

1 you said that you're going to court unless we complied
2 with that schedule, and, therefore, things went
3 downhill from there.

4 Q First of all, just as a sideline, you'd
5 be hard-pressed to show me a letter that I wrote that
6 said we're going to court unless you complied with that
7 schedule, but leave that aside for a minute.

8 My question is this: Why not --
9 forgetting about whether the -- whether you were
10 going -- had prepared a written response or gotten all
11 the information from them that they could provide, why
12 not sit down and talk with them? Why did you -- why
13 not sit down and talk with them? Let them come to you
14 so you wouldn't have to travel. Why not sit down and
15 talk with them?

16 A Like I said, that would have been my
17 intention, but the fact is you also had a threat of
18 legal action in the November 20th letter. There was
19 talk from yourself to Mr. Duboff about taking legal
20 action, and so it did not take place.

21 Q **Well, did you read Mr. Weldon's note**
22 **that basically said a time -- the time for dialogue has**
23 **passed?**

24 A **Mr. Weldon went back and forth in his**
25 **opinion of what to do.**

1 Q That wasn't my question. Did you read
2 Mr. Weldon's note?

3 A I don't know which note. Do you have a
4 note there?

5 Q No. Do you recall -- well, I guess I
6 do. This is JA 00334. That means you produced it.
7 We'll mark it next in order.

8 (Exhibit 12 was marked for
9 identification.)

10 Q Let me call your -- you can read
11 anything you want on there, but the paragraph right in
12 the center of the page, it says -- it starts out, "To
13 some, we face a dilemma."

14 A Do you know when this is dated?

15 Q No, I don't. I'm going to ask you if
16 you've ever read it before.

17 A (Reviewing document.)

18 Q See that sentence in there, "Be that as
19 it may, we think the time of dialogue -- at least as
20 far as the claimed evangelical Christian status of the
21 LC is concerned -- is over"?

22 A Can I mark it?

23 Q Yes, that -- no, don't mark that. Mark
24 the one I gave Mr. Sharpe.

25 A All right. I don't remember reading

1 this in relationship to the events around November
2 20th. In fact, I don't -- I think this was part of --
3 I don't know what it was part of.

4 Q Do you remember reading it at all?

5 A Not, not exactly, no.

6 Q Where, where did you get it in order
7 that you had produced -- to produce it to us?

8 A There were sometimes talk like this in
9 some of the previous manuscripts, documents, and so on,
10 but I don't remember exactly where.

11 (Exhibit 13 was marked for
12 identification.)

13 Q Let's mark as the next in order a
14 letter. This one is Bates stamped -- it's one page.
15 It's Bates stamped HH 00087. The HH means it was
16 produced by Harvest House. It's addressed to you, and
17 I'm sure we have one Bates stamped JA as well, but this
18 just happens to be the one that Harvest House produced.

19 A All right.

20 Q Have you read Exhibit 13?

21 A Yes, sir.

22 Q You notice the date is -- first of all,
23 do you remember receiving this letter?

24 A Yes, sir.

25 Q Notice the date is January 31st, 2001?

- 1 A Yes, sir.
- 2 Q That's before 9/11, right?
- 3 A That's correct.
- 4 Q And there's a request in this letter to
- 5 talk about the situation face-to-face?
- 6 A Yes, sir.
- 7 Q Was there any reason why in January you
- 8 did not sit down and talk about the situation
- 9 face-to-face?
- 10 A Well, we wanted to, first of all, know
- 11 what we were going to talk about in the face-to-face
- 12 meeting. So we asked for them to detail what their
- 13 objections were.
- 14 Q And you needed that done in writing
- 15 before any meeting would take place?
- 16 A That's what we asked.
- 17 (Exhibit 14 was marked for
- 18 identification.)
- 19 Q I'm going to mark as next in order
- 20 another letter, single page, HH -- Bates stamped HH
- 21 00089. So, that'll be, what, 14? Number 14.
- 22 A All right.
- 23 Q Do you recall receiving Exhibit 14?
- 24 A Yes, sir.
- 25 Q And this is, again, in May of 2001,

1 which is before 9/11?

2 A Yes, sir.

3 Q And they, they offered to meet you
4 anywhere you wanted?

5 A Yes, sir.

6 Q And was there a reason that -- was
7 there any particular reason why you didn't meet with
8 them at the time this letter was written?

9 A We were still waiting for them to tell
10 us the specifics on what they objected to in our
11 chapter.

12 Q Couldn't they have done that at the
13 meeting?

14 A They could have, but it would have been
15 nice to have that so we could prepare. Or possibly you
16 could meet their objections by simply giving
17 documentation without even having a meeting.

18 Q Did you ever -- have you ever heard of
19 the Lee versus Duddy case?

20 A Yes, sir.

21 Q When, when did you first hear of it?

22 A Probably after the November 20th letter
23 when they pointed to those exhibits.

24 Q And so prior to that November 20th
25 letter you had -- you were never aware that there had