

Lim - Direct

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1 MR. PFEIFFER: I'd like to call Mr. Edward Lim.

2 THE COURT: Raise your right hand, please.

3 EDWARD BOYNTON LIM, PLAINTIFF'S WITNESS, SWORN

4 THE COURT: Have a seat, please.

5 DIRECT EXAMINATION

6 BY MR. PFEIFFER:

7 Q. Are you familiar with the substance of this complaint?

8 In fact, you filed it, correct? Wasn't that in 2001?

9 MR. NADLER: Objection, Your Honor; compound.

10 THE COURT: Sustained.

11 MR. PFEIFFER: I'll divide all that up.

12 BY MR. PFEIFFER:

13 Q. Do you know who filed this complaint?

14 A. I believe Mr. Qin, or Mr. Chin, as I was told that was

15 his name, filed it for me.

16 Q. When was that?

17 A. That was back in 2000, when Mrs. Xiao, who was his landlady

18 at the time, told me that he never had paid her all the --

19 MR. NADLER: Objection, Your Honor; hearsay.

20 THE COURT: Sustained.

Each **type** of examination is introduced by a centered "exam line" — see **line 5**. This also triggers the need for a corresponding header.

The first question is introduced by the **questioner's ID** or **BY** line.

A period after each Q or A is optional.

Notice that **another BY** or questioner's ID line resumes Q/A after **EACH colloquy interruption**, unlike common deposition practice.

21 BY MR. PFEIFFER:

22 Q. Do you know when Mr. Qin or Chin filed this complaint?

23 A. Sometime in -- sometime in about -- I guess it was in --

24 THE COURT: Don't guess, Mr. Lim. If you don't --

25 THE WITNESS: I don't know.

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