

<p>1 IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY 1 2 _____) 3) 3 MARILYN CLARK, et al.,) 4) 4 Plaintiffs,) 5) 5 v.) Case No. 6) CAL 08-2332 6 KEITH WASHINGTON, et al.,) 7) 7 Defendants.) 8 _____) 9 10 11 12 Deposition of ROBERT WHITE 13 Greenbelt, Maryland 14 Monday, October 27, 2008 15 10:00 a.m. 16 17 18 19 20 Job No: 3-139268 21 Pages: 1-154 22 Reported by: Tracy Obering, RPR/CSR</p>	<p>1 A P P E A R A N C E S 3 2 ON BEHALF OF THE PLAINTIFFS: 3 MICHAEL WINKLEMAN, ESQUIRE 4 MCCARTHY & WINKLEMAN, LLP 5 4201 Northview Drive 6 Suite 410 7 Bowie, Maryland 20716 8 (301) 262-7422 9 10 ON BEHALF OF THE PLAINTIFFS: 11 DAVID E. HAYNES, ESQUIRE 12 THE COCHRAN FIRM 13 1100 New York Avenue, Northwest 14 Suite 340, West Tower 15 Washington, DC 20005 16 (202) 682-5800 17 18 19 20 21 22</p>
<p>1 Deposition of ROBERT WHITE, held at the 2 2 offices of: 3 LAD Reporting Company 4 6301 Ivy Lane 5 Suite 619 6 Greenbelt, Maryland 20770 7 (301) 474-5699 8 9 10 Pursuant to notice, before Tracy Obering, 11 Registered Professional Reporter/California Shorthand 12 Reporter. 13 14 15 16 17 18 19 20 21 22</p>	<p>1 A P P E A R A N C E S (Continued) 4 2 ON BEHALF OF THE DEFENDANT 3 PRINCE GEORGE'S COUNTY: 4 STEPHEN W. THIBODEAU, ESQUIRE 5 ASSOCIATE COUNTY ATTORNEY 6 14741 Governor Oden Bowie Drive 7 Suite 5121 8 Upper Marlboro, Maryland, 20772 9 (301) 952-2842 10 11 ON BEHALF OF THE DEFENDANT: 12 DANIEL KARP, ESQUIRE 13 KARPINSKI, COLARESI & KARP 14 120 Baltimore Street 15 Suite 1850 16 Baltimore, Maryland 21202 17 (410) 727-5000 18 19 20 21 22</p>

<p>1 CONTENTS</p> <p>2 EXAMINATION OF ROBERT WHITE</p> <p>3 By Mr. Karp 6</p> <p>4</p> <p>5</p> <p>6</p> <p>7 EXHIBITS</p> <p>8 (Attached to Transcript)</p> <p>9 EXHIBIT NUMBER PAGE</p> <p>10 1 Statement 34</p> <p>11 2 Photograph 83</p> <p>12 3 Photograph 84</p> <p>13 4 Photograph 86</p> <p>14 5 Photograph 89</p> <p>15 6 Photograph 90</p> <p>16 7 Photograph 129</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p style="text-align: right;">5</p> <p>1 A. I graduated.</p> <p>2 Q. High school?</p> <p>3 A. Yes, sir.</p> <p>4 Q. In South Carolina?</p> <p>5 A. South Carolina.</p> <p>6 Q. What was the name of the high school?</p> <p>7 A. Andrews High.</p> <p>8 Q. Have you had any military service?</p> <p>9 A. No.</p> <p>10 Q. 161 Olivia Road, is that a single-family home?</p> <p>11 In other words, a detached house or is it something</p> <p>12 else?</p> <p>13 A. No.</p> <p>14 Q. What is it?</p> <p>15 A. It's a mobile home.</p> <p>16 Q. How long have you lived there?</p> <p>17 A. 2004.</p> <p>18 Q. From 2004 to now?</p> <p>19 A. Yes.</p> <p>20 Q. Was there a period of time when you lived</p> <p>21 someplace else?</p> <p>22 A. Yes. I was more in the city. When people</p>
<p style="text-align: right;">6</p> <p>1 PROCEEDINGS</p> <p>2 ROBERT WHITE,</p> <p>3 having been duly sworn, testified as follows:</p> <p>4 BY MR. KARP:</p> <p>5 Q. Good morning. My name is Dan Karp. I</p> <p>6 represent Mr. Keith Washington.</p> <p>7 Give us your full name and address, please.</p> <p>8 A. Robert White. 161 Olivia Road, Andrews, South</p> <p>9 Carolina.</p> <p>10 Q. Your date of birth, sir?</p> <p>11 A. 1/23/71.</p> <p>12 Q. Are you married?</p> <p>13 A. No, I am not.</p> <p>14 Q. Have you ever been married?</p> <p>15 A. No.</p> <p>16 Q. Do you have any children?</p> <p>17 A. Yes.</p> <p>18 Q. Names and ages, if you please?</p> <p>19 A. Jakara White, age 3.</p> <p>20 Q. Is she your only child?</p> <p>21 A. Yes, sir.</p> <p>22 Q. How far did you go in school, sir?</p>	<p style="text-align: right;">7</p> <p>1 bought some land and put a trailer on it.</p> <p>2 Q. What was your previous address -- or let me</p> <p>3 say it a different way.</p> <p>4 Where, other than 161 Olivia Road, have you</p> <p>5 lived in the last four years?</p> <p>6 A. Well, I was locked up. When I got out in</p> <p>7 2004, that's where I went.</p> <p>8 Q. Okay. When did you live at 475 Orange Street</p> <p>9 Southeast?</p> <p>10 A. 2005.</p> <p>11 Q. So is it the case that you lived on Olivia</p> <p>12 Road in Andrew, South Carolina from 2004 to 2005?</p> <p>13 A. Could have been.</p> <p>14 Q. Excuse me?</p> <p>15 A. Yes.</p> <p>16 Q. When did you move to Orange Street, Southeast?</p> <p>17 A. I don't remember the exact date, but 2005.</p> <p>18 Q. How long did you live there?</p> <p>19 A. 2005 up until this incident.</p> <p>20 Q. Up until January of 2007?</p> <p>21 A. Yes.</p> <p>22 Q. Did you move back to the Olivia Street address</p>
<p style="text-align: right;">8</p>	<p style="text-align: right;">8</p>