

JAMES W. SIRE

1 THE WITNESS: I don't know.

2 MR. MORGAN: Q. All right. Let me ask you,  
3 Mr. Sire, having read pages 176 and 177, do you see  
4 anything on those pages, other than the area I just  
5 covered with you, that could have been interpreted by you  
6 back in 1979 as possible libel?

7 MR. KLENK: Same objections.

8 THE WITNESS: Please repeat the question.

9 MR. MORGAN: Sure. I'll ask her to read it back.

10 [Record read as follows:]

11 THE REPORTER: "Question: All right. Let me  
12 ask you, Mr. Sire, having read pages 176 and  
13 177, do you see anything on those pages, other  
14 than the area I just covered with you, that  
15 could have been interpreted by you back in 1979  
16 as possible libel?"

17 MR. KLENK: If I didn't say it at all, I object  
18 also on the grounds that it calls for speculation.

19 THE WITNESS: I don't see anything now.

20 MR. MORGAN: Q. All right, fine. Now, again  
21 going back to Exhibit 403.5, the notation, "Neil will get  
22 back to me," the way that's written by you, does it  
23 indicate to you that it refers to pages 176 and 177 also?

24 A. Yes.

25 Q. All right. Did you ever get any information  
26 from Neil Duddy regarding the president of a Local Church

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1 in Northern California collapsing under the pressure of  
2 public humiliation and being admitted for psychiatric  
3 care in a local hospital?

4 A. I don't recall.

5 Q. In the review of all your records, have you  
6 seen any indication that you ever got that information?

7 A. I haven't seen anything that I recall having  
8 seen that has anything to do with this.

9 Q. Would you agree, Mr. Sire, based upon your  
10 journalistic experience, that this would have been a  
11 statement that would be easy to confirm or deny?

12 MR. KLENK: Objection. The question is unclear  
13 as to what is meant by "easy" in terms of "deny." It  
14 calls for speculation.

15 MR. MORGAN: I'll put it another way.

16 Q. Would you agree, Mr. Sire, that this  
17 statement is a statement that could be confirmed if it  
18 was true?

19 MR. KLENK: Objection. Calls for speculation.

20 THE WITNESS: It might be. It might not be.

21 MR. MORGAN: Well, let's start out.

22 Q. First, you can identify the person, can't  
23 you?

24 MR. KLENK: Objection. Calls for speculation.

25 THE WITNESS: Today?

26 MR. MORGAN: Q. Yes, today.