

# **EXHIBIT E**

Edgar Allen Peterson, IV

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

EDGAR ALLEN PETERSON, IV,  
PLAINTIFF,

V.

NO. 7:23-CV-01576-M

UNITED STATES OF AMERICA,

DEFENDANTS.

VIDEO DEPOSITION OF EDGAR ALLEN PETERSON, IV

Taken at the instance of the Defendant on Thursday,  
February 8, 2024, in the home of Edgar Allen Peterson,  
IV, 1509 Goodbar Avenue, Memphis, Tennessee,  
beginning at 9:13 a.m.

(Appearances noted herein)

REPORTED BY: Kelly D. Brentz, CSR, RPR

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

APPEARANCES:

JOHN F. ROMANO, ESQ.  
MARJORIE H. LEVINE, ESQ.  
Romano Law Group  
john@romanolawgroup.com  
majorie@romanolawgroup.com  
J. EDWARD BELL, III, ESQ.  
Bell Legal Group  
jeb@belllegalgroup.com  
SARA PAPANTONIO, ESQ. (VIA ZOOM)  
Levin Papantonio Rafferty  
spapantonio@levinlaw.com

COUNSEL FOR PLAINTIFF

ELIZABETH K. PLATT, ESQ.  
JOSEPH TURNER, ESQ.  
ANNA ELLISON, ESQ. (VIA ZOOM)  
ADAM RAVIV, ESQ. (VIA ZOOM)  
U.S. Department of Justice  
elizabeth.k.platt@usdoj.gov  
joseph.b.turner@usdoj.gov

COUNSEL FOR DEFENDANT

ALSO: Michael Mitchell, videographer, VCE Legal Tech  
Patti Mobley  
Lori Peterson

1           Q.    "No"? Well, let me go through some broad  
2 instructions before we get started. I'm going to ask you  
3 some questions and I would like you to answer them to the  
4 best of your ability. If you don't understand a question,  
5 please ask me to rephrase. I'm happy to rephrase the  
6 question for you. If you answer the question, I'm going  
7 to assume that you understood the question as it was  
8 phrased.

9                   In a normal conversation, you typically can  
10 start speaking in the middle of a question, but for  
11 deposition purposes and for purposes of the court  
12 reporter, please wait until I finish my questioning and  
13 then you can answer that question.

14                   Also, when you are answering the question,  
15 please say "yes" or "no" fully, and if you're speaking  
16 through your software, then feel free to use Y for "yes"  
17 or N for "no" to make it easier on yourself.

18                   If you need to take a break at any time, just  
19 let me know, we're happy to take breaks. But if there's a  
20 question pending, I ask that you answer that question and  
21 then we can take a break.

22                   And I also want to put on the record that  
23 Mr. Peterson is using a text-to-speech software called --  
24 app entitled NaturalReader and that is being used as his  
25 form of communication, and he is also going to verbally

1 A. Two or three years ago.

2 Q. I'm sorry, I did not --

3 A. Two or three years ago. Two or three years ago.

4 Q. Thirty years ago?

5 A. Two to three.

6 THE REPORTER: Two or three years ago?

7 Q. (By Ms. Platt) Two to three years ago?

8 A. (Unintelligible.)

9 (Whereupon, the witness responded with a lengthy  
10 uninterrupted answer which was largely unintelligible  
11 and unreportable. Per discussion, counsel will make  
12 provisions subsequent to the deposition for acquiring  
13 the answer.)

14 Q. Well, thank you for answering my questions,  
15 Mr. Peterson. I really appreciate your time today.  
16 That's all the questions I have, and I wanted to thank you  
17 again for your service to this country.

18 A. Thank you.

19 Q. We do really appreciate it.

20 A. (Unintelligible.)

21 MS. PLATT: Just for the record, Mr. Peterson's  
22 counsel and I have agreed that we will serve  
23 interrogatories to answer follow-up questions. Our  
24 previous agreement will stand, that they're not  
25 limited in number and they will follow the deposition

1 protocol for objections.

2 Do you have anything to add for the record?

3 MR. ROMANO: Agreed. We don't have any  
4 questions at this time. We do want him to read and  
5 sign this transcript. And I just want to make sure  
6 that we take care of anything we're agreeing to while  
7 we're still on the record.

8 MS. PLATT: You also proposed that you would not  
9 state that this was the sole deposition if we needed  
10 to follow up after interrogatories.

11 MR. ROMANO: No, no, we can -- I agree. We will  
12 not do that. And so that we're clear on that, we do  
13 understand there may be a need for the government to,  
14 in essence, move forward with further questioning in  
15 the line of deposition setting. And if you-all -- if  
16 the government feels that is necessary, we're not  
17 going to object to that. Okay.

18 I think that's it. If there's anything else we  
19 need to discuss, you can call Marjorie or me or Ed  
20 Bell.

21 MS. PLATT: Okay. And thank you all for your  
22 time. We can go off the record.

23 THE VIDEOGRAPHER: Off the record at 12:31.

24 (Pause.)

25 THE REPORTER: And do you want a copy of this,


1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

CERTIFICATE OF COURT REPORTER

I, Kelly D. Brentz, Court Reporter and Notary Public do hereby certify that the foregoing 33 pages, and including this page, contain a true and accurate transcription of the testimony of Edgar Allen Peterson, IV, taken by me in the aforementioned matter at the time and place heretofore stated, by stenotype and later reduced to typewritten form under my supervision by means of computer-aided transcription.

I further certify that I am not in the employ of or related to any counsel or party in this matter and have no interest, monetary or otherwise, in the final outcome of this proceeding.

Witness my signature and seal this the 25th day of February 2024.

  
KELLY D. BRENTZ, CSR