

1 Q. Yes. 11:08:09
2 A. As an editor. 11:08:10
3 Q. (Shakes head.) 11:08:13
4 A. Yes. 11:08:14
5 Q. You've never heard the term used in the 11:08:15
6 context of this material needs to be vetted, 11:08:21
7 V E T T E D, by an attorney? 11:08:26
8 A. No, I never heard that term used before. 11:08:33
9 Q. Are you familiar with a process that is 11:08:55
10 sometimes used in the publishing industry of sending a 11:08:57
11 manuscript, or even a galley, to an attorney to look 11:09:02
12 over to make sure that the publisher is minimizing, at 11:09:07
13 least, exposure to defamation or privacy law violations 11:09:12
14 or copyright violations? 11:09:19
15 A. Yes, I'm familiar with that process. I wasn't 11:09:25
16 aware that there was a specific term for it. 11:09:27
17 Q. Okay. I got to teach you something. 11:09:30
18 I'm going to call that process vetting. 11:09:32
19 A. Okay. 11:09:37
20 Q. Do you know whether Harvest House has a policy 11:09:40
21 for determining which, if any, publications will be sent 11:09:43
22 to an attorney for vetting? 11:09:49
23 A. I'm not aware of a specific written policy. I 11:09:55
24 am aware that the editors are expected to report to 11:09:58
25 their superiors if they believe there is potentially 11:10:11

1 **defamatory material. And at that point, Harvest House** 11:10:15
2 **Publishers can use their discernment on that matter.** 11:10:19
3 **So I guess you can say on a case-by-case basis** 11:10:23
4 **that can happen. I'm not aware of a specific written** 11:10:27
5 **policy.** 11:10:29
6 Q. Okay. So this is a consideration that you had 11:10:35
7 to make during your career when editing various books, 11:10:37
8 whether or not to highlight it as potentially defamatory 11:10:41
9 to your superiors; correct? 11:10:44
10 A. Are you asking if I would do that? 11:10:52
11 Q. I'm asking, in the past it is something that 11:10:54
12 you have faced. That is, you have had to consider 11:10:58
13 whether or not particular works should be highlighted to 11:11:03
14 your superiors as potentially defamatory. 11:11:07
15 A. I can't think of any specific examples at the 11:11:13
16 moment. 11:11:15
17 I can think of a small, very very small number 11:11:16
18 of examples where I took the initiative to contact the 11:11:19
19 author and asked the author, please verify this 11:11:23
20 information, double-check it, because you are 11:11:26
21 potentially exposing yourself here with this statement, 11:11:31
22 and I want to make sure that the author has it accurate. 11:11:34
23 So I have followed up directly with authors on 11:11:38
24 that in a very small number of instances. 11:11:40
25 I do not recall from memory any instance where 11:11:43