

1 Q. What about whistle-blowers?

2 A. I probably interviewed about 60 people a year on
3 those cases. I probably took maybe six or seven
4 over the course of the years I tried several
5 cases, settled a lot of cases. You bet.

6 Q. Would that include wrongful discharge cases?

7 A. Yes. Wrongful discharge, unlawful employment
8 practices is what we call them here in Oregon.

9 Q. All right. How did you get acquainted with Max
10 Zweizig?

11 A. I actually received a call from an attorney in
12 New Jersey. I'm not sure that I completely
13 understood the nature of their relationship, but
14 she called me on the phone and said that she had
15 a, an issue with an employer and needed some
16 help filing a complaint with the Department of
17 Justice and just making sure that all of his
18 rights and interests were protected. My
19 recollection now, because I've taken a look at
20 some of the exhibits in this case, was that that
21 was a, oh, I can't remember her name. Still
22 can't remember her name.

23 Q. Sandra --

24 A. She did contact me. She gave me the basic
25 outline of a case that, there was a, kind of a

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1 new issue in those days of a no call list that
2 people could be on the no call list. And she
3 said that Max had discovered when he came to
4 workout here in Oregon that one of the employees
5 had violated that no call list and it was a
6 federal violation and that he needed some help
7 turning that violation into the Oregon
8 Department of Justice. I agreed to do that. I
9 think I had a short conversation with Max and
10 then I prepared an e-mail to the Department of
11 Justice here in Oregon and e-mailed to his
12 employer.

13 Q. Did you do, do you have a practice of doing an
14 intake interview?

15 A. I always do about a one hour intake interview
16 with all of my clients. I can't recall
17 specifically this intake interview. I don't
18 have my notes in front of me. I don't have the