you can ask questions. 12:57:19

21 BY MR. KLAYMAN:

22 Q Go ahead.

23 A This letter is not suing me?

24 Q This letter was written to avoid suit, correct?

25 MS. BOLGER: Object to the form. How could he 12:57:26

1 possibly know what you intended?

2 BY MR. KLAYMAN:

3 Q Read the -- read the terms of the letter.

4 A Okay. I assumed that you were suing me, that's
5 why I'm here. Why would I be here unless this was a 12:57:36
6 suit?

7 Q Well, you were sued and it says do you -- can
8 you look at the letter, please?

9 A Yes, sir, I -- I've seen it.

10 Q You have a college degree. You can read it. 12:57:44

11 MS. BOLGER: Hey, Mr. Klayman, we're not here
12 to insult the witness. And that is the last time you
13 will insult the witness or we will leave.

14 MR. KLAYMAN: I agree. You don't need to
15 have -- be a college degree to read all this. 12:57:54

16 BY MR. KLAYMAN:

17 Q Okay. Look. It says at the bottom:
18 "Accordingly, with full reservation of all rights to
19 pursue legal remedies including but not limited to
20 filing suit." 12:58:02

21 A What's your question? What's your point?

22 Q We're not saying at that point that we're
23 filing suit, are we?

24 A I guess not.

25 Q No. 12:58:08

1 A So what are you asking me?

2 Q So then it says: "Ms. Loomer demands
3 correction or retraction of these false, malicious, and
4 defamatory statements within five days pursuant to
5 Florida Statute 770.01, along with a public apology on 12:58:18
6 an episode of Real Time With Bill Maher
7 featuring Ms. Loomer as a guest."

8 A Yeah.

9 Q No one ever said to you should -- no one ever
10 brought it to your attention that one of the ways to 12:58:31
11 mitigate any damage here would be to put her on the show
12 and let her explain, correct?

13 MS. BOLGER: Object to the form.

14 THE WITNESS: I don't have -- I don't have any
15 obligation to put on the show every person who's not 12:58:40
16 happy with everything I say.

17 This again, Larry, is America. Check your flag
18 pin. We get to say what we want in this America -- in
19 this America. That's why we love this country. That's
20 why I love this country. It's called free speech. And 12:58:55
21 this is covered by it.

22 BY MR. KLAYMAN:

23 Q Now --

24 A Again, 32 years on the air, nobody's ever done
25 this to me. 12:59:04

1 Q You are aware that public figures have brought
2 successful cases in the past against persons who defame
3 them?

4 MS. BOLGER: Object to the form. Calls for a
5 legal conclusion. 12:59:16

6 MR. KLAYMAN: Right?

7 MS. BOLGER: You can answer if you'd like.

8 THE WITNESS: I'm guessing possibly, but I
9 don't know. Name one.

10 BY MR. KLAYMAN: 12:59:25

11 Q Well, you're aware that George Stephanopoulos
12 and ABC paid \$15 million to settle the lawsuit when
13 Stephanopoulos said on ABC that President Trump had
14 raped a woman, E. Jean Carroll, who figured out 40 years
15 later she was raped? 12:59:40

16 MS. BOLGER: Again, we're not here to talk
17 about your politics, Mr. Klayman. And in addition, that
18 wasn't a victory. Your question was a settlement.

19 But you can answer the question.

20 THE WITNESS: I read that, yes. 12:59:50

21 BY MR. KLAYMAN:

22 Q So President Trump prevailed, correct?

23 MS. BOLGER: Object to the form. He's not a
24 lawyer and it was a settlement.

25 ///

1 BY MR. KLAYMAN:

2 Q Well, \$15 million isn't chopped liver, is it,
3 Bill?

4 A It is not chopped liver, but it could buy a lot
5 of it. 01:00:07

6 MS. BOLGER: We're going to take a break
7 whenever you're -- when you're done with this exhibit.

8 MR. KLAYMAN: When I'm finished with this
9 letter.

10 MS. BOLGER: Absolutely. We'll take a break. 01:00:15

11 BY MR. KLAYMAN:

12 Q Based on your experience for 30-some years
13 being successful, as you state you have been, Ms. Loomer
14 would have been a really great guest, correct?

15 A Incorrect. 01:00:58

16 Q You didn't want to confront her personally, did
17 you?

18 A Had nothing to do with it. Even the
19 Republicans didn't like her. My show is, as I mentioned
20 a few minutes ago, mostly a debate show. And we've had 01:01:11
21 on many, many Trumpers. We want both sides. I want to
22 hear both sides. Most shows don't do that. But if the
23 Democrats don't like her, and that's obvious they don't,
24 and even the Republicans -- even Marjorie Taylor Greene
25 doesn't like her, who is the constituency to watch her 01:01:29

1 on my show?

2 Q That's not --

3 A Also, she said things like "If Kamala Harris
4 wins, the White House will smell like curry." Even for
5 my show, that's way too out of bounds. 01:01:41

6 Q Oh, really?

7 A Yeah, I'm not going to put somebody on who says
8 something that racist.

9 Q There are -- you are aware there are a lot of
10 people that like Laura Loomer, aren't you? 01:02:03

11 MS. BOLGER: Object to the form.

12 THE WITNESS: I'm sure there are some.

13 BY MR. KLAYMAN:

14 Q And that is not the criterion with regard to
15 whether someone should be heard or not. You just said 01:02:14
16 this is America, you can say whatever you want, you can
17 do whatever you want in terms of speaking, in terms of
18 expressing your opinion so. You're saying that you
19 discriminated against Ms. Loomer?

20 A I did not. 01:02:27

21 MS. BOLGER: Object to the form -- sorry, that
22 was a crazy mischaracterization of Mr. Maher's
23 testimony.

24 But you may answer it yourself.

25 THE WITNESS: I did not discriminate against 01:02:34

1 her. We made a decision based on who the audience wants
2 to see. Again, I do a show once a week. There's only
3 three guests a week, so it's kind of the A-team. I did
4 not think she rose to that level.

5 MS. BOLGER: Are we done with this exhibit so 01:02:52
6 we can take a break?

7 MR. KLAYMAN: No, no, I have a few more
8 questions. We haven't been going that long.

9 MS. BOLGER: We've been going an hour and we'd
10 like to take a break when you're done with this line of 01:03:01
11 question.

12 MR. KLAYMAN: Well, I'm not done with this line
13 of questioning.

14 BY MR. KLAYMAN:

15 Q In fact, putting on controversial people will 01:03:07
16 increase clicks and viewership; will it not --

17 MS. BOLGER: Object to the form.

18 BY MR. KLAYMAN:

19 Q -- based on your experience?

20 A You're assuming I do my show for clicks. I 01:03:16
21 don't. In fact, I had a billboard up twice and the
22 catch phrase on it was "He's not in it for the likes."

23 Q If you have no viewership you're off the air,
24 correct?

25 A No -- what that means "he's not in it for the 01:03:30

1 likes" is I say what I mean and I mean what I say. And
2 that's my bond with the audience. I don't do it to
3 pander to them. I don't do it for the clicks.

4 Q In fact, you didn't --

5 A So you're just making an assumption about who I 01:03:44
6 put on my show based on your venality, not mine.

7 Q In fact -- are you insulting me?

8 MS. BOLGER: Are you kidding?

9 THE WITNESS: You can --

10 MS. BOLGER: Move on, Mr. Klayman. 01:03:55

11 THE WITNESS: I'm saying you made an assumption
12 about me that was wrong.

13 BY MR. KLAYMAN:

14 Q You didn't want to have Ms. Loomer on because
15 you didn't want to look her in the face after what you 01:04:03
16 did to her?

17 A I can look her in the face right now.

18 Q You came in this -- in this deposition, you
19 didn't look at her, did you?

20 A I'm looking at her right now. 01:04:10

21 Q Well, now you loosened up.

22 THE WITNESS: I don't know what --

23 MS. BOLGER: What was that, Mr. Klayman? What
24 was that? Was that a question, did you loosen up? You
25 don't get to make editorial comments about witnesses in 01:04:21

1 depositions, Mr. Klayman.

2 MR. KLAYMAN: Neither do you. Neither do you.

3 You made a lot of them.

4 MS. BOLGER: You should act like a

5 professional. 01:04:27

6 MR. KLAYMAN: I should. You're right. And you

7 should too. I agree with you.

8 MS. BOLGER: Are you done with this line --

9 MR. KLAYMAN: I have a few more questions.

10 Don't rush me, please. 01:04:34

11 BY MR. KLAYMAN:

12 Q [REDACTED]

13 MS. BOLGER: [REDACTED]

[REDACTED]

[REDACTED]

01:04:55

16 THE WITNESS: [REDACTED]

17 BY MR. KLAYMAN:

18 Q [REDACTED]

[REDACTED]

20 A I [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

25 MS. BOLGER: [REDACTED] 01:05:22

1 [REDACTED]

2 THE WITNESS: [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 BY MR. KLAYMAN: 01:05:37

6 Q [REDACTED]

7 [REDACTED]

8 A [REDACTED]

9 MS. BOLGER: [REDACTED]

10 THE WITNESS: [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 BY MR. KLAYMAN:

18 Q Y [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED] 01:06:38

1

2

Q

3

A

8

Q

10

A

12

MS. BOLGER:

13

Mr. Klayman.

14

BY MR. KLAYMAN:

15

Q

19

MS. BOLGER:

20

BY MR. KLAYMAN:

01:07:23

21

Q

22

A

23

24

Q

25

A

:07:27

68

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 Q [REDACTED]

5 [REDACTED] 01:07:43

6 MS. BOLGER: [REDACTED]

7 [REDACTED]

8 MR. KLAYMAN: [REDACTED]

9 MS. BOLGER: [REDACTED]

10 [REDACTED] 01:07:48

11 MR. KLAYMAN: [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 MS. BOLGER: [REDACTED]

15 MR. KLAYMAN: [REDACTED] 01:07:54

16 MS. BOLGER: [REDACTED]

17 MR. KLAYMAN: [REDACTED]

18 [REDACTED]

19 MS. BOLGER: [REDACTED]

20 [REDACTED] 01:08:00

21 MR. KLAYMAN: [REDACTED]

22 [REDACTED]

23 MS. BOLGER: [REDACTED]

24 [REDACTED]

25 ///

1 BY MR. KLAYMAN:

2 Q [REDACTED]

■ [REDACTED]

4 MS. BOLGER: [REDACTED]

5 [REDACTED]

■ [REDACTED]

■ [REDACTED]

8 THE WITNESS: [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

13 [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

19 BY MR. KLAYMAN:

20 Q [REDACTED]

■ [REDACTED]

22 A [REDACTED]

23 Q [REDACTED]

■ [REDACTED]

25 MS. BOLGER: [REDACTED]

01:09:01

1

3

MR. KLAYMAN: Okay.

4

THE VIDEOGRAPHER: Mic off, please?

5

MR. KLAYMAN: What's that?

01:09:15

6

THE VIDEOGRAPHER: Are we going off the record?

7

MR. KLAYMAN: We are off the record, right?

8

THE VIDEOGRAPHER: Nope.

9

MR. KLAYMAN: Can you please tell us how much

10

time we --

01:09:19

11

THE VIDEOGRAPHER: We're going off the record

12

at 1:09 p.m.

13

(Recess.)

14

THE VIDEOGRAPHER: We're back on the record at

15

1:25 p.m.

01:25:49

16

Please continue.

17

BY MR. KLAYMAN:

18

Q Now, in response, Mr. Maher, to my letter of

19

September 16, 2024, which is Exhibit 3, are you aware

20

that lawyers on your behalf wrote a response?

01:26:03

21

A Yes.

22

Q When did they write that response?

23

MS. BOLGER: Object to the form.

24

THE WITNESS: I assume soon after you sent the

25

letter.

01:26:17

1 BY MR. KLAYMAN:

2 Q Have you ever seen that response?

3 A Yes.

4 Q When did you see it?

5 A Last night. 01:26:23

6 Q It's the first time?

7 A Yes.

8 Q I'll show you what I'll ask the court reporter
9 to mark as Exhibit 4.

10 (Deposition Exhibit 4 was marked for 01:26:26
11 identification by the Court Reporter and is
12 attached hereto.)

13 BY MR. KLAYMAN:

14 Q Given your response, I take it you had no input
15 into this letter of September 26, 2024, written by your 01:26:52
16 counsel, Kathryn M. Bolger?

17 MS. BOLGER: I'm going to object to the form
18 and instruct you not to answer if you had any
19 conversations with a lawyer, but if you had other
20 conversations or can otherwise answer the question, 01:27:04
21 please do.

22 BY MR. KLAYMAN:

23 Q Not what she told you, but I'm just saying
24 whether you had any input. I'm asking what that input
25 was. That's not attorney-client. 01:27:14

1 A No. It was all very brief. They told me we
2 were being sued and I said, "Okay. You know, do what we
3 have to do and answer it and follow the law and I'm not
4 settling." We all agreed on that, that it was
5 preposterous.

01:27:33

6 Q Who's we?

7 A Me and the producers and then the lawyer.

8 Q What lawyer?

9 MS. BOLGER: Object to the --

10 THE WITNESS: Kate.

01:27:42

11 BY MR. KLAYMAN:

12 Q Did HBO weigh in on this in terms of whether --

13 A I don't know. HBO is a giant company. I don't
14 know who you are referring to when you say HBO. I told
15 you --

01:27:52

16 Q Home Box Office.

17 A I know what it stands for, Larry. I don't know
18 what you mean when you say HBO. It's a giant company.
19 I talked to my producers who I mentioned and named and I
20 talked to Kate, the lawyer. That's it.

01:28:03

21 Q And you've never talked to anyone with HBO
22 about this lawsuit?

23 A Well, again, my producers work for HBO as do I.
24 Those, as I keep saying, are the people I talked to very
25 briefly: "We're being sued. It's ridiculous. We'll

01:28:18

1 answer it. We'll handle it."

2 Q Did anyone from HBO have a reaction after your
3 motion to dismiss was denied? Did anyone talk to you
4 about this case?

5 MS. BOLGER: Objection. Lack of foundation. 01:28:32

6 And also, you can answer the question without
7 talking about any conversation you had with an attorney.

8 THE WITNESS: Just that we have to keep going
9 forward with this nonsense.

10 BY MR. KLAYMAN: 01:28:46

11 Q Are you aware that I approached your counsel,
12 Ms. Bolger, and said "Would you like to consider
13 settlement?"

14 A I don't think I was aware it was you until a
15 couple days ago, that was the lawyer. Did -- I guess I 01:28:58
16 was because I remember saying "We're not settling" and
17 everyone agreed. Everyone suggested that to me and I
18 agreed.

19 Q That's not my question.

20 A Oh, I'm sorry. 01:29:18

21 Q My question was -- my question was whether you
22 were advised that counsel for Ms. Loomer, which is me,
23 recently approached your counsel and said before your
24 deposition, would you like to consider settlement?

25 MS. BOLGER: Object to the form. 01:29:34

1 You may not answer that question because all of
2 it was done at the direction of an attorney, me.

3 And you're not entitled to ask Mr. Maher what
4 he knows or what he doesn't know about information he
5 obtained or did not obtain from me. 01:29:43

6 MR. KLAYMAN: Let's take you out of the
7 equation. Let's take you out of the question.

8 BY MR. KLAYMAN:

9 Q Are you aware from any source that I raised the
10 issue of settlement before you had to sit here at 01:29:56
11 deposition today?

12 A Can I answer this?

13 MS. BOLGER: As long as you didn't learn it
14 from me. If you learned it from me, you cannot answer
15 it. If you learned it from someone else, you can 01:30:02
16 answer.

17 THE WITNESS: I learned it from you.

18 MS. BOLGER: Then you cannot answer.

19 BY MR. KLAYMAN:

20 Q When did you learn it from Ms. Bolger? 01:30:09

21 MS. BOLGER: We're not having this
22 conversation, Larry. It's irrelevant anyway. You can
23 say when you learned -- no -- no, that's a content of a
24 conversation. No, you can't. You -- no, he's not
25 answering questions about his discussions with me, 01:30:20

1 period. Don't answer.

2 THE WITNESS: I have no objection to answering
3 this, but on advice of counsel, apparently I'm not going
4 to.

5 BY MR. KLAYMAN: 01:30:30

6 Q Would you like to settle this case or do you
7 want to go to a jury in Ocala, Florida?

8 A Well, it's -- I don't think it's going to go to
9 a journey -- jury, and I do not want to settle this
10 case. 01:30:38

11 Q Do you know anything about Ocala, Florida?

12 MS. BOLGER: Object to the form.

13 You can answer.

14 THE WITNESS: No, I don't.

15 BY MR. KLAYMAN: 01:30:47

16 Q Do you know that it's the heart of the Bible
17 Belt?

18 MS. BOLGER: I'm so sorry, I object and also
19 have no idea what this -- it sounds like you're
20 threatening -- 01:30:55

21 BY MR. KLAYMAN:

22 Q Well, you'll learn about it.

23 MS. BOLGER: It sounds like you're threatening
24 my client.

25 MR. KLAYMAN: I'm not. I'm just asking. 01:30:57

1 MS. BOLGER: I know you wouldn't be doing that.

2 MR. KLAYMAN: I'm not threatening him.

3 BY MR. KLAYMAN:

4 Q I'm saying do you know the makeup of the likely
5 jury in Ocala, Florida? They're very religious people. 01:31:03

6 MS. BOLGER: Object to the form.

7 If there's a question, you can answer.

8 BY MR. KLAYMAN:

9 Q Because in Los Angeles --

10 A You're -- you're apprising me of this 01:31:11
11 information for the first time.

12 Q You think they are going to like your humor?

13 A I don't know what that has to do with this.

14 And I have faith in this country and its principles and
15 hope that would obtain to all of the country. And I 01:31:25
16 don't have a prejudice against certain parts of the
17 country, that they don't have the ability to see through
18 a case that has no merit.

19 Q I just want to get your state of mind.

20 A I think I just gave it to you. 01:31:43

21 Q Are you --

22 MS. BOLGER: Don't answer. There's no
23 question.

24 BY MR. KLAYMAN:

25 Q Yeah. Again, I'm not going to ask more than 01:31:47

1 one question here. But you see what's going on with
2 judges, whether it's left or right, correct?

3 MS. BOLGER: Object to the form.

4 BY MR. KLAYMAN:

5 Q You've observe that? 01:31:55

6 MS. BOLGER: Mr. Klayman, what is the question?

7 MR. KLAYMAN: I'm laying a foundation. Please
8 don't harass me.

9 MS. BOLGER: That's not what's happening.

10 MR. KLAYMAN: This is a benign question. 01:32:03

11 MS. BOLGER: This is irrelevant questioning and
12 you're wasting my time --

13 MR. KLAYMAN: Well, you know what, in
14 discovery, you can get into that which may lead to
15 relevant evidence, and you know that. 01:32:10

16 MS. BOLGER: And this is not that.

17 MR. KLAYMAN: So -- it is.

18 MS. BOLGER: What's the question? Actually,
19 really, what's the question?

20 MR. KLAYMAN: Well, you're not letting me 01:32:16
21 ask --

22 MS. BOLGER: Ask one.

23 MR. KLAYMAN: I am. Stop harassing me. This
24 is very rude.

25 MS. BOLGER: Mr. Maher, no -- there's no 01:32:23

1 pending question. Don't speak.

2 BY MR. KLAYMAN:

3 Q Yeah, you're aware that whether it's judges or
4 human beings, they reach -- they frequently reach
5 decisions based upon their own personal experience? 01:32:35

6 MS. BOLGER: Object to the form.

7 BY MR. KLAYMAN:

8 Q And beliefs. And beliefs?

9 MS. BOLGER: Go ahead.

10 THE WITNESS: It sounds to me like you're 01:32:44
11 threatening me, putting a gun to my head and saying this
12 case is going to be tried in an -- in an area that is
13 politically hostile to a lot of my politics. And
14 therefore, you should just surrender and give up your
15 principles and the principles of the United States of 01:33:05
16 America and just do what we want and settle and put
17 Ms. Loomer on your show. That's to me what -- that
18 sounds to me like what you're asking me to do.

19 BY MR. KLAYMAN:

20 Q No, it's not. I'm wanting to know -- 01:33:17

21 A No? Then what is it?

22 Q It sounds me -- and I'll lay this as a
23 foundation.

24 You've had little to no contact with your
25 attorneys about this case, that they made all the 01:33:25

1 decisions here. And actually, I'm trying to do you a
2 service in many ways.

3 MS. BOLGER: So I'm going to object to the
4 form. That is wildly unprofessional, totally
5 inconsistent with his testimony. And I suppose you 01:33:37
6 could answer it if there was a question. So you have
7 ruminated that I've done something wrong, but you've not
8 asked a question. So why don't you ask a question?

9 MR. KLAYMAN: I'm not saying you did something
10 wrong. I'm saying that the guy is not informed of 01:33:50
11 anything.

12 MS. BOLGER: I'm so sorry, are you asking a
13 question or are you giving a speech because I haven't
14 heard a question --

15 MR. KLAYMAN: That's what I'm trying to figure 01:33:56
16 out. I'm trying to figure out what his state of mind
17 was when whether he played any role in this Exhibit 4.
18 He says he didn't.

19 THE WITNESS: I did say -- may I answer?

20 MS. BOLGER: You may answer. 01:34:06

21 THE WITNESS: Okay. As I've said, I did
22 discuss this with my producers, who I assume had been
23 talking to the lawyers, especially at HBO. The
24 consensus across the board was that this was
25 preposterous. We were very surprised when a judge let 01:34:27

1 it go this far. We don't think a judge will let it go
2 further than this, especially after he hears this.

3 BY MR. KLAYMAN:

4 Q Do you -- did anyone ever explain to you what
5 defamation per se is? 01:34:37

6 MS. BOLGER: Object to the form. That would be
7 a conversation he had with a lawyer.

8 And you may not answer that question. You may
9 not answer the question.

10 BY MR. KLAYMAN: 01:34:44

11 Q Well, outside of a lawyer -- outside of a
12 lawyer, do you -- do you know what defamation per se is?

13 A Roughly. And I also know what an opinion is.
14 And when I -- when I say "I think she might," that's an
15 opinion. "I think." It's very different than "I know 01:34:59
16 Kamala Harris sucked dick." That's saying -- that's
17 basically a statement of fact. I didn't say that. I
18 said "I think" and "she might." "Think" and "might" are
19 very different kinds of words.

20 Q I'm going to show you what I'll ask the court 01:35:31
21 reporter to mark as Exhibit 5. It's Defendant Bill
22 Maher and Home Box Office's Motions to Dismiss and
23 Memorandum of Law Thereof.

24 MS. BOLGER: I'd like a copy, please.

25 MR. KLAYMAN: I'm going to give you a copy, 01:35:51

1 don't worry. You wrote it.

2 THE WITNESS: You didn't really get your
3 paperwork in order, Larry.

4 MR. KLAYMAN: I know. I'm not good with paper.

5 MS. LOOMER: I have copies. 01:36:08

6 MR. KLAYMAN: Okay.

7 MS. LOOMER: Which one is it?

8 MR. KLAYMAN: You know, it's the -- Exhibit 5
9 their motion to dismiss.

10 I don't have an extra copy of that. 01:36:16

11 THE WITNESS: It's okay.

12 MR. KLAYMAN: I didn't make one.

13 MS. LOOMER: Is that it?

14 MR. KLAYMAN: Yeah. Okay. Here, you can have
15 that. 01:36:20

16 MS. BOLGER: Thanks.

17 BY MR. KLAYMAN:

18 Q Okay. Take a look at that, Mr. Maher.

19 A This big one?

20 Q Yeah. 01:36:27

21 A Okay.

22 Q Do you want to review it further? Have you
23 ever seen it before?

24 A What is it?

25 Q It's your lawyer's motion to dismiss. 01:36:38

1 MS. BOLGER: Object to the form.

2 THE WITNESS: Okay.

3 MS. BOLGER: It's not my motion.

4 MR. KLAYMAN: It's his motion written by you.

5 BY MR. KLAYMAN: 01:36:49

6 Q Have you ever seen it before?

7 A I may have. I don't feel like I read it as
8 closely as you have, but --

9 Q You never saw -- you hadn't seen it before
10 today? 01:37:03

11 MS. BOLGER: Object to the form. That's not
12 what he said.

13 You can answer.

14 THE WITNESS: I am aware that the counsel on my
15 behalf filed a motion to dismiss. 01:37:10

16 BY MR. KLAYMAN:

17 Q But you don't know what was in it?

18 MS. BOLGER: Object to the form.

19 THE WITNESS: Not to the degree of detail that
20 the lawyers do. I'm not the lawyer. 01:37:20

21 BY MR. KLAYMAN:

22 Q Okay. What detail do you know of that's in
23 that motion to dismiss without reading it right now?

24 A You tell me.

25 Q I don't have to tell you. I'm asking you the 01:37:29

1 questions.

2 A I just answered the question. I don't --

3 Q You don't know?

4 MS. BOLGER: Object to the form. That's not

5 what he said, Mr. Klayman. 01:37:36

6 THE WITNESS: For the millionth time, I
7 discussed this with my producers when it first came up
8 and then a -- the lawyer got involved and my contact
9 with them was very brief. We all thought it was a
10 ridiculous lawsuit -- 01:37:57

11 BY MR. KLAYMAN:

12 Q I got it.

13 A -- because of the freedom of speech in this
14 country.

15 Q I got it. 01:38:02

16 A Therefore, I was -- it was not necessary for me
17 to get involved with all the details as clients don't
18 usually in cases where the lawyers are involved. That's
19 their job.

20 Q Isn't it your duty to verify that what your 01:38:12
21 lawyers are putting forward --

22 A I trust them.

23 Q -- is accurate and true?

24 A I trust them.

25 MS. BOLGER: Object to the form. 01:38:18

1 THE WITNESS: I trust my lawyers.

2 BY MR. KLAYMAN:

3 Q Now -- now --

4 A I have trustworthy lawyers.

5 Q Your -- do you know what defamation per se is, 01:38:26
6 that's the question?

7 MS. BOLGER: Okay. That's -- objection.
8 That's been asked and answered.

9 MR. KLAYMAN: He didn't -- he didn't answer it.
10 I said -- 01:38:37

11 THE WITNESS: I did.

12 BY MR. KLAYMAN:

13 Q I said take out of the equation -- take out of
14 the equation anything you may have learned from your
15 lawyer? 01:38:42

16 MS. BOLGER: You may answer the question the
17 same way again, Bill.

18 THE WITNESS: Again, I'm not a lawyer. But
19 having worked in television for 32 years and never been
20 accused of it, I assumed that my radar was pretty good 01:38:55
21 on what it was and what it wasn't.

22 And I was -- have always been very happy that I
23 lived in a country, unlike some countries in the world,
24 including some western democracies where they don't have
25 the kind of laws we have, where they don't have the kind 01:39:11

1 of free speech we have.

2 It would be easier to prove a kind of case like
3 this in Britain, for example. But we don't live in
4 Great Britain. We live in America, the greatest country
5 in the world. 01:39:22

6 BY MR. KLAYMAN:

7 Q I got it, okay? You don't have to keep
8 repeating it. Okay?

9 A Then don't keep asking it.

10 BY MR. KLAYMAN: 01:39:27

11 Q It's in the -- it's in the record five times.

12 MS. BOLGER: There's no pending question.

13 THE WITNESS: Because you asked it five times.

14 BY MR. KLAYMAN:

15 Q Ten. Ten. 01:39:31

16 A How ridiculous --

17 MS. BOLGER: Mr. Klayman, we're not here for
18 you to chat with Mr. Maher. Ask a question.

19 BY MR. KLAYMAN:

20 Q All right. This is not a Miss America contest. 01:39:37

21 MS. BOLGER: Ask a question.

22 THE WITNESS: Then don't ask the same question
23 and you won't get the same answer.

24 MS. BOLGER: Wait until he asks a question.

25 THE WITNESS: How silly of you. 01:39:42

1 BY MR. KLAYMAN:

2 Q Now, if you had read that, you might have
3 learned about defamation per se, correct?

4 MS. BOLGER: Object to the form.

5 I don't even know how you can answer that 01:39:56
6 question, but you can answer that question.

7 THE WITNESS: What is it -- what is the
8 question?

9 BY MR. KLAYMAN:

10 Q You don't know what defamation per se is? 01:40:03

11 MS. BOLGER: Object to the form. That's not
12 what he said, three times.

13 But you can say it again.

14 MR. KLAYMAN: All right. And I'm closing --
15 I'm closing the question. I'm closing the line of 01:40:10
16 questioning so we can move on.

17 THE WITNESS: Again, I just assumed that for
18 32 years, since I was doing what I do and it hadn't come
19 up yet that that was a pretty good guide, that I was
20 hewing to the line of what defamation wasn't. This is 01:40:26
21 the first time it's ever come up.

22 BY MR. KLAYMAN:

23 Q You are aware -- so you're not aware -- are you
24 aware -- I'll ask an open question -- that defamation
25 per se is when you disparage someone's moral turpitude 01:40:39

1 and affect their line of business and profession and
2 everything else. Are you aware of that?

3 MS. BOLGER: Okay. So object to the form.
4 You're asking him for a legal conclusion. You're also
5 misstating the law. 01:40:54

6 MR. KLAYMAN: All right. Just generally
7 speaking.

8 MS. BOLGER: If you feel you can answer that
9 question, you can. But that question was misleading,
10 incorrect, and asked and answered. You can answer. 01:41:02

11 BY MR. KLAYMAN:

12 Q Go ahead.

13 A I make jokes. Some people like them. Some
14 people don't.

15 Q Are you aware that under Florida law -- I'm not 01:41:10
16 asking what your lawyer may or may not have told you,
17 particularly since you didn't communicate with her on
18 the substance --

19 MS. BOLGER: Objection. Right now, that
20 misstates the lawyer's testimony. It is strangely an 01:41:22
21 unprofessional, personal attack on me for no reason.

22 MR. KLAYMAN: That's what he said.

23 MS. BOLGER: It's not what he said. It's
24 definitely not what he said, Mr. Klayman. This is a
25 weird area of communication. 01:41:35

1 He's going to answer one more time what he
2 knows defamation per se is. And then we're not letting
3 him answer any more questions.

4 BY MR. KLAYMAN:

5 Q All right. Outside of anything with your 01:41:42
6 counsel, are you aware that when it's defamation per se
7 that malice and damages are presumed under Florida law?

8 MS. BOLGER: That is a radical misstatement of
9 the law in Florida. In Florida, very specifically, if a
10 plaintiff sues a media defendant, damages are not 01:41:56
11 presumed. You are not telling the truth to Mr. Maher.

12 MR. KLAYMAN: We cited -- we cited cases.
13 You're not a Florida lawyer, are you?

14 MS. BOLGER: You're about not to be,
15 Mr. Klayman. And you are misstating the law. 01:42:08

16 MR. KLAYMAN: Thank you. Thank you for your --

17 MS. BOLGER: Answer the -- you can answer the
18 question, Bill, if there's a pending question.

19 THE WITNESS: I forgot what the question was
20 minutes ago. 01:42:15

21 BY MR. KLAYMAN:

22 Q Well, apparently you don't know.

23 MR. KLAYMAN: I'm going to ask you to just mark
24 as Exhibit 7 --

25 MS. BOLGER: I want the record to reflect that 01:42:23

1 Mr. Klayman said, "Well, apparently you don't know."

2 Mr. Maher didn't testify to that. That's what

3 Mr. Klayman said. Not what Mr. Maher said.

4 (Simultaneous speaking.)

5 MR. KLAYMAN: Open-ended question. 01:42:31

6 THE WITNESS: Do I know what?

7 BY MR. KLAYMAN:

8 Q Do you -- do you know that -- let's parse it;
9 that if defamation per se is shown, that the damages are
10 presumed? 01:42:45

11 MS. BOLGER: That is a false statement.

12 You may answer the question.

13 MR. KLAYMAN: Somehow you're an expert.

14 BY MR. KLAYMAN:

15 Q Go on. 01:42:52

16 A Aren't lawyers supposed to be expert --

17 MS. BOLGER: I've been a defamation lawyer for
18 25 years.

19 But it's fine. You can answer the question.

20 MR. KLAYMAN: Apparently you never read the 01:43:01
21 law.

22 BY MR. KLAYMAN:

23 Q Go on.

24 A I would not presume to speak on a lawyerly
25 subject since I am not a lawyer. So I just -- I guess 01:43:06

1 I've just been going by my good instincts.

2 Q I'm going to ask that a -- the Answer to the
3 Amended Complaint and Affirmative Defenses be marked as
4 Exhibit 7.

5 MS. BOLGER: I don't have that. 01:43:21

6 MR. KLAYMAN: I'm going to give it to you.

7 MS. BOLGER: Exhibit 6.

8 THE REPORTER: Exhibit 6.

9 MR. KLAYMAN: Exhibit 6, I'm sorry.

10 BY MR. KLAYMAN: 01:43:26

11 Q If you wish, you could be my assistant here and
12 you can do it rather than laughing.

13 A Well you sure -- you sure need one.

14 Q Yeah, I think you need assistance.

15 MS. BOLGER: You need to give that to the court 01:43:38
16 reporter. And if you make a disparaging comment about
17 the witness one more time, I'll end the deposition. And
18 you need to give that to the court reporter so she can
19 mark it.

20 MR. KLAYMAN: I will. I'm showing it to him 01:43:45
21 first.

22 MS. BOLGER: He's not going to see it first.
23 Please mark the exhibit.

24 MR. KLAYMAN: Here.

25 THE WITNESS: Oh. 01:44:07

1 MS. BOLGER: Is that -- is -- are these pages
2 part of that exhibit, Mr. Klayman?

3 MR. KLAYMAN: Yes.

4 THE WITNESS: Are we passing it around or is
5 this -- 01:44:11

6 MS. BOLGER: This is all part of yours and may
7 I have a copy, please? May I have a copy, please?

8 THE WITNESS: Take my copy.

9 MS. BOLGER: No, no, you need to look at it.

10 MR. KLAYMAN: Answers to the Amended Complaint. 01:44:19
11 I've got another one. I've got another one.

12 (Simultaneous speaking.)

13 MR. KLAYMAN: Here you go. Here's one for you.

14 THE WITNESS: Oh, here. So this goes --

15 BY MR. KLAYMAN: 01:44:31

16 Q And I'll give you -- I'll give you a stapled
17 one.

18 MS. LOOMER: Well, they have clips.

19 THE WITNESS: Okay. Got it.

20 (Deposition Exhibit 6 was marked for 01:44:35
21 identification by the Court Reporter and is
22 attached hereto.)

23 BY MR. KLAYMAN:

24 Q You have never seen this document before
25 either, have you? 01:44:40

1 MS. BOLGER: Object to the form. He didn't
2 testify he hadn't seen any other documents. You are
3 misstating his testimony.

4 You may answer.

5 THE WITNESS: What is it? 01:44:48

6 BY MR. KLAYMAN:

7 Q When, if at all, have you seen this document,
8 amended -- answer to amended complaint?

9 A I don't believe I have.

10 Q You're aware that it was filed on your behalf? 01:44:55

11 A Correct. Well, I assume it was. Again, I
12 trust my lawyers. They're very professional.

13 MR. KLAYMAN: I'm going to ask the court
14 reporter to mark the next exhibit as Exhibit 7. Okay.
15 This is Plaintiff's First Request For Production of 01:45:48
16 Documents.

17 (Deposition Exhibit 7 was marked for
18 identification by the Court Reporter and is
19 attached hereto.)

20 MS. BOLGER: Take a look at that. 01:46:13

21 BY MR. KLAYMAN:

22 Q What I just handed you, have you ever seen
23 this?

24 MS. BOLGER: Take a look at the document --

25 ///

1 BY MR. KLAYMAN:

2 Q Exhibit 7.

3 A Don't think so.

4 Q Has anyone ever asked you to look for documents

5 in response to a document request by Ms. Loomer? 01:46:29

6 A Yes.

7 Q When was that?

8 A I don't remember. But somewhere in the
9 process, they said that they had to look in my computer
10 for anything that was related to the case and we let 01:46:44
11 them.

12 Q Where is your computer located?

13 A In my office.

14 Q Is it a desktop or a laptop?

15 A Desk. 01:46:58

16 Q What's the make of it?

17 A Don't know.

18 Q How long have you had it?

19 A I don't know that either. I mean, I don't
20 know. 01:47:15

21 Q Did you find any documents that you gave to
22 your counsel when you looked?

23 A I wasn't there. They went through it and they
24 were told, you know, you can't fish through the whole
25 thing, just anything that had to do with Laura Loomer 01:47:33

1 and apparently they got what they wanted.

2 Q Who is they?

3 A The lawyers.

4 Q Which lawyers?

5 A Yours and mine. 01:47:45

6 Q No, I didn't go into your computer.

7 A Okay. Well, somebody did.

8 Q Do you know which lawyers went into your
9 computer?

10 MS. BOLGER: The lawyers who represented him -- 01:47:53
11 represent him.

12 BY MR. KLAYMAN:

13 Q Yeah, I know. Which ones? Names?

14 A I don't -- these are the lawyers I have. These
15 are the lawyers I know. 01:48:03

16 Q But you have no knowledge of which lawyers if
17 any went into your computer?

18 A Well, it wasn't the lawyers. It was -- I mean,
19 lawyers don't actually go through the computer. Whoever
20 does that on behalf of the law firm. 01:48:16

21 Q Did you see anyone going through your computer
22 or know of it?

23 A Yes, I knew it.

24 Q Firsthand?

25 A Yes, absolutely. 01:48:23

1 Q Were you there when they went through your
2 computer?

3 A I was in the next room.

4 Q Okay. So it wasn't Ms. Bolger; it was somebody
5 else? 01:48:32

6 A I don't know. I don't know.

7 Q [REDACTED]

8 [REDACTED]
9 MS. BOLGER: [REDACTED]
10 [REDACTED]
11 [REDACTED]

12 MR. KLAYMAN: [REDACTED]

13 MS. BOLGER: [REDACTED]
14 [REDACTED]
15 [REDACTED]

16 BY MR. KLAYMAN:

17 Q Who determined what on your computer your
18 lawyers could -- could see?

19 A I was told it was only things that pertained to
20 this case. 01:49:04

21 Q Were there things on your computer that were
22 filtered out that they could not view?

23 MS. BOLGER: Object to the form.

24 If you know, you can answer that question.

25 MR. KLAYMAN: That's -- 01:49:14

1 THE WITNESS: Well --

2 MR. KLAYMAN: That's a speaking objection,
3 which gives the client an answer.

4 MS. BOLGER: Well, ask a question with a
5 foundation then. 01:49:20

6 MR. KLAYMAN: Inappropriate.

7 THE WITNESS: Obviously, there are things in my
8 computer that have -- that don't have to do with Laura
9 Loomer. There's very little on it that did. Only the
10 material from those two weeks of the show where she was 01:49:29
11 in the news. These were correspondence, e-mails from
12 the staff to me, especially the week when she was part
13 of the written material, the desk piece I spoke of
14 before. So that came through the computer. My writers
15 and I communicate that way. That's mostly, I assume, 01:49:56
16 what they were finding.

17 BY MR. KLAYMAN:

18 Q No one went through your cell phone though, did
19 they?

20 MS. BOLGER: Object to the form. 01:50:05

21 THE WITNESS: No. And there's nothing on my
22 cell phone.

23 BY MR. KLAYMAN:

24 Q You get e-mails on your cell phone, don't you,
25 and texts? 01:50:13

1 A But they're the same e-mails that are on the
2 computer. There was no text about this.

3 Q You can send texts off your cell phone,
4 correct, that are not on your computer?

5 A I don't text with the writers. 01:50:24

6 Q But no one searched your cell phone?

7 A No, but they searched the writers' cell phones.

8 Q What kind of cell phone do you have?

9 A Don't know.

10 Q What service do you use? 01:50:37

11 A Don't know.

12 Q Verizon? T-Mobile?

13 A Don't even know that.

14 Q Who owns your cell phone?

15 A I'm not -- I'm not a tech person. 01:50:45

16 Q Who owns your cell phone?

17 A I do.

18 Q It's not HBO's cell phone?

19 A No.

20 Q You purchased it? 01:50:52

21 A Yeah.

22 Q Who pays the monthly bill for it?

23 A I do through my business manager.

24 Q And who's your business manager?

25 A [REDACTED] 01:51:03

1 Q Is he a member of this firm here that we're
2 here today on?

3 A No. Business manager.

4 Q Do you have a production company yourself,
5 right, Bill Maher Productions? 01:51:22

6 A Correct.

7 Q Where is that located?

8 A Located?

9 Q Yeah, does it have an office?

10 A No. 01:51:32

11 Q Do you have a home office?

12 A Well, I work out of my home. I guess you'd
13 call that a home office.

14 Q The offices that we're in today, what relation
15 if any does this firm have with you? 01:51:46

16 MS. BOLGER: What relation, if any, does this
17 line of questioning have to do with this lawsuit?

18 MR. KLAYMAN: It's about documents. He may
19 have documents.

20 THE WITNESS: This is my manager's office. Not 01:51:57
21 business manager. Manager.

22 BY MR. KLAYMAN:

23 Q And what's the difference between a business
24 manager and a manager with regard to you?

25 A Business manager pays your bills and does your 01:52:09

1 finances. Manager has to do with managing your career
2 in show business.

3 Q So the office we're in today manages your bills
4 and such?

5 A No. 01:52:26

6 MS. BOLGER: Object to the form.

7 THE WITNESS: I just --

8 BY MR. KLAYMAN:

9 Q I got it confused. It's the reverse?

10 A Correct, the reverse. Business manager pays 01:52:31
11 your bills, and manager manages your career.

12 Q Who represents you here?

13 MS. BOLGER: Do you -- do you mean in this room
14 or in the building? I don't understand the question.

15 MR. KLAYMAN: With this firm that we're here 01:52:47
16 taking the deposition today.

17 THE WITNESS: [REDACTED]

18 BY MR. KLAYMAN:

19 Q How is that spelled?

20 A [REDACTED] 01:52:54

21 Q You've discussed this lawsuit with him; have
22 you not?

23 A Yes.

24 Q And what did you discuss with him?

25 MS. BOLGER: I'm going to object and tell you 01:53:04

1 that you can only talk about things you have talked to
2 him about outside of the presence of an attorney, either
3 me or any other attorney that may represent you.

4 THE WITNESS: Say that again.

5 MS. BOLGER: So you can talk about what you've 01:53:16
6 talked about with [REDACTED] related to this lawsuit, but only
7 if I wasn't present or another lawyer who represents you
8 wasn't present.

9 THE WITNESS: Same theme.

10 BY MR. KLAYMAN: 01:53:31

11 Q Well, just tell me --

12 A Can I finish?

13 Q Yes.

14 A She's suing us. It's ridiculous, but we have
15 to follow the law. 01:53:38

16 Q But he asked you what it was about, right,
17 specifically?

18 MS. BOLGER: Object to the form. I don't
19 understand the question.

20 BY MR. KLAYMAN: 01:53:46

21 Q You had a specific conversation about the
22 lawsuit, right?

23 A No, not really.

24 Q Just that she's suing and it's ridiculous?

25 A That's it. 01:53:55

1 Q And he had no problem otherwise?

2 MS. BOLGER: Object to the form.

3 You can answer.

4 THE WITNESS: We all had a problem with it, but

5 we have to follow the law. 01:53:59

6 BY MR. KLAYMAN:

7 Q But you don't know what the law is, do you?

8 MS. BOLGER: Object to the form. He's not a

9 lawyer.

10 BY MR. KLAYMAN: 01:54:10

11 Q No one ever told you?

12 MS. BOLGER: Object to the form. You may not

13 testify about conversations you had with a lawyer.

14 BY MR. KLAYMAN:

15 Q I didn't say with a lawyer. Weren't you 01:54:17

16 curious to know what you were sued about?

17 A I knew what I was sued about.

18 Q I'm going to ask that -- do you keep paper

19 files?

20 MS. BOLGER: Object to the form. 01:54:55

21 BY MR. KLAYMAN:

22 Q For your business? You have stuff in paper

23 that's in files?

24 MS. BOLGER: In general? About this

25 litigation -- 01:55:02

1 MR. KLAYMAN: In general. In general.

2 MS. BOLGER: -- about in life, does he have
3 paper files?

4 MR. KLAYMAN: Yeah, it pertains to his
5 professional activities.

01:55:08

6 BY MR. KLAYMAN:

7 Q Do you keep paper files with tax returns, with
8 correspondence, with matters like that?

9 A Yes.

10 Q And where are they kept?

01:55:15

11 A In my house.

12 Q No one searched them, did they, with regard to
13 what was requested in this request to produce?

14 MS. BOLGER: Object to the form.

15 THE WITNESS: There's nothing in it about this
16 case.

01:55:25

17 BY MR. KLAYMAN:

18 Q But you don't know if you didn't look, correct?

19 A I know what's in my files.

20 MS. BOLGER: Object to the form.

01:55:33

21 BY MR. KLAYMAN:

22 Q Did anyone ever ask you to search your paper
23 files in your home?

24 A Not to my knowledge.

25 Q Did anyone specifically go through with you the
01:55:41

1 specific documents requested on Page 2 of Exhibit 7?

2 MS. BOLGER: Object to the form. Asked and
3 answered.

4 You can answer it again.

5 MR. KLAYMAN: I'm going to go one by one. 01:56:25

6 BY MR. KLAYMAN:

7 Q Number 1: "Any and all documents that refer or
8 relate to Laura Loomer having sex with Donald Trump."

9 Did anyone ever say look for those documents to
10 you? 01:56:35

11 A They said they were going to go through
12 everything in the computer that mentioned Laura Loomer
13 and they did.

14 Q But you made no effort yourself to do that?

15 MS. BOLGER: Object to the form. 01:56:52

16 THE WITNESS: I wouldn't even know how to do
17 that.

18 BY MR. KLAYMAN:

19 Q You know how to do a word search in a computer,
20 don't you? 01:56:58

21 A Very briefly. Very meagerly. I told you I'm
22 not a very good tech person. I don't even know what
23 kind of phone I have.

24 Q Do you have your phone with you?

25 A It's right there. 01:57:09

1 Q Yeah. Can you tell me what kind of phone you
2 have?

3 MS. BOLGER: Absolutely not. Put your phone
4 down.

5 MR. KLAYMAN: Just the mark. Just the brand. 01:57:13

6 MS. BOLGER: You don't need to know that. You
7 can ask another question. He's not looking at his phone
8 during the deposition. He's not doing it.

9 BY MR. KLAYMAN:

10 Q What service provider do you use? 01:57:21

11 MS. BOLGER: You already asked this question.
12 He doesn't know.

13 THE WITNESS: I said this two minutes ago.

14 BY MR. KLAYMAN:

15 Q Well, maybe you might remember. 01:57:26

16 A No, I'm not a liar.

17 Q Two: "Any and all documents that refer or
18 relate to Laura Loomer and her relationship with Donald
19 Trump."

20 Did you ever search yourself for any such 01:57:36
21 documents?

22 A No.

23 Q "Any and all documents with regard to internal
24 discussions at Home Box Office concerning Laura Loomer
25 and allegations that she was defamed by Bill Maher." 01:57:44

1 Did you ever yourself search for such
2 documents?

3 A No.

4 Q "Any and all documents that refer or relate to
5 criticism and/or discipline by HBO concerning Bill 01:57:53
6 Maher's publication of the following statement on the
7 September 13, 2024, episode of Real Time."

8 That's the one I read to you earlier. Did you
9 search for any such documents?

10 MS. BOLGER: Object to the form. 01:58:07

11 BY MR. KLAYMAN:

12 Q Yourself?

13 MS. BOLGER: You can answer.

14 THE WITNESS: No.

15 BY MR. KLAYMAN: 01:58:11

16 Q Five: "Any and all documents which refer or
17 relate to Donald Trump's relationship, sexual or
18 otherwise, with Melania Trump."

19 Did you yourself ever search for any such
20 documents? 01:58:20

21 A No.

22 Q So you don't have any firsthand knowledge
23 whether any such documents that I've just read to you
24 exist?

25 MS. BOLGER: Object to the form. In fact, you 01:58:31

1 asked that question the first time, Mr. Maher answered
2 it.

3 But you may answer it again as to whether you
4 have firsthand knowledge about the search for documents.

5 THE WITNESS: Firsthand, no. 01:58:40

6 BY MR. KLAYMAN:

7 Q Okay.

8 A I know they did it.

9 Q Let's go back to the amended complaint.

10 MR. KLAYMAN: Madam Court Reporter, what 01:59:08

11 exhibit number is that?

12 THE REPORTER: They're not in front of me.

13 MR. KLAYMAN: Okay.

14 MS. BOLGER: We didn't get the complaint.

15 MR. KLAYMAN: Can you give her -- 01:59:18

16 MS. BOLGER: We don't have the complaint. You
17 didn't mark the complaint.

18 MR. KLAYMAN: Oh, okay. Please mark as
19 Exhibit 8 the Amended Complaint of Ms. Loomer.

20 (Deposition Exhibit 8 was marked for 01:59:22

21 identification by the Court Reporter and is
22 attached hereto.)

23 BY MR. KLAYMAN:

24 Q Have you ever seen the amended complaint that

25 Ms. Loomer filed against you? 01:59:54

1 A No.

2 Q Are you aware that early on in this case, I
3 asked your counsel to accept service of the complaint
4 for you?

5 A Accept service? 02:00:07

6 Q Means that I wouldn't have to go through a
7 process server to hunt you down.

8 MS. BOLGER: Object to the form.

9 You can answer.

10 THE WITNESS: I'm not sure I understand the 02:00:15
11 question.

12 BY MR. KLAYMAN:

13 Q Well, a lawyer -- well, I don't want to, you
14 know, tell you otherwise, but are you aware that I asked
15 your lawyer to accept service such that I didn't have to 02:00:23
16 get a process server to find you?

17 MS. BOLGER: Object to the form.

18 THE WITNESS: I don't remember. I seem to
19 remember being told that they were going to serve me and
20 then they did, but not me directly. They dropped it off 02:00:46
21 at the house. And I think I asked, "Does that count as
22 being served?" And they said, "Well, they're going to
23 serve you anyway so just accept it." So the upshot is
24 you served me and I -- we accepted it.

25 ///

1 BY MR. KLAYMAN:

2 Q But you're not aware that before that happened,
3 I asked your lawyer to accept service to avoid putting
4 Ms. Loomer through initial expense?

5 MS. BOLGER: I'm going to object to the form 02:01:20
6 and ask you why this is relevant to anything? This
7 feels a little bit like you're trying to ask questions
8 to imply I did something wrong, so I'm just wondering
9 what -- what's going on here?

10 MR. KLAYMAN: No, I just -- I'm trying to 02:01:29
11 figure out, you know, what -- at what point he saw this
12 complaint.

13 MS. BOLGER: Well, he told you. He saw the
14 complaint when it was delivered to his house. So why
15 don't you ask a question that has relevance to this 02:01:36
16 litigation?

17 MR. KLAYMAN: I have one more question.

18 BY MR. KLAYMAN:

19 Q You're aware that HBO was served before you and
20 they had already been served? Did HBO tell you that 02:01:43
21 they were served with the original complaint?

22 A I thought it was all one complaint.

23 Q Now, turning to -- I take it you've never
24 reviewed this amended complaint? It's Exhibit 8.

25 MS. BOLGER: Take a look at it. 02:02:11

1 THE WITNESS: I think we've established I'm a
2 big picture guy. I get the big picture from people I
3 trust. That's it.

4 BY MR. KLAYMAN:

5 Q So the answer is you never saw this amended 02:02:23
6 complaint until today?

7 A Probably not.

8 Q Turn to Page 8 of this amended complaint,
9 paragraph 30: "As further evidence of the Defendants'
10 intent to defame, and actual and constitutional malice, 02:03:34
11 on September 20, 2024 -- on the September 20, 2024,
12 episode of Real Time, defendant Maher, being on notice
13 of this pending lawsuit, pursuant to Florida Statute
14 770.01, retaliated and compounded the damage to
15 Ms. Loomer with a segment titled, '24 Things You Don't 02:03:53
16 Know About Laura Loomer,' where he continues to make
17 false, disparaging statements about Ms. Loomer. For
18 instance, he and his joint tortfeasor Defendant HBO,
19 published, acting in concert, 'It's because the person
20 like Trump, the nut at the center of this, starts 02:04:13
21 surrounding himself with -- I mean, he normally
22 surrounds himself with pretty crazy people. But this
23 Laura Loomer...she's the new groupie in Trump's
24 circle...here are 24 things you don't know about Laura
25 Loomer.'" 02:04:33

1 Was that written by your writers or was -- is
2 that something you ad-libbed?

3 A That's something --

4 MS. BOLGER: Object to the form. You mean, the
5 entire paragraph that you wrote or the quote that -- 02:04:41

6 MR. KLAYMAN: The quote. The quote.

7 MS. BOLGER: Well, ask a good question then.

8 THE WITNESS: No, that's me. Writers don't
9 write the intros to the -- to the desk piece.

10 BY MR. KLAYMAN: 02:04:51

11 Q By using the word groupie, you're again
12 implying that Ms. Loomer had sex with Donald Trump
13 behind Melania's back, correct?

14 MS. BOLGER: Object to the form.

15 THE WITNESS: Well, groupie has become a word 02:05:01
16 that is more widely used than just that. I mean,
17 obviously a groupie started out as a word that referred
18 to people who follow rock bands. It means anyone who is
19 a devoted follower.

20 It does not in my view, and I think the view of 02:05:16
21 most people in this country if you ask them, necessarily
22 imply sex. It implies -- I mean, she said herself on
23 many occasions Donald Trump is the most important person
24 in her life. In the broad sense, that's kind of a
25 groupie, yes. 02:05:35

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1 BY MR. KLAYMAN:

2 Q Well you said necessarily implies sex, but it
3 can imply sex, correct?

4 MS. BOLGER: Object to the form.

5 BY MR. KLAYMAN: 02:05:41

6 Q Based on your knowledge?

7 MS. BOLGER: Object to the form. It's what you
8 said.

9 THE WITNESS: And again, it's a joke. So if it
10 does, I don't retract it. 02:05:48

11 BY MR. KLAYMAN:

12 Q Paragraph 31.

13 A Okay.

14 Q "He," meaning Bill Maher, "and HBO then proceed
15 to conjure up fabricated 'facts' about and attributed to 02:05:58
16 Ms. Loomer, including but not limited to, 'My biggest
17 fear is immigrants taking my job as a right-wing hate
18 monger.'"

19 Is that you or was that your writers or both?

20 MS. BOLGER: Object to the form. 02:06:13

21 THE WITNESS: Now, we're into the written
22 material. And you seem to not understand what a joke
23 is. Jokes are not literal. They are things that are
24 not literally true or else they wouldn't be jokes. Can

25 I -- 02:06:29

1 BY MR. KLAYMAN:

2 Q That's not my question.

3 A Oh, I thought it was.

4 Q Who wrote that, you or your writers, and then

5 you endorsed what the -- your writers wrote? 02:06:37

6 MS. BOLGER: Object to the form. You can
7 answer.

8 THE WITNESS: The writers write the pieces. We
9 decide on what the desk piece is, they all present me
10 with their version of it, and then I choose the ones I 02:06:46
11 want to use. And so they wrote it, I chose it. I
12 chose --

13 BY MR. KLAYMAN:

14 Q You endorsed it?

15 A Correct. I did it. I performed it. 02:07:00

16 Q Which writer or writers wrote that?

17 A I can't tell you that. That was in September.
18 They wrote it and I don't know which writer wrote which
19 ones.

20 Q Number 2: "I don't hate all brown people, just 02:07:14
21 the brown ones."

22 A Yes, this is satire based on things that she
23 has said, like "When Kamala Harris moves into the White
24 House, it will smell of curry." That joke makes perfect
25 sense. 02:07:29

1 Q You're implying that she's a racist, correct?

2 A Yes.

3 MS. BOLGER: Object to the form.

4 THE WITNESS: Yes. I think someone who says
5 that is a racist, among other things. She's a birther. 02:07:43
6 That to me was racism.

7 BY MR. KLAYMAN:

8 Q What is a birther?

9 A Someone who thinks that Obama was not born in
10 this country. 02:08:02

11 Q You are aware that his birth certificate is
12 published by the White House, said he was
13 African-American?

14 MS. BOLGER: Are we actually talking about
15 birtherism as a serious thing in this deposition? 02:08:14

16 MR. KLAYMAN: He brought it up. He brought it
17 up.

18 MS. BOLGER: No, he didn't. Move on.

19 MR. KLAYMAN: No, I'm not going to move on.

20 MS. BOLGER: Okay. You're going to waste your 02:08:21
21 time asking him whether Obama was born in Kenya?

22 MR. KLAYMAN: You're aware -- that's not what
23 I'm asking. Maybe you believe that. I'm asking a
24 different question.

25 MS. BOLGER: I know you believe that. You sued 02:08:29

1 to get him off the ballot on this basis.

2 MR. KLAYMAN: That was not what I sued on. You
3 better get better reading glasses.

4 BY MR. KLAYMAN:

5 Q You are aware that the -- that there are 02:08:38
6 legitimate bases to question the authenticity of Obama's
7 birth certificate?

8 A It doesn't matter. That's my opinion. That's
9 my opinion, that anybody who went after Barack Obama for
10 not being born in this country had some racial animus 02:08:51
11 because he was born in this country.

12 Q You're aware that he himself filed documents
13 with the passport office that said he wasn't --

14 MS. BOLGER: Object to the form.

15 BY MR. KLAYMAN: 02:09:04

16 Q -- born in this country. Are you aware of
17 that?

18 MS. BOLGER: You can answer again.

19 THE WITNESS: I am not aware of that.

20 MR. KLAYMAN: I'm going to ask the following 02:09:39
21 document be marked as composite Exhibit 9.

22 MS. BOLGER: I'll take a look at this one.
23 It's very long.

24 MR. KLAYMAN: We're going to go through them.

25 MS. BOLGER: He's entitled to look at it in its 02:10:08

1 entirety before you ask him a question.

2 MR. KLAYMAN: Sure. He can. Look at all of
3 them.

4 THE WITNESS: Okay. I see what it is. I get
5 the gist. 02:10:17

6 (Deposition Exhibit 9 was marked for
7 identification by the Court Reporter and is
8 attached hereto.)

9 BY MR. KLAYMAN:

10 Q Okay. These are all statements that you made 02:10:19
11 on Real Time, correct?

12 MS. BOLGER: Object to the form.

13 THE WITNESS: I haven't read all of them. If
14 you want me to read them all now, that's going to take
15 some time. 02:10:30

16 BY MR. KLAYMAN:

17 Q Well, we're going to go as quickly as we can
18 through them. We've got some time here.

19 Let's look at the first page of Exhibit 9.

20 Bill Maher @billmaher, November 10, 2015, "Trump: 02:10:44

21 'We're a country of laws' Thankfully, bankruptcy laws."

22 You stated that, correct?

23 MS. BOLGER: I'm going to object to form. I
24 think you said that this was on Real Time with Bill

25 Maher. This is not Real Time with Bill Maher. So I 02:10:56

1 don't --

2 BY MR. KLAYMAN:

3 Q Okay. What was -- where did you make that
4 statement?

5 A Where are we? 02:11:00

6 MS. BOLGER: No, first -- first page.

7 BY MR. KLAYMAN:

8 Q Okay. These are --

9 MS. BOLGER: I don't know. That's the --

10 MR. KLAYMAN: These are tweets. Okay. 02:11:04

11 MS. LOOMER: Yes.

12 MS. BOLGER: Are you representing that to us?

13 MR. KLAYMAN: Yes, we are.

14 THE WITNESS: "We are a country of laws,
15 Thankfully, bankruptcy laws." I'm just going on good 02:11:14
16 faith that these are my tweets. I don't remember tweets
17 from ten years ago.

18 BY MR. KLAYMAN:

19 Q Well, this raises the question: Did anyone
20 search your phone for tweets that might be responsive to 02:11:26
21 our document requests which I've gone through before?

22 A I haven't personally tweeted in years.

23 Q Okay. Let's look at the next one.

24 A Definitely was not tweeting at the time of
25 September -- 02:11:45

1 Q Bill Maher --

2 A -- of last year.

3 Q -- @billmaher, 3/26/16: "Cruz could be our
4 worst president. But Trump might well be our last" --

5 and then hashtag "better Ted than dead." 02:11:56

6 That's your tweet, correct?

7 A I'm, again, taking on good faith that it is.
8 If you're asking me if I specifically remember that, of
9 course I do not.

10 Q Next one, Bill Maher @billmaher, 3/10/16: 02:12:16

11 "Trump: Only I can stop me from fucking America's
12 workers," quoting Trump.

13 That's your tweet, correct?

14 A Same answer, don't remember. Taking on good
15 faith that you're taking this actually off of Twitter. 02:12:34

16 Q Flip down to a tweet on 7/19/16.

17 MS. BOLGER: You need to tell him what page
18 it's on.

19 MS. LOOMER: Just past two pages.

20 BY MR. KLAYMAN: 02:12:55

21 Q Yeah. 7/19/16.

22 A Um-hum.

23 Q Okay. Bill Maher on July 19, 2016, "Trump's
24 sons (Douchebag Von Fuckface and Thurston Shitbag the
25 3rd, you'll recall) look like the date rapist in every 02:13:13

1 after school special ever."

2 Which Trump sons were you referring to as

3 Douchebag Von Fuckface?

4 MS. BOLGER: Object to the form.

5 You can answer. 02:13:25

6 THE WITNESS: Again, assuming on good faith
7 that this is an actual tweet of mine, that must be Don
8 and Eric, who were public figures and very much injected
9 themselves also into the public debate as public
10 figures. 02:13:45

11 BY MR. KLAYMAN:

12 Q In order: The first one, Douchebag, is Don,
13 Jr.; the other one is Eric?

14 MS. BOLGER: Object to the form.

15 THE WITNESS: Oh, for God's sakes, that I don't 02:13:49
16 know. And I don't think -- I don't know. Sure, Larry.
17 The first one is Don, if that matters to you.

18 BY MR. KLAYMAN:

19 Q And you're referring to them both as date
20 rapists in every -- 02:14:02

21 A No, I didn't. I said "look like" and, again, a
22 joke. A joke here in America where we're allowed to
23 make jokes. That's a joke. Look like. That's not
24 accusing them of being one. Saying "look like" as a
25 joke. 02:14:20

1 Q It shows an animus towards President Trump's
2 sons, doesn't it?

3 MS. BOLGER: Object to the form.

4 You can answer.

5 THE WITNESS: I have every right to have 02:14:27
6 differing politics from someone as controversial as
7 Donald Trump and his sons.

8 BY MR. KLAYMAN:

9 Q You hate them all, don't you?

10 A I do not hate anyone. 02:14:41

11 Q You hate all the Trumps?

12 A I do not.

13 Q Including Melania Trump?

14 A I do not hate anyone. And I certainly don't
15 hate her. I don't even hate you. 02:14:48

16 Q And by hating them, you're able to increase
17 your viewership among a certain left-wing audience?

18 A Stop putting words in my mouth. I just told
19 you I don't hate anyone.

20 Q I'm entitled to ask leading questions. 02:15:02

21 MS. BOLGER: You're not entitled to misstate
22 testimony.

23 MR. KLAYMAN: I didn't state anything. I'm
24 asking a question.

25 MS. BOLGER: You certainly did. 02:15:08

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1 THE WITNESS: [REDACTED]

2 BY MR. KLAYMAN:

3 Q [REDACTED]

■ [REDACTED]

5 MS. BOLGER: [REDACTED]

02:15:15

6 [REDACTED]

7 THE WITNESS: [REDACTED]

■ [REDACTED]

■ [REDACTED]

10 BY MR. KLAYMAN:

02:15:32

11 Q [REDACTED]

■ [REDACTED]?

13 MS. BOLGER: [REDACTED]

14 THE WITNESS: [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

17 BY MR. KLAYMAN:

18 Q [REDACTED]

■ [REDACTED]

20 MS. BOLGER: [REDACTED] [REDACTED]

■ [REDACTED]

22 BY MR. KLAYMAN:

23 Q [REDACTED]

24 A [REDACTED]

■ [REDACTED] 02:15:59

121

1 Q [REDACTED]

[REDACTED]

3 MS. BOLGER: [REDACTED]

4 [REDACTED]

5 THE WITNESS: [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

10 BY MR. KLAYMAN: 02:16:37

11 Q [REDACTED]

[REDACTED]

13 A [REDACTED]

[REDACTED]-

15 Q [REDACTED] 02:16:47

16 A [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 02:17:09

21 Q [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 02:17:16

122

1 MS. BOLGER: [REDACTED]

■ [REDACTED]

3 [REDACTED]

4 MR. KLAYMAN: [REDACTED] o

5 [REDACTED]. 02:17:25

6 MS. BOLGER: [REDACTED]

■ [REDACTED]

8 [REDACTED].

9 MR. KLAYMAN: [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

12 BY MR. KLAYMAN:

13 Q [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

20 MS. BOLGER: [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

25 MR. KLAYMAN: [REDACTED] 02:18:10

123

1 [REDACTED]

2 THE WITNESS: [REDACTED]

3 MS. BOLGER: [REDACTED]

4 [REDACTED]

5 [REDACTED] [REDACTED]

6 [REDACTED]

7 MR. KLAYMAN: [REDACTED]

8 THE WITNESS: [REDACTED]

9 [REDACTED].

10 MS. BOLGER: [REDACTED] [REDACTED]

11 [REDACTED]

12 THE WITNESS: [REDACTED]

13 [REDACTED]

14 BY MR. KLAYMAN:

15 Q [REDACTED] [REDACTED]

16 [REDACTED]

17 A [REDACTED]

18 MS. LOOMER: [REDACTED]

19 BY MR. KLAYMAN:

20 Q [REDACTED] 02:18:53

21 MS. BOLGER: [REDACTED]

22 THE WITNESS: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 02:19:11

124

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 MS. BOLGER: [REDACTED] [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 THE WITNESS: [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED] 02:20:14

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 ///

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1 BY MR. KLAYMAN:

2 Q [REDACTED]

3 A [REDACTED]

4 MS. BOLGER: [REDACTED]

5 [REDACTED] 02:20:39

6 MR. KLAYMAN: [REDACTED]

7 MS. BOLGER: [REDACTED]

8 MR. KLAYMAN: [REDACTED]

9 [REDACTED]

10 MS. BOLGER: [REDACTED] [REDACTED]

11 [REDACTED]

12 MR. KLAYMAN: [REDACTED]

13 [REDACTED]

14 MS. BOLGER: [REDACTED]

15 [REDACTED] 02:20:54

16 MR. KLAYMAN: [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 MS. BOLGER: [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED]

22 MR. KLAYMAN: [REDACTED]

23 [REDACTED]

24 MS. BOLGER: [REDACTED]

25 [REDACTED] 02:21:04

126

1 [REDACTED]

2 [REDACTED]

3 MR. KLAYMAN: [REDACTED]

4 MS. BOLGER: [REDACTED]

5 MR. KLAYMAN: [REDACTED] 02:21:10

6 MS. BOLGER: [REDACTED]

7 [REDACTED]

8 MR. KLAYMAN: [REDACTED]

9 [REDACTED]

10 MS. BOLGER: [REDACTED] [REDACTED]

11 [REDACTED]

12 BY MR. KLAYMAN:

13 Q [REDACTED]

14 [REDACTED]

15 A [REDACTED] [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 Q [REDACTED]

20 [REDACTED] 02:21:37

21 MS. BOLGER: [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 MR. KLAYMAN: [REDACTED]

[REDACTED] 02:21:47

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1 MS. BOLGER: [REDACTED]

■ [REDACTED]

3 [REDACTED]

■ [REDACTED]

5 MR. KLAYMAN: [REDACTED] 02:21:51

6 MS. BOLGER: [REDACTED]

■ [REDACTED]

■ [REDACTED]

9 MR. KLAYMAN: [REDACTED]

■ [REDACTED] 02:21:58

11 MS. BOLGER: [REDACTED]

■ [REDACTED]

■ [REDACTED]

14 MR. KLAYMAN: [REDACTED]

15 [REDACTED] 02:22:07

16 [REDACTED]

■ [REDACTED]

18 MS. BOLGER: [REDACTED]

19 MS. LOOMER: [REDACTED]

20 [REDACTED] 02:22:18

21 [REDACTED]

22 MS. BOLGER: [REDACTED]

23 MR. KLAYMAN: [REDACTED]

24 [REDACTED]

25 MS. BOLGER: [REDACTED] 02:22:23

1 [REDACTED]

2 MR. KLAYMAN: [REDACTED]

3 [REDACTED]

4 BY MR. KLAYMAN:

5 Q [REDACTED] 02:22:31

6 A [REDACTED]

7 Q [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED] 02:22:49

11 MS. BOLGER: [REDACTED]

12 THE WITNESS: [REDACTED]

13 BY MR. KLAYMAN:

14 Q [REDACTED]

15 A [REDACTED] 02:23:00

16 [REDACTED]

17 Q [REDACTED]

18 MS. BOLGER: [REDACTED]

19 MR. KLAYMAN: [REDACTED]

20 MS. BOLGER: [REDACTED] 02:23:22

21 [REDACTED]

22 THE WITNESS: [REDACTED]

23 BY MR. KLAYMAN:

24 Q [REDACTED]

25 [REDACTED] 02:23:30

129

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED] 02:23:46

6 A [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 Q [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED]

17 A [REDACTED]

18 MS. BOLGER: [REDACTED]

19 [REDACTED]

20 [REDACTED]. 02:24:24

21 MR. KLAYMAN: [REDACTED]

22 [REDACTED]

23 MS. BOLGER: [REDACTED]

24 THE WITNESS: [REDACTED]

[REDACTED] 02:24:30

130

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 BY MR. KLAYMAN: 02:24:54

6 Q W [REDACTED]

7 A [REDACTED]

8 Q [REDACTED]

9 [REDACTED]

10 [REDACTED] 02:25:05

11 A [REDACTED]

12 MS. BOLGER: [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED] 02:25:12

16 MR. KLAYMAN: [REDACTED]

17 [REDACTED]

18 THE WITNESS: [REDACTED]

19 [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 BY MR. KLAYMAN:

25 Q [REDACTED] -- 02:25:33

131

1 A [REDACTED]

2 Q [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

7 [REDACTED]

■ [REDACTED]

9 MS. BOLGER: [REDACTED]

10 THE WITNESS: [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

13 BY MR. KLAYMAN:

14 Q [REDACTED]

■ [REDACTED] 02:26:14

16 MS. BOLGER: [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

20 MR. KLAYMAN: [REDACTED] 02:26:22

21 MS. BOLGER: [REDACTED]

22 THE WITNESS: [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] 02:26:51

132

1 BY MR. KLAYMAN:

2 Q [REDACTED]

3 A [REDACTED]

4 Q [REDACTED]

5 [REDACTED] 02:26:57

6 A [REDACTED]

7 Q [REDACTED]

8 A [REDACTED]

9 Q [REDACTED]

10 [REDACTED] 02:27:05

11 A [REDACTED]

12 Q [REDACTED]

13 MS. BOLGER: [REDACTED]

14 MR. KLAYMAN: [REDACTED]

15 [REDACTED] 02:27:35

16 MS. BOLGER: [REDACTED]

17 THE WITNESS: [REDACTED]

18 [REDACTED]

19 BY MR. KLAYMAN:

20 Q [REDACTED] 02:27:38

21 MS. BOLGER: [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 THE WITNESS: [REDACTED]

25 [REDACTED] 02:27:50

133

1 MS. BOLGER: [REDACTED]

2 BY MR. KLAYMAN:

3 Q [REDACTED]

■ [REDACTED]

5 [REDACTED]

■ [REDACTED]

7 MS. BOLGER: [REDACTED]

■ [REDACTED]

9 THE WITNESS: [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

14 [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

20 BY MR. KLAYMAN: 02:28:52

21 Q [REDACTED]

22 [REDACTED]

23 A [REDACTED]

24 Q [REDACTED]

■ [REDACTED] 02:29:08

134

1 A [REDACTED]

■ [REDACTED]

3 Q [REDACTED]

■ [REDACTED]

5 A [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

8 [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

12 Q [REDACTED]

13 A [REDACTED]

14 Q [REDACTED]

15 A [REDACTED] 02:29:54

16 Q [REDACTED]

■ [REDACTED]

18 MS. BOLGER: [REDACTED]

19 [REDACTED]

20 THE WITNESS: [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

23 BY MR. KLAYMAN:

24 Q [REDACTED]

■ [REDACTED]

02:30:13

1 A [REDACTED]

2 [REDACTED]

3 Q And you have no problem using Ms. Loomer as a
4 way to get to Trump, correct?

5 MS. BOLGER: Object to the form. 02:30:24

6 You can answer.

7 THE WITNESS: She has nothing to do with this.

8 BY MR. KLAYMAN:

9 Q [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 A [REDACTED]

14 MS. BOLGER: [REDACTED]

15 [REDACTED] 02:31:00

16 BY MR. KLAYMAN:

17 Q Y [REDACTED]

18 A [REDACTED]

19 [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED]

22 MS. BOLGER: [REDACTED]

23 [REDACTED]

24 BY MR. KLAYMAN:

25 Q [REDACTED] 02:31:22

136

1

■

■

■

5

MS. BOLGER:

■

7

8

MR. KLAYMAN:

9

MS. BOLGER:

10

02:31:44

11

THE WITNESS:

■

■

■

15

■

■

18

BY MR. KLAYMAN:

19

Q

20

A

02:32:12

21

Q

22

MS. BOLGER:

23

THE WITNESS:

■

■

02:32:21

137

1 [REDACTED]

2 BY MR. KLAYMAN:

3 Q [REDACTED]

4 MS. BOLGER: [REDACTED]

5 BY MR. KLAYMAN: 02:32:33

6 Q [REDACTED]

7 MS. BOLGER: [REDACTED]

8 THE WITNESS: [REDACTED]

9 [REDACTED]

10 BY MR. KLAYMAN: 02:32:37

11 Q [REDACTED]

12 A [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

17 Q [REDACTED]

[REDACTED]

19 MS. BOLGER: [REDACTED]

[REDACTED] 02:33:04

21 BY MR. KLAYMAN:

22 Q [REDACTED]

23 A [REDACTED]

[REDACTED]

25 Q [REDACTED] 02:33:18

138

1 [REDACTED]

■ [REDACTED]

■ [REDACTED]

4 A [REDACTED]

5 MS. BOLGER: [REDACTED] 02:33:33

6 THE WITNESS: [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

12 [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

20 BY MR. KLAYMAN: 02:34:21

21 Q [REDACTED]

22 A [REDACTED]

■ [REDACTED]

■ [REDACTED]

25 Q [REDACTED] 02:34:35

139

1

[REDACTED]

2

A

[REDACTED]

3

Q

[REDACTED]

■

[REDACTED]

■

[REDACTED]

02:34:43

6

[REDACTED]

7

MS. BOLGER:

[REDACTED]

■

[REDACTED]

9

MR. KLAYMAN:

[REDACTED]

10

MS. BOLGER:

[REDACTED]

[REDACTED]

■

[REDACTED]

12

[REDACTED]

■

[REDACTED]

14

[REDACTED]

15

THE WITNESS:

[REDACTED]

[REDACTED]

■

[REDACTED]

17

BY MR. KLAYMAN:

18

Q

[REDACTED]

■

[REDACTED]

■

[REDACTED]

02:35:05

21

A

[REDACTED]

22

Q

[REDACTED]

■

[REDACTED]

24

MS. BOLGER:

[REDACTED]

25

///

140

1 BY MR. KLAYMAN:

2 Q [REDACTED]

■ [REDACTED]

4 MS. BOLGER: [REDACTED]

5 BY MR. KLAYMAN:

02:35:22

6 Q [REDACTED]

7 MS. BOLGER: [REDACTED]

■ [REDACTED]

9 [REDACTED]

10 [REDACTED]

02:35:26

11 BY MR. KLAYMAN:

12 Q [REDACTED]

13 MS. BOLGER: W [REDACTED]

■ [REDACTED]

■ [REDACTED]

02:35:39

16 MR. KLAYMAN: [REDACTED]

■ [REDACTED]

18 MS. BOLGER: [REDACTED]

■ [REDACTED]

■ [REDACTED]

02:35:45

21 MR. KLAYMAN: [REDACTED]

■ [REDACTED]

23 MS. BOLGER: [REDACTED]

■ [REDACTED]

25 MR. KLAYMAN: [REDACTED]

02:35:49

141

1 MS. BOLGER: -- [REDACTED]

■ [REDACTED]

3 MR. KLAYMAN: [REDACTED]

4 [REDACTED]

■ [REDACTED]

02:35:56

6 THE VIDEOGRAPHER: [REDACTED]

■ [REDACTED]

8 (Recess.)

9 THE VIDEOGRAPHER: W [REDACTED]

■ [REDACTED]

02:50:39

11 BY MR. KLAYMAN:

12 Q Mr. Maher, are you aware of the damages that
13 Ms. Loomer has requested in her amended complaint?

14 A The money she's asking for?

15 Q Yes.

02:50:50

16 A I think I am, yes. I think it's 150 million.

17 Q 350 million in punitive in excess?

18 A 350 million?

19 Q Yes.

20 A Wow, that's quite a number.

02:51:04

21 Q Are you aware of that?

22 A I'm aware now.

23 Q Okay. Is that something that would cause you
24 to pay more attention to what's going on in this case?

25 MS. BOLGER: Oh, my gosh, are we threatening 02:51:16

1 again, Larry?

2 MR. KLAYMAN: No.

3 THE WITNESS: I have to pay attention to this

4 because the law tells me I have to pay attention to it.

5 That's it. The numbers are crazy, but it doesn't really 02:51:24

6 matter what the numbers are.

7 BY MR. KLAYMAN:

8 Q [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15 A [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 02:52:43

143

1

■

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■

■

■

14

Q

■

■

■

■

19

A

20

MS. BOLGER:

02:53:53

21

THE WITNESS:

22

23

BY MR. KLAYMAN:

24

Q

■

02:54:00

144

1

2

MS. BOLGER:

3

4

5

THE WITNESS:

6

7

8

BY MR. KLAYMAN:

9

Q

10

A

11

12

Q

13

14

15

02:54:24

16

MS. BOLGER:

O

n

17

18

BY MR. KLAYMAN:

19

Q

20

MS. BOLGER:

21

22

23

THE WITNESS:

02:54:38

145

1 [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

8 BY MR. KLAYMAN:

9 Q [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED] --

12 A [REDACTED]

13 Q [REDACTED]

14 MS. BOLGER: [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

17 MR. KLAYMAN: [REDACTED]

18 MS. BOLGER: [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

22 [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

02:55:41

146

1 [REDACTED]

2 MR. KLAYMAN: [REDACTED]

3 THE WITNESS: [REDACTED].

4 BY MR. KLAYMAN:

5 Q [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

10 MS. BOLGER: [REDACTED] 02:56:02

11 [REDACTED]

12 [REDACTED]

13 BY MR. KLAYMAN:

14 Q [REDACTED]

■ [REDACTED] 02:56:09

16 MS. BOLGER: [REDACTED]

17 THE WITNESS: [REDACTED].

18 BY MR. KLAYMAN:

19 Q [REDACTED]

20 A [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] 02:56:37

147

1

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■

■

8

Q

■

■

02:57:14

11

MS. BOLGER:

■

13

14

BY MR. KLAYMAN:

15

Q

02:57:19

16

MS. BOLGER:

17

18

THE WITNESS:

19

BY MR. KLAYMAN:

20

Q

■

■

23

MS. BOLGER:

■

25

MR. KLAYMAN:

02:57:33

148

1

2

MS. BOLGER:

3

MR. KLAYMAN:

4

BY MR. KLAYMAN:

5

Q

02:57:37

6

A

7

MS. BOLGER:

8

9

THE WITNESS:

10

11

12

13

BY MR. KLAYMAN:

14

Q

15

16

17

A

18

19

20

21

22

MS. BOLGER:

23

24

25

02:58:29

149

1 MR. KLAYMAN: [REDACTED]

2 [REDACTED]

3 MS. BOLGER: [REDACTED]

4 [REDACTED]

5 BY MR. KLAYMAN: 02:58:37

6 Q [REDACTED]

7 [REDACTED]

8 A [REDACTED]

9 Q [REDACTED]

10 A [REDACTED] [REDACTED]

11 [REDACTED]

12 Q [REDACTED]

13 A [REDACTED]

14 [REDACTED]

15 [REDACTED] 02:58:55

16 [REDACTED]

17 Q [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED]

22 [REDACTED].

23 MS. BOLGER: [REDACTED]

24 MR. KLAYMAN: [REDACTED]

25 MS. BOLGER: [REDACTED] 02:59:41

150

1 BY MR. KLAYMAN:

2 Q [REDACTED]

3 MS. BOLGER: [REDACTED]

4 BY MR. KLAYMAN:

5 Q [REDACTED]

02:59:42

6 A [REDACTED]

■

■

■

10 Q [REDACTED]

02:59:57

11 A [REDACTED]

12 [REDACTED]

■

■

■

03:00:14

16 [REDACTED]

■

■

■

■

■

22 Q [REDACTED]

■

■

25 MS. BOLGER: [REDACTED]

03:00:39

151

1 [REDACTED]

2 [REDACTED]

3 THE WITNESS: Y [REDACTED]

4 [REDACTED]

5 MS. BOLGER: [REDACTED] 03:00:45

6 BY MR. KLAYMAN:

7 Q [REDACTED]

8 [REDACTED]

9 MS. BOLGER: [REDACTED]

10 [REDACTED] 03:00:52

11 THE WITNESS: [REDACTED]

12 MS. BOLGER: [REDACTED]

13 THE WITNESS: [REDACTED]

14 BY MR. KLAYMAN:

15 Q [REDACTED] [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 MS. BOLGER: [REDACTED] 03:01:23

21 THE WITNESS: [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED] 03:01:45

1 BY MR. KLAYMAN:

2 Q [REDACTED]

3 MS. BOLGER: [REDACTED]

4 [REDACTED]

5 THE WITNESS: [REDACTED] [REDACTED]

6 [REDACTED]

7 BY MR. KLAYMAN:

8 Q [REDACTED]

9 A [REDACTED]

10 MS. BOLGER: I [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

03:02:24

16

MR. KLAYMAN: [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20

THE WITNESS: [REDACTED]

03:02:33

21

BY MR. KLAYMAN:

22

Q [REDACTED]

23

MS. BOLGER: [REDACTED]

24

MR. KLAYMAN: [REDACTED]

25

MS. BOLGER: [REDACTED]

03:02:42

153

1

[REDACTED]

2

MR. KLAYMAN:

[REDACTED]

3

BY MR. KLAYMAN:

4

Q

[REDACTED]

5

A

[REDACTED]

03:02:47

6

MS. BOLGER:

[REDACTED]

7

MR. KLAYMAN:

[REDACTED]

8

MS. LOOMER:

[REDACTED]

9

THE WITNESS:

[REDACTED]

10

BY MR. KLAYMAN:

03:03:39

11

Q

[REDACTED]

12

MS. BOLGER:

[REDACTED]

13

[REDACTED]

14

THE WITNESS:

[REDACTED]

15

MR. KLAYMAN:

[REDACTED]

03:03:48

16

THE WITNESS:

[REDACTED]

17

BY MR. KLAYMAN:

18

Q

[REDACTED]

19

[REDACTED]

20

[REDACTED]

03:04:00

21

[REDACTED]

22

MS. BOLGER:

[REDACTED]

23

THE WITNESS:

[REDACTED]

24

BY MR. KLAYMAN:

25

Q

[REDACTED]

03:04:08

154

1

[REDACTED]

2

A

P

[REDACTED]

3

[REDACTED]

4

Q

[REDACTED]

5

A

[REDACTED]

03:04:21

6

[REDACTED]

7

[REDACTED]

8

Q

[REDACTED]

9

[REDACTED]

10

[REDACTED]

03:04:35

11

A

[REDACTED]

12

[REDACTED]

13

[REDACTED]

14

[REDACTED]

15

[REDACTED]

[REDACTED]

16

[REDACTED]

17

[REDACTED]

18

Q

[REDACTED]

19

MS. BOLGER:

[REDACTED]

20

[REDACTED]

03:05:06

21

MR. KLAYMAN:

[REDACTED]

22

[REDACTED]

23

MS. BOLGER:

[REDACTED]

24

[REDACTED]

25

MR. KLAYMAN:

[REDACTED]

03:05:12

155

1 [REDACTED]

2 THE WITNESS: [REDACTED]

3 [REDACTED]

4 BY MR. KLAYMAN:

5 Q [REDACTED]. 03:05:19

6 A [REDACTED]

7 Q [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 MS. BOLGER: [REDACTED] 03:05:41

11 MR. KLAYMAN: [REDACTED]

12 MS. BOLGER: [REDACTED]

13 BY MR. KLAYMAN:

14 Q [REDACTED]

15 [REDACTED]

03:05:47

16 A [REDACTED]

17 MS. BOLGER: T [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

03:05:54

21 MR. KLAYMAN: [REDACTED]

22 [REDACTED].

23 MS. BOLGER: [REDACTED]

24 [REDACTED]

25 THE WITNESS: [REDACTED] 03:06:00

156

1 MS. BOLGER: [REDACTED]

2 THE WITNESS: [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

03:06:11

6 BY MR. KLAYMAN:

7 Q [REDACTED]

8 A [REDACTED]

9 [REDACTED]

10 Q [REDACTED]

11 [REDACTED]

12 MS. BOLGER: [REDACTED]

13 THE WITNESS: [REDACTED]

14 [REDACTED]

15 MS. BOLGER: [REDACTED] [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 MR. KLAYMAN: [REDACTED]

19 MS. BOLGER: [REDACTED]

20 MR. KLAYMAN: [REDACTED]

03:06:36

21 MS. BOLGER: [REDACTED]

22 MR. KLAYMAN: [REDACTED]

23 MS. BOLGER: [REDACTED]

24 MR. KLAYMAN: [REDACTED]

25 THE WITNESS: [REDACTED] 03:06:44

157

1 BY MR. KLAYMAN:

2 Q [REDACTED]

3 MS. BOLGER: [REDACTED]

■ [REDACTED]

5 MR. KLAYMAN: [REDACTED] 03:06:54

6 THE WITNESS: [REDACTED]

7 BY MR. KLAYMAN:

8 Q [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

12 A [REDACTED]

13 MS. BOLGER: [REDACTED]

14 BY MR. KLAYMAN:

15 Q [REDACTED] 03:07:28

16 MS. BOLGER: [REDACTED]

17 THE WITNESS: [REDACTED]

■ [REDACTED]

■ [REDACTED]

20 BY MR. KLAYMAN: 03:07:39

21 Q [REDACTED]

■ [REDACTED]

23 A [REDACTED]

24 MS. BOLGER: [REDACTED]

■ [REDACTED]

03:07:47

1 BY MR. KLAYMAN:

2 Q [REDACTED]

■ [REDACTED]

4 MS. BOLGER: [REDACTED]

■ [REDACTED]

■ [REDACTED]

7 THE WITNESS: [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

13 BY MR. KLAYMAN:

14 Q [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

18 [REDACTED]

19 A [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

25 By the way, before, when you asked me about

03:09:19

1 papers, I did turn over cards.

2 Q What do you mean there?

3 A Well, you asked me about papers. But cards --
4 show cards, I turned over the show cards that were -- my
5 blue show cards, cardboard cards. There weren't many of 03:09:34
6 them and they didn't have anything much to do with this,
7 but I turned them over.

8 Q [REDACTED]

9 [REDACTED]

10 A [REDACTED] 03:10:34

11 Q [REDACTED]

12 MS. BOLGER: [REDACTED]

13 [REDACTED]

14 BY MR. KLAYMAN:

15 Q [REDACTED] 03:10:41

16 A [REDACTED]

17 Q [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED]

22 A [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED] 03:11:08

160

1 [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

8 A [REDACTED]

9 MS. BOLGER: [REDACTED]

10 THE WITNESS: [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

13 BY MR. KLAYMAN:

14 Q [REDACTED]

15 A [REDACTED] 03:11:51

16 Q [REDACTED]

17 A [REDACTED]

■ [REDACTED]

19 Q [REDACTED]

20 A [REDACTED] [REDACTED]

■ [REDACTED]

22 Q [REDACTED]

23 MS. BOLGER: O [REDACTED]

■ [REDACTED]

25 ///

161

1 BY MR. KLAYMAN:

2 Q [REDACTED]

3 MS. BOLGER: [REDACTED]

4 MR. KLAYMAN: [REDACTED]

5 MS. BOLGER: [REDACTED] [REDACTED]

■

7 BY MR. KLAYMAN:

8 Q [REDACTED]

■

10 A [REDACTED] [REDACTED]

■

■

■

■

■

03:12:48

16 Q [REDACTED]

17 MS. BOLGER: [REDACTED]

18 [REDACTED]

19 THE WITNESS: [REDACTED]

20 MS. BOLGER: [REDACTED]

03:12:59

21 BY MR. KLAYMAN:

22 Q [REDACTED]

■

24 MS. BOLGER: [REDACTED]

25 THE WITNESS: [REDACTED]

03:13:11

162

1 BY MR. KLAYMAN:

2 Q [REDACTED]

3 A [REDACTED]

4 MS. BOLGER: [REDACTED]

■ [REDACTED] 03:13:24

6 BY MR. KLAYMAN:

7 Q [REDACTED]

■ [REDACTED]

9 A W [REDACTED]

■ [REDACTED] 03:13:34

11 MS. BOLGER: [REDACTED]

■ [REDACTED]

13 THE WITNESS: [REDACTED]

14 MS. BOLGER: [REDACTED]

15 BY MR. KLAYMAN: 03:14:11

16 Q Turning to your tweet of 2/5/18: "Being that
17 Donald Trump is so in the doghouse with his wife. We
18 suggested a few cards to help him make up with Melania
19 #free Melania, #Stormy Daniels."

20 A picture of you and an inscription below that 03:14:27
21 it was 19 accusers?

22 Again, you're trying to sow marital discord
23 between Trump and Melania.

24 MS. BOLGER: Object. Object to the form.

25 First of all, it's not an inscription below, so that's 03:14:37

1 an incorrect thing to say.

2 But you can answer the question.

3 THE WITNESS: Well, I think if we are making a
4 list of people who are responsible for marital discord
5 between Trump and Melania, I don't think I'm the first
6 one on that list. I think that person might be Donald
7 Trump himself.

03:14:46

8 BY MR. KLAYMAN:

9 Q [REDACTED]

[REDACTED] 03:14:57

11 A [REDACTED]

12 Q [REDACTED]?

13 A [REDACTED]

14 Q [REDACTED].

15 MS. BOLGER: [REDACTED]

03:15:06

16 BY MR. KLAYMAN:

17 Q [REDACTED]

19 A [REDACTED]

20 Q [REDACTED]

03:15:10

21 MS. BOLGER: [REDACTED]

23 MR. KLAYMAN: [REDACTED]

24 MS. BOLGER: [REDACTED]

[REDACTED] 03:15:18

1

[REDACTED]

2

[REDACTED]

3

MR. KLAYMAN:

[REDACTED]

4

[REDACTED]

5

MS. BOLGER:

[REDACTED]

6

[REDACTED]

7

THE WITNESS:

[REDACTED]

8

[REDACTED]

9

BY MR. KLAYMAN:

10

Q

[REDACTED]

03:15:28

11

A

[REDACTED]

12

MS. BOLGER:

13

BY MR. KLAYMAN:

14

Q

[REDACTED]

15

[REDACTED]

16

[REDACTED]

17

[REDACTED]

18

[REDACTED]

19

[REDACTED]

20

MS. BOLGER:

[REDACTED]

21

[REDACTED]

22

[REDACTED]

23

BY MR. KLAYMAN:

24

Q

[REDACTED]

25

A

[REDACTED]

03:16:02

165

1 MS. BOLGER: [REDACTED]

[REDACTED]

[REDACTED]

4 (Simultaneous speaking.)

5 (Reporter clarification.)

03:16:13

6 MS. BOLGER: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. KLAYMAN: [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

13 [REDACTED]

14 THE WITNESS: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 BY MR. KLAYMAN:

18 Q [REDACTED]

19 A [REDACTED]

20 MS. BOLGER: [REDACTED]

03:17:00

21 BY MR. KLAYMAN:

22 Q [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

03:17:14

166

1

■

3

A

A

■

■

03:17:35

6

Q

Tweet on June 9, 2018, Bill Maher @billmaher

7

"Trump bragged yesterday that he didn't prepare for

8

North Korea. Of course, when he has ever prepared for

9

anything. This guy didn't bring a condom to fuck a porn

10

star."

03:18:12

11

That's your tweet, right?

12

A

How many times do I have to say it? I'm going

13

on good faith that you're reprinting them. I don't

14

remember it.

15

Q

03:19:20

16

MS. BOLGER:

■

■

■

■

03:19:49

21

BY MR. KLAYMAN:

22

Q

■

■

■

■

25

MS. BOLGER:

03:19:56

1 THE WITNESS: [REDACTED]

2 BY MR. KLAYMAN:

3 Q [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

7 [REDACTED]

■ [REDACTED]

9 MS. BOLGER: [REDACTED]

10 THE WITNESS: [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

17 MS. BOLGER: [REDACTED]

■ [REDACTED]

19 MR. KLAYMAN: [REDACTED]

20 MS. BOLGER: [REDACTED]

03:20:59

21 MR. KLAYMAN: [REDACTED]

22 MS. BOLGER: [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] 03:21:07

168

1 MR. KLAYMAN: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5 MS. BOLGER: [REDACTED]

03:21:17

6 MR. KLAYMAN: [REDACTED]

7 MS. BOLGER: [REDACTED]

[REDACTED]

[REDACTED]

10 MR. KLAYMAN: [REDACTED]

03:21:23

11 MS. BOLGER: -- [REDACTED]

[REDACTED]

13 [REDACTED]

[REDACTED]

[REDACTED]

03:21:35

16 MR. KLAYMAN: [REDACTED]

[REDACTED]

[REDACTED]

19 MS. BOLGER: [REDACTED]

[REDACTED]

03:21:47

21 MR. KLAYMAN: [REDACTED]

[REDACTED]

23 MS. BOLGER: [REDACTED]

24 MR. KLAYMAN: [REDACTED]

25 MS. BOLGER: [REDACTED]

03:21:51

169

1

2

MR. KLAYMAN:

3

4

MS. BOLGER:

5

03:22:02

6

MR. KLAYMAN:

7

8

MS. BOLGER:

9

10

MR. KLAYMAN:

11

12

MS. BOLGER:

13

14

MR. KLAYMAN:

15

03:22:17

16

MS. BOLGER:

17

18

19

BY MR. KLAYMAN:

20

Q

03:22:24

21

MS. BOLGER:

22

MR. KLAYMAN:

23

24

MR. KLAYMAN:

03:22:34

1

[REDACTED]

2

(Deposition Exhibit 10 was marked for

3

identification by the Court Reporter and is

4

attached hereto.)

5

MS. BOLGER:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12

MR. KLAYMAN:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17

MS. BOLGER:

[REDACTED]

[REDACTED]

[REDACTED]

19

MR. KLAYMAN:

[REDACTED]

[REDACTED]

[REDACTED]

03:23:30

21

MS. BOLGER: Y

[REDACTED]

[REDACTED]

[REDACTED]

23

MR. KLAYMAN:

[REDACTED]

[REDACTED]

[REDACTED]

25

MS. BOLGER:

[REDACTED]

03:23:35

171

1

2

MR. KLAYMAN:

■

■

5

MS. BOLGER:

■

7

MR. KLAYMAN:

■

9

MS. BOLGER:

10

BY MR. KLAYMAN:

03:23:58

11

Q

■

■

14

■

03:24:09

16

MS. BOLGER:

17

THE WITNESS:

18

BY MR. KLAYMAN:

19

Q

20

MS. LOOMER:

03:24:50

21

MR. KLAYMAN:

22

BY MR. KLAYMAN:

23

Q

■

■

03:25:14

172

1

[REDACTED]

■

[REDACTED]

3

A [REDACTED]

4

MS. BOLGER: [REDACTED].

5

THE WITNESS: [REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

20

BY MR. KLAYMAN:

03:26:12

21

Q [REDACTED]

■

[REDACTED]

■

■ [REDACTED]

24

MS. BOLGER: [REDACTED] [REDACTED]

25

THE WITNESS: [REDACTED] 03:26:18

173

1

■

■

■

■

■

■

■

9

MS. BOLGER: O

10

THE WITNESS:

■

■

■

■

■

■

■

■

19

BY MR. KLAYMAN:

20

Q

■

22

MS. BOLGER:

■

24

MR. KLAYMAN:

25

MS. BOLGER:

03:27:42

174

1 BY MR. KLAYMAN:

2 Q [REDACTED]

■ [REDACTED]

4 [REDACTED]

5 A [REDACTED]

03:27:49

6 Q [REDACTED]

7 A [REDACTED]

8 Q [REDACTED]

■ [REDACTED]

10 A [REDACTED]

03:28:06

11 Q [REDACTED]

■ [REDACTED]

■ [REDACTED]

14 MS. BOLGER: [REDACTED]

■ [REDACTED]

03:28:14

16 MR. KLAYMAN: [REDACTED]

■ [REDACTED]

■ [REDACTED]

19 MS. BOLGER: [REDACTED]

■ [REDACTED]

03:28:53

21 MR. KLAYMAN: [REDACTED]

■ [REDACTED]

23 MS. BOLGER: [REDACTED]

24 MR. KLAYMAN: [REDACTED]

25 MS. LOOMER: [REDACTED]

03:29:06

175

1 [REDACTED]

2 MS. BOLGER: [REDACTED]

3 [REDACTED]

4 BY MR. KLAYMAN:

5 Q [REDACTED] 03:30:03

6 MS. BOLGER: [REDACTED]

7 [REDACTED]

8 THE WITNESS: [REDACTED]

9 MR. KLAYMAN: [REDACTED]

10 [REDACTED] 03:30:16

11 THE WITNESS: [REDACTED]

12 [REDACTED]

13 BY MR. KLAYMAN:

14 Q [REDACTED]

15 MS. BOLGER: [REDACTED] [REDACTED]

16 [REDACTED]

17 THE WITNESS: [REDACTED]

18 [REDACTED]

19 BY MR. KLAYMAN:

20 Q [REDACTED] 03:30:30

21 MS. BOLGER: [REDACTED]

22 BY MR. KLAYMAN:

23 Q [REDACTED]

[REDACTED]

[REDACTED] 03:30:50

176

1

■

■

■

5

A

■

7

Q

■

9

MS. BOLGER:

■

03:31:15

11

12

THE WITNESS:

■

■

■

■

■

18

BY MR. KLAYMAN:

19

Q

■

■

22

MS. BOLGER:

■

24

THE WITNESS:

■

03:31:58

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 BY MR. KLAYMAN:

5 Q [REDACTED] 03:32:10

6 MS. BOLGER: [REDACTED]?

7 THE WITNESS: [REDACTED].

8 [REDACTED]

9 BY MR. KLAYMAN:

10 Q [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 MS. BOLGER: [REDACTED]

14 [REDACTED]

15 MR. KLAYMAN: [REDACTED] 03:32:34

16 MS. BOLGER: [REDACTED]

17 BY MR. KLAYMAN:

18 Q [REDACTED]

19 [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 A [REDACTED]

25 MS. BOLGER: [REDACTED] 03:32:56

1

[REDACTED]

2

THE WITNESS:

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

15

MS. BOLGER:

[REDACTED]

03:34:00

16

BY MR. KLAYMAN:

17

Q

T [REDACTED]

■

[REDACTED]

19

MS. BOLGER:

[REDACTED]

■

[REDACTED]

[REDACTED]

■

[REDACTED]

22

BY MR. KLAYMAN:

23

Q

[REDACTED]

■

[REDACTED]

25

A

[REDACTED]

03:35:04

1 MS. BOLGER: [REDACTED]

2 BY MR. KLAYMAN:

3 Q [REDACTED]

4 A [REDACTED]

■ [REDACTED] 03:35:11

6 Q [REDACTED]

■ [REDACTED]

■ [REDACTED]

9 MS. BOLGER: [REDACTED]

10 THE WITNESS: [REDACTED] 03:35:22

11 MR. KLAYMAN: [REDACTED]

■ [REDACTED]

13 THE WITNESS: [REDACTED]

14 MR. KLAYMAN: [REDACTED]

15 THE WITNESS: [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

20 BY MR. KLAYMAN: 03:35:43

21 Q Y [REDACTED]

■ [REDACTED]

23 MS. BOLGER: [REDACTED]

24 THE WITNESS: [REDACTED]

■ [REDACTED] 03:35:52

180

1 [REDACTED]

2 [REDACTED]

3 BY MR. KLAYMAN:

4 Q [REDACTED]

5 [REDACTED] [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED]

12 MS. BOLGER: [REDACTED]

13 [REDACTED]

14 THE WITNESS: [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED] 03:37:27

21 BY MR. KLAYMAN:

22 Q [REDACTED]

23 A [REDACTED]

24 Q [REDACTED]

[REDACTED] 03:37:55

181

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 A A [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 MS. BOLGER: [REDACTED]

9 THE WITNESS: [REDACTED]

10 [REDACTED]

03:38:25

11 BY MR. KLAYMAN:

12 Q [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 MS. BOLGER: [REDACTED]

16 [REDACTED]

17 BY MR. KLAYMAN:

18 Q [REDACTED]

19 MS. BOLGER: [REDACTED]

20 [REDACTED]

03:38:44

21 THE WITNESS: [REDACTED]

22 [REDACTED]

23 MS. BOLGER: [REDACTED]

24 THE WITNESS: [REDACTED]

[REDACTED]

03:39:02

182

1

■

■

■

5

BY MR. KLAYMAN:

03:39:18

6

Q

■

■

■

10

A

03:39:32

11

Q

12

A

13

Q

■

15

A

A

■

■

■

19

Q

■

03:40:21

21

22

A

23

MS. BOLGER: S

■

■

03:40:31

1 THE WITNESS: [REDACTED]

2 BY MR. KLAYMAN:

3 Q What investigation did you do, if any, before
4 publishing the statement that's at issue in this case,
5 that we went through earlier today, that "I think maybe 03:42:18
6 Laura Loomer is in an arranged relationship to affect
7 the election because she's very close to Trump. She's
8 31. Looks like his type. We did an editorial here a
9 few years ago. It was basically who's Trump fucking
10 because I said, you know, it's not nobody. He's been a 03:42:32
11 dog for too long. And it's not Melania. I think we may
12 have our answer this week. I think it might be Laura
13 Loomer."

14 What investigation did you have done to come up
15 with the conclusion and/or the implication that Laura 03:42:45
16 Loomer was fucking Trump?

17 MS. BOLGER: Object to the form.

18 BY MR. KLAYMAN:

19 Q What investigation? That's the question,
20 investigation? 03:42:54

21 MS. BOLGER: And I object to the form.

22 But you can answer.

23 THE WITNESS: It's a joke. You cut off the
24 beginning of it, by the way, where I'm talking about
25 Taylor Swift and Travis Kelce, right? Isn't there a 03:43:02

1 beginning to that? I know there is, which Trump, I
2 think, or somebody from the camp -- maybe him, maybe
3 somebody from the camp accused her or implied that she
4 was in an arranged relationship with Travis Kelce to try
5 to affect the election.

03:43:26

6 Again, using that as comedic fodder, then based
7 on the fact that everywhere in the news that week Laura
8 Loomer was beside the president, I love you, I love you,
9 screaming at him; he, blowing kisses at her, putting his
10 arm around her waist, saying she's a lot softer in
11 person.

03:43:45

12 She was in the news talking about how she has
13 trouble keeping a boyfriend because Donald Trump is more
14 important than any other man in her life. It was all
15 over and I was not the only one who was making these
16 kind of jokes or making this kind of speculation. It's
17 in the Drudge Report. Meghan McCain talked about it.
18 Lots of people were.

03:44:00

19 Again, I would be remiss if I didn't make jokes
20 about this. That is my job. It was low-lying fruit.
21 The president of the United States was seen everywhere
22 suddenly, at the 9/11 ceremony, at the debate.
23 Suddenly, that there's this very attractive woman is by
24 his side everywhere. So it was fodder for comedy and
25 that's what I do.

03:44:14

03:44:33

1 BY MR. KLAYMAN:

2 Q But you didn't --

3 A I make jokes.

4 Q You didn't do an investigation, did you?

5 A It is not -- 03:44:39

6 MS. BOLGER: Object to the form.

7 BY MR. KLAYMAN:

8 Q That was the question.

9 MS. BOLGER: Asked and answered.

10 MR. KLAYMAN: No, it isn't. 03:44:41

11 MS. BOLGER: You may answer it again.

12 BY MR. KLAYMAN:

13 Q You didn't do an investigation?

14 A I'm a comedian. Comedians don't do
15 investigations. They make jokes. 03:44:48

16 Q And you never gave Ms. Loomer an opportunity to
17 reply to your defamatory allegations, correct?

18 A A show like mine does not give anyone an
19 opportunity to reply if we don't invite them on the
20 show. It's not that kind of thing. And there's no 03:45:06
21 obligation to.

22 Q You're not saying that every time a man has a
23 close friendship with a woman there's a sexual
24 relationship, are you?

25 MS. BOLGER: Object to the form. 03:45:23

1 THE WITNESS: Of course I'm not saying that.

2 But it would be hard to imagine any other president --

3 oh, I don't know, Barack Obama, George Bush, Ronald

4 Reagan, anybody, even Bill Clinton, just suddenly

5 appearing everywhere for a whole week with a new and 03:45:38

6 very attractive young woman at his side. It just would

7 be hard for -- to imagine that of any other president.

8 And I don't think it's ever happened with any other

9 president. So obviously, that's the reason why me and

10 everyone else in the media was commenting on it. 03:45:58

11 BY MR. KLAYMAN:

12 Q So if you appear with someone who is

13 attractive, that's worse than if you're actually doing

14 it behind closed doors with some woman, like Clinton or,

15 for instance, John F. Kennedy, or other people -- 03:46:15

16 presidents like that?

17 MS. BOLGER: Object to the form. Calls for

18 hypothetical.

19 If you feel you can answer that without

20 speculating, you can answer. 03:46:21

21 THE WITNESS: I don't know what this has to do

22 with anything. But if you're asking me -- what are you

23 asking me?

24 BY MR. KLAYMAN:

25 Q Why is there an implication or a statement that 03:46:32

1 Trump is having sex with Ms. Loomer because he appears
2 with her in public when, as you know, there were lots
3 of -- there were several presidents who had affairs
4 behind closed doors and tried to hide that?

5 A Because -- 03:46:52

6 MS. BOLGER: Object to the form. I don't even
7 understand it.

8 But you can answer it, Bill.

9 THE WITNESS: Okay. Because he's been in the
10 news a lot for marital infidelity, the Stormy Daniels, 03:46:57
11 the Marla Maples, the "I grab pussies. When you're a
12 star, they let you do it." It was, again, low-lying
13 fruit for a comedian, which is why all comedians were
14 making jokes about this new...

15 BY MR. KLAYMAN: 03:47:26

16 Q All right.

17 MS. BOLGER: She's not -- he's not done
18 answering. You can't cut him off.

19 BY MR. KLAYMAN:

20 Q I'm not cutting him off. 03:47:30

21 A It's okay. You can cut me off.

22 Q What if I -- you know --

23 A Cut me off.

24 Q [REDACTED]

[REDACTED] 03:47:37

188

1 [REDACTED]

2 A [REDACTED]

3 Q [REDACTED]

4 [REDACTED]

5 [REDACTED] 03:47:51

6 MS. BOLGER: [REDACTED]

7 [REDACTED]

8 MR. KLAYMAN: [REDACTED]

9 [REDACTED]

10 BY MR. KLAYMAN: 03:48:01

11 Q D [REDACTED]

12 A [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED] 03:48:16

16 Q [REDACTED]

17 [REDACTED]

18 A [REDACTED]

19 MS. BOLGER: [REDACTED]

20 MR. KLAYMAN: [REDACTED]

21 [REDACTED]

22 THE WITNESS: [REDACTED]

23 [REDACTED]?

24 BY MR. KLAYMAN:

25 Q [REDACTED]

03:48:28

189

1 A B [REDACTED]

2 Q [REDACTED]

3 A [REDACTED]

4 [REDACTED]

5 Q [REDACTED]

03:48:36

6 A S [REDACTED]

7 Q Y [REDACTED]

8 [REDACTED]

9 A [REDACTED]

10 Q [REDACTED]

03:48:44

11 A [REDACTED]

12 Q Okay. You had a preconceived desire to
13 disparage Ms. Loomer to be able to harm Donald Trump,
14 correct?

15 MS. BOLGER: Objection.

03:48:59

16 THE WITNESS: Completely incorrect. I'd never
17 heard of her before that week.

18 BY MR. KLAYMAN:

19 Q And you've made repetitive attacks on
20 Ms. Loomer; have you not?

03:49:07

21 A No. She was in the news for two weeks and
22 that's when we talked about her, when everyone was
23 talking about her for two weeks.

24 Q Have you made any jokes in any forum about her,
25 since the one that's at issue in this case and then the 03:49:21

1 one that was September 13th, and then the September 20,
2 2024 --

3 A Not to my --

4 Q -- publication?

5 A Not to my recollection because she flew out of 03:49:33
6 the news as quickly as she flew in.

7 Q Now, you are aware that in the last day or so,
8 she -- Ms. Loomer's made a lot of news?

9 A I just read in the paper briefly today, I saw
10 the headline that she was at the White House this week 03:49:49
11 and influenced the president to fire six people. That's
12 as much as I know.

13 Q Are you planning to make so-called jokes about
14 that?

15 A Well, we're not on this week. We're on next 03:49:59
16 week. So that's a week from now. It would be a little
17 stale as far as a news story by then, but it is possible
18 that that will be part of what we talk about because it
19 is news. It was on the front page of the New York
20 Times. I have every right to comment on that. 03:50:18

21 Q Are you going to again state that the reason
22 that she allegedly influenced the president is because
23 of a sexual relationship that she has with him?

24 MS. BOLGER: Object to the form. Misstates
25 testimony. You can answer. 03:50:31

1 THE WITNESS: I have no idea what I'm going to
2 say a week from tonight. That's for next week's show.

3 BY MR. KLAYMAN:

4 Q You think that would be a good idea in light of
5 this lawsuit? 03:50:40

6 A It sounds like another threat, Larry.

7 Q I'm helping you out, Bill.

8 A I see. We'll have to see what happens on
9 Friday. I have a lot to talk about.

10 Q I'll give you my cell phone. Give me a call 03:50:53
11 when you decide to make that joke. Okay?

12 MS. BOLGER: Again, we're not here to chat,
13 Larry.

14 MR. KLAYMAN: All right.

15 THE WITNESS: Yeah. 03:50:59

16 BY MR. KLAYMAN:

17 Q The airing of the September 20th episode on
18 Real Time, paraphrasing 24 things you need to know about
19 Laura Loomer, that was meant to really put the nail in
20 the coffin with her and Trump, correct? 03:51:24

21 MS. BOLGER: Object to the form. You can
22 answer.

23 THE WITNESS: No, it was just meant to give us
24 a comedy bit in a week when Laura Loomer was in the news
25 every day and, therefore, would be a good subject to do 03:51:37

1 a comedy bit about. That's all that was. I got to do a
2 show every week, Larry. You've got to do a lot of --
3 there's a lot of comedy that has to be covered.

4 BY MR. KLAYMAN:

5 Q So you have to -- so you have to go to an easy 03:51:58
6 target like Loomer if you run out of material; is that
7 what you're saying?

8 MS. BOLGER: Object to the form.

9 THE WITNESS: No. No, that's not what I'm
10 saying at all. What I'm saying is that whoever is in 03:52:09
11 the news that week, they are subject to me doing my job
12 with and that is making jokes about. And I make plenty
13 of them about people on the left also, by the way.

14 BY MR. KLAYMAN:

15 Q You are aware the things that you say can 03:52:31
16 severely harm someone's reputation and goodwill and
17 financial condition? You're aware that that could
18 happen?

19 MS. BOLGER: I'll object to the form.

20 But you can answer the question. 03:52:44

21 THE WITNESS: It is never my aim. And I just
22 call them as I see them. My bond with my audience is
23 that I never pull a punch. So I'm going to make jokes
24 about whoever I think make -- needs a joke made about
25 them and that does happen on the left and the right. 03:53:02

1 BY MR. KLAYMAN:

2 Q Is that a consideration you ever take into
3 account when you make a so-called joke, what it can do
4 to harm the subject of that joke?

5 MS. BOLGER: Object to the form. 03:53:17
6 You can answer.

7 THE WITNESS: Yes, I think I -- I can't think
8 of an example, but I -- hypothetically, are there times
9 when I'm sure I think that joke or a joke that -- here's
10 I think the proper way to answer this. 03:53:42

11 My writers present me with many jokes that I
12 reject. I mean, I do -- I don't know -- 12 monologue
13 jokes, five new rules, the desk piece has eight to ten
14 jokes in it. Okay. So how much is that? That's like
15 25 different jokes there. Well, during that week, my 03:54:03
16 writers present me with hundreds. Now I reject jokes
17 for different reasons, but among the reasons I have
18 rejected jokes is yeah, that's too mean or that person
19 doesn't deserve that, so --

20 BY MR. KLAYMAN: 03:54:24

21 Q Or what --

22 MS. BOLGER: No, don't interrupt the witness,
23 so.

24 MR. KLAYMAN: Go ahead. I thought he was done.

25 MS. BOLGER: So. 03:54:30

1 THE WITNESS: I'm done.

2 BY MR. KLAYMAN:

3 Q Or is any consideration what reputational and
4 goodwill and financial damage you can do with a joke?

5 MS. BOLGER: Object to the form. You can 03:54:41
6 answer.

7 THE WITNESS: Well, again, if someone injects
8 themselves into the public debate, including at the
9 highest levels, then all bets are off. It is my job to
10 comment on it. And it is the beauty of this country 03:54:54
11 that I am able to comment on it.

12 BY MR. KLAYMAN:

13 Q So if someone injects themselves into a public
14 debate, you can say anything you want, no holds barred?

15 A I didn't -- 03:55:07

16 MS. BOLGER: Object to the form.

17 BY MR. KLAYMAN:

18 Q That's your concept?

19 MS. BOLGER: That's not what he said.

20 THE WITNESS: I -- that's not what I said. 03:55:12
21 That's what you said. And by the way, people say things
22 about me all the time because I'm in the public debate.
23 What's good for the goose is good for the gander.

24 BY MR. KLAYMAN:

25 Q Well, you're quite wealthy; are you not? 03:55:22

1 MS. BOLGER: Object to the form. Don't answer
2 that question.

3 BY MR. KLAYMAN:

4 Q You are aware that Ms. Loomer is an individual
5 person who doesn't have a lot of financial means like 03:55:31
6 you?

7 MS. BOLGER: How can he possibly know what
8 Ms. Loomer's financial means are? Come on. Ask a
9 question that lays a foundation for.

10 BY MR. KLAYMAN: 03:55:41

11 Q I'm asking.

12 A I have no idea.

13 Q Is she part a big law firm that you -- any
14 knowledge to that?

15 A I have no knowledge of that. 03:55:47

16 Q Do you know whether she's represented by
17 William Morris like you are?

18 A What does that have to do with anything?

19 Q She's just one individual, one woman, an
20 influencer, correct? 03:55:58

21 MS. BOLGER: Object to the form.

22 THE WITNESS: Well -- answer?

23 MS. BOLGER: You can answer, yeah.

24 THE WITNESS: An influencer --

25 ///

1 BY MR. KLAYMAN:

2 Q A journalist?

3 A I'm glad you used the word influencer. You're
4 correct, she is an influencer. She's influences people
5 in a way that I think is untoward and often racist and 03:56:15
6 wrong. Therefore, I feel I have complete free rein to
7 make jokes about her. And they are just jokes.

8 Q And you have free rein to try to destroy her?

9 A I did not try to destroy her and she is not
10 destroyed. You just said she was at the White House 03:56:37
11 this week, so plainly she's not been destroyed.

12 Q You're aware that she's a legitimate,
13 investigative journalist who has uncovered a lot of
14 things that are true?

15 A I am not aware of that. She talks about 03:56:49
16 birtherism. She talks about 9/11 trutherism. I don't
17 think these things are true.

18 Q W [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

22 MS. BOLGER: [REDACTED]
[REDACTED]

24 MR. KLAYMAN: [REDACTED]

25 THE WITNESS: [REDACTED] 03:57:15

197

1 [REDACTED]

2 BY MR. KLAYMAN:

3 Q [REDACTED]

4 MS. BOLGER: [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

7 MR. KLAYMAN: [REDACTED]

■ [REDACTED]

9 MS. BOLGER: [REDACTED]

■ [REDACTED] 03:57:28

11 MR. KLAYMAN: [REDACTED]

■ [REDACTED]

13 MS. BOLGER: [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

18 BY MR. KLAYMAN:

19 Q [REDACTED]

■ [REDACTED]

■ [REDACTED]

22 MS. BOLGER: [REDACTED]

23 [REDACTED]

24 THE WITNESS: [REDACTED]

■ [REDACTED] 03:57:57

198

1 [REDACTED]

2 [REDACTED]

3 BY MR. KLAYMAN:

4 Q [REDACTED]

5 [REDACTED] 03:58:10

6 A [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 Q [REDACTED]

10 A [REDACTED] [REDACTED]

11 [REDACTED]

12 Q [REDACTED]

13 [REDACTED]

14 A [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED]

17 Q [REDACTED]

18 A [REDACTED]

19 [REDACTED] [REDACTED]

20 MS. BOLGER: [REDACTED] [REDACTED]

21 [REDACTED]

22 THE WITNESS: [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 ///

1 BY MR. KLAYMAN:

2 Q [REDACTED]

■ [REDACTED]

4 Q [REDACTED]

■ [REDACTED]

■ [REDACTED]

7 MS. BOLGER: [REDACTED]

■ [REDACTED]

9 [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

13 BY MR. KLAYMAN:

14 Q [REDACTED]

■ [REDACTED]

■ [REDACTED]

17 MS. BOLGER: [REDACTED]

18 MR. KLAYMAN: [REDACTED]

■ [REDACTED]

20 MS. BOLGER: [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

03:59:41

1 [REDACTED]

■ [REDACTED]

3 MR. KLAYMAN: [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

9 MS. BOLGER: [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

12 MR. KLAYMAN: [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

17 THE WITNESS: [REDACTED]

■ [REDACTED]

19 BY MR. KLAYMAN:

20 Q A [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

24 THE VIDEOGRAPHER: We are going off the record

25 at 4:00 p.m. 04:00:34

1 (Recess.)

2 THE VIDEOGRAPHER: We're back on the record at
3 4:20 p.m. Please continue.

4 BY MR. KLAYMAN:

5 Q Mr. Maher, as part of the publication that you 04:20:41
6 made on Real Time on September 13, 2024, you stated: "I
7 think maybe Laura Loomer is in an arranged relationship
8 to affect the election."

9 You have -- you did not have any basis to make
10 that in terms of doing any investigation, did you? 04:20:58

11 MS. BOLGER: Object to the form.

12 THE WITNESS: Again, I've answered this so many
13 times. You're leaving off the front part of that. It's
14 a joke because Taylor Swift was accused that week of
15 being in an arranged relationship with Travis Kelce to 04:21:14
16 affect the election. This is called parody.

17 BY MR. KLAYMAN:

18 Q Well, if as you claim Ms. Loomer is so
19 unpopular with Republicans, how would that help
20 President Trump? 04:21:28

21 MS. BOLGER: I'm sorry, object to the form. I
22 don't -- I don't understand.

23 BY MR. KLAYMAN:

24 Q If you claim that she's so unpopular with
25 Republicans, how would that help Trump in being in an 04:21:35

1 arranged relationship with her?

2 A It's a joke. I -- it's not meant to be taken
3 literally. Did you not hear the part about Taylor
4 Swift?

5 Q No, I don't see Taylor Swift at all mentioned 04:21:45
6 in what you've published with regard to Ms. Loomer.

7 MS. BOLGER: That's because that's your letter.
8 That's not what he published. That's outrageous.
9 That's outrageous.

10 MR. KLAYMAN: Please do not -- what you're 04:21:52
11 doing is outrageous because you're testifying --

12 MS. BOLGER: Mr. Klayman, you just picked up
13 your own letter and suggested that it was what Mr. Maher
14 published. That's improper.

15 MR. KLAYMAN: You are interrupting. 04:21:59

16 THE WITNESS: We watched the tape. That's what
17 it was about. I start the bit talking about Travis
18 Kelce. That's why that makes sense; otherwise, it
19 doesn't make sense. You edited it. You cut off the
20 beginning of it. 04:22:13

21 BY MR. KLAYMAN:

22 Q But you said what you said, correct?

23 MS. BOLGER: Object to the form.

24 THE WITNESS: Oh, yeah.

25 ///

1 BY MR. KLAYMAN:

2 Q Okay.

3 A Yeah, that's my joke.

4 Q At the time that you published the statements

5 about Ms. Loomer on September 13th -- 04:23:07

6 A I didn't publish them.

7 Q You aired them. Okay. Published them, it's a

8 phrase in terms of, you know, sending them out to the

9 public.

10 You're aware that it was going to have a wide 04:23:21

11 reach in Florida, nationally, and internationally,

12 correct?

13 MS. BOLGER: Object to the form.

14 THE WITNESS: I know my show's on all over the

15 country and people watch it. 04:23:32

16 BY MR. KLAYMAN:

17 Q How many viewers did you get approximately or

18 were you getting around September 13, 2024?

19 A I don't know. I don't follow that.

20 Q You don't look at your ratings? 04:23:43

21 A I do not.

22 Q No idea?

23 A Well, I mean, roughly, I remember the Hollywood

24 Reporter, I think it was, did a story maybe four or

25 five years ago about all the late night shows. And we 04:23:55

1 were the second most watched; John Oliver was first. So
2 I assume as long as they keep reupping my contract, it
3 does well enough, the network, and I have never involved
4 myself in that. So I don't know what the numbers are.

5 And TV has a very hard time with the way -- 04:24:21

6 Q Well, those are things that I can get --

7 MS. BOLGER: Hey, he's talking. Finish what
8 you were saying.

9 THE WITNESS: TV is a very hard time these
10 days, ascertaining ratings because it's not like the old 04:24:31
11 days where you had a Nielsen box on your TV and people
12 watched when shows were on. You can watch them on
13 YouTube. You can watch them on, you know, DVR or
14 something. I mean, it's just -- it's very hard to say
15 how many people watch a show. Again, no -- I have no 04:24:50
16 idea what this has to do with this, but --

17 BY MR. KLAYMAN:

18 Q So what you're saying is it's not just the
19 airing of it in terms of HBO and on cable, but it's also
20 picked up on YouTube and other forum for it as well and 04:25:02
21 it's widely seen? Your show is widely seen?

22 A Yes.

23 MS. BOLGER: That's not what he said.

24 But you can answer the question.

25 THE WITNESS: Yes, we want it to be seen. 04:25:11

1 That's why we film it.

2 BY MR. KLAYMAN:

3 Q And it's seen internationally as well?

4 MS. BOLGER: If you know.

5 MR. KLAYMAN: That is an improper objection. 04:25:19

6 That's telling him not to know.

7 MS. BOLGER: That's a foundation.

8 MR. KLAYMAN: No.

9 MS. BOLGER: If he knows, he can answer.

10 MR. KLAYMAN: This is outrageous. 04:25:26

11 BY MR. KLAYMAN:

12 Q Go ahead. Outrageous.

13 A I don't follow that either. I believe we're on
14 in Canada. I do the show for an American audience, so I
15 assume anything can be seen anywhere because of the way 04:25:42
16 the world is and technology is. But whether we're on in
17 Argentina or someplace. I don't know. I don't follow
18 that either. Maybe I should.

19 BY MR. KLAYMAN:

20 Q Would your agency know that, William Morris? 04:25:58

21 MS. BOLGER: That's a question to ask the HBO
22 representative.

23 But you can answer.

24 MR. KLAYMAN: Why are you interrupting me on
25 that? It's a simple question. It shows -- it shows a 04:26:08

1 lack of respect.

2 MS. BOLGER: Oh, Mr. Klayman, you're just
3 wasting time. It's exhausting.

4 You can answer the question.

5 MR. KLAYMAN: It's not for you to decide. 04:26:15
6 Apparently you're the -- you're the client here,
7 Ms. Bolger, so he knew -- he knew nothing about what you
8 were doing, so, please, butt out.

9 MS. BOLGER: What did you say?

10 MR. KLAYMAN: Listen to the testimony. He 04:26:23
11 had -- he had -- he had no input in -- into any of the
12 pleadings or anything else that have been filed.

13 MS. BOLGER: Mr. Klayman, that's not what he
14 testified to.

15 MR. KLAYMAN: It is. 04:26:31

16 BY MR. KLAYMAN:

17 Q You can answer.

18 A I forgot the question.

19 Q Would your agency, William Morris, know your
20 ratings? 04:26:41

21 A If they don't, they can look it up and find
22 out, I'm sure.

23 Q And that your ratings bear on your contract
24 negotiations, correct?

25 A I would assume yes. 04:26:56

1 MS. BOLGER: Don't assume. You can only --
2 Mr. Klayman can only ask you for what you know. He
3 can't ask you to speculate.

4 THE WITNESS: Oh. Well, then I can't answer
5 that question because I do have to speculate. I can 04:27:04
6 only speculate that they wouldn't keep hiring me if I
7 wasn't doing well for the network.

8 BY MR. KLAYMAN:

9 Q [REDACTED]
[REDACTED] 04:27:16

11 A [REDACTED]

12 BY MR. KLAYMAN:

13 Q [REDACTED]

14 MS. BOLGER: [REDACTED]
[REDACTED] 04:27:26

16 MR. KLAYMAN: [REDACTED]

[REDACTED]

18 MS. BOLGER: [REDACTED]

[REDACTED]

20 MR. KLAYMAN: [REDACTED] 04:27:31

21 MS. BOLGER: [REDACTED]

[REDACTED]

23 [REDACTED]

24 MR. KLAYMAN: [REDACTED]

25 MS. BOLGER: [REDACTED] 04:27:37

208

1 MR. KLAYMAN: [REDACTED]

[REDACTED]

3 BY MR. KLAYMAN:

4 Q [REDACTED]

5 A [REDACTED] [REDACTED]

[REDACTED]

7 Q [REDACTED]

[REDACTED]

9 MS. BOLGER: W [REDACTED]

10 MR. KLAYMAN: [REDACTED]

04:27:52

11 THE WITNESS: [REDACTED]

[REDACTED]

[REDACTED]

14 BY MR. KLAYMAN:

15 Q [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

18 MS. BOLGER: [REDACTED]

19 [REDACTED]

20 THE WITNESS: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

04:28:38

209

1 [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

04:28:57

6 BY MR. KLAYMAN:

7 Q [REDACTED]

■ [REDACTED]

■ [REDACTED]

10 MS. BOLGER: [REDACTED]

04:29:07

11 MR. KLAYMAN: [REDACTED]

12 BY MR. KLAYMAN:

13 Q [REDACTED]

■ [REDACTED]

15 A [REDACTED]

04:29:15

16 Q [REDACTED]

17 A [REDACTED]

18 Q [REDACTED]

19 A W [REDACTED]

■ [REDACTED]

[REDACTED]

■ [REDACTED]

■ [REDACTED]

23 Q [REDACTED]

24 MS. BOLGER: [REDACTED]

25 [REDACTED]:29:38

1

■

3

BY MR. KLAYMAN:

4

5

Q Have you talked about Real Time when you do
your comedy shows throughout the country?

04:29:47

6

A Talk about Real Time?

7

8

Q Yeah, talk about what you've done in Real Time
in your comedy acts?

9

10

11

12

A Could it have come up, I guess. But generally,
the audience, if they're coming to see me live and pay
a -- pay for a ticket to see me, they know me from Real
Time.

04:30:00

13

14

15

16

Q Yeah, and that's what creates your reputation
and goodwill and that's why people, you know, want to
pay to see you when you go out around the country and
tour, correct, because you've developed that?

04:30:16

17

MS. BOLGER: Object to the form.

18

BY MR. KLAYMAN:

19

Q Go ahead. You can answer it.

20

21

22

23

24

25

A It's also actually why people don't pay to see
you because they see you at home and that can be a
detriment to selling tickets on the road because they
figure "Why should I go and pay for something that I can
see at home that I'm already paying HBO for?" So it
works both ways.

04:30:24

04:30:41

1 Q Other than what you've testified to, you don't
2 have any additional information of late that Ms. Loomer
3 has a sexual relationship with Donald Trump, right?

4 MS. BOLGER: I'm going to object to the form of
5 the question. You've asked and answered it at least six 04:31:10
6 times.

7 MR. KLAYMAN: Okay. Fine. Fine. I accept
8 that.

9 BY MR. KLAYMAN:

10 Q And if this overlaps with a prior question, 04:31:33
11 indulge me for one question here, just to clear it up is
12 at the time that you made the statements on
13 September 13, 2024, you had reason to believe that that
14 could harm Ms. Loomer's reputation, goodwill, and
15 financial status, correct? 04:31:52

16 MS. BOLGER: Objection to the form.

17 You've asked and answered that several times.

18 BY MR. KLAYMAN:

19 Q You may answer it again.

20 MS. BOLGER: You can answer it again, but 04:31:57
21 exactly the same way.

22 THE WITNESS: I was just making a joke about
23 someone in the news.

24 BY MR. KLAYMAN:

25 Q You will concede that your viewers take much of 04:32:40

1 what you say to be true?

2 MS. BOLGER: Object to the form. I don't
3 understand that question or how can you possibly
4 conceive what viewers think.

5 BY MR. KLAYMAN: 04:32:53

6 Q Based on your experience. Based on your
7 experience.

8 A My viewers are a sophisticated HBO audience.
9 They absolutely know when something is a joke. That's
10 why they laugh. 04:33:00

11 Q You started off this deposition by saying that
12 people watch your show because they want the news.

13 MS. BOLGER: Object to the form. That's not
14 what he said.

15 THE WITNESS: I -- 04:33:10

16 BY MR. KLAYMAN:

17 Q Correct?

18 A I did not say that.

19 Q I will let your testimony stand.

20 A No, I didn't say -- should I go on? 04:33:15

21 MS. BOLGER: Sure.

22 THE WITNESS: I did not say they watch the show
23 because they want the news. I said it's a wrap-up show
24 that uses news as comedy -- news as fodder for its
25 comedy, that people who don't get a chance to see the 04:33:29

1 news and want to be caught up of the big stories in a
2 week in a way that is -- presents them in a comedic way
3 as opposed to the more dry way on regular news shows.
4 They can do that by watching our show.

5 BY MR. KLAYMAN: 04:33:46

6 Q But you are aware that at a minimum when you
7 say that Ms. Loomer had a sexual relationship with
8 Trump, that people could take that to be true?

9 MS. BOLGER: Object to the form.

10 You can answer again. 04:33:56

11 THE WITNESS: I can't help how people interpret
12 jokes. And I can't not do jokes about people who are in
13 the news, including Donald Trump and his marital
14 infidelities that were much in the news and Ms. Loomer
15 being by his side every day for a week. I can't not 04:34:18
16 comment on that. I would be remiss.

17 BY MR. KLAYMAN:

18 Q Because Mr. Trump had alleged marital
19 infidelities with other women doesn't mean that he did
20 it with Ms. Loomer, does it? 04:34:28

21 A It does not. And I was not saying that that
22 was a definitive. I was making a joke.

23 Q Do you regret making this joke?

24 MS. BOLGER: Oh, gosh. Mr. Klayman, the last
25 four questions are questions you've already asked. 04:34:42

1 You've got to ask something new or we're going to end
2 this deposition. Ask a new question.

3 MR. KLAYMAN: It's over shortly so just
4 please --

5 MS. BOLGER: Ask -- 04:34:50

6 MR. KLAYMAN: Don't interrupt me. You've
7 interrupted me throughout this deposition. It's
8 inappropriate.

9 MS. BOLGER: Ask a new question.

10 MR. KLAYMAN: Inappropriate. And I've -- and 04:34:54
11 I've taken it from you because you're -- you yourself
12 are not doing the right thing.

13 MS. BOLGER: What? I'm sorry, Mr. Klayman,
14 that insult, I didn't understand if you want to clear it
15 up. 04:35:11

16 MR. KLAYMAN: You're not -- you're not allowing
17 me to take my deposition. You're obstructing it.

18 BY MR. KLAYMAN:

19 Q [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

24 MS. BOLGER: [REDACTED]

25 THE WITNESS: [REDACTED] 04:36:01

215

1 [REDACTED]

2 BY MR. KLAYMAN:

3 Q Y [REDACTED]

4 [REDACTED]

5 MS. BOLGER: [REDACTED] [REDACTED]

6 [REDACTED]

7 MR. KLAYMAN: H [REDACTED]

8 THE WITNESS: [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 MS. LOOMER: [REDACTED] 04:36:44

16 BY MR. KLAYMAN:

17 Q [REDACTED]

18 [REDACTED]

19 MS. BOLGER: [REDACTED]

20 [REDACTED] 04:36:55

21 THE WITNESS: [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 ///

1 BY MR. KLAYMAN:

2 Q [REDACTED]

■ [REDACTED]

■ [REDACTED]

5 A [REDACTED]

■ [REDACTED]

7 Q [REDACTED]

■ [REDACTED]

■ [REDACTED]

10 A [REDACTED]

■ [REDACTED]

■ [REDACTED]

13 Q You are aware that she's earned the trust of
14 President Trump and many conservatives because of the
15 things she's uncovered as an investigative journalist?

04:37:50

16 A Well, I seem to remember that on

17 September 13th, the day we were doing that show, Trump
18 himself was starting to distance himself from her. And
19 then again, we did not see Ms. Loomer on the public
20 stage or around Trump for up until this week, like
21 today. So obviously, I don't know what goes on behind
22 the scenes. Not my business. But your contention that
23 I've somehow ruined her obviously is not true since
24 she's at the White House, influencing him about big,
25 national decisions.

04:38:10

04:38:32

1 Q You are -- you don't know how many people would
2 have otherwise supported her financially and otherwise
3 if you hadn't made the statements that you made on
4 September 13th?

5 MS. BOLGER: Object to the form of the 04:38:46
6 question.

7 You can answer.

8 THE WITNESS: You are giving me way too much
9 power. I'm just a comedian making jokes. Nobody
10 changed anything in their real life because I made those 04:39:00
11 jokes.

12 BY MR. KLAYMAN:

13 Q But you have no knowledge of that?

14 MS. BOLGER: Object to the form. You just
15 asked him his knowledge. 04:39:07

16 THE WITNESS: No one has -- no one has any full
17 knowledge of anything that people do. But this became
18 publicized because she publicized it. It would have
19 gone away if she didn't file a lawsuit.

20 BY MR. KLAYMAN: 04:39:20

21 Q Now, with --

22 A So it stayed in the public eye because of her,
23 not me; otherwise, it would have just been another week
24 of jokes that went by and no one thought about them the
25 week after. 04:39:29

1 Q You're aware that once things go up on YouTube
2 or on the internet they're always there?

3 MS. BOLGER: Object to the form of the
4 question.

5 If you can even understand that question, you 04:39:38
6 can answer it.

7 MR. KLAYMAN: You can -- I understand it. He
8 does -- he does too.

9 BY MR. KLAYMAN:

10 Q Answer it, please. 04:39:43

11 A Yes, I suppose that's right. I suppose that
12 anything on the internet stays there forever.

13 Q So when people search to find out about you,
14 they find out all the stuff that you said -- they can
15 find out all the stuff that you said about her? 04:39:57

16 MS. BOLGER: That's a hypothetical. Calls for
17 speculation.

18 If you have independent knowledge, you can
19 answer.

20 BY MR. KLAYMAN: 04:40:04

21 Q Correct?

22 MS. BOLGER: You can't call for speculation.

23 MR. KLAYMAN: I'm asking if he's aware of it.

24 THE WITNESS: Plainly, people can look up
25 anything. I doubt if anyone does or cares. The only 04:40:10

1 reason they would have it in their mind is because of
2 this suit.

3 BY MR. KLAYMAN:

4 Q Are you aware that she gets called a whore
5 every day because of your claims that she slept with 04:40:26
6 Trump?

7 A I reject that premise completely that it's my
8 fault. I get called names too. I don't -- I don't
9 blame any one person.

10 Q In today's political environment, using that 04:40:45
11 kind of language and statements can actually endanger
12 her life, based upon your experience in observing what's
13 going on in our country today.

14 MS. BOLGER: Sorry, is there a question?
15 Because that's just you giving a lesson. 04:41:00

16 MR. KLAYMAN: Yes, that's it. No, that's a --

17 MS. BOLGER: What's the question?

18 MR. KLAYMAN: That's a leading question.

19 MS. BOLGER: That's not a leading question.
20 That's a statement. 04:41:04

21 BY MR. KLAYMAN:

22 Q You're are aware of that --

23 MR. KLAYMAN: Please don't interrupt.

24 MS. BOLGER: Object to the form. That was
25 ridiculous. 04:41:09

1 THE WITNESS: I don't know what the question
2 is. My comment would be both sides do it. Nobody does
3 it more than Donald Trump.

4 BY MR. KLAYMAN:

5 Q And there's a lot of violence in the country 04:41:14
6 today --

7 A There is a lot of violence in the country and
8 there's probably some because he says things like lock
9 her up and --

10 Q I'm talking about Ms. Loomer here. 04:41:22

11 A I know. You're asking general questions, so
12 you get general answers.

13 Q Isn't it in your -- in your experience
14 reasonably foreseeable that what you said about her
15 could endanger her physically? 04:41:33

16 MS. BOLGER: Object to the form.

17 THE WITNESS: What anybody says about anything
18 could incite any sort of borderline person to do
19 anything.

20 MS. BOLGER: Even releasing press releases 04:41:44
21 about a video deposition.

22 BY MR. KLAYMAN:

23 Q [REDACTED]

[REDACTED]

[REDACTED]

04:42:05

221

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[REDACTED]

2

A

[REDACTED]

3

MS. BOLGER: A

[REDACTED]

4

[REDACTED]

5

[REDACTED]

6

[REDACTED]

7

[REDACTED]

8

MR. KLAYMAN:

[REDACTED]

9

[REDACTED]

10

MS. BOLGER:

[REDACTED]

[REDACTED]

11

[REDACTED]

12

MR. KLAYMAN:

[REDACTED]

13

[REDACTED]

14

MS. BOLGER:

[REDACTED]

15

[REDACTED]

04:42:31

16

MR. KLAYMAN:

[REDACTED]

17

MS. BOLGER:

[REDACTED]

18

[REDACTED]

19

MR. KLAYMAN:

[REDACTED]

20

(Simultaneous speaking.)

04:42:35

21

MS. BOLGER:

[REDACTED]

22

[REDACTED]

23

MR. KLAYMAN:

[REDACTED]

24

BY MR. KLAYMAN:

25

Q

Have you ever had any contact with the Florida

04:42:48

1 law firm representing you, Shullman Fugate?

2 A No.

3 MR. KLAYMAN: I'm going to reserve all the time
4 that I haven't used based upon your litigating what's
5 confidential and what's not confidential because 04:43:10
6 Mr. Maher may have to come back. I will come back to LA
7 if I have to.

8 And also there are other issues that may arise
9 that require a further deposition. But we have not used
10 the full seven hours. It may be that we don't need any 04:43:22
11 more time, but I'm going to reserve it and adjourn the
12 deposition at this time.

13 MS. BOLGER: I -- on the record, you may ask
14 Mr. Maher any question. He is here. I have not
15 instructed him to not answer a question on the basis of 04:43:35
16 confidentiality. In fact, I've let him answer every
17 confidentiality question. I instructed him not to
18 answer questions that were frankly so outrageous that
19 I -- he wasn't going to answer them.

20 This is your time. We are not producing 04:43:48
21 Mr. Maher -- I'm not done talking. We're not producing
22 Mr. Maher again. This is the time you have now with
23 Mr. Maher. Please ask him any questions you have and he
24 will answer them. But we are here today and this is the
25 only time we will be here with Mr. Maher. 04:44:04

1 MR. KLAYMAN: We will let the court decide
2 that. And for the record, the only question that is
3 potentially confidential is his compensation and I was
4 very --

5 MS. BOLGER: That's surprising, Mr. Klayman, 04:44:14
6 because earlier in the day you said that another
7 question was confidential, so maybe you forgot that.

8 MR. KLAYMAN: What was that?

9 MS. BOLGER: It was your completely
10 inappropriate questions about lawsuits that he was 04:44:20
11 involved in. You asked for the name --

12 MR. KLAYMAN: That's not confidential at all.

13 MS. BOLGER: You said it was confidential.

14 MR. KLAYMAN: That's not. No, it's not. So
15 maybe I misheard you or you misheard me, but that is not 04:44:28
16 confidential.

17 MS. BOLGER: That's what you said.

18 MR. KLAYMAN: Okay. That is a normal question
19 which is asked in a case that involves --

20 MS. BOLGER: And what's what you said. 04:44:34

21 MR. KLAYMAN: -- tort actions in --

22 MS. BOLGER: Mr. Maher -- Mr. Maher is not
23 coming back for a deposition. You may ask him any
24 question you have.

25 MR. KLAYMAN: I understand your position. 04:44:42

1 MS. BOLGER: He is right here.

2 MR. KLAYMAN: I understand your position, which
3 is the typical position that someone in your position
4 would take. So the deposition is adjourned. I am not
5 concluding the deposition. 04:44:51

6 I thank you, Mr. Maher, for coming.

7 THE WITNESS: Thank you.

8 MR. KLAYMAN: Okay.

9 THE WITNESS: Thank you.

10 MS. LOOMER: Thank you. 04:44:57

11 MR. KLAYMAN: And please in the future, be
12 careful about what you say.

13 MS. BOLGER: No. No. No lectures. No
14 lectures. No lectures.

15 THE WITNESS: Okay. 04:45:02

16 MS. BOLGER: Don't -- unplug yourself, Bill. I
17 mean, do unplug yourself. Don't --

18 THE VIDEOGRAPHER: This concludes today's
19 deposition. We are going off the record at 4:45 p.m.

20 THE REPORTER: And Ms. Bolger, you want your
21 copy by this Wednesday as well?

22 MS. BOLGER: Yes, please.

23 (Whereupon, at the hour of 4:45 p.m., the
24 deposition of BILL MAHER was adjourned.)

25 ---oOo---

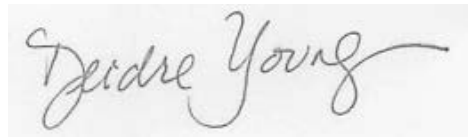
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REPORTER'S CERTIFICATION

I, Deidre Young, RPR, a Certified Shorthand
Reporter in and for the State of California, do hereby
certify:

That the foregoing witness was by me duly sworn;
that the deposition was then taken before me at the time
and place herein set forth; that the testimony and
proceedings were reported stenographically by me to the
best of my ability and later transcribed into
typewriting under my direction; that the foregoing is a
true record of the testimony and proceedings taken at
that time.

IN WITNESS WHEREOF, I have subscribed my name this
8th day of APRIL, 2025.

A handwritten signature in cursive script that reads "Deidre Young". The signature is written in dark ink on a light-colored background.

Deidre Young, RPR, CSR No. 11461

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DEPOSITION ERRATA SHEET

Case Caption: LAURA LOOMER
vs. BILL MAHER, et al.,

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I
have read the entire transcript of my Deposition taken
in the above captioned matter or the same has been read
to me, and the same is true and accurate, save and
except for changes and/or corrections, if any, as
indicated by me on the DEPOSITION ERRATA SHEET hereof,
with the understanding that I offer these changes as if
still under oath.

Signed on the ____ day of _____, 20____,

BILL MAHER

1 DEPOSITION ERRATA SHEET

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25 BILL MAHER

1 DEPOSITION ERRATA SHEET

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25 BILL MAHER