## **EXHIBIT B**

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            UNITED STATES DISTRICT COURT
            SOUTHERN DISTRICT OF NEW YORK
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     E. JEAN CARROLL,
                                )
                  Plaintiff,
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               -against- )20-cv-7311(LAK)
 7
     DONALD J. TRUMP, in his
                                )
 8
     personal capacity,
                 Defendant.
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11
                  ***CONFIDENTIAL***
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13
               VIDEOTAPED DEPOSITION OF
                    E. JEAN CARROLL
14
15
                 New York, New York
16
                Friday, October 14, 2022
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     Reported By:
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     CATHI IRISH, RPR, CRR, CLVS
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Page 40 CARROLL - CONFIDENTIAL 1 2 sold the company? 3 Α. No. 4 Q. Did you ever use your own website to meet anyone? 6 Α. I looked. 7 I'll just repeat my question. Ο. Did you ever use the website to meet 8 anyone? 9 I didn't see anyone --10 Α. 11 Q. You didn't --12 Α. -- that I would have dated. 13 Q. Did your sister ever date anybody from the website? 14 15 Α. No. 16 What would have been your Ο. 17 criteria for someone you dated at that 18 time, and I can give you a year 19 approximately, but let's say when you sold 20 the company to The Knot? 21 Here's the thing, the light had gone out. I just wasn't -- I liked 22 23 meeting men, I liked meeting new people 24 but my life was not there, you know? New York there's a taxi and if the light 25

Page 41 CARROLL - CONFIDENTIAL 1 2 is on it means it's available, wants to meet people. I didn't have that. My 3 4 light was gone. But you had been looking on the 6 website to see if there was anyone? I'm always curious. Α. 8 Q. Do you go out on dates? 9 MS. KAPLAN: Again, let's have a time frame. 10 BY MS. HABBA: 11 12 Same time frame, let's stick with Q. 13 that time frame, when you sold it to The Knot. 14 15 Α. Every once in awhile but I rarely 16 let a new acquaintance get to the point 17 where he would ask me out or I would ask 18 him out. 19 So you would go to dinners; is that correct? 20 21 Yes, as friends. 2.2 Let me ask you this: Did you Q. 23 only date men? 24 Α. Yes. 25 Q. Never dated women?

Page 42 CARROLL - CONFIDENTIAL 1 2 Α. No. So who was your last significant 3 Q. relationship that you remember? 4 Α. John Johnson. 6 Ο. Who was the last man you dated 7 that you recall? Α. I don't remember his name. 8 That's how significant it was. 9 Do you remember approximately 10 11 when? 12 It's not for lack of trying. No. 13 I wanted to meet people. I just -- the music had stopped. 14 15 Ο. Why do you think the music had 16 stopped? 17 Α. Well, looking back on it, it may 18 have been what happened at Bergdorf's. 19 Is there anything else that you Ο. 20 think could have caused it? Luck, not -- not meeting people 21 22 that would make me want to spend time with 23 them. Do you consider yourself asexual 24 at this moment? 25

Page 43 CARROLL - CONFIDENTIAL 1 2 Α. No. Ο. So a sex drive is not the issue; is that correct? 4 I had no desire for desire. don't have the desire to want sex. You 6 have to want sex. 8 Q. Would you describe that as a sex drive for most people? 9 Α. Yes. 10 11 Have you ever tried to fix that Ο. 12 in any way, meaning getting help? 13 Α. Well, looking back perhaps maybe I should have but in my own way, I started 14 15 a dating site and then I started another 16 dating site. It's not that I was, you 17 know, staying in the house with a shawl 18 over my head. 19 What type of men do you like? Q. 20 MS. KAPLAN: Objection to form. 21 MS. HABBA: Generally what type 2.2 of men do you like? 23 MS. KAPLAN: You can answer. THE WITNESS: Men who live 24 25 fascinating lives, men who are kind,

Page 44 CARROLL - CONFIDENTIAL 1 2 men who have a great sense of humor, men who are fun to be with, men who love animals, men who love their 4 mothers, men who like women, men who 6 like other men, not sexually but like, 7 you know, athletic men, adventurous 8 men. BY MS. HABBA: 9 Do you like men who are 10 11 successful? 12 Α. Yes. 13 MS. KAPLAN: Objection to form, 14 sorry. 15 THE WITNESS: Yes. 16 BY MS. HABBA: 17 Q. When is the last time you went out with a man -- how do I state this --18 19 in hopes of becoming more than friends? 20 See, that's the thing. You put Α. 21 your finger on it. I've never met anybody 2.2 since that time where I felt that hope of 23 wow, I hope this turns into something. 24 Q. So when is last time you had sex? '94 or '95. 25 Α.

Page 135 CARROLL - CONFIDENTIAL 1 2 Α. No. 3 Ο. Do you recall what your disposition was on that phone call? 4 I was in shock and disordered. 5 6 felt unbalanced which was a strange 7 feeling for me. When you say unbalanced were you 8 Q. 9 actually physically unbalanced? 10 Α. Yes. 11 Q. Did you sit down at any point 12 or --13 Α. No. Did you need to get a water or do 14 Ο. 15 anything to take care of yourself after 16 that moment? 17 No, what I wanted to do, I needed Α. 18 to talk to somebody, talk to Lisa. Then I 19 just wanted to go home. 20 Q. Is that what you did? 21 (Witness nodded.) 2.2 Q. So did you go to a parking garage 23 to get your car or did you go straight home? 24 25 Α. The parking garage.

Page 137 CARROLL - CONFIDENTIAL 1 2 Α. Model. 3 Q. Thank you. Α. It was a 1959. It was a real 4 beauty. 5 What color? 6 Q. 7 Α. That aquamarine and white. Ιt 8 was a gorgeous car. 9 So what did you do immediately Ο. following the call? 10 11 Α. Walked to the car. 12 Q. Did you call anybody else? 13 Α. No. After you --14 Ο. 15 Α. No, not particularly after that 16 call. I knew that I wasn't going to tell 17 anybody ever again about this. Lisa shocked me in the call. 18 19 Why did she shock you? Q. 20 Α. She told me I had been raped. Had it occurred to you? 21 Ο. 2.2 Α. No. After this conversation, did you 23 Ο. discuss this incident with Ms. Birnbach 24 25 again?

Page 145 CARROLL - CONFIDENTIAL 1 2 Have you ever questioned if what Ο. 3 happened in that dressing room was rape? MS. KAPLAN: Objection to form. 4 You can answer. 6 THE WITNESS: I question whether 7 he thought it was rape. I never questioned what I thought. 8 9 BY MS. HABBA: During the two decades that 10 11 followed, how would you say the alleged 12 attack impacted your life? 13 Α. Well, four or five years ago I would have told you it had no effect. I'm 14 15 as good as new. This is great. I'm fine. I rarely think of it but I've come to 16 17 understand that that rape changed my life 18 which is shocking for me to now understand. 19 20 When you say four or five years Ο. 21 ago, do you mean when you started this 2.2 lawsuit? 23 No, before that, before that. I'm talking about the time before this. 24 Before the lawsuit. 25 Q.

Page 147 CARROLL - CONFIDENTIAL 1 2 why was -- let me scratch that. During the last two decades, have 3 you ever interacted with the defendant 4 again directly? 5 6 Α. No. 7 Ο. Were you aware that the president -- that the defendant was a 8 9 presidential candidate prior to the 2016 10 election? 11 Α. Yes. 12 And are you aware that he ran in Q. 13 2000 as a potential member of the reform party? 14 15 Α. No. 16 Did you ever consider coming Ο. forward with your account prior to #MeToo? 17 18 Α. Never. 19 Why not? Q. 20 Α. Just -- I'm going to say 21 something that even surprises me because 2.2 women who have been raped are looked at in 23 this society as less, are looked at as 24 spoiled goods, are looked at as rather dumb to let themselves get attacked. 25

Page 148 CARROLL - CONFIDENTIAL 1 2 mean even you have to say did you scream? 3 I mean every woman who admits to being attacked has to answer that question, why 4 didn't you scream, why did you come 6 forward when you did, why didn't you come forward before and so no, I didn't -- I would have been fired. 8 9 How did you feel when you found out that the defendant announced he was 10 11 running for president in 2016? 12 Α. I thought oh, boy. 13 Ο. What does oh, boy mean? Just almost disbelief and a 14 15 little bit of heartache. I felt really bad, you know. 16 17 Why did you feel bad? Q. 18 Α. I didn't think he would be a good candidate. 19 20 Why didn't you come forward with Ο. 21 your account at that time? 2.2 Α. I was with my mother in 23 Bloomington, Indiana. She was on her deathbed. She was a feisty redheaded 24 25 Scottish woman, republican politician, so

Page 172 CARROLL - CONFIDENTIAL 1 2 BY MS. HABBA: 3 Ο. Were the timing of your allegations related to the former 4 president's run for reelection? 5 6 Α. No. Was it something you considered? Q. 8 Α. No. 9 How did the defendant's Q. statements impact your personal life? 10 11 Totally affected it. I lost my Α. 12 job. I'm looked at as a woman who's 13 untrustworthy, looked at now as a woman who can't be believed. I'm looked at as a 14 15 woman who was stupid and dumb enough to 16 have happen to her what happened to her. 17 You just said that you're looked at as a woman stupid enough to have had 18 19 happen to her what happened to her; is 20 that correct? 21 (Witness nodded.) 2.2 Q. How does that relate to Donald 23 Trump, the perception rather? 24 Α. He raped me and after that everything I thought was quickly over and 25

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           VIDEOTAPED DEPOSITION OF DONALD J. TRUMP
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                  Wednesday, October 19, 2022
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                     10:22 a.m. - 3:50 p.m.
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                      The Mar-a-Lago Club
                   1100 South Ocean Boulevard
                  Palm Beach, Florida, Florida
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     Stenographically Reported By
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     Pamela J. Pelino, RPR, FPR, CLR
     Notary Public, State of Florida
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     TSG REPORTING
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     JOB NO. 218342
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