

# **EXHIBIT E**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

LONG HAUL, INC. and EAST BAY )  
PRISONER SUPPORT, )

Plaintiffs, )

v. )

No. C 09-00168-JSW

UNITED STATES OF AMERICA; MIGUEL )  
CELAYA; KAREN ALBERTS; WILLIAM )  
KASISKE; WADE MacADAM; TIMOTHY )  
ZUNIGA; MIKE HART; LISA SHAFFER; )  
and DOES 1 - 25, )

Defendants. )

DEPOSITION OF LISA SHAFFER, taken on behalf  
of Plaintiffs, at One Market Street, 32nd Floor, San  
Francisco, California, commencing at 9:22 a.m.,  
Wednesday, July 28, 2010, before Donna J. Blum,  
Certified Shorthand Reporter, No. 11133.

1 articles that were in this container?

2 A. I don't remember.

3 Q. Do you remember what publication they were from?

4 A. They were photocopies, so I don't remember which  
5 ones -- where they came from.

6 Q. Okay. Approximately how many books were in the  
7 container?

8 A. Seven, eight.

9 Q. And approximately how many news articles?

10 A. There were just a couple sheets, maybe six or  
11 seven.

12 Q. Okay. Anything else in that container?

13 A. That was it that I remember.

14 Q. And what did you do, what did you do next?

15 A. I just kind of stood around upstairs for a while  
16 until Officer MacAdam called me downstairs.

17 Q. And why did MacAdam call you downstairs?

18 A. He'd said something to the effect of there's  
19 something here you might want to take a look at.

20 Q. And what was that that he was referring to?

21 A. I met him downstairs by one of the rooms.

22 Q. Okay. And can you describe the room to which he  
23 had called you?

24 A. The room -- when I got to the room, the only  
25 thing I saw there was a pile of paperwork on the floor.

1 There's a copy machine, and then I think there was a  
2 table.

3 Q. And these were inside the room?

4 A. Yes.

5 Q. Okay. Do you remember if there was anything on  
6 the door to this room?

7 A. The door was open.

8 Q. Okay. Do you remember a sign?

9 A. I didn't -- don't remember seeing one.

10 Q. Do you recall if it appeared that the door to  
11 this room had been forced open?

12 A. I don't remember if it was.

13 Q. All right. Did you subsequently gain  
14 information that let you know if any of the -- if any of  
15 the doors inside the Long Haul had been forced open?

16 A. I didn't see any of them. I wasn't -- if they  
17 were, I wasn't present.

18 Q. You didn't -- you didn't see any of the other  
19 officers force open any of the doors. Is that correct?

20 A. Correct.

21 Q. Okay. And do you remember seeing -- aside from  
22 seeing it happen, do you remember seeing any -- any doors  
23 inside the Long Haul that appeared to have been forced  
24 open?

25 A. Not that I remember.

1 Q. Okay. So back to this -- this room that you  
2 just referred to that had papers and a copy machine --

3 A. Uh-huh.

4 Q. -- is there anything else that you can recall  
5 about -- about the inside of that room?

6 A. No.

7 Q. Did it -- did it appear to be an office, for  
8 example, with a desk that someone might sit in to -- to  
9 do whatever kind of work?

10 A. I don't remember a desk. I just remember a  
11 table.

12 Q. Okay. And why had Detective MacAdam called to  
13 you that room?

14 A. When he came down, he pointed to the papers on  
15 the floor and said there may be something of interest on  
16 there to me.

17 Q. Do you know what he -- know what he meant by  
18 something that might have been something of interest to  
19 you?

20 A. No. He just said that in pointing to the stack.

21 Q. Did you look at the pile of papers?

22 A. I looked at the first two items on the top of  
23 the pile.

24 Q. And what were they?

25 A. They were envelopes that were either from

1 inmates or to inmates.

2 Q. Okay. Approximately how many pages were in this  
3 stack of papers that you just referred to?

4 A. I only looked at the envelopes.

5 Q. So let me make sure I understand this. So where  
6 was the stack of envelopes situated?

7 A. They were on top of the pile -- there were more  
8 piles, but they were on top.

9 Q. And this was on the table or this was on the  
10 floor?

11 A. On the floor.

12 Q. And why did you only look at two?

13 A. They were from prisoners that had nothing to do  
14 with why we were there. And so I didn't look any  
15 further.

16 Q. Did you do anything else -- did you look at any  
17 other items inside that room?

18 A. No.

19 Q. Okay. Did you have any further conversation  
20 with Detective MacAdam about -- during the time that you  
21 were in that room?

22 A. No.

23 Q. Did you see any computers in that room at the  
24 point in which Detective MacAdam had called you there?

25 A. No.



1 of the testimony given by the witness. (Fed. R. Civ. P.  
2 30(f)(1)).

3 Before completion of the deposition, review of  
4 the transcript [XX] was [ ] was not requested. If  
5 requested, any changes made by the deponent (and  
6 provided to the reporter) during the period allowed, are  
7 appended hereto. (Fed. R. Civ. P. 30(e)).

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Dated: August 11, 2010

A handwritten signature in black ink, appearing to be "D. O. O.", is written over a horizontal line.