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STATE OF MAINE
PENOBSCOT, ss

SUPERIOR COURT
CIVIL ACTION
Docket No. PENSC-CV-2021-20

* * * * *
OTTO SNOW,
Plaintiff,
vs.
ANDREW DAVIS, et al.
Defendant.
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DEPOSITION of ROBERT SADLOWSKI

BEFORE: Christine Fraga Thornton, RDR, a
Maine Notary Public, via Zoom videoconference, on
Wednesday, October 5, 2022, beginning at 4:00 p.m.

APPEARANCES:

Christopher R. Largay, Esq. For the Plaintiff
Kady Huff, Esq. For the Defendants
Matthew Libby, Esq.
Sam Johnson, Esq.

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INDEX OF APPEARANCES

For the Plaintiff:

Christopher R. Largay, Esq.
LARGAY LAW OFFICES, PA
293 State Street, Suite 1
Bangor ME 04401-5528
207-947-4529
Chris@LargayLaw.com

For the Defendant, Andrew Davis:

Kady Huff, Esq.
EATON PEABODY
PO Box 1210
Bangor ME 04402-1210
207-947-0111
khuff@eatonpeabody.com

For the Defendant, Debra Conley:

Matthew Libby, Esq.
MONAGHAN LEAHY, LLP
95 Exchange Street
PO Box 7046
Portland ME 04112-7046
207-774-3906
mlibby@mleahy.com

For the Defendant, Dora Smith Family
Real Estate Company, LLC:

Sam Johnson, Esq.
NORMAN, HANSON & DeTROY, LLC
PO Box 4600
Portland ME 04112-4600
207-774-7000
sjohnson@nhdlaw.com

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EXHIBITS

(No exhibits were marked.)

1 (This deposition was taken before Christine Fraga
2 Thornton, RDR, a Maine Notary Public, via Zoom
3 videoconference, on Wednesday, October 5, 2022,
4 beginning at 4:00 p.m.)

5 (The deponent was at Largay Law Office, 293 State
6 Street, Bangor, Maine, with Attorney Largay.)

7 * * * * *

8 (Also present at the deposition was Otto Snow, via
9 Zoom videoconference.)

10 * * * * *

11 (The deponent was administered the oath by the
12 Notary Public.)

13 * * * * *

14 ROBERT SADLOWSKI, called, after having been duly sworn, on
15 his oath deposes and says as follows:

16 DIRECT EXAMINATION

17 BY MR. LARGAY:

18 Q. Please tell us your full legal name and spell your last
19 name.

20 A. Robert Joseph Sadlowski, S-a-d-l-o-w-s-k-i.

21 Q. And what's your residence address?

22 A. , Winterport, Maine.

23 Q. How long have you lived in Winterport?

24 A. I'd say about six to seven years.

25 Q. Okay. Where were you born, Rob?

1 A. I was born in Beaufort County, Washington, North
2 Carolina.

3 Q. And how long have you lived in Maine?

4 A. I've lived in Maine now, this time, seven years, I'd
5 say, about the same time that I've lived on Eight
6 Taylor Lane.

7 Q. Okay. And where did you move from when you moved to
8 Maine?

9 A. West Mass.

10 Q. Okay. And how old are you now?

11 A. 51.

12 Q. Your date of birth?

13 A. .

14 Q. Okay. And what is it you do for work?

15 A. I do handyman services, painting, fixing, repairing,
16 landscaping, pretty basically everything under the sun
17 when it comes to repair of a home or a property.

18 Q. Okay. And did you ever -- did you graduate high
19 school?

20 A. I did.

21 Q. And what high school was that?

22 A. Hampshire Regional High School through a GED.

23 Q. About what year was that?

24 A. '89.

25 Q. Okay. And since then, you've done mostly those type of

1 contracting jobs --

2 A. Yes.

3 Q. -- that you described?

4 A. Yup.

5 Q. Okay. Do you work for yourself or for someone else?

6 A. I work for myself.

7 Q. And do you have a company or an LLC or is it a --

8 A. I don't at the moment, because I've had -- the last
9 two, two and a half years, I've had five operations, so
10 I've recuperated from that, and I'm just starting now to be
11 able to go back to the work field, best I can. So I
12 don't have a company name right now or anything.

13 Q. Okay.

14 A. I just go by word of mouth, and seems to get around
15 when you do good work and honest work.

16 Q. Okay. And when did you meet Otto Snow?

17 A. I met Otto, six -- I'd say six years ago. Shortly
18 after I moved here. About a year after I moved here,
19 roughly. Six years, yeah.

20 Q. Okay. How did you meet?

21 A. I was told -- he was told about me through
22 Bathfitter actually. He was looking for a deeper bath
23 for his home.

24 Q. All right.

25 A. And Bathfitter suggested I go in there because the

1 extent of work was more than just a bath itself.

2 Q. Okay. Right. They could do a replacement tub but --

3 A. Exactly right.

4 Q. -- but if needed to --

5 A. -- floor needed repair --

6 Q. -- trim work --

7 (Speaking simultaneously. Court reporter
8 interrupted to protect the record.)

9 BY MR. LARGAY:

10 Q. And so it was a little more than just a Bathfitter
11 install?

12 A. Yes.

13 Q. Okay. And did you do that work for Otto?

14 A. Yes.

15 Q. Did you charge him?

16 A. Yes.

17 Q. Okay. Have you done work for him since that initial
18 meeting?

19 A. Yes.

20 Q. Okay. What other work have you done for him?

21 A. Organization of the home, polying floors, painting the
22 home, sealing the driveway, setting up cabinets for
23 his -- it was like a chemistry room, putting up
24 chalkboards, things like that nature.

25 Q. Okay.

1 A. Cellar painting, cleaning again.

2 Q. Okay. And have you been paid for your work each time
3 you did something?

4 A. Yes.

5 Q. Okay. And at an amount of money that you guys just
6 agreed on each job?

7 A. Yes.

8 Q. And does he owe you any money now?

9 A. No.

10 Q. Okay. Have you ever paid Otto for anything?

11 A. No.

12 Q. Okay. And approximately how many times on separate
13 occasions have you been to his house?

14 A. How many times throughout the time I've known him?

15 Q. Yeah.

16 A. Oh, hundreds.

17 Q. That many?

18 A. Oh, yes. Six years? Hundred times. Hundreds.

19 Q. Okay.

20 A. A couple hundred anyway.

21 Q. In addition to being -- would you have to be there
22 multiple times on any one of those jobs?

23 A. Yes.

24 Q. Okay. In addition to those times, did you ever go to
25 his house for social occasions --

1 A. Yes.

2 Q. -- to socialize?

3 Okay. What would you guys do?

4 A. Well, I'd met him through working for him, and then I
5 recognized what he was going through, and became closer
6 as a friend to him, concerned about him, and that's how
7 we built a friendship. So that's basically what we
8 would talk about a lot of times would be his past and
9 what happened to him. He brings up when he was younger
10 and the explosion and all these dramatic things that
11 has happened to him. And that's when I got to know
12 Otto.

13 Q. Okay.

14 A. Because he didn't bring that up when I first met him
15 and stuff. After what we're sitting here for today,
16 that's when I got the knowledge of all of these things,
17 because he'd be repeating it over and over, and going
18 over it and over it --

19 Q. Okay.

20 A. -- and be stuck on it actually.

21 Q. Okay. And so you'd known him for a few years before
22 the dog bite that --

23 A. A year --

24 Q. -- happened in this case?

25 A. Not even. About nine months, I'd say.

1 Q. Okay. And when did you first learn about the dog bite
2 or attack?

3 A. Pretty much the very next morning, when I showed up to
4 do more work, and that's when I recognized -- because
5 he had this -- he had it all -- his mouth was gauzed
6 up, and he answered the door that way. So immediately,
7 I was just, like, "Whoa, what happened to you?"

8 And that's when he started telling me about the
9 dog bite.

10 Q. Okay. Let me take you step by step here. So that's
11 the first time you'd seen him since the attack?

12 A. Yes.

13 Q. Okay. And you weren't present during the dog attack at
14 all?

15 A. No.

16 Q. Okay. And you said he was gauzed up and whatnot. Can
17 you describe specifically what you saw, what it looked
18 like?

19 A. Yeah. It looked like pretty much this side of his face
20 had a large bandage, and it was taped all the way
21 around his mouth from his ear down to here, surrounding
22 this area --

23 Q. Okay.

24 A. -- I think is the best description I can give.

25 Covering my hand, I would say.

1 Q. Okay. So just to visualize it for the record, you have
2 your left hand over almost your entire left cheek?

3 A. Yeah, a little halfway over his lip.

4 Q. And halfway over your lip?

5 A. Yeah.

6 Q. And before you motioned down the right side of your
7 lip?

8 A. Yeah. This -- this whole area right here, where my
9 hand is covering.

10 Q. Okay. And aside from the gauze, could you see around
11 it to see if any of the skin was affected by the dog
12 bite?

13 A. No. I couldn't see anything, and he could barely -- he
14 wasn't really talking. It was more or less huffing or
15 talking like this. Very aggravated.

16 Q. Yeah.

17 A. Still in shock, I think, and I think it just happened
18 that night. I'm not positive. Must have been that
19 night or that afternoon, because I wasn't there then.
20 And then, so he was very agitated and very -- couldn't
21 even understand him really. He just throwing his arm
22 up and huffing and puffing. "The dog bit me,"
23 profanity, et cetera, "You know, I can't believe this.
24 I can't believe this has happened to me."

25 Q. Was he excitable?

1 A. He's so hyper, he was so hyped up about it, so upset.

2 Q. Okay.

3 A. Visibly very upset.

4 Q. Okay.

5 A. And it was shocking seeing him like that, you know,
6 with a big thing like that. And you know, you saw him
7 yesterday, and then you see him then, "Oh, what the
8 heck happened to you?"

9 Q. Right.

10 A. You know? Because Otto don't really go many places.
11 He's pretty much, you know, to his home. He goes to
12 walks in the park, walks around, pretty much stays in
13 that area.

14 Q. Okay.

15 A. He's hard to get out of the house, especially now, try
16 to get him out more. He's more secluded than ever.

17 Q. Okay. And what did he tell you about what happened to
18 him?

19 A. Well later on, like the second day is when, you know,
20 the third day I think is when I could actually talk
21 with him. Because I left. I didn't finish up the work
22 that day because he was so upset. It is just not the
23 place to be, to do work, and him being in that
24 position.

25 So I think it was the third day, two days after

1 the dog bite, I went back there to complete the work.

2 And he was -- I'm trying to remember all this as I
3 speak. I apologize.

4 And he was talking, but you know, not that great.
5 And he was telling me he got bit by a damn dog to get
6 pizza.

7 And I says, "Well, who went with you? Why'd you
8 get bit by a dog?"

9 And he started telling me sparks of it. You know,
10 he wouldn't, like, complete what he was saying. So the
11 story I got, he's going out for pizza with his
12 neighbor, and a dog bit him. That's what I got out of
13 him just in the beginning.

14 Q. Okay. And was he animated when you saw him? Was he
15 excitable that --

16 A. I think that -- at that time, he was beat down. That
17 was going on day three. I think he exerted himself
18 actually where he's now, you know, not sleeping, that
19 kind of a thing, worn out.

20 Q. Did he tell you he wasn't sleeping?

21 A. It became apparent shortly after.

22 Q. Okay. Did he tell you anything else about how it was
23 affecting him?

24 A. He's, like, "I can't do this again. I can't go through
25 this. My god. My god." A lot about, "My god."

1 "I can't do this again. I can't go through this."

2 He'd say things like that.

3 Q. Okay. Did he appear upset when he said those things?

4 A. Very upset. He's still today, he gets worked up on it,
5 just like it was today. I mean --

6 Q. And describe that a little further for us if you can.

7 Any examples?

8 A. Yeah, just -- it will come up. It will come up in
9 conversation quite often. If he sees another dog. If
10 a dog comes up in conversation -- like me, I have a
11 little Shih Tzu. I bring up the Shih Tzu here and
12 there, something funny, you know, family dog.

13 And he's like, "That's what they should have had.
14 If they had a Shih Tzu, I wouldn't be in this
15 situation," this and that.

16 If he sees another dog, he's says you have to go
17 around it. You know, he'll take another street to go
18 for that walk instead of going there. Things like
19 that, you know.

20 And then it -- you know, it combines together with
21 him reliving his childhood memories. Then he starts
22 going into, "I can't take this anymore." This and
23 that.

24 And you know, to say truthfully, when I first
25 showed up for the first -- after about three weeks of

1 this happening, he was on the phone, I was listening to
2 him -- because at this point, I'm more of a worker,
3 handyman than I am a friend. I'm in the area. I'm in
4 his home. You know, you get to know someone,
5 especially when he lives alone, and he has a large
6 home, speaks loudly when he gets going. And he was
7 looking for assisted suicide that he could go to
8 Norwegian -- Norway or something like that, and they
9 would assist him in suicide. And --

10 Q. He actually said that to you?

11 A. Oh, yeah.

12 Q. When was that about?

13 A. About three, four weeks after the dog bite, within a
14 month.

15 Q. And did he relate it to the dog bite or to --

16 A. Yeah, he "can't take it anymore. This is just -- this
17 was the last straw." He started really going off about
18 a month into it. And he stayed going off. Now he's --
19 now he -- I don't know. He goes off, but you can
20 sometimes bring him down a lot easier than you could
21 before. Because you got to tell him, "Well, Otto, you
22 don't want to do that. You don't want to say that,
23 Otto. People will take you seriously today, Otto. You
24 can't talk like that, Otto."

25 And he goes, "I know. I know. What the heck, you

1 know. Look at me. Look at me."

2 And I'm like, "I know, Otto. You're going through
3 a lot."

4 "My muscles are tightening. I can't eat. I can't
5 sleep -- ta-da-da-da-da. I need a damn Valium. They
6 won't even give me a Valium to calm down. I can't do
7 this anymore, Rob. I can't keep living like this."

8 I'm sorry. It gets me going.

9 Q. He's a friend of yours.

10 A. Yes. Well, anybody -- a friend or not a friend --

11 Q. Okay. Take a minute.

12 A. Yeah. Yeah.

13 Q. Take a minute. You don't have to --

14 A. He says some harsh stuff, you know.

15 Q. I'm sorry?

16 A. He says some harsh things.

17 Q. Right.

18 A. And very hurtful to himself.

19 Q. Right.

20 A. And you can only listen so long to someone saying
21 things like that, and it affects you --

22 Q. Sure.

23 A. -- you know, and --

24 Q. Would you describe Otto as a kind person?

25 A. Oh, very kind.

1 Q. Can you elaborate on that?

2 A. He -- I've known Otto -- for the six years I've known
3 him, he's always treated me good. He's always paid me
4 what he owes me. He's never played any games with me.

5 Recently, I just did some work at his house,
6 painting, because now he's selling his house in order
7 to go get help, he says, in Florida or Mass. And so I
8 did some work there and -- I just need a minute.

9 Q. That's okay. You want to go off the record? Take a
10 break?

11 A. No, no. Just give me a second.

12 Q. That's okay. You take your time.

13 A. I just think of everything. I feel for the guy at this
14 point, you know what I mean, to see what's going on in
15 his life. Sorry.

16 Q. Have some of the water. Just take a minute.

17 A. What I'm trying to say, what's touched my heart
18 recently is I've been having a hard time working
19 because I had my surgeries, et cetera. I can't do a
20 solid 40, or I never know. One day, I could work.
21 Next day, I'm hurting so I'm not able that day to get
22 off the couch sometimes.

23 And Otto offered his assistance in heating my
24 home. He's like, "Man, I'm not going to let you and
25 your woman get cold. We'll do whatever we got to do.

1 I'll help you."

2 And I was just "tooken" back by that. What guy
3 does that for a person?

4 Q. Right.

5 A. You know what I mean? And he's sincere about it. And
6 I didn't accept, of course, and you know, I'll say,
7 "We'll get assistance, blah, blah, blah," but just the
8 thought of it, you know what I mean?

9 There's a guy sitting here going crazy, you know
10 what I mean, over his own stuff; he's still there to
11 help others.

12 Q. Right.

13 A. He's there even right now helping a person that, you
14 know, is going through a lot of stuff, works for the
15 Sheriff's Department actually, and he's there for her.

16 Q. Right.

17 A. You know, helping her going through some personal
18 problems in her life, and she's a sheriff. And she's
19 over there with him, you know.

20 Q. Right.

21 A. Yeah. He's a great guy. But like I said, he says
22 horrible things, you know. He gets so upset over
23 what's happened to him. And you know, I got to learn a
24 lot through Otto, recognized he has PTSD, now that I
25 know him for so many years after.

1 Q. Did you know that he may have had it before this
2 incident?

3 A. I could see something, but not really. Not really. He
4 was -- when I first met him, he had a plan on the
5 house. He had a plan on doing this. He's -- and then,
6 you know, we had to move all these books. He has cases
7 and cases of books. And you know, I was like, "What
8 are these?"

9 And you know, he showed me a few of them, and one
10 of them, you could look up -- I'm sure you have -- is
11 to all the sheriffs and things, where they thanked them
12 throughout the United States for his hard work, and
13 they're going to use this with the sheriffs to educate
14 them, blah, blah. So I was like, "Wow, you're an
15 author too," you know.

16 And he was, like, "Yeah, I got a book. I'm going
17 to get it written up. I already wrote it. I'm just
18 going to get all the work done. I need help. I'm
19 going to set it up here."

20 (Court reporter interrupted to protect the record.
21 Colloquy off the record.)

22 A. He says, you know, "I got a book. I'm about to publish
23 it," this and that. "I need help up here to publish
24 it. I'm trying to get ahold of college people to work
25 on the computers," blah, blah, blah. "Do you know any

1 chemists?"

2 I don't know no chemists, you know, and this and
3 that, and blah, blah, blah.

4 And he was on target, and he had a plan.

5 And then after the dog bite, and then after about
6 a month, he had crazy started coming in real hard core,
7 like I said. Assisted suicide. He's sleeping with a
8 gun. He's claiming he has a gun that he keeps by his
9 bedside. Of course, I don't go in his bedroom so I
10 don't know. So that was kind of a scary thought. And
11 then -- excuse me -- an ambulance went by.

12 Then he just went crazy pretty much. Police
13 officers had to show up at his house.

14 And thank God for them because they recognized his
15 PTSD, and they sat with him for hours. And they would
16 check up on him. They still do to today. They drive
17 by, "Hey, Otto," wave, and they drive off, blah, blah.
18 But they were there for him, you know, to get him
19 through this, so far.

20 Q. Okay. And when's the last time you saw Otto?

21 A. Today.

22 Q. Okay.

23 A. Yeah.

24 Q. At his house or --

25 A. Yes.

1 Q. He's not here with us now.

2 A. No.

3 Q. Okay.

4 A. Had to change a light for him earlier today.

5 Q. Okay. Did he tell you whether he was going to be here
6 in person at your deposition or --

7 A. No.

8 Q. -- whether he was going to stay home?

9 A. I didn't even know about it till yesterday --

10 Q. Okay.

11 A. -- to be honest. He texted me yesterday, "Hey,
12 deposition's tomorrow. Hope you can make it. If not,
13 please let me know, so I can tell Chris," blah, blah.

14 Q. Okay.

15 A. And I said sure thing I'd be here.

16 Q. Did you get a copy of the subpoena that we prepared?

17 A. I did not.

18 Q. Okay. Were you aware of one?

19 A. Yeah, I was aware of one that was coming. We spoke.
20 You were just going to hand it to me too.

21 Q. Okay. And do you have any reason to testify for or
22 against Otto in any way?

23 A. No. No. Absolutely not.

24 Q. Okay. Is there anything else, Rob, that you can tell
25 us that you have witnessed, observed about Otto's

1 behavior changes? You've given us a lot of helpful
2 information. Anything else you can think about that
3 shows it was directly related to the dog attack and has
4 happened since then?

5 A. Directly related to the dog attack? I'd say the
6 beard's the thing -- he hasn't stopped growing it since
7 he's had this dog attack. He's always had a shorter
8 beard. Now, since the dog attack, he wears it down
9 hanging low.

10 I've witnessed, talking to him and meeting with
11 him, he'll dribble off this side a lot, spit sometimes
12 when he's trying to talk to you. It's affected him
13 wanting to give talks.

14 We've -- like, see, some of the handyman service
15 things I did for him, even during, like, after the dog
16 bite, he still pushed for it and he'd drop it, he'd
17 push for it and he'd drop it. And that would be -- he
18 has this big screen. It's, like, huge. And he has
19 this thing he puts on, and he gives talks about all
20 types of things, you know, things that I don't even
21 understand some of it. But it helps people -- PTSD,
22 all types of things he puts into it, and he put a lot
23 into it, but he never did it.

24 Same with the room that we set up for him. He put
25 out the equipment, this and that, never finished it at

1 all. Dropped it.

2 The house itself, that was a big thing that he was
3 fixing up, so that he could do all these things and
4 demonstrations and have actual people, you know, in
5 there and all this. That's now for sale because of his
6 losses. And now he wants to sell the house, move to
7 Florida, back to the doctors he had, or find help in --
8 he's already called Massachusetts, Mass. General --
9 "skeletor" things because his body tightens up.

10 He doesn't eat really that good, doesn't sleep
11 sometimes at all. I'll catch him, like if I go just
12 hang out with him or see him, you know, he'd be on the
13 computer all night, stuck on Dr. Witker -- I mean, I
14 got these names even in my head because he repeats them
15 so much. This one -- this one who he feels has said
16 that he's not who he says he is. They've said that
17 that never happened to him.

18 He's shown me film strips, news articles, et
19 cetera. He's put together this big thing on the
20 computer to show the facts, and still people ignore it
21 or say, "Oh, you sure you didn't see it in a movie?
22 You sure you're not making this up?"

23 And that just gets him so wound up where he feels
24 like he has to prove it all over again. So he's
25 reliving it again.

1 And you know, with the dog bite, this being so
2 long and so long of a process, and affecting his face
3 and the way he talks and all that, now he's -- he's all
4 over the place. He's miserable. And it's no closure
5 is what gets these people with PTSD now -- I've studied
6 into it. I go home and get on the computer too. And
7 the no closure just keeps it activating. Like in
8 Otto's head, this is still happening just like it was
9 yesterday.

10 And what -- before I met him, well, I guess he got
11 help in Florida because I looked and talked to him, and
12 people have been forwarding calls to them to get more
13 help and talk with them. And I guess he had it way
14 worse before, and it affected his life. He got the
15 help he needed, and he was fine. And that's when I met
16 him.

17 And then this happened, and it just -- it
18 exploded. You know, it became more than a dog bite.
19 It became a whole 'nother world to him. And I ain't
20 seen him the same since. That's the honest-to-god
21 truth. I ain't seen him the same since.

22 But he is an honest guy. He's a good guy. He's a
23 community person. I don't know what to say other than
24 that.

25 Q. That's okay, and I appreciate your information. If

1 other things come to your mind after, because we've
2 just, you know, got an hour here with you today --

3 A. Yeah.

4 Q. -- if you could just let us know anything else you
5 think about of a specific incidence, I'd appreciate it.
6 And what I'm going to do now, Rob, is turn the
7 deposition over to the three other attorneys, and each
8 one will have an opportunity to ask you some
9 questions --

10 A. Okay. Sure. Yes.

11 Q. -- just continue on? Do you want to take a break
12 before we --

13 A. No, no, no.

14 Q. -- go straight through --

15 A. It's just a lot. I just got here, and you know,
16 thinking about it, and you know.

17 Q. Yeah.

18 A. I had to be there for him. You know, when he's sitting
19 there, "I'm going to kill myself" --

20 Q. Right.

21 A. -- all this stuff.

22 Q. Okay. And feel free to drink your water. The tissues
23 are there for you. If you need a break, you let us
24 know, and I'm sure the attorneys would oblige too.

25 A. Okay. Thank you.

1 MR. LARGAY: And I'll turn it over to
2 whomever wishes to proceed first.

3 MS. HUFF: I have a few questions if --

4 THE WITNESS: Yes, ma'am.

5 MS. HUFF: -- want to do the same order as
6 before.

7 CROSS EXAMINATION

8 BY MS. HUFF:

9 Q. So Mr. Sadlowski, my name is Kady Huff. I represent
10 Andrew Davis in this lawsuit, and I have a few
11 questions for you, but I want to start by asking a bit
12 more about your background.

13 [REDACTED]

14 [REDACTED]

15 A. [REDACTED].

16 Q. [REDACTED]

17 A. [REDACTED]

18 Q. [REDACTED]

19 A. [REDACTED].

20 Q. [REDACTED]

21 [REDACTED]

22 A. [REDACTED]

23 [REDACTED]

24 Q. [REDACTED]

25 [REDACTED]

1 A. [REDACTED]

2 Q. [REDACTED]

3 [REDACTED]

4 A. [REDACTED]

5 Q. [REDACTED]

6 A. [REDACTED]

7 [REDACTED]

8 [REDACTED]

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[REDACTED]

MR. LARGAY: You want to -- if I can, just for the court reporter, just want to go a little slow sometimes.

THE WITNESS: Oh, okay. I apologize.

MR. LARGAY: She's transcribing it, so --

THE WITNESS: Oh, I apologize.

MR. LARGAY: I'm a fast talker, so --

THE WITNESS: I am too much too.

MR. LARGAY: -- I recognize another one.

Okay?

THE WITNESS: Yeah.

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MR. LARGAY: Just slow down.

A.

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[REDACTED] Turns out

he was a pastor and let that go -- of his church, to

1 become a sheriff. He was a great man.

2 [Redacted]

3 [Redacted]

4 [Redacted]

5 [Redacted]

6 [Redacted]

7 [Redacted]

8 [Redacted]

9 [Redacted]

10 Q. [Redacted]

11 [Redacted]

12 [Redacted]

13 A. [Redacted]

14 Q. [Redacted]

15 A. Great system we got here.

16 Q. [Redacted]

17 [Redacted]

18 [Redacted]

19 A. [Redacted]

20 [Redacted]

21 [Redacted]

22 [Redacted]

23 [Redacted]

24 Q. [Redacted]

25 A. But I'm 51 years old. [Redacted]

1



2



3

Q. And you testified previously that you've done work at

4

Mr. Snow's home; is that correct?

5

A. That is correct.

6

Q. Have you recently been doing work at his home?

7

A. Little things, like I said. Fix a light, this and

8

that. His house is really nice now, you know. He's

9

had a lot of work done by everybody.

10

Q. And since his injury, have you done any work on his

11

home?

12

A. Oh, yeah. In the last four or five years, sure I have.

13

Yes.

14

Q. Okay. Can you describe the type of work that you've

15

done?

16

A. Again, painting, cleaning up. This last year, it's

17

been like a -- it's been awkward this last year,

18

because I'd help him out, but he's more or less calling

19

me so he can't be alone. If you understand that. He

20

doesn't want to be alone. So he'll make up things that

21

need to be fixed and stuff like that, where I have to

22

separate that from, "Well, hey, Otto, I just spent

23

three and a half, four hours with you. I can't bill

24

you like I did something for you because, out of that

25

time, two and a half hours was talking to you,"

1 Bringing him to the grocery stores, bringing --

2 Q. Let me jump in. So does he pay you in cash when he
3 pays you for work that you do at his home?

4 A. Yeah, usually here and there. Mostly checks in the
5 past. Now it's so pathetic, the stuff, that he just
6 throws me 30 bucks here, 50 bucks there, depending on
7 what I'm doing.

8 Q. And you mentioned driving him to the grocery store. Do
9 you take him places generally?

10 A. Not like generally, but on occasion, like, for this
11 "disposition," I had to bring him here that day because
12 he was so wrecked he couldn't drive. He was afraid he
13 wouldn't be able to drive back. So there's days he's
14 doing good, and there's days he's not doing so good.

15 Q. And when you would transport him places, does he pay
16 you for your time?

17 A. No, no. He does me like -- he does and doesn't. You
18 know what I mean? He helps me out. He'll be like,
19 "Here, man, go fill up your tank," or you know, "I'll
20 get you this." Or he tries to help me. He tries to
21 offer things that I don't accept a lot of the times.

22 Q. And you mentioned earlier that he offered to pay for
23 your heat or your oil or something like that? Do you
24 remember testifying about that?

25 A. Yeah. He would do whatever he can to help me pay for

1 my heat and oil. Yeah.

2 Q. And did that, to you, suggest he was going to pay you
3 cash?

4 A. No. That suggested to me that he ain't got no money,
5 but he's willing to do anything he can to try to help
6 me. I don't know what he was going to do, but --

7 Q. Well, back to my question, sir. So if Mr. Snow doesn't
8 have any resources or money, how is he paying for your
9 oil?

10 A. He's not. I don't even burn oil, but needless to say,
11 the heat itself. He didn't want me to be in the cold.
12 That we would do whatever it takes that you and your
13 woman won't be in the cold. Someone reaching out to
14 you saying, you know, "I don't want you and your
15 husband to be cold. We'll do whatever it takes to help
16 you out." You know, that was touching when he's
17 sitting there destroyed.

18 Q. And you mentioned that Otto had texted you recently to
19 remind you of the deposition here today?

20 A. Yes.

21 Q. Is that right?

22 A. Yes.

23 Q. And is it fair to say that Otto communicates with you
24 by text?

25 A. At times, yes.

1 Q. And has he had the same number since his injury?

2 A. I believe so.

3 Q. Okay. And you mentioned he has a screen in his house
4 that he gives talks on?

5 A. No, that he was going to. He had a -- he bought a
6 projector and a big screen, and he was going to start
7 giving talks out into the public, reaching out. One
8 place he was looking into at one point was the Eagles
9 Club to give talks there for PTSD and lots of different
10 things. Medical things, I don't get that much. I'm
11 not a chemist or anything like that.

12 Q. And do you know if he's given those types of talks in
13 the past?

14 A. Yeah. He's talked to me about how he's given big talks
15 before -- da-da-da-da-da, in grouping with helping
16 people and all that. He's trying to find that around
17 here, but he hasn't been successful.

18 Q. Now Mr. Snow testified in his deposition that he plans
19 to go public with his story and to give talks to
20 universities and things like that. Has he told you
21 about that plan?

22 A. When he gets upset by it, he says, "I've got to go
23 public by this. I've got to let people know what can
24 really happen to you, and people aren't there to reach
25 out, even though they said they're there, and that's

1 why I moved up here, and that doesn't exist. It's
2 fraud." Blah, blah, blah.

3 I can't predict the future, what he'll do, but I
4 know he's -- you know, I don't know. I don't know what
5 he'll do. You know, tell you the truth. It's very
6 possible he could.

7 Q. Okay. And you've indicated that you do work at his
8 home, but how much time per week would you say you
9 spend in Mr. Snow's home?

10 A. There's weeks I stay away for like a week, week and a
11 half sometimes, and then there's weeks I'll visit more
12 often. If I was to give it -- well, a monthly would be
13 more easier to sort of say, I'd say about 25 to 35
14 hours in a month --

15 Q. Okay. And --

16 A. -- sit there in a chair talking with him.

17 Q. And when you're in his home talking with him, does he
18 pay you for your time there?

19 A. Not the talking time.

20 Q. Okay. And when he pays you, is it only -- it's for the
21 work that you're performing in his home?

22 A. Exactly right.

23 Q. And do you provide him with an invoice of the work that
24 you're providing?

25 A. I used to when I used to -- when I was in a business as

1 a handyman, but there's been no, like, big work there.
2 It's, like I said, light bulbs, paint this, oh, this is
3 loose, my oven door handle came off. You know, it's
4 like I said, sometimes it almost seems as though he
5 needs the attention, that he can't be alone. That's
6 what I notice more than anything. And that's why I end
7 up sitting there talking to him for three of the four
8 hours at times.

9 Q. And so when you say you spend -- I think you said 25 or
10 35 hours a month in Mr. Snow's home, is most of that
11 you socializing with him?

12 A. Yes.

13 Q. Okay.

14 A. And of course, grocery stores and stuff like that.

15 Q. And again, I just want to make sure I understand. He
16 does not pay you to take him to the grocery store?

17 A. No. No.

18 Q. And he doesn't pay you to go to doctors' appointments
19 or take him to doctors' appointments?

20 A. I have gone to doctors' appointments with him. He has
21 been like, "Just take this, Rob," 40 bucks or
22 something, because I brought him there, I brought him
23 back home. He realizes too I got to make a living, but
24 he realizes I'm being kind, so he'd be kind back that
25 way.

1 Q. And do you --

2 A. There's no, like --

3 Q. -- ask for payment?

4 A. At times, I do, yes. When I do a job or I buy any
5 material, he has to pay all that back.

6 Q. So I'm talking about the occasions where you take him,
7 for example, to an appointment. Do you ask him to pay
8 you for your gas or your time?

9 A. I do not. It's -- you know, I can't.

10 Q. Okay.

11 A. Because I -- you know what I mean? Helping someone,
12 you're helping them. You're not charging them. You
13 know what I mean?

14 Q. And have you -- what's the farthest you've traveled
15 with Otto?

16 A. Portland.

17 Q. And did you have to stay overnight for that trip?

18 A. No, I didn't even go to Portland. It's north from
19 here. Aw, geez. Starts with a P. It's about an hour
20 away from here. I'm not too sure of the area up north.
21 It's an artsy place, da-da-da-da-da.

22 Q. And was that for a medical appointment?

23 A. Yeah, he was going to go seek a doctor up there. He
24 thinks that they're more qualified up there, he says.

25 Q. Okay. And did you have to stay overnight on that trip?

1 A. No, I did not.

2 MS. HUFF: Okay. That's all I have.

3 Matt or Sam, if you want to ask questions.

4 MR. LIBBY: Sure, I'll jump in.

5 CROSS EXAMINATION

6 BY MR. LIBBY:

7 Q. Hi, Mr. Sadlowski. My name is Matt Libby.

8 A. Hello, Matt.

9 Q. Hi, there. I represent one of the defendants in this
10 case, and I wanted to ask you about your testimony
11 concerning Otto's childhood memories. Do you remember
12 talking about that?

13 A. Yes.

14 Q. When did you first learn about these traumatic
15 childhood memories?

16 A. I'd say six months to a -- six months to eight months
17 after he got bit by the dog. He started pulling out
18 videos and newspaper clippings and saying, "Now I
19 can't -- now I got to deal with this," and
20 da-da-da-da-da, and then throwing his hands up in the
21 air.

22 Oh, what I want to bring your attention, it was
23 like week third -- third week, fourth week, like I say,
24 he's losing it. I show up at his house. I just
25 painted his whole kitchen. He went through his whole

1 kitchen, marked the walls, took a knife, stabbed the
2 walls, all this. Put the -- I'm trying to think of
3 some of the things on the wall, but it was just -- it
4 was just crazy, scribbled all over it. That's when I
5 realized something's wrong here, man. I was, like,
6 Whoa, whoa, where either I made it a joke or it was
7 going to get worse.

8 So I was like, "Whoa, dude, you can't be doing
9 this, man. We're going to have to cover this up.
10 People see this, my God, what are you doing?"

11 So he actually had to pay me again to do his
12 kitchen, you know, so that just goes to show you, I
13 mean, you don't destroy your kitchen, you know, and he
14 did. Sorry. It just came to mind.

15 Q. So he stabbed the walls in his kitchen with a knife?

16 A. He did, and he put drawings all over it, writing all
17 over it.

18 Q. All right. So some of the writing were scribbles, but
19 did any of the writing make out words?

20 A. Parts of words. I can't recall any, so I don't want to
21 say I do, because I don't recall the words, but they
22 were scrapped all over it, written across the wall.
23 That's when I noticed, My God, what's going on? And
24 that's when he started bringing out all this to
25 everybody. Before that, I had no idea Otto had any

1 kind of past of any kind of craziness or, you know, I
2 figured he was kind of -- we called him the mad
3 scientist, you know what I mean? Because he moved to
4 Maine. He's opening up this. He's going to reach out
5 and separate molecules to help people with cancer down
6 the road. And he's writing a book. So it was kind of
7 cool, you know. It was like Stephen King up the road,
8 you know, because he lives up the road from Stephen
9 King.

10 MR. LIBBY: Let me stop you right there.

11 Just hold on one second. I just have to step away from
12 my computer. I'll be right back.

13 (Colloquy off the record. Momentary recess.)

14 BY MR. LIBBY:

15 Q. So I thought your testimony earlier was that you became
16 friends with Otto after you learned about all his past
17 traumas; is that right?

18 A. It was a long, prolonged become friends. Like I said,
19 I'd hang out to do work with him, and I'd hear him, and
20 I'd see people coming to help him. And then I see
21 people come and go, come and go. And I recognized that
22 they're kind of there for other reasons, for themselves
23 more so than what Otto is having them to do. Because
24 he was trying to have people cook for him, take him to
25 the -- do this, do that afterwards, and they were using

1 him. They were just straight up using him.

2 One guy took his credit card, and they owe him \$50
3 a month through the courts right now. A guy he helped
4 out, let him into his home, try to help him, and the
5 guy stole his credit card and put \$3,000 on it, and
6 went to court and got \$50 a month. Things like that.

7 Q. So you started to do work for him about six years ago;
8 right?

9 A. Yes, sir.

10 Q. When did your relationship go from a professional one
11 to an actual friendship?

12 A. Year and a half, two years.

13 Q. Okay. So a year and a half, two years after you
14 started doing work with him, you became friends?

15 A. Year and a half, yeah.

16 Q. Okay.

17 A. Yeah. Because it -- yeah. Yeah. Year and a half, two
18 years, yeah.

19 Q. Since -- so from that --

20 A. Didn't want to get involved in the beginning.

21 Q. I'm sorry?

22 A. I'm sorry. I over-talked.

23 I didn't want to get involved in the beginning.

24 It seemed awkward. You know, he's a client. You're

25 going over there, you're helping him out. He's a guy,

1 he wants to help us, and then he's breaking down in
2 front of you, acting like that. Then you start to feel
3 a little bit. Then you try to separate, Is this real?
4 Is this really happening? Is this true what he's
5 saying?

6 And then after a while, you get to see it, and get
7 to know him. Then you start to feel for the guy in
8 recognition that it's reality, and that's what's
9 happened.

10 Q. So right, but that evolution occurred prior to the dog
11 bite; right?

12 A. No. The dog bite -- I wasn't friends with him with the
13 dog bite. And it was, like I said, about a year and a
14 half -- I worked nine months roughly for him. He got
15 the dog bite, and within nine months or so, eight
16 months after that, I became more of a friend than like
17 a handyman, but still a handyman.

18 So like I said, it's evolved over five, six years
19 now into where I consider Otto a friend now.

20 Q. Okay. So let's slow down here a little bit. You moved
21 back to Maine roughly seven years ago; right?

22 A. Yes, sir.

23 Q. And it's my understanding that you became or you
24 started to do work with Otto about a year after you
25 moved back to Maine; right?

1 A. That's correct.

2 Q. Okay. So I thought that you just testified that, about
3 a year or so or a year and a half into working for him
4 you two became friends?

5 A. That's correct.

6 Q. Okay. Do you know when the dog bite occurred?

7 A. I want to say late summer.

8 Q. What -- do you know what year?

9 A. Spring. I thought it was April. I want to say
10 April -- March, April. My son's birthday, and my
11 birthday is March, April. It was a while back. I'd
12 say three, four years now.

13 I thought this was long done. I didn't even
14 realize it until recently, you know, that this was
15 still happening. I was shocked that he was still, you
16 know, about the dog bite. I'm like, "Well, that's in
17 the past now, Otto. Ain't it?"

18 He was like, "No, it's not in the past. We're
19 still going through it."

20 I'm like, "You're still going through that too?"

21 You know what I'm saying? So it's crazy.

22 Q. Before the dog bite, you never witnessed any type of
23 erratic behavior from Otto?

24 A. No.

25 Q. You never witnessed him, as you referred to it, freak

1 out?

2 A. No. He literally was a guy who knew what he wanted,
3 yes or no. If you didn't give him what he wanted,
4 generally he'd say like this, "This is what I want,
5 either you can do it or you don't." And he was cut and
6 dry like that. And then after, now he's -- he don't
7 know what he's doing.

8 Q. How many children do you currently have?

9 A. I have one son.

10 Q. And he was -- the same one that you had mentioned that
11 was the subject of the child protective proceeding?

12 A. Yes.

13 Q. How old is he now?

14 A. He's 30 years old.

15 Q. Do you -- do you have a relationship with him?

16 A. Absolutely. Turned out to be a fine young man, made me
17 a grandfather of two great grandchildren.

18 Q. Oh, congratulations.

19 A. He's held a relationship over 13 years, being only 30
20 years old. Yeah, pretty impressive. Very proud of --

21 Q. Are you married?

22 A. --him. Very proud of him.

23 Q. Are you married?

24 A. I am not. I'm engaged.

25 Q. Have you ever been married?

1 A. I have.

2 Q. How many times?

3 A. One time.

4 Q. When did you get divorced?

5 A. Oh, must have been 12, 15 years ago? I'm just throwing
6 that out. I think it's around 12, 15 years, over a
7 decade.

8 Q. The medical procedures that you underwent recently,
9 what were those procedures?

10 A. Both knees and both shoulders, and a cyst behind the
11 shoulder blade on the left side.

12 MR. LIBBY: Those are all the questions I
13 have. Thank you.

14 CROSS EXAMINATION

15 BY MR. JOHNSON:

16 Q. Hi, Rob. My name is Sam Johnson. I represent Dora
17 Smith Family Real Estate Company. And luckily, going
18 third in the order, much of the questions I would have
19 asked have already been asked. So I actually only have
20 a few questions for you.

21 You mentioned earlier an incident where police
22 showed up to Otto's house and sat with him for a few
23 hours?

24 A. There's more than one time they've done that. I'd have
25 to say 30 to 40 times they've been to Otto's residence

1 to talk with him, talk him down. They know Otto now,
2 so they -- they realize he had PTSD in the beginning,
3 so they just -- they work their magic. They do a good
4 job up here Bangor for the PD.

5 Q. So it was the Bangor Police Department?

6 A. What's that, sir?

7 Q. It was the Bangor Police Department that showed up?

8 A. I believe so, yup. Yup. That's one that was a
9 sheriff.

10 Q. And you said it could have been upwards of 30 or 40
11 times?

12 A. Oh, yes. After that, that was it. Like I said, he'd
13 go off. I wouldn't show up for a day or two because I
14 got -- too much, too much.

15 Q. And --

16 A. I didn't really know if he would do anything at that
17 point either. You know what I mean? I had to learn
18 his story. That's where it evolved into a friendship.

19 Q. Okay. And I'm not going to ask you if you know the
20 date for all 30 or 40 times, but do you know
21 approximately when the first time the police showed up
22 would have been?

23 A. Probably within a week.

24 Q. When you say "within a week," was that a week of you
25 starting work at his house?

1 A. No, a week of the dog bite occurring.

2 Q. And you mentioned you -- did you testify that you saw
3 Otto today prior to coming in?

4 A. Yes. I had to change -- I didn't really see him. I
5 changed a light, and he pulled in. And I said, "Oh, I
6 got to get going to that."

7 He wanted to make sure I was coming too. Like I
8 said, he'll repeat it, repeat it, repeat it. You know
9 what I mean? He'll relive everything over and over and
10 over.

11 So I said, "Don't worry, I'm going to be there,
12 man."

13 You know, he says, "Okay. You just tell them what
14 you think. Tell them the truth, and that's what I need
15 you to do for me. Just tell them the truth, and you
16 know, let them know what you think and how you feel and
17 what happened and --"

18 Q. Okay.

19 A. You know, "Okay, Otto. I'm going to tell them what I
20 know, you know."

21 Q. And so other than today, had you guys talked about your
22 deposition or you being a witness in this case?

23 A. Other than today?

24 Q. Yeah.

25 A. Yeah. When I stepped up and actually offered to be a

1 witness to it, when I recognized this wasn't solved and
2 that he was still going through this, I said, "Jesus,
3 Otto, I'll tell them myself. I was here that day you
4 got bit. That next morning, I came here." I said,
5 "I'll tell them how we came here and one of the guys
6 that used to work with me didn't want to go in the
7 house and work because of his behavior."

8 And then he said he had a gun and sleeping by it,
9 and the guy that was working with me said, "Dude, I'm
10 ain't going in there if he's got a gun, man. He's out
11 of his mind right now. Something's wrong with him.
12 He's changed." This and that. "He's going to lose it,"
13 blah, blah.

14 (Court reporter interrupted to protect the record.
15 Colloquy off the record.)

16 THE WITNESS: Oh, I'm sorry. I'm sorry.

17 BY MR. JOHNSON:

18 Q. And was that a worker that you said -- was it an
19 employee of yours or someone who just worked with you,
20 kind of on like a --

21 A. He was a subcontractor also that, once in a while, when
22 I need help, he would give me a hand.

23 Q. Do you recall what his name is?

24 A. Noah.

25 Q. Noah. Do you know what his last name is?

1 A. Not positive.

2 Q. Okay. Do you have a phone number or address for Noah
3 off the top of your head?

4 A. I do not. I do not. There's a possibility I could get
5 a hold of him. I could try. It's been a while. He
6 does security cams, I think, now somewhere in Maine.

7 Q. That was my question. Do you remember if Noah ever
8 went in to work at Otto's house after that dog bite
9 incident?

10 A. Yes, I believe he did go back in to do cellar work.
11 Yup.

12 Q. When you were either working at Otto's house or hanging
13 out socially, does he wear a mask when you're over?

14 A. At times, yeah. If he's ever out, he uses it, because
15 he's afraid to be -- he says that they can see it.
16 Because he's -- then he gets all -- he goes, "Look at
17 my lip. Look at my lip." And he's like, "It's
18 crooked, my face is crooked," and stuff like that.

19 Q. So other than when you're going out, like if it's just
20 you and him in the house, is he wearing a mask?

21 A. No.

22 Q. Okay. And you know, we've met Mr. Snow, and he
23 obviously currently has a large beard. When you were
24 over there recently, are you able to see any scarring
25 or is it covered by the beard and the mustache?

1 A. I can see it. I can see it when he's talking on this
2 side's upper. It's like stuck up. But he spits -- he
3 spits out that side sometimes too.

4 Q. So do you observe scarring or do you just observe the
5 lip is moving differently?

6 A. I don't really look that hard, to be honest with you.
7 I just realize there's something up with your lip, you
8 know. I know what happened to his lip. I seen the
9 pictures. I've seen it, you know, after he -- I never
10 seen it without the bandage to be honest. He's never
11 let anybody seen it. Pretty much kept it covered till
12 his beard took over.

13 He has this big thing where he's, like, "My face
14 is crooked. How am I going to get talks?" This and
15 that. "People notice that my face is crooked."

16 And I'm like -- it's not me. I can imagine if it
17 was me, I'd be devastated too.

18 MR. JOHNSON: I think those are all the
19 questions that I have. I don't know if that prompted
20 any other questions from anyone else, but I will sign
21 off for now.

22 MR. LIBBY: No, not me.

23 MS. HUFF: Yup. No. Me neither.

24 MR. LARGAY: I'm all set as well, Christine,
25 so I think we're done, and I talked to you in the very

1 beginning about the deposition, whether you wanted to
2 read and sign it when it becomes available or --

3 THE WITNESS: Sure.

4 MR. LARGAY: -- whether you want to give up
5 that right and just have it published? Do you know
6 what you'd like?

7 THE WITNESS: Well, either that or I have no
8 problem with you guys doing whatever with it.

9 MR. LARGAY: Okay. It's your choice because
10 it's your deposition.

11 THE WITNESS: Okay. I'd like to read it
12 then. I guess, sure. Just review it.

13 MR. LARGAY: Is it okay if it gets sent to my
14 address and then we get it to you?

15 THE WITNESS: Certainly.

16 MR. LARGAY: Will you agree to mark up any
17 changes that you think need to be made, not to the
18 substance of the testimony, but grammar or to correct a
19 spelling or something?

20 THE WITNESS: Yeah, sure.

21 MR. LARGAY: And then get it back to us
22 within three or four days?

23 THE WITNESS: Sure.

24 MR. LARGAY: Okay. I appreciate that. We're
25 all set.

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(The deposition concluded at 4:54 p.m.)

* * * * *

CERTIFICATE

I, Christine Fraga Thornton, RDR, a Notary Public in and for the State of Maine, hereby certify that on October 5, 2022, personally appeared before me ROBERT SADLOWSKI, the within-named deponent, who was sworn to testify to the truth, the whole truth, and nothing but the truth in the cause of action now pending in the State of Maine, Penobscot Superior Court, and that this deposition was stenographically reported by me and later reduced to typewritten form with the aid of Computer-Aided Transcription, and the foregoing is a full and true record of the testimony given by the witness.

I further certify that I am a disinterested person in the event or outcome of the above-named cause of action.

IN WITNESS WHEREOF, I subscribe my hand and affix my seal October 25, 2022.

Christine Fraga Thornton, RDR
Notary Public, Court Reporter

My Commission Expires April 10, 2028.

DON THOMPSON & ASSOCIATES, INC.
Court Reporting and Video Conferencing
PO Box 2236
Bangor ME 04402-2236
dtreport@myottmail.com
207-394-3900

October 25, 2022

Christopher R. Largay, Esq.
LARGAY LAW OFFICES, PA
293 State Street, Suite 1
Bangor ME 04401-5528

Re: Snow v. Davis, et al.
Deposition of ROBERT SADLOWSKI, October 5, 2022

Dear Chris:

Attached is your transcript of the deposition of Robert Sadlowski, which was taken in this matter on October 5, 2022, along with a separate signature page and errata sheet for the deponent to execute.

Please provide these items, along with appropriate instructions to Robert Sadlowski for his review and signature. Once the deponent has completed reviewing the transcript and has returned the executed sheet to you, please retain a copy of those documents with the original and forward the copies directly to Kady Huff, Esq.; Matt Libby, Esq.; and Sam Johnson, Esq., for inclusion in their copies of the transcript.

Sincerely,

DON THOMPSON & ASSOC., INC.

Christine Fraga Thornton, RDR
Freelance Court Reporter

cft

cc: Kady Huff, Esq.; Matt Libby, Esq.; and
Sam Johnson, Esq.

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SIGNATURE PAGE

TO BE COMPLETED BY DEPONENT:

I, ROBERT SADLOWSKI, have read or had read to me the foregoing pages of my deposition and have noted any errors in form or substance of my testimony, together with their respective corrections and the reasons therefore on the following errata page.

(Signature) _____

(Date) _____

Name of person reading transcript to deponent if deponent cannot read:

* * * * *

TO BE COMPLETED BY NOTARY PUBLIC/ATTORNEY:

I, _____, a Notary Public/Attorney, hereby acknowledge that the above-named deponent personally appeared before me and affixed his/her signature above as his/her own true act and deed.

(Signature) _____

(Date) _____

My Commission Expires: _____

Title: Snow v. Davis, et al.
Jurisdiction: State of Maine, Penobscot Superior Court
Date of Deposition: October 5, 2022
Transcript Mailing Date: October 25, 2022

Noticing Party:

Christopher R. Largay, Esq., LARGAY LAW OFFICE

Copies sent to:

Kady Huff, Esq., EATON PEABODY;
Matt Libby, Esq., MONAGHAN LEAHY, LLP; and
Sam Johnson, Esq., NORMAN HANSON & DeTROY, LLC

Court Reporter: Christine F. Thornton, RDR

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DEPOSITION ERRATA SHEET

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