

**Transcript of the Testimony of:**

**Sandra Sikes**

**Date:** February 28, 2013

**Case:** Lisa T. Jackson v. Paula Deen, et al.  
4:12-CV-0139

*Tom Crites & Associates International, Inc.*

*P.O. Box 9438*

*Savannah, Georgia 31412*

*Phone: 800-631-3480*

*Fax: 912-233-7777*

*critesreporting@aol.com*

*www.critesintl.com*

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

LISA T. JACKSON,

Plaintiff,                    CIVIL ACTION NO.

vs.

PAULA DEEN, PAULA DEEN            4:12-CV-0139  
ENTERPRISES, LLC, THE LADY  
& SONS, LLC, THE LADY  
ENTERPRISES, INC., EARL  
W. "BUBBA" HIERS, and UNCLE  
BUBBA'S SEAFOOD and OYSTER  
HOUSE, INC.,

Defendants.

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Deposition of SANDRA SIKES, taken by  
counsel for the Plaintiff, pursuant to notice and  
agreement, before Rachael Miller, Certified Court  
Reporter, at 218 West State Street, Savannah,  
Georgia, February 28, 2013, at 2:22 p.m.

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<p>1 APPEARANCE OF COUNSEL:</p> <p>2</p> <p>3 FOR THE PLAINTIFF:</p> <p>4 MATTHEW C. BILLIPS, Esquire</p> <p>5 Billips &amp; Benjamin, LLP</p> <p>6 3101 Towercreek Parkway</p> <p>7 Suite 190</p> <p>8 Atlanta, Georgia 30339</p> <p>9 (770) 859-0753</p> <p>10</p> <p>11 S. WESLEY WOOLF, Esquire</p> <p>12 408 East Bay Street</p> <p>13 Savannah, Georgia 31401</p> <p>14 (912) 201-3696</p> <p>15</p> <p>16</p> <p>17 FOR THE DEFENDANTS:</p> <p>18 WILLIAM FRANKLIN, Esquire</p> <p>19 Oliver, Maner, LLP</p> <p>20 218 West State Street</p> <p>21 Savannah, Georgia 31401</p> <p>22 (912) 236-3311</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 I N D E X</p> <p>2</p> <p>3 OPENING REMARKS AND STIPULATIONS ----- 7</p> <p>4</p> <p>5</p> <p>6</p> <p>7 EXAMINATION</p> <p>8 By Mr. Billips ----- 10</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13 ATTESTATION ----- 60</p> <p>14 ERRATA SHEET ----- 61</p> <p>15 CERTIFICATE ----- 62</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 FOR THE DEFENDANTS:</p> <p>2 THOMAS A. WITHERS, Esquire</p> <p>3 ANTHONY C. LAKE, Esquire</p> <p>4 Gillen, Withers &amp; Lake, LLC</p> <p>5 8 East Liberty Street</p> <p>6 Savannah, Georgia 31401</p> <p>7 (912) 447-8400</p> <p>8</p> <p>9 Also Present: Melissa McCurry, Earl Hiers</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 DOCUMENTARY EVIDENCE</p> <p>2 NUMBER DESCRIPTION PAGE</p> <p>3</p> <p>4 A February 18, 2013 email from 59</p> <p>5 Bill Hunter to Matthew Billips</p> <p>6 and February 18, 2013 email</p> <p>7 from Matthew Billips to</p> <p>8 Bill Franklin</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p>1 DISCLOSURE STATEMENT</p> <p>2 STATE OF GEORGIA:</p> <p>3 COUNTY OF CHATHAM:</p> <p>4</p> <p>5 Pursuant to Article 10.B. of the Rules</p> <p>6 and Regulations of the Board of Court Reporting of</p> <p>7 the Judicial Council of Georgia, I make the</p> <p>8 following disclosure.</p> <p>9 I am a Georgia Certified Court Reporter.</p> <p>10 I am not disqualified for a relationship</p> <p>11 of interest under the provisions of O.C.G.A.</p> <p>12 9-11-28(c).</p> <p>13 Tom Crites &amp; Associates International,</p> <p>14 Inc. was contacted by S. Wesley Woolf, P.C. to</p> <p>15 provide court reporting services for this</p> <p>16 proceeding.</p> <p>17 Tom Crites &amp; Associates International,</p> <p>18 Inc. will not be taking this proceeding under any</p> <p>19 contract that is prohibited by Georgia law.</p> <p>20 This, the 10th day of March, 2013.</p> <p>21 _____</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 the details of the movers, the movers were</p> <p>2 supposed to come one day and they had to change it</p> <p>3 because they weren't available that day. Okay.</p> <p>4 That's the reason that those days changed and I</p> <p>5 was able to be here.</p> <p>6 MR. FRANKLIN: We'll just attach that to</p> <p>7 this deposition.</p> <p>8 MR. BILLIPS: You know what, you can</p> <p>9 attach anything you like at this deposition. I</p> <p>10 have not lied to you. I do not feel that I have</p> <p>11 received the same level of truth from you.</p> <p>12 MR. FRANKLIN: I don't need a lecture</p> <p>13 from you. And don't throw --</p> <p>14 MR. BILLIPS: You need a lecture from</p> <p>15 somebody.</p> <p>16 MR. FRANKLIN: And don't throw things at</p> <p>17 me either.</p> <p>18 MR. BILLIPS: I was handing that back to</p> <p>19 you.</p> <p>20 MR. FRANKLIN: Yeah. It's a funny way</p> <p>21 of handing it. I'll hand you something, too.</p> <p>22 Let's just put this --</p> <p>23 MR. BILLIPS: What did you just say?</p> <p>24 You'll hand me something, too?</p> <p>25 MR. FRANKLIN: I said don't throw</p>
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<p>1 MR. BILLIPS: This will be the</p> <p>2 deposition of Sandra Sikes taken pursuant to</p> <p>3 notice and agreement of counsel pursuant to the</p> <p>4 same stipulations as in prior depositions.</p> <p>5 MR. WITHERS: Agreed.</p> <p>6 MR. FRANKLIN: That's fine. Before I go</p> <p>7 on the record -- I mean while we're on the record,</p> <p>8 I thought you weren't going to be here today.</p> <p>9 MR. BILLIPS: No. I'm leaving today. I</p> <p>10 won't be here tomorrow.</p> <p>11 MR. FRANKLIN: What day is today?</p> <p>12 MR. BILLIPS: Today is Thursday.</p> <p>13 MR. FRANKLIN: The 28th?</p> <p>14 MR. BILLIPS: Yes.</p> <p>15 MR. FRANKLIN:</p> <p>16 I'd just like to mark this and attach</p> <p>17 it. The reason you said we couldn't move</p> <p>18 Mr. Gerard's deposition was you had to be out of</p> <p>19 here on the evening of the 27th.</p> <p>20 MR. BILLIPS: Yes. And I had to -- if</p> <p>21 you really want to know the details of the moving</p> <p>22 schedule --</p> <p>23 MR. FRANKLIN: I just want to know why</p> <p>24 you lied to us.</p> <p>25 MR. BILLIPS: If you really want to know</p>	<p>1 something at me.</p> <p>2 MR. BILLIPS: What are you implying?</p> <p>3 Was that a threat, Counsel?</p> <p>4 MR. FRANKLIN: I don't make threats.</p> <p>5 Actions have consequences. I don't like the way</p> <p>6 you've questioned some of the witnesses in this</p> <p>7 case, but that's your prerogative.</p> <p>8 MR. BILLIPS: You don't like the way I</p> <p>9 questioned some of the witnesses in this case.</p> <p>10 MR. FRANKLIN: I don't like you asking</p> <p>11 people is so-and-so gay. That has no bearing in</p> <p>12 this case, and you know it and I know it.</p> <p>13 MR. BILLIPS: Oh, my lord. If two</p> <p>14 people who are witnesses in the case are having a</p> <p>15 relationship, it has a bearing on their --</p> <p>16 MR. FRANKLIN: You're just trying to</p> <p>17 drag the Deen family --</p> <p>18 MR. BILLIPS: It has a bearing on the</p> <p>19 credibility. And you know what, it would have</p> <p>20 been a defense, okay, to the pay disparity for</p> <p>21 Dustin if the reason he was getting paid so much</p> <p>22 was because he was having sex with somebody in the</p> <p>23 family. It would have been a defense.</p> <p>24 MR. FRANKLIN: We don't make up</p> <p>25 defenses. I just don't like the way you're trying</p>

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<p>1 to drag the Deen family through the gutter, and it</p> <p>2 started with the --</p> <p>3 MR. BILLIPS: Who are you showing off</p> <p>4 for here today?</p> <p>5 MR. FRANKLIN: I'm not showing off for</p> <p>6 anyone. I'm disgusted with your behavior. I</p> <p>7 mean, that's what it is. Just take your</p> <p>8 deposition. We've agreed to disagree. Take your</p> <p>9 deposition.</p> <p>10 SANDRA SIKES,</p> <p>11 having been first duly sworn, was examined and</p> <p>12 testified as follows:</p> <p>13 EXAMINATION</p> <p>14 BY MR. BILLIPS:</p> <p>15 Q. Ms. Sikes, are you about twice as</p> <p>16 nervous as you were five minutes ago?</p> <p>17 A. I'm okay. Thank you.</p> <p>18 Q. Okay. Good.</p> <p>19 MR. FRANKLIN: That's a way to calm the</p> <p>20 witness.</p> <p>21 BY MR. BILLIPS:</p> <p>22 Q. Please state your full legal name.</p> <p>23 A. Sandra Lynn Jackson Sikes.</p> <p>24 Q. Okay. Where and in what capacity are</p> <p>25 you presently employed?</p>	<p>1 influence of any medication, anything -- couldn't</p> <p>2 sleep last night, anything at all that would</p> <p>3 prevent you from remembering events that have</p> <p>4 occurred just as well as you might on any other</p> <p>5 occasion?</p> <p>6 A. No.</p> <p>7 Q. Okay. Good enough. How long have you</p> <p>8 worked for Uncle Bubba's?</p> <p>9 A. Since June of 2006.</p> <p>10 Q. And what was your initial job?</p> <p>11 A. A server position.</p> <p>12 Q. Okay. How long did you work as a</p> <p>13 server?</p> <p>14 A. One year.</p> <p>15 Q. Now, you understand that the testimony</p> <p>16 you're giving today is under oath?</p> <p>17 A. Yes.</p> <p>18 Q. And that it is just as if you were</p> <p>19 sitting in a courtroom in front of a judge and</p> <p>20 jury?</p> <p>21 A. Yes.</p> <p>22 Q. And you have sworn to tell the truth and</p> <p>23 you are going to tell the truth; is that correct?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Ms. Sikes, Uncle Bubba's has a gentleman</p>
Page 11	Page 13
<p>1 A. Uncle Bubba's Seafood &amp; Oyster House.</p> <p>2 Q. Okay. Have you ever given your</p> <p>3 deposition before?</p> <p>4 A. No.</p> <p>5 Q. I'm going to be asking you a series of</p> <p>6 questions. If at any point you don't understand</p> <p>7 my question and would like me to rephrase it or</p> <p>8 restate it, please do so. If you don't, I'll have</p> <p>9 to assume you understood the question and are</p> <p>10 answering the question I asked. Okay?</p> <p>11 A. Okay.</p> <p>12 Q. At some point, counsel may interpose an</p> <p>13 objection. Ordinarily -- and we have agreed that</p> <p>14 those depositions -- or those objections will be</p> <p>15 made in the form of objection to the form of the</p> <p>16 question.</p> <p>17 If they object, you go ahead and answer</p> <p>18 after they've finished their objection, okay,</p> <p>19 unless they tell you not to. All right?</p> <p>20 A. Okay.</p> <p>21 Q. Now, is there any reason today why you</p> <p>22 would be unable to listen to my questions and give</p> <p>23 honest and truthful answers?</p> <p>24 A. No.</p> <p>25 Q. Okay. Are you presently under the</p>	<p>1 that does work for the company as a wildlife</p> <p>2 trapper; is that correct?</p> <p>3 A. Yes.</p> <p>4 Q. And on one occasion when the wildlife</p> <p>5 trapper was in the restaurant, Mr. Hiers made what</p> <p>6 he apparently believed was a joke about having the</p> <p>7 wildlife trapper go and trap all the coons that</p> <p>8 were in the kitchen. Do you recall that?</p> <p>9 A. No, I do not.</p> <p>10 Q. Is your testimony under oath that you do</p> <p>11 not remember that at all?</p> <p>12 A. I do not remember that at all.</p> <p>13 Q. Okay. If that had occurred, would you</p> <p>14 have remembered it?</p> <p>15 A. I think so, yes.</p> <p>16 Q. Okay. Do you recall him saying, I have</p> <p>17 a bunch of coons in the kitchen, I'll pay you \$10</p> <p>18 each to take them out of here?</p> <p>19 A. No, sir.</p> <p>20 Q. Okay. Now, in addition to working for</p> <p>21 Mr. Hiers at the restaurant, did you also work for</p> <p>22 he and his ex-wife cleaning their house?</p> <p>23 A. Yes, I did.</p> <p>24 Q. For how long did you do that?</p> <p>25 A. I'm going to say almost two years maybe</p>

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<p>1 not quite the total. It was before they got</p> <p>2 married.</p> <p>3 Q. Okay.</p> <p>4 A. So I do remember that. I want to say</p> <p>5 about two years. Yes.</p> <p>6 Q. As a manager, did you have any</p> <p>7 responsibility for taking applications from</p> <p>8 employees?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And was there a direction given</p> <p>11 by Mr. Hiers to write the number 110 on the</p> <p>12 applications that --</p> <p>13 A. No.</p> <p>14 Q. Okay -- on applications from</p> <p>15 African-American employees or applicants?</p> <p>16 A. No, sir.</p> <p>17 Q. Okay. Have you ever heard Mr. Hiers use</p> <p>18 -- well, strike.</p> <p>19 You were present during managers'</p> <p>20 meetings, correct?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And you were present during</p> <p>23 managers' meetings during which Mr. Hiers told a</p> <p>24 joke about President Obama and said that President</p> <p>25 Obama should be sent down to the Gulf of Mexico to</p>	<p>1 BY MR. BILLIPS:</p> <p>2 Q. Is that correct?</p> <p>3 A. I just thought the joke in general --</p> <p>4 I'm sorry. Did you want me to answer?</p> <p>5 MR. WITHERS: Yeah. You can answer.</p> <p>6 THE WITNESS: The joke in general was</p> <p>7 just kind of funny. No, I don't like the "N"</p> <p>8 word. Personally I do not care for it at all. I</p> <p>9 think it was just more of the Obama part of it</p> <p>10 than the -- it being a black joke, I guess.</p> <p>11 BY MR. BILLIPS:</p> <p>12 Q. Now, did you ever have occasion to --</p> <p>13 strike. What was your -- what was your particular</p> <p>14 managerial position?</p> <p>15 A. Front of the house manager. All --</p> <p>16 everybody that worked in the front of the house</p> <p>17 pretty much. Guest relations, the employees.</p> <p>18 Q. Okay.</p> <p>19 A. I mean, is that what you wanted or -- I</p> <p>20 was in charge of the bar.</p> <p>21 Q. Okay. Did Mr. -- did Mr. Hiers ever</p> <p>22 give you any instructions on the appearance of</p> <p>23 people he wanted to hire as bartenders?</p> <p>24 A. No, sir.</p> <p>25 Q. Okay. Were you aware of him being upset</p>
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<p>1 nigger rig the oil spill?</p> <p>2 A. I -- I recall that joke or whatever, but</p> <p>3 not at a manager meeting.</p> <p>4 Q. Where was it he told that joke?</p> <p>5 A. I don't think he told me. He showed me</p> <p>6 his phone. We were outside smoking and he showed</p> <p>7 it to me on his phone and that was all.</p> <p>8 Q. Did he laugh?</p> <p>9 A. He said, here, Sandra, look at this.</p> <p>10 And that's kind of all there was.</p> <p>11 Q. Okay. Did you laugh?</p> <p>12 A. I don't remember.</p> <p>13 Q. Did you think it was funny?</p> <p>14 MR. WITHERS: Same question. Objection.</p> <p>15 You can answer.</p> <p>16 THE WITNESS: It was probably kind of</p> <p>17 funny just the way it sounded.</p> <p>18 BY MR. BILLIPS:</p> <p>19 Q. Okay. Have you used the word nigger in</p> <p>20 the workplace?</p> <p>21 A. Never.</p> <p>22 Q. Okay. But you think that a joke about</p> <p>23 the president of the United States referring to</p> <p>24 him as a nigger was funny?</p> <p>25 MR. WITHERS: Objection. Argumentative.</p>	<p>1 with Ms. Jackson for hiring a woman to work as a</p> <p>2 bartender who was heavyset?</p> <p>3 A. No, sir. Did you ask me was I aware?</p> <p>4 Q. Yeah.</p> <p>5 A. No.</p> <p>6 Q. Had you ever heard that from anyone?</p> <p>7 A. No, sir.</p> <p>8 Q. Okay. Were you aware of a comment by</p> <p>9 Mr. Hiers that he thought that the restaurant</p> <p>10 should fire all the waitresses and hire Hooters</p> <p>11 girls?</p> <p>12 A. No, sir.</p> <p>13 Q. Okay. Now, were you aware of Mr. Hiers</p> <p>14 watching pornography at work?</p> <p>15 A. No, sir.</p> <p>16 Q. Okay. Did you ever on any occasion hear</p> <p>17 from any source that Mr. Hiers was looking at</p> <p>18 pornography on the work computer?</p> <p>19 A. No, sir.</p> <p>20 Q. Okay. And you've worked there since</p> <p>21 2006; is that right?</p> <p>22 A. Yes.</p> <p>23 Q. Did you ever go in the office and -- in</p> <p>24 the back office?</p> <p>25 A. The kitchen office?</p>

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<p>1 Q. Yes.</p> <p>2 A. Yes, sir.</p> <p>3 Q. Okay. Did you ever go in there when Mr.</p> <p>4 Hiers was in there?</p> <p>5 A. No, not that I can remember.</p> <p>6 Q. Okay. Was Mr. Hiers there much?</p> <p>7 A. Yes, he was.</p> <p>8 Q. Okay. Did you ever go to Mr. Hiers and</p> <p>9 register any complaints about any of your fellow</p> <p>10 employees?</p> <p>11 A. Not that I can recall, no.</p> <p>12 Q. Did you ever go to Mr. Hiers and</p> <p>13 register any complaints about any of your fellow</p> <p>14 managers?</p> <p>15 A. Yes.</p> <p>16 Q. Which ones?</p> <p>17 A. I believe I complained to him a couple</p> <p>18 of times about Lisa.</p> <p>19 Q. Okay. Who else?</p> <p>20 A. Nobody else that I can recall.</p> <p>21 Q. Okay. When did you complain to Mr.</p> <p>22 Hiers about Ms. Jackson?</p> <p>23 A. I don't remember the exact date, but it</p> <p>24 was not too -- it was -- I don't know. It's been</p> <p>25 a few years. But we had had a manager meeting and</p>	<p>1 Q. All right. And it was your job to have</p> <p>2 made sure it was in the trash can to begin with?</p> <p>3 A. Probably, yes.</p> <p>4 Q. And so she got it and cleaned up after</p> <p>5 you when you hadn't properly done your job --</p> <p>6 MR. WITHERS: Objection.</p> <p>7 MR. BILLIPS: -- and then decided to</p> <p>8 pull it back out and take a picture of it to show</p> <p>9 that it had not, in fact, been thrown away?</p> <p>10 MR. WITHERS: Objection. Argumentative.</p> <p>11 BY MR. BILLIPS:</p> <p>12 Q. Is that a fair characterization of what</p> <p>13 she did?</p> <p>14 A. No.</p> <p>15 Q. Okay. Had you -- had you properly</p> <p>16 thrown away the syrup box?</p> <p>17 A. No, I had not.</p> <p>18 Q. Okay.</p> <p>19 A. Can I finish?</p> <p>20 MR. WITHERS: Just out of curiosity, Mr.</p> <p>21 Billips, is it your contention that trying to</p> <p>22 frame somebody is okay? Is that the basis for</p> <p>23 that question?</p> <p>24 MR. BILLIPS: You know, when you and I</p> <p>25 are in a situation where I am a deponent and you</p>
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<p>1 after the manager meeting Bubba and I talked, and</p> <p>2 Lisa. And I had been written up for something</p> <p>3 that seemed -- just a few things that were not</p> <p>4 taken care of in the restaurant.</p> <p>5 And Lisa had shown me a picture on her</p> <p>6 phone of something that -- a box that was in front</p> <p>7 of the tea urn that I was being written up about</p> <p>8 that was not there when I left the night before.</p> <p>9 So later that afternoon I went and</p> <p>10 looked at the cameras and saw where she had</p> <p>11 actually taken it out of the trash can and put it</p> <p>12 on top of the tea urn and took a picture of it.</p> <p>13 So I showed Bubba that to let her know I felt like</p> <p>14 that she was setting me up.</p> <p>15 Q. Okay. And when she first -- what was</p> <p>16 the item?</p> <p>17 A. It was just like a Coke -- like the box</p> <p>18 that the syrup comes in.</p> <p>19 Q. Right. And she had gone and initially</p> <p>20 had gotten that box, that syrup box --</p> <p>21 A. Out of the trash can.</p> <p>22 Q. -- out of the closet --</p> <p>23 A. The busser closet.</p> <p>24 Q. -- and put it in the trash can?</p> <p>25 A. Uh-huh. Yes.</p>	<p>1 are asking me questions, we can have this</p> <p>2 discussion, but right now we're not. I'm asking</p> <p>3 the witness questions. Do you have an objection</p> <p>4 to the form?</p> <p>5 MR. WITHERS: Objection. Objection to</p> <p>6 form. Argumentative. Improper hypothetical.</p> <p>7 MR. BILLIPS: Okay.</p> <p>8 MR. WITHERS: Assumes facts not in</p> <p>9 evidence. Go right ahead.</p> <p>10 THE WITNESS: Okay.</p> <p>11 BY MR. BILLIPS:</p> <p>12 Q. Now, the fact of the matter is that Ms.</p> <p>13 Jackson was your supervisor, correct?</p> <p>14 A. Uh-huh. Yes.</p> <p>15 Q. And you had an obligation to make sure</p> <p>16 that at the end of the shift the restaurant was</p> <p>17 clean and everything was thrown away, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Ms. Jackson found something that you had</p> <p>20 not, in fact, cleaned and thrown away, correct?</p> <p>21 A. Correct.</p> <p>22 Q. And initially she threw it away herself,</p> <p>23 correct?</p> <p>24 A. Yes.</p> <p>25 Q. And then she apparently reconsidered,</p>

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1 took it out of the trash can and took a picture of  
 2 it?  
 3 MR. WITHERS: Objection. She doesn't  
 4 know whether Ms. Jackson reconsidered or not. She  
 5 can't testify about -- she can't testify about  
 6 what somebody else knows, and you know that.  
 7 Objection. Improper hypothetical.  
 8 MR. BILLIPS: That's why I used the word  
 9 apparently.  
 10 MR. WITHERS: Let me finish my  
 11 objection.  
 12 BY MR. BILLIPS:  
 13 Q. She took it back out of the trash can  
 14 and took a picture of it, right?  
 15 A. Yes.  
 16 Q. Okay. And the following shift when you  
 17 were at work, did Ms. Jackson confront you about  
 18 the fact that you had not properly done your job?  
 19 A. No.  
 20 Q. Did she ever tell you anything at all  
 21 about the fact that you had not properly cleaned  
 22 the restaurant?  
 23 A. Not until the manager meeting.  
 24 Q. Oh, okay. So she waited until the next  
 25 manager meeting and confronted you about the fact

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1 that you had not properly done your job?  
 2 A. With a write-up, yes.  
 3 Q. With a write-up?  
 4 A. Yes.  
 5 Q. Okay. And you were mad because you got  
 6 written up for not doing your job?  
 7 A. No.  
 8 MR. WITHERS: Objection. Assumes facts  
 9 not in evidence. Omits your clients' framing a  
 10 co-employee.  
 11 BY MR. BILLIPS:  
 12 Q. Is it in fact the case that you had  
 13 failed to throw away the box you were supposed to  
 14 have thrown away?  
 15 A. No.  
 16 Q. You weren't framed for that, you  
 17 actually did it, right?  
 18 MR. WITHERS: Objection. Argumentative.  
 19 You can go ahead and answer.  
 20 THE WITNESS: Okay. The reason -- the  
 21 reason I have a problem with this question is  
 22 because she never said she took it back out. She  
 23 showed the picture to Bubba with the write-up.  
 24 This was here when I got here. She never said she  
 25 took it out of the trash can and put it up on

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1 there so she could leave it out for me. She told  
 2 me that when she got there that box was sitting  
 3 right there. And I told her, Lisa, that is  
 4 impossible because I would not have left a box  
 5 sitting there when I go to turn that light off in  
 6 that room.  
 7 And that was her that I -- saying not  
 8 that I didn't do my job of cleaning out the trash  
 9 in the busser closet. And, no, I was not mad when  
 10 she brought it up to the manager meeting and  
 11 that's why I was mad. That's not what I was mad  
 12 about.  
 13 BY MR. BILLIPS:  
 14 Q. All right. Had you already gone back  
 15 and looked at the tape?  
 16 A. Before the manager meeting?  
 17 Q. Yeah.  
 18 A. No.  
 19 Q. Okay. Did the write-up -- what did the  
 20 write-up say specifically?  
 21 A. There was a couple of things on there of  
 22 things that were left out that evening.  
 23 Q. Okay.  
 24 A. And I don't remember. That was probably  
 25 four years ago, so I don't remember everything. I

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1 was very upset.  
 2 Q. Okay. And you told Mr. Hiers about  
 3 this, right?  
 4 A. Yes. He was there during all this.  
 5 Q. Right. And you told him about looking  
 6 at the camera?  
 7 A. Not until -- not until I looked later  
 8 after she had left that day.  
 9 Q. Okay. And what year was this?  
 10 A. I don't know.  
 11 Q. Four years ago?  
 12 A. I don't know. I mean, I've been there  
 13 for almost seven years. I don't know how long ago  
 14 it was.  
 15 Q. To your knowledge, did this incident  
 16 have anything to do with any action taken by the  
 17 defendants toward Ms. Jackson?  
 18 A. I'm sorry. I don't understand.  
 19 Q. Okay. Did -- as -- to your knowledge,  
 20 did this incident have anything to do with any  
 21 action taken by the defendants toward Ms. Jackson  
 22 in terms of pay raises or bonuses or harassing her  
 23 or telling dirty jokes or using the "N" word?  
 24 A. So you're asking me, me saying something  
 25 to Bubba about --



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8 (Pages 26 to 29)

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<p>1 Q. Yeah.</p> <p>2 A. -- and showing him the tape had anything</p> <p>3 to do with him retaliating against her?</p> <p>4 Q. Yeah. To your knowledge.</p> <p>5 A. No. No.</p> <p>6 Q. Okay. Good enough. Did you ever</p> <p>7 complain to Bubba about anything else involving</p> <p>8 Ms. Jackson?</p> <p>9 A. Not really a whole lot, because she</p> <p>10 didn't allow us to talk to him.</p> <p>11 Q. Okay. You were allowed to on that</p> <p>12 occasion, right?</p> <p>13 A. Well, because she was standing right</p> <p>14 there.</p> <p>15 Q. Because she was standing right there you</p> <p>16 were allowed to talk to Bubba?</p> <p>17 A. Well, I was mad and I was ready because</p> <p>18 I had other issues, so...</p> <p>19 Q. I'm sorry?</p> <p>20 A. Nothing.</p> <p>21 Q. You were mad --</p> <p>22 A. I was mad at the write-up, yes.</p> <p>23 Q. And you were ready to quit --</p> <p>24 A. Yes, I was.</p> <p>25 Q. -- because you had other issues?</p>	<p>1 Schumacher about anything relating to Ms. Jackson?</p> <p>2 A. No.</p> <p>3 Q. Okay. You knew that opportunity was</p> <p>4 there if you had a problem, correct?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. What is your date of birth?</p> <p>7 A. 10/22/69.</p> <p>8 Q. Do you recall sending a text message to</p> <p>9 Lisa Jackson asking her why she had left?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And did you tell her in the text</p> <p>12 that you missed her and wished she would come back</p> <p>13 because it wouldn't be the same without her?</p> <p>14 A. Oh, yes, I did.</p> <p>15 Q. Okay. Now, you recall Ms. Jackson</p> <p>16 sending you a text message regarding the chef</p> <p>17 coats?</p> <p>18 A. Yes.</p> <p>19 Q. And she -- you were not aware that she</p> <p>20 had had them cleaned and that they were back from</p> <p>21 the cleaners?</p> <p>22 A. At her house, yes.</p> <p>23 Q. Right. And did you send her a text</p> <p>24 message back?</p> <p>25 A. Yes.</p>
Page 27	Page 29
<p>1 A. Because I was mad because Bubba was</p> <p>2 believing everything that Lisa Jackson was saying.</p> <p>3 Q. Okay. And you had other issues going on</p> <p>4 in your life and you were ready to quit?</p> <p>5 A. No. I was just mad.</p> <p>6 MR. WITHERS: Objection. That's not</p> <p>7 what she said.</p> <p>8 MR. BILLIPS: Sorry. I'm</p> <p>9 misunderstanding you.</p> <p>10 BY MR. BILLIPS:</p> <p>11 Q. Okay. Did you suffer any retaliation of</p> <p>12 any sort for going to Mr. Hiers on that occasion?</p> <p>13 A. No.</p> <p>14 Q. Okay. Did Ms. Jackson ever tell you on</p> <p>15 any other occasion that you can't -- shouldn't go</p> <p>16 see Bubba Hiers if you have a problem?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Who were you supposed to go to</p> <p>19 see if you had a problem?</p> <p>20 A. Her.</p> <p>21 Q. Her. And if you had a problem that</p> <p>22 needed to go above her, who were you supposed to</p> <p>23 see?</p> <p>24 A. I assume Karl Schumacher.</p> <p>25 Q. Uh-huh. Did you ever go see Karl</p>	<p>1 Q. Okay. What did you say?</p> <p>2 A. No. She -- well, I said, can I -- is</p> <p>3 there some way I can get them from you?</p> <p>4 Q. Okay. Do you remember whether you sent</p> <p>5 her a text message or if you called her or what</p> <p>6 you did?</p> <p>7 A. I don't think I called her.</p> <p>8 Q. Okay. Do you remember if you sent her a</p> <p>9 text message?</p> <p>10 A. I'm pretty sure I did. I don't know.</p> <p>11 I'm sure I did, because I needed the coats.</p> <p>12 Q. Okay. Is it possible you intended to</p> <p>13 and forgot?</p> <p>14 A. No.</p> <p>15 Q. Did you ever go pick the coats up from</p> <p>16 her?</p> <p>17 A. No. Because she told me that she would</p> <p>18 have -- she would drop them off at R&amp;R Restaurant</p> <p>19 and that I could pick them up there.</p> <p>20 Q. Okay.</p> <p>21 A. That's what she texted me.</p> <p>22 Q. Did you know where she lived?</p> <p>23 A. Yes.</p> <p>24 Q. And did you know where the coats were?</p> <p>25 A. No. I mean --</p>

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1 Q. Well, she said they were at her house,  
 2 right?  
 3 A. Right. I guess they were at her house.  
 4 Q. Okay. Did you ever -- and you said you  
 5 needed the coats, right?  
 6 A. Yes.  
 7 Q. So did you bother to drive out to her  
 8 house and pick them up?  
 9 A. No.  
 10 Q. Okay. Was Ms. Jackson still working for  
 11 the company at the time?  
 12 A. No.  
 13 Q. And Ms. Jackson had communicated to you  
 14 that the coats were available for Uncle Bubba's to  
 15 have when it wanted them, correct?  
 16 A. No.  
 17 Q. Well, she had offered to return them and  
 18 you knew where they were at her house, correct?  
 19 A. She offered to return them to R&R  
 20 Restaurant for me to pick up. She did not want to  
 21 bring them to the restaurant. She did not want me  
 22 to come to her house.  
 23 Q. Okay. Did she tell you not to come to  
 24 her house?  
 25 A. No. I said, do you want me to come and

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1 get them? And she said, no, I will drop them off  
 2 at R&R with Regina.  
 3 Q. Okay.  
 4 A. And you can pick them up there.  
 5 Q. Okay. And did you go to R&R?  
 6 A. I did.  
 7 Q. And did -- did you try to reach Ms.  
 8 Jackson again?  
 9 A. No, I did not.  
 10 Q. So you don't know what happened and why  
 11 they weren't at R&R?  
 12 A. No. But they were never dropped off.  
 13 Q. Okay. But you took no further steps to  
 14 retrieve these coats; is that right?  
 15 A. Correct.  
 16 Q. Did you tell Mr. Hiers?  
 17 A. Yes.  
 18 Q. And did Mr. Hiers tell you to do  
 19 anything else to get them back?  
 20 A. Not -- no, sir.  
 21 Q. Okay. What was his response?  
 22 A. For me to just order some more.  
 23 Q. Okay. So he just appeared to abandon  
 24 them?  
 25 MR. WITHERS: Objection. Calls for a

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1 legal conclusion.  
 2 MR. FRANKLIN: Objection.  
 3 BY MR. BILLIPS:  
 4 Q. Is that the way --  
 5 THE WITNESS: Can I answer? As far as I  
 6 understood, we were under -- she had already filed  
 7 a lawsuit against Bubba and Paula, and the best  
 8 thing in our interest was just to order some  
 9 more --  
 10 MR. BILLIPS: Okay.  
 11 THE WITNESS: -- and not go bother to  
 12 her house and get them.  
 13 BY MR. BILLIPS:  
 14 Q. Because she had filed the EEOC charge?  
 15 A. I guess that's correct. Okay.  
 16 Q. Okay. All right. During the time that  
 17 you were working at Uncle Bubba's with Ms.  
 18 Jackson, were you under the influence of any  
 19 medication? Did you have any prescription  
 20 medication?  
 21 A. I take blood pressure and I take  
 22 Lexapro.  
 23 Q. Okay. And I'm sorry to have to bring  
 24 this up, but you were also having to care for your  
 25 mother; is that right?

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1 A. Well, I mean, she wasn't an invalid.  
 2 Yes. I would have to take care of her, yes.  
 3 Q. And were you also taking Xanax?  
 4 A. No.  
 5 Q. Did you take any other prescription  
 6 medications besides Lexapro and blood pressure  
 7 medication?  
 8 A. No.  
 9 Q. As a front of the house manager, did you  
 10 use the customer rest room or the one back in the  
 11 kitchen?  
 12 A. Nine times out of ten the one in the  
 13 kitchen. I used both.  
 14 Q. Okay. And was the one in the kitchen  
 15 usually pretty disgusting?  
 16 A. No, not all the time.  
 17 Q. A good part of the time?  
 18 A. It could have been, but I kept it  
 19 cleaned a lot because I used it, so...  
 20 Q. Okay. Now, there were also some  
 21 problems with the rest room in the kitchen  
 22 actually overflowing with sewage; is that correct?  
 23 MR. WITHERS: For the seven years that  
 24 she's worked there?  
 25 MR. BILLIPS: Sure.

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<p>1 MR. WITHERS: At any time?</p> <p>2 MR. BILLIPS: Sure. We'll narrow it</p> <p>3 down.</p> <p>4 THE WITNESS: I think I can vaguely</p> <p>5 remember when I was a server maybe. I don't</p> <p>6 remember sewage. I remember the drain was backed</p> <p>7 up, but not sewage. Not since I've been there.</p> <p>8 BY MR. BILLIPS:</p> <p>9 Q. Okay. Okay. Did Ms. Jackson appear to</p> <p>10 you to be under a lot of stress at work?</p> <p>11 A. Yes.</p> <p>12 Q. And did she share with you problems that</p> <p>13 she was having with Bubba Hiers?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. What kind of problems did she</p> <p>16 share with you about Mr. Hiers?</p> <p>17 A. Occasionally she was having a bad week</p> <p>18 or whatever and she was having a bad day and she</p> <p>19 would just say Bubba was -- he talked to her mean</p> <p>20 and that he was hateful to her.</p> <p>21 Q. Uh-huh.</p> <p>22 A. But other than that, I mean, no.</p> <p>23 Q. Did she ever talk to you about her</p> <p>24 concerns about him coming into the restaurant</p> <p>25 intoxicated?</p>	<p>1 characterization. You can answer.</p> <p>2 THE WITNESS: No. I was not aware that</p> <p>3 occurred.</p> <p>4 BY MR. BILLIPS:</p> <p>5 Q. Okay.</p> <p>6 A. Can I say something?</p> <p>7 Q. Sure.</p> <p>8 A. How can he steal from his own company?</p> <p>9 Q. Do you know whether Mr. Hiers has a</p> <p>10 business partner?</p> <p>11 A. No.</p> <p>12 Q. Okay. If his sister owns half of the</p> <p>13 company --</p> <p>14 A. I'm sorry. That would -- I didn't think</p> <p>15 it through. Yes.</p> <p>16 Q. If his sister owns half of the company</p> <p>17 and he steals \$30,000 from the company, then he's</p> <p>18 stealing at least half that money from her, right?</p> <p>19 A. I guess, yes.</p> <p>20 Q. Okay.</p> <p>21 MR. WITHERS: Objection to the extent it</p> <p>22 calls for a legal conclusion.</p> <p>23 MR. BILLIPS: I'm using stealing in the</p> <p>24 vernacular, not as a legal definition.</p> <p>25 BY MR. BILLIPS:</p>
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<p>1 A. No.</p> <p>2 Q. Now, did you ever see Mr. Hiers come</p> <p>3 into the restaurant in a state of intoxication?</p> <p>4 A. No.</p> <p>5 Q. Okay. Are you aware that Mr. Hiers was</p> <p>6 actually requested to stop coming into the</p> <p>7 workplace in a state of intoxication by Mr.</p> <p>8 Schumacher and by counsel?</p> <p>9 A. No. I did not know that.</p> <p>10 Q. Okay. Do you want to reconsider your</p> <p>11 testimony that you never saw him in a state of</p> <p>12 intoxication at the restaurant?</p> <p>13 A. No. I don't want to restate it.</p> <p>14 Q. Okay.</p> <p>15 A. While I was there -- he was not there</p> <p>16 intoxicated when I was there.</p> <p>17 Q. What shift did you work?</p> <p>18 A. Different shifts, a.m., p.m.</p> <p>19 Q. Okay. Did Ms. Jackson ever complain to</p> <p>20 you about Mr. Hiers stealing approximately 25 to</p> <p>21 \$30,000 from the restaurant?</p> <p>22 A. No.</p> <p>23 Q. Okay. Were you aware that that in fact</p> <p>24 occurred?</p> <p>25 MR. WITHERS: Objection to the</p>	<p>1 Q. Now, were you -- are you familiar with</p> <p>2 what's known or what has been referred to as the</p> <p>3 Big Will incident?</p> <p>4 A. Yes.</p> <p>5 Q. Were you at work on the day of the Big</p> <p>6 Will incident?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Did you see what happened?</p> <p>9 A. No.</p> <p>10 Q. When did you first hear from anyone that</p> <p>11 Mr. Hiers had put his hands on Big Will?</p> <p>12 MR. WITHERS: Objection to the</p> <p>13 characterization. You can answer.</p> <p>14 THE WITNESS: Okay. I guess a little</p> <p>15 while after. Maybe 35, 40 minutes after it</p> <p>16 happened.</p> <p>17 BY MR. BILLIPS:</p> <p>18 Q. Who did you hear it from?</p> <p>19 A. An employee in the kitchen, but theirs</p> <p>20 was -- I heard it was hearsay.</p> <p>21 Q. Okay.</p> <p>22 A. They didn't see it happen either.</p> <p>23 Q. Okay. Do you know which employee?</p> <p>24 A. No, I don't.</p> <p>25 Q. Okay. Did you talk to Will about it?</p>

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11 (Pages 38 to 41)

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<p>1 A. I did later. Uh-huh.</p> <p>2 Q. How much later?</p> <p>3 A. Probably about an hour later when things</p> <p>4 calmed down.</p> <p>5 Q. What did he say?</p> <p>6 A. He said, Sandra, Bubba did not shake me.</p> <p>7 He put his hands on me and said, now, Will, this</p> <p>8 is my restaurant. You know I want to know what</p> <p>9 happened.</p> <p>10 Q. Okay.</p> <p>11 A. He said but Bubba did not shake me.</p> <p>12 Q. And did you speak to anyone else who had</p> <p>13 seen the incident?</p> <p>14 A. That had seen it, no. Not that I</p> <p>15 recall.</p> <p>16 Q. Did you talk to Maria Bartley?</p> <p>17 A. Oh, maybe I did. I don't -- I don't</p> <p>18 remember.</p> <p>19 Q. Okay. Did the person who was telling</p> <p>20 you about it in the kitchen, what did they tell</p> <p>21 you had happened?</p> <p>22 A. All they said was that -- they said that</p> <p>23 Bubba shook Big Will asking what happened with</p> <p>24 Terrica and Mike. I said, really? Bubba shook</p> <p>25 Big Will? That's what they said. And I said --</p>	<p>1 Q. Did he?</p> <p>2 A. He did.</p> <p>3 Q. Okay. What did he say?</p> <p>4 A. I don't remember. Probably -- I don't</p> <p>5 know. I'm not going to speculate what he said. I</p> <p>6 don't remember. I think he was a little</p> <p>7 surprised.</p> <p>8 Q. Okay. After that meeting did you take</p> <p>9 better care to clean up the restaurant at the end</p> <p>10 of your shift?</p> <p>11 A. I always took care.</p> <p>12 Q. Okay.</p> <p>13 A. And I have missed a few nights every now</p> <p>14 and then, but I took very good care of that</p> <p>15 restaurant.</p> <p>16 Q. Well, did you try just that much harder</p> <p>17 after that when you were written up?</p> <p>18 A. Maybe, I guess.</p> <p>19 Q. Okay. And have you ever heard Mr. Hiers</p> <p>20 make any kind of inappropriate sexual comment?</p> <p>21 A. You mean me or in general or --</p> <p>22 Q. Either one.</p> <p>23 A. Inappropriate, no.</p> <p>24 Q. Okay. Have you ever heard him make</p> <p>25 sexual comments?</p>
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<p>1 it was just a real crazy day, so I don't remember</p> <p>2 who it was. And I don't remember talking to</p> <p>3 Maria. I did talk to Will later though, because I</p> <p>4 asked him about it, because I wanted to make sure</p> <p>5 everything was good with him.</p> <p>6 Q. Okay. And who was it that -- you talked</p> <p>7 to somebody, you don't remember who?</p> <p>8 A. No.</p> <p>9 Q. And they said they heard it from</p> <p>10 somebody else. Do you know who that was?</p> <p>11 A. No, I don't.</p> <p>12 Q. Okay. Did you have any discussions with</p> <p>13 anyone prior to the deposition other than counsel?</p> <p>14 A. No.</p> <p>15 Q. Okay. Did you talk to Stephanie Strong</p> <p>16 about her deposition?</p> <p>17 A. No, sir.</p> <p>18 Q. Did she talk to you about her</p> <p>19 deposition?</p> <p>20 A. She just said it was long.</p> <p>21 Q. Okay. Now, if I'm understanding</p> <p>22 correctly, you complained to Bubba Hiers about the</p> <p>23 write-up of the box incident on one occasion. Did</p> <p>24 you ask Mr. Hiers to look at the tape?</p> <p>25 A. I did.</p>	<p>1 A. Boy, that woman's got some big boobs.</p> <p>2 That's about all I've heard.</p> <p>3 Q. Okay. Did you hear any comments about</p> <p>4 his ex-wife's breasts?</p> <p>5 A. No.</p> <p>6 Q. That he was glad she was gone because</p> <p>7 she had small titties?</p> <p>8 A. No.</p> <p>9 Q. Did he ever make comments about women's</p> <p>10 bodies other than make comments on the size of</p> <p>11 their breasts?</p> <p>12 A. No.</p> <p>13 Q. Did he ever tell jokes about blow jobs?</p> <p>14 A. Tell jokes, no.</p> <p>15 Q. Okay. Talk about blow jobs but in a</p> <p>16 serious way? Remember you're under oath.</p> <p>17 A. I know. It's kind of personal. Yeah.</p> <p>18 Between he and I. Yes.</p> <p>19 Q. Yeah?</p> <p>20 A. Yeah.</p> <p>21 Q. Okay.</p> <p>22 A. A very small comment.</p> <p>23 Q. What did he say?</p> <p>24 A. I had just gotten a new set of dentures</p> <p>25 and he said, well, I bet Milton likes that. But</p>

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12 (Pages 42 to 45)

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1 that's between he and I.  
 2 Q. Okay. That's a pretty obnoxious thing  
 3 to say, isn't it?  
 4 A. Not to me. It didn't bother me.  
 5 Because I know Bubba and it was like between he  
 6 and I a conversation we were having.  
 7 Q. Okay. So you had just gotten a set of  
 8 dentures and he commented to you that he bet your  
 9 husband would like that; is that correct?  
 10 A. He said, I bet Milton kind of likes that  
 11 or something like that. It wasn't anything  
 12 inappropriate to me.  
 13 Q. Okay. Who did he make this statement in  
 14 front of?  
 15 A. I think it was just me. Lisa might have  
 16 been there. I guess she had to have remembered  
 17 something like that if she put it in the lawsuit.  
 18 Q. Right.  
 19 A. So it must have just been the couple of  
 20 us because -- yeah.  
 21 Q. Okay. Is that a typical example of Mr.  
 22 Hiers -- of the sense of humor Mr. Hiers expressed  
 23 at the workplace?  
 24 MR. LAKE: Object to form.  
 25 THE WITNESS: No.

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1 MR. BILLIPS: You're taking over for Tom  
 2 or Bill?  
 3 MR. FRANKLIN: Well, Tom's not in the  
 4 room, so he's the representative for Uncle  
 5 Bubba's.  
 6 MR. BILLIPS: Okay. Well, that's what I  
 7 was --  
 8 MR. FRANKLIN: If Tom comes back from  
 9 the potty break wherever he was, I can't speak for  
 10 him.  
 11 MR. BILLIPS: I can't keep the players  
 12 straight without a scorecard, and that's the  
 13 reason I was asking.  
 14 MR. LAKE: Okay.  
 15 BY MR. BILLIPS:  
 16 Q. Had you ever talked to Bubba Hiers about  
 17 either your sex life with your husband or about  
 18 blow jobs in general?  
 19 A. No.  
 20 Q. Had you ever said anything to Bubba  
 21 Hiers that would give him any reasonable  
 22 indication that you would welcome him talking  
 23 about you giving your husband a blow job after  
 24 taking out your dentures?  
 25 A. He didn't say that.

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1 Q. Well, that was what was implied?  
 2 A. That's what you're saying.  
 3 MR. FRANKLIN: Objection to form.  
 4 MR. LAKE: Mischaracterizes.  
 5 THE WITNESS: Thank you.  
 6 BY MR. BILLIPS:  
 7 Q. It's not what you -- how you took it?  
 8 A. I just took it like a little joke  
 9 between Bubba and I.  
 10 Q. Is that how you took it though, that's  
 11 what he was referring to?  
 12 MR. LAKE: Objection. The witness has  
 13 answered the question.  
 14 THE WITNESS: Thank you.  
 15 BY MR. BILLIPS:  
 16 Q. You may answer.  
 17 A. But I don't have to. He said I don't  
 18 have to.  
 19 Q. You do have to.  
 20 A. I guess I could have taken it that way.  
 21 Q. Okay. As a matter of fact, you first  
 22 brought up this when I asked you if Bubba had made  
 23 any jokes about blow jobs and you brought up the  
 24 thing about the dentures.  
 25 A. Right. Right.

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1 Q. Okay. Had you ever done anything that  
 2 you would think would tell Bubba that you wouldn't  
 3 be offended by that?  
 4 MR. LAKE: Object to form. It calls for  
 5 speculation.  
 6 BY MR. BILLIPS:  
 7 Q. You can answer.  
 8 A. Okay. You're asking would I have --  
 9 Q. Have you ever said or done anything to  
 10 Bubba Hiers that would indicate in your mind that  
 11 you'd think that was funny?  
 12 A. Yes.  
 13 MR. LAKE: Same objection.  
 14 BY MR. BILLIPS:  
 15 Q. Like what?  
 16 A. Just casual talking sometimes --  
 17 Q. Telling jokes?  
 18 A. -- about things. Telling jokes. Not  
 19 necessarily sexual, but just having a little fun.  
 20 Q. Indicating a similar sense of humor; is  
 21 that fair?  
 22 A. I guess.  
 23 Q. Now, before Mr. -- you cleaned Mr.  
 24 Hiers' house before he was married to Dawn?  
 25 A. Yes.

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1 Q. And when you cleaned his house and came  
 2 into the restaurant, would you tell people about  
 3 seeing lipstick on his sheets?  
 4 A. No.  
 5 Q. Or tell people that he had been to the  
 6 strip club the night before?  
 7 A. No.  
 8 Q. Okay. Did you ever see things of that  
 9 sort when you were cleaning his house?  
 10 A. No.  
 11 Q. Okay. Now, did you ever -- did Mr.  
 12 Hiers ever say anything that you felt was  
 13 inappropriate and you tell him that you felt it  
 14 was inappropriate?  
 15 A. No.  
 16 Q. Would you have felt free to do so?  
 17 A. Yes.  
 18 Q. Does Mr. Hiers currently have any active  
 19 involvement in the management of the restaurant,  
 20 other than meeting and greeting guests and getting  
 21 his picture taken?  
 22 A. Not too much. That's why we have a  
 23 general manager.  
 24 Q. Okay. He has a much less active  
 25 involvement?

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1 A. No. I didn't say that. Oh, in the  
 2 management. Maybe, yes. He still is there and  
 3 involved.  
 4 Q. Right. But he has much less involvement  
 5 in the actual management of the restaurant than he  
 6 did when Ms. Jackson was there; is that right?  
 7 A. Yes.  
 8 Q. Did Ms. Jackson complain on occasion  
 9 about Mr. Hiers interfering with her effort to  
 10 manage the restaurant?  
 11 A. No.  
 12 Q. Not to you?  
 13 A. Huh-uh.  
 14 Q. Okay. When Ms. Jackson -- now, you  
 15 indicated that you -- back on these chef coats.  
 16 You and Ms. Jackson had texted back and forth, and  
 17 she responded to you that she would take them and  
 18 give them to you at R&R, right?  
 19 A. She would drop them off at R&R.  
 20 Q. And did you respond to her?  
 21 A. I did.  
 22 Q. Okay. What did you say?  
 23 A. I told -- I think I said, just let me  
 24 know, you know, what -- when you drop them off and  
 25 I'll go pick them up.

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1 Q. Okay.  
 2 A. And she never responded. I even called  
 3 Regina at R&R, and she said they weren't there.  
 4 So I texted Lisa again, but she never texted me  
 5 back after that.  
 6 Q. Okay. It's possible that y'all just had  
 7 some miscommunication about when they were going  
 8 to be dropped off?  
 9 A. No, not really. It was the week before  
 10 Thanksgiving.  
 11 Q. Now, do you know a Ms. Copeland --  
 12 A. No.  
 13 Q. -- who used to be a bartender?  
 14 A. Copeland. First name maybe?  
 15 Q. Sarah Copeland.  
 16 A. No.  
 17 Q. Okay. Actually, I think she was a bar  
 18 manager until May of 2008.  
 19 A. Do you have the last name correct?  
 20 Q. Who was the bar manager in May of 2008?  
 21 A. Sarah Wilkerson, I believe.  
 22 Q. That may have been her name at the time.  
 23 A. Okay.  
 24 Q. And do you know anything about the  
 25 circumstances under which she left Uncle Bubba's?

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1 A. I vaguely know. Not really. I want to  
 2 say she was pregnant. I don't think that was the  
 3 reason. That was later. I don't remember.  
 4 Q. And did she leave under good terms, as  
 5 far as you know?  
 6 A. As far as I knew she did.  
 7 Q. Okay. Now, were you ever in  
 8 Ms. Copeland's presence, Sarah, the bar manager in  
 9 her presence when Mr. Hiers used the "N" word?  
 10 A. No.  
 11 MR. FRANKLIN: You're assuming --  
 12 objection. You're assuming he used it.  
 13 BY MR. BILLIPS:  
 14 Q. My question was whether.  
 15 MR. FRANKLIN: You said when he used it,  
 16 not if he used it, I thought.  
 17 BY MR. BILLIPS:  
 18 Q. Have you ever heard Mr. Hiers use the  
 19 word nigger?  
 20 A. No.  
 21 MR. FRANKLIN: Asked and answered.  
 22 BY MR. BILLIPS:  
 23 Q. Okay. What is your educational  
 24 background?  
 25 A. I have five years of college, no degree.

Page 50	Page 52
1 Q. Which degree?	1 Bubba's what do you make?
2 A. It was in criminal justice.	2 A. I'm salary, so I'm -- how much do I
3 Q. From what school?	3 make?
4 A. Child psychology.	4 MR. FRANKLIN: He can't answer for you.
5 Q. What school?	5 THE WITNESS: I know. I'm thinking.
6 A. Armstrong.	6 Can I have a pen real quick. I'm sorry. I don't
7 Q. When did you graduate?	7 even know how much I make. I know how much I
8 A. I did not.	8 make, but if you want me to break it down. 11 --
9 Q. Oh.	9 1,190.
10 A. I said five years, no degree.	10 MR. FRANKLIN: You have to speak up a
11 Q. Oh, okay. I thought you said five years	11 little bit.
12 and a degree.	12 THE WITNESS: 1,190 every week is what I
13 A. No degree.	13 get.
14 Q. Okay. Prior to working at Uncle Bubba's	14 BY MR. BILLIPS:
15 where did you work?	15 Q. Is that take-home pay?
16 A. Old Savannah Tours.	16 A. No. Take home is 832.
17 Q. For how long?	17 Q. Have there been any recent raises?
18 A. Seven years.	18 A. No.
19 Q. And prior to that?	19 Q. Okay. When was the last time you got a
20 A. Carry Hilliard's. It's a restaurant.	20 raise?
21 Q. Carry --	21 A. Two years ago in March, I believe.
22 A. Hilliard's.	22 Q. Do you know Paula Deen at all?
23 Q. Hilliard's?	23 A. Yes.
24 A. Uh-huh.	24 Q. How many times have you met her?
25 Q. For how long?	25 A. Several over the last seven years. I
Page 51	Page 53
1 A. Five years.	1 can't count them.
2 Q. What did you do there?	2 Q. Have you ever had an in-depth
3 A. I was a waitress, server.	3 conversation with her other than saying hello, how
4 Q. Okay. Prior to that?	4 are you?
5 A. Red Lobster.	5 A. We talk a little bit. She asks how I'm
6 Q. Okay. For how long?	6 doing, asks about my children. Nothing more than
7 A. Two and a half years.	7 maybe 20 minutes long.
8 Q. And prior to that?	8 Q. Okay. Have you ever spoken to her about
9 A. Dunkin' Donuts.	9 Lisa Jackson?
10 Q. For how long?	10 A. No, sir.
11 A. I don't remember. That's like the first	11 MR. BILLIPS: Let's take five minutes.
12 job I ever had. 16 until I guess I was 23. Until	12 MR. FRANKLIN: Okay.
13 I had my son, so seven years.	13 (Recess from 3:28 p.m. to 3:40 p.m.)
14 Q. Approximately what were you making when	14 BY MR. BILLIPS:
15 you were working for Savannah Tours?	15 Q. Ms. Sikes, when Mr. Hiers would come in
16 A. About 12.50 an hour.	16 to work in the morning, would you on occasion pour
17 Q. And when you began working at Uncle	17 him a drink?
18 Bubba's, what were you making?	18 A. In the morning?
19 A. Well, I was making tips, so...	19 Q. Yes, ma'am.
20 Q. Including tips.	20 A. No. No.
21 A. Including tips probably about 16, \$18 an	21 Q. Did you ever see Mr. Hiers working -- or
22 hour.	22 excuse me, drinking while at work?
23 Q. Okay.	23 A. Yes.
24 A. I don't know.	24 Q. Okay. While there were customers
25 Q. And presently as a manager at Uncle	25 present?

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1 A. Yes.	1 didn't say that he was drinking before that. I
2 Q. What would he generally drink?	2 think her testimony was he would have a drink made
3 A. Jack Daniels and water.	3 for the road.
4 Q. Okay. Would he have a Styrofoam cup	4 MR. BILLIPS: Right.
5 with his initials on it?	5 THE WITNESS: It was the cup he was
6 A. Yes.	6 using during the day, whatever he was drinking.
7 Q. Would he pour it himself or would he get	7 MR. BILLIPS: Whatever he was drinking?
8 the bartenders to pour it?	8 THE WITNESS: Right.
9 A. No. Usually the bartender or me.	9 BY MR. BILLIPS:
10 Q. Really?	10 Q. Which may or may not have been Jack and
11 A. Uh-huh.	11 water?
12 Q. So Mr. Hiers does not believe always	12 A. Which usually was not.
13 self pour?	13 Q. Sometimes it was?
14 A. I'm sorry?	14 A. I don't know.
15 Q. You're not aware of Mr. Hiers holding	15 Q. Okay. So you don't know whether it was
16 the opinion that one should always self pour?	16 or was not?
17 A. No.	17 A. When I was there, it was not.
18 Q. And if Mr. Hiers was pouring his own	18 Q. Okay. Well, did Mr. Hiers ever drink
19 drinks, you weren't aware of it, correct?	19 while he was at work?
20 A. Correct.	20 A. Okay.
21 Q. But you were aware of other people	21 MR. LAKE: Objection. Asked and
22 pouring him drinks, correct?	22 answered.
23 A. Yes.	23 BY MR. BILLIPS:
24 Q. Did he pay for them?	24 Q. I thought I asked that question and you
25 A. No.	25 answered affirmatively.
Page 55	Page 57
1 Q. Were the employees of the restaurant	1 A. He was at work. There were customers in
2 permitted to drink during -- while there were	2 the restaurant. He was sitting at the bar fixing
3 customers present in the restaurant?	3 to leave.
4 A. No.	4 Q. Okay.
5 Q. Okay. Would Mr. Hiers be sitting out at	5 A. That's what I guess I needed to make
6 the bar drinking?	6 clear.
7 A. He was on his way out the door.	7 Q. Okay. And this Styrofoam cup is like a
8 Q. On his way out the door?	8 16-ounce Styrofoam cup?
9 A. Yes.	9 A. Right. But it was not full. It was one
10 Q. Where was he going?	10 shot and half water.
11 A. Home.	11 Q. Okay. And he would take that and get in
12 Q. Okay. So he would pour himself a --	12 his car and drive off?
13 A. No.	13 A. And go home, yes.
14 Q. -- or somebody would pour him a Jack and	14 Q. Okay. Does the restaurant generally
15 Coke --	15 pour roadies for people?
16 A. Jack and water.	16 A. No. No.
17 Q. Jack and water. Sorry. And he'd write	17 Q. Is it against the law for a restaurant
18 his name on the cup?	18 to pour a roadie for someone to take with them
19 A. Usually it was a cup he was using that	19 when they leave?
20 day and it was already on there.	20 MR. FRANKLIN: Objection. You're asking
21 Q. So that's the cup he had been drinking	21 her the legal opinion.
22 out of that day?	22 BY MR. BILLIPS:
23 A. Yes.	23 Q. Well, as a bartender, is it your
24 Q. And then he'd get another drink --	24 understanding you're not allowed to pour a drink
25 MR. FRANKLIN: Wait a minute. She	25 for a customer to take out of the restaurant and



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1 get in their car and drive off?  
 2 MR. FRANKLIN: Objection. You can  
 3 answer.  
 4 THE WITNESS: Can I still answer?  
 5 MR. FRANKLIN: Sure.  
 6 THE WITNESS: When I poured the drink  
 7 for Bubba sitting at the bar, no, we cannot serve  
 8 alcohol to go, but nine times out of -- or excuse  
 9 me, he would drink it and then he would leave.  
 10 MR. BILLIPS: Okay.  
 11 THE WITNESS: Does that make sense?  
 12 BY MR. BILLIPS:  
 13 Q. Sure. So he was sitting there at the  
 14 bar?  
 15 A. Okay. One drink, yes, and then he was  
 16 gone.  
 17 Q. Okay. So it's not that you'd pour the  
 18 drink for him and he would leave?  
 19 A. I knew he was fixing to leave. Right.  
 20 Q. Okay. You'd pour the drink for him and  
 21 then he would drink it and then he would leave?  
 22 MR. LAKE: Objection. Mischaracterizes  
 23 the witness's testimony. She said she didn't pour  
 24 him a drink.  
 25 BY MR. BILLIPS:

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1 Q. You did say you poured him a drink,  
 2 didn't you?  
 3 A. I did say I poured him a drink.  
 4 MR. LAKE: Withdraw the objection.  
 5 MR. BILLIPS: All right. I believe  
 6 that's all I've got of this witness.  
 7 MR. FRANKLIN: No questions.  
 8 (Exhibit A marked for identification.  
 9 (Signature reserved.)  
 10 (Deposition concluded at 3:48 p.m.)  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
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 22  
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 24  
 25

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1 ATTESTATION  
 2  
 3 I, the undersigned, have read the  
 4 foregoing transcript, and, with the exception of  
 5 any corrections specified on the attached  
 6 correction sheet, attest it constitutes a true and  
 7 correct transcription of my testimony given at the  
 8 time and place specified therein.  
 9  
 10 (Signed): \_\_\_\_\_  
 11  
 12 Sandra Sikes  
 13  
 14  
 15 WITNESS: \_\_\_\_\_  
 16  
 17  
 18  
 19 DATE: \_\_\_\_\_  
 20  
 21  
 22  
 23  
 24  
 25

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1 ERRATA SHEET  
 2 STATE OF GEORGIA )  
 3 )  
 4 COUNTY OF CHATHAM )  
 5 I wish to make the following  
 6 changes for the following reasons:  
 7 PAGE LINE  
 8 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 9 REASON: \_\_\_\_\_  
 10 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 11 REASON: \_\_\_\_\_  
 12 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 13 REASON: \_\_\_\_\_  
 14 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 15 REASON: \_\_\_\_\_  
 16 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
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 18 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 19 REASON: \_\_\_\_\_  
 20 \_\_\_\_\_ CHANGE: \_\_\_\_\_  
 21 REASON: \_\_\_\_\_  
 22  
 23 (Signed) \_\_\_\_\_  
 24 Sandra Sikes  
 25

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1 CERTIFICATE

2

3 STATE OF GEORGIA:

4 COUNTY OF CHATHAM:

5

6 I hereby certify that the foregoing  
7 transcript was taken down, as stated in  
8 the caption, and the questions and  
9 answers thereto were reduced to  
10 typewriting under my direction; that the  
11 foregoing pages 1 through 61 represent a  
12 true, complete, and correct transcript  
13 of the evidence given upon said hearing,  
14 and I further certify that I am not of  
15 kin or counsel to the parties in the  
16 case; am not in the regular employ of  
17 counsel for any of said parties; nor am  
18 I in anywise interested in the result of  
19 said case.

20 This, the 10th day of March, 2013.

21

22

23

24 \_\_\_\_\_  
RACHAEL MILLER, RPR, CSR, CCR 2807

25

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