

2002 Randy White Deposition.TXT  
STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

MOTOR CITY AVIATION, L.L.C.,

Plaintiff,

vs.

WITHOUT WALLS INTERNATIONAL  
CHURCH,

Defendant.

Case No. 02-041096-CK

DEPOSITION OF: PASTOR RANDY WHITE  
TAKEN: Pursuant to Notice  
by Counsel for Plaintiff  
DATE: September 23, 2002  
TIME: 10:00 a.m.  
PLACE: 2511 North Grady Avenue  
Tampa, Florida

Pages: 90

HARTSOCK & CERVONE COURT REPORTERS  
SUITE 2825  
100 NORTH TAMPA STREET  
TAMPA, FLORIDA 33602  
(813) 221-3292

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1 APPEARANCES:

Page 1

2 PAUL G. VALENTINO, ESQUIRE

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5 BRADLEY WOOD, ESQUIRE

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I N D E X

9 Direct Examination by Mr. Valentino 3  
10 Certificate of Oath 90

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21 The deposition, upon oral examination, of PASTOR  
22 RANDY WHITE, was taken pursuant to notice by counsel for  
23 Plaintiff, in accordance with MCR 2.306, 2.308 and other  
24 applicable provisions of the Michigan Court Rules of  
25 Court.

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1 PASTOR RANDY WHITE,  
2 being first duly sworn to tell the truth, was examined and  
3 testified as follows:

- 14 A If they had called Todd?
- 15 Q Yes, that's what I'm asking you, sir.
- 16 A To use a jet to fly somewhere, is that what you're
- 17 asking?
- 18 Q To call to discuss anything with Todd about setting
- 19 up plans for you to fly or Paula to fly anywhere, would that
- 20 have been contrary to your instructions to them?
- 21 A I never gave instructions at all.
- 22 Q So if they had been in contact with Mr. Bates
- 23 concerning the Lear jet or flight arrangements in April and
- 24 May, it would have been without your knowledge?
- 25 A Talking about the Lear jet to purchase?

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- 1 Q Or setting up trips for you and Paula.
- 2 A Yes, it would have been without my knowledge.
- 3 Q And you were never -- I want to make real clear on
- 4 this. You never had a conversation on the phone with Mr.
- 5 Bates where you told him, I'm buying the airplane?
- 6 A Correct.
- 7 Q You never were on the phone with Mr. Bates at all,
- 8 to your recollection?
- 9 A Correct.
- 10 Q And you never told Mr. Bates, I didn't say I wasn't
- 11 buying the airplane then, I'm just saying I'm not buying it
- 12 now?
- 13 A Repeat that.
- 14 MR. VALENTINO: would you read that back, please.
- 15 (The record was read as requested.)

16

A Correct.

17

Q And you're absolutely positive of that?

18

A Correct.

19

Q So would it be fair to say that if, in fact, you did, say, have a conversations with Mr. Bates on the phone and did say those words to Mr. Bates, you're a liar?

20

21

22

A I don't lie.

23

Q Okay.

24

MR. VALENTINO: I don't think I have any other questions, but let me take a minute.

25

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