

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK CARL HIGBIE, JOSEPH HARRIS AND MICHAEL VORTUBA, Plaintiffs, V Index No.: 24-CV-0174MAD/TWD STEVEN G. JAMES, in his Official Capacity as Superintendent of the New York State Police, SHERIFF KYLE BOURGAULT, in his Official Capacity as the Sheriff of Rensselaer County, New York, SHERIFF DONALD J. KRAPF, in his Official Capacity as the Sheriff of Columbia County, New York, and JOHN DOES 1-10, Defendants.</p> <p style="text-align: center;">X</p> <p>DEPOSITION OF: JOSEPH HARRIS DATE: October 16, 2024 TIME: 1:06 p.m. to 2:39 p.m. VENUE: WebEx</p> <p>Reported by Becky Foster</p> <p style="text-align: right;">Page 1</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 INDEX OF PROCEEDINGS 3 JOSEPH HARRIS; Sworn 4 Direct Examination by Mr. Thompson 11 5 6 REQUEST LIST 7 . Copies of email conversations between 63 8 Joseph Harris and the owner of Guns and 9 Gadgets YouTube Channel 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 3</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 APPEARANCES: 3 FOR JOSEPH HARRIS: 4 STAMBOULIEH LAW 5 BY: STEPHEN STAMBOULIEH, ESQ. 6 P.O. Box 428 7 Olive Branch, Mississippi 38654 8 FOR DEFENDANT: 9 OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL 10 BY: MATTHEW GALLAGHER, A.A.G. 11 The Capitol 12 Albany, New York 12224 13 14 BY: JAMES THOMPSON, A.A.G. 15 28 Liberty Street, 18th Floor 16 New York, New York 10005 17 FOR DONALD KRAPF: 18 COLUMBIA COURT ATTORNEY 19 BY: ROBERT FITZSIMMONS, ESQ. 20 401 State Street 21 Hudson, New York 12534 22 23 24 25</p> <p style="text-align: right;">Page 2</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 EXHIBIT INDEX 3 Marked as 4 Described as 5 One 23 6 Firearms License Information for Joseph Harris 7 from various states 8 Two 66 9 Email between Joseph Harris and G.O.A. 10 Re: Guns and Gadgets YouTube channel 11 Three 77 12 Text message between Joseph Harris and Frankie 13 with YouTube video link 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 4</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris</p> <p>2 STIPULATIONS</p> <p>3 IT IS HEREBY STIPULATED AND AGREED by</p> <p>4 and between counsel for the respective parties hereto</p> <p>5 that:</p> <p>6 All rights provided by the Civil</p> <p>7 Practice Law and Rules, including the right to object</p> <p>8 to any question, except as to form, or to move to</p> <p>9 strike any testimony at this examination is reserved.</p> <p>10 And, in addition, the failure to object to any</p> <p>11 question or to move to strike testimony at this</p> <p>12 examination shall not be a bar or waiver to make such</p> <p>13 motion at, and is reserved for the trial of this</p> <p>14 action;</p> <p>15 IT IS FURTHER STIPULATED AND AGREED by</p> <p>16 and between counsel for the respective parties</p> <p>17 hereto, that this examination may be sworn to by the</p> <p>18 witness being examined before a Notary Public, other</p> <p>19 than the Notary Public before whom this examination</p> <p>20 was begun, but the failure to do so, or to return the</p> <p>21 original of this examination to counsel, shall not be</p> <p>22 deemed a waiver of the rights provided by Rule 3116</p> <p>23 and 3117 of the Civil Practice Law and Rules, and</p> <p>24 shall be controlled thereby;</p> <p>25 IT IS FURTHER STIPULATED AND AGREED by</p> <p>Page 5</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris</p> <p>2 be a bar or waiver to make such motion at, and is</p> <p>3 reserved to, the trial of this action.</p> <p>4 IT IS HEREBY STIPULATED AND AGREED by</p> <p>5 and between counsel for all parties present that</p> <p>6 pursuant to CPLR section 3113(d) this deposition is</p> <p>7 to be conducted by video conference, that the court</p> <p>8 reporter, all counsel, and the witness are all in</p> <p>9 separate remote locations (except the witness and his</p> <p>10 counsel are in the same physical location) and</p> <p>11 participating via videoconference meeting under the</p> <p>12 control of Associated Reporters International, Inc.</p> <p>13 (ARII), that the officer administering the oath to</p> <p>14 the witness need not be in the place of the</p> <p>15 deposition and the witness shall be sworn in remotely</p> <p>16 by the court reporter after confirming the witness's</p> <p>17 identity, that this videoconference will not be</p> <p>18 recorded in any manner and that any recording without</p> <p>19 the express written consent of all parties shall be</p> <p>20 considered unauthorized, in violation of law, and</p> <p>21 shall not be used for any purpose in this litigation</p> <p>22 or otherwise.</p> <p>23 IT IS FURTHER STIPULATED that exhibits</p> <p>24 may be marked by the attorney presenting the exhibit</p> <p>25 to the witness, and that a copy of any exhibit</p> <p>Page 7</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris</p> <p>2 and between counsel for the respective parties</p> <p>3 hereto, that this examination may be utilized for all</p> <p>4 purposes as provided by the Civil Practice Law and</p> <p>5 Rules;</p> <p>6 IT IS FURTHER STIPULATED AND AGREED by</p> <p>7 and between counsel for the respective parties</p> <p>8 hereto, that the filing and certification of the</p> <p>9 original of this examination shall be, and the same</p> <p>10 hereby are waived;</p> <p>11 IT IS FURTHER STIPULATED AND AGREED by</p> <p>12 and between counsel for the respective parties</p> <p>13 hereto, that a copy of the within examination shall</p> <p>14 be furnished to counsel representing the witness</p> <p>15 testifying without charge;</p> <p>16 IT IS FURTHER STIPULATED AND AGREED by</p> <p>17 and between counsel for the respective parties</p> <p>18 hereto, that all rights provided by the Civil</p> <p>19 Practice Law and Rules, and Part 221 of the Uniform</p> <p>20 Rules for the Conduct of Depositions, including the</p> <p>21 right to object to any question, except as to form,</p> <p>22 or to move to strike any testimony at this</p> <p>23 examination, is reserved. And, in addition, the</p> <p>24 failure to object to any question, or to move to</p> <p>25 strike any testimony, at this examination, shall not</p> <p>Page 6</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris</p> <p>2 presented to a witness shall be e-mailed to or</p> <p>3 otherwise in possession of all counsel prior to any</p> <p>4 questioning of a witness regarding the exhibit in</p> <p>5 question. Unless otherwise agreed upon, all parties</p> <p>6 shall bear their own costs in the conduct of this</p> <p>7 deposition by video conference, notwithstanding the</p> <p>8 obligation by CPLR to supply a copy of the transcript</p> <p>9 to the deposed party by the taking party in civil</p> <p>10 litigation matters.</p> <p>11 CPLR § 3113 Conduct of Examination (d)</p> <p>12 states:</p> <p>13 (d) The parties may stipulate that a</p> <p>14 deposition be taken by telephone or other remote</p> <p>15 electronic means and that a party may participate</p> <p>16 electronically. The stipulation shall designate</p> <p>17 reasonable provisions to ensure that an accurate</p> <p>18 record of the deposition is generated, shall specify,</p> <p>19 if appropriate, reasonable provisions for the use of</p> <p>20 exhibits at the deposition; shall specify who must</p> <p>21 and who may physically be present at the deposition;</p> <p>22 and shall provide for any other provisions</p> <p>23 appropriate under the circumstances. Unless otherwise</p> <p>24 stipulated to by the parties, the officer</p> <p>25 administering the oath shall be physically present at</p> <p>Page 8</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 the place of the deposition and the additional costs 3 of conducting the deposition by telephonic or other 4 remote electronic means, such as telephone charges, 5 shall be borne by the party requesting that the 6 deposition be conducted by such means. 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>Page 9</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 MR. FITZSIMMONS: Robert Fitzsimmons, 3 Columbia County Attorney, 401 State Street, Hudson, 4 New York for Defendant Donald Krapf. 5 THE COURT REPORTER: Thank you, Mr. 6 Gallagher. 7 MR. GALLAGHER: Matthew Gallagher, 8 Office of the Attorney General Litigation Bureau 9 Albany, The Capital, Albany, New York, 12224. On 10 behalf of Steven James, Defendant Steven James. 11 THE COURT REPORTER: Thank you. And 12 Mr. Stamboulieh. 13 MR. STAMBOULIEH: It's Stephen 14 Stamboulieh, Stamboulieh Law. P.O. Box 428, Olive 15 Branch, Mississippi 38654. On behalf of Plaintiff, 16 Joseph Harris. 17 THE COURT REPORTER: Okay, thank you. 18 You're all set. 19 MR. THOMPSON: Great, thank you so 20 much Ms. Foster. 21 DIRECT EXAMINATION 22 BY MR. THOMPSON: 23 Q. Mr. Harris, thank you very much 24 for taking the time to talk with us today. My name 25 is James Thompson, I'm an Assistant Attorney General,</p> <p>Page 11</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 (The deposition commenced at 1:06 3 p.m.) 4 THE COURT REPORTER: Okay, we are on 5 the record. Mr. Harris, would you please raise your 6 right hand? Do you swear or affirm the testimony 7 you're about to give in this cause will be the truth, 8 the whole truth, and nothing but the truth? 9 THE WITNESS: Yes. 10 JOSEPH HARRIS; Sworn 11 THE COURT REPORTER: Would you please 12 state and spell your name for the record? 13 THE WITNESS: My name is Joseph 14 Harris. That's spelled J-O-S-E-P-H. Last name is H- 15 A-R-R-I-S. 16 THE COURT REPORTER: Okay, thank you. 17 And then gentlemen, if I could please have you each 18 just state your name and your firms for the record, 19 please. 20 MR. THOMPSON: Sure, I'll start. I'm 21 James Thompson with the Office of the Attorney 22 General, the New York City Office, 28 Liberty Street, 23 New York, New York, 10005. 24 THE COURT REPORTER: Okay, Mr. 25 Fitzsimmons?</p> <p>Page 10</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 and I represent the Superintendent of the New York 3 State Police in this lawsuit. 4 So, during the deposition, I'm going 5 to ask you a number of questions and there are a 6 handful of things to remember for the aid of the 7 Court Reporter, who's always the most important 8 person because if she doesn't get it, it didn't 9 happen. So, when I ask you a question, please wait 10 until the end of the question before beginning your 11 answer. If I ask a question that you don't 12 understand, please just ask me to clarify it. If you 13 give me an answer, I'll assume that you understood 14 the question. Please make sure that all of your 15 answers are verbal. 16 In -- in normal conversation, it's 17 typical to say huh-uh or uh-huh, shake your head or 18 shrug your shoulders, but none of that gets picked up 19 on the transcript. And so you know, please make sure 20 that you're answering yes, no or -- or otherwise 21 verbally. 22 From time to time your attorney may 23 make an objection. Unless your Attorney instructs 24 you not to answer based on a claim of privilege, you 25 should still answer the question that I've asked. If</p> <p>Page 12</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 at any point you need to take a break, just tell me 3 and we'll take one. I will ask you to finish 4 responding to the question that's presented or to the 5 line of questioning, but otherwise, happy to take a 6 break at your convenience. Does that all make sense? 7 A. Yes, it does. 8 Q. Great. So Mr. Harris, do you 9 understand that you're under oath today? 10 A. Yes, I do. 11 Q. Are you suffering from any 12 illness that could affect your ability to answer 13 questions today? 14 A. No. 15 Q. Have you taken any medication 16 that could affect your ability to answer questions? 17 A. I have not, no. 18 Q. Is there any other reason why you 19 might not be able to give complete and truthful 20 answers to the questions that you're asked today? 21 A. No. 22 Q. Have you ever been deposed 23 before? 24 A. No, never. 25 Q. And are you represented today by</p> <p>Page 13</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 to object to the extent that you seek any questions 3 about attorney-client privilege information? 4 MR. THOMPSON: Understood. 5 BY MR. THOMPSON: (Cont'g.) 6 Q. And I'm just asking about whether 7 there was a meeting or not -- not about the content 8 of anything you discussed. 9 A. We had a phone call yesterday 10 just to kind of prepare for what to expect. 11 Q. Other than your attorney, have 12 you discussed this deposition with anyone else? 13 A. This deposition? No. 14 Q. And is there anything else that 15 you did to prepare beyond what we've already 16 discussed? 17 A. No, not that I can say, no. No. 18 Q. So Mr. Harris, where do you 19 currently live? 20 A. I currently live in Massachusetts 21 in Worcester County. 22 Q. And that's pretty central in 23 Massachusetts, right? 24 A. Yeah. I -- I always say I'm 25 originally from a different area, so it always takes</p> <p>Page 15</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 Counsel? 3 A. Yes, by Stephen. 4 Q. And that's Mr. Stamboulieh? 5 A. Yes, Mr. Stamboulieh, sorry. 6 Q. Did you do anything to prepare 7 for today's deposition? 8 A. I -- I went over -- I went over 9 the filings, and I'm trying to remember the exact 10 wording for everything, so I beg your pardon. But 11 the -- essentially the -- the filings that we're all 12 aware of, the interrogatory and things like that. 13 Q. Do you remember any other 14 documents in addition to the interrogatories? 15 A. Besides the complaint, the 16 interrogatory, it was my declaration, and I went over 17 my -- I'm trying to remember again, I'm sorry for the 18 correct wording, but my response to the -- I can't 19 remember what it's called, but basically you asked me 20 to supply certain information, and I did like the 21 pictures of my licenses and so on. I reviewed all 22 that. 23 Q. Understood, did you meet with Mr. 24 Stamboulieh in preparation for the deposition? 25 MR. STAMBOULIEH: And I'm just going</p> <p>Page 14</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 me a second to think about it but yes, it's pretty 3 close to New Hampshire border toward Nashua. 4 Q. Where -- where are you originally 5 from in Massachusetts? 6 A. Lynn, which is right outside of 7 Boston in the North Shore. 8 Q. I got a brother-in-law from Lynn. 9 It's great place. 10 A. Oh, yeah. We're -- we're all 11 over the place, yeah. 12 Q. Do you have any other residences 13 in addition to Worcester County? 14 A. Prior -- you mean like prior 15 residences? 16 Q. No, current residences. 17 A. Current, no. Just this is my 18 residence in -- in Worcester County. Yeah. 19 Q. And do you have any prior 20 residences? Have you ever lived anywhere other than 21 Massachusetts? 22 A. Yes. I've lived in two other 23 States, California, and Texas. 24 Q. And what do you do for work, sir? 25 A. I'm a network engineer.</p> <p>Page 16</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 Q. That is the sort of impressive 3 sounding title that I never understand what it 4 actually means. What -- what does that involve on 5 the day-to-day basis? 6 A. It's a lot of -- it's a lot of 7 working with clients to have them peer with our -- 8 with our routing so we can exchange information over 9 the internet, and they can get data from certain 10 sources and things like that. Essentially, it's part 11 of like maintaining the internet. 12 Q. Got you. Does your work ever 13 take you into New York State? 14 A. No -- so not regularly. I have 15 gone to New York for work twice, I believe, in my -- 16 in the past. Yeah. 17 Q. And when were those times? 18 A. So, one was in either 2019 or 19 2020 when I moved back to Massachusetts since I had 20 to drive there to go to a data center. That was only 21 for a day. And there was another time prior, I 22 believe it was 2017, where I was working in the New 23 York office for about a week, the New York City 24 office. 25 Q. So for the first time -- the --</p> <p>Page 17</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 check. I don't know off the top of my head, 3 unfortunately. 4 Q. Do you recall a region? Was it 5 in -- in New York City or the capital region or -- or 6 elsewhere in New York? 7 A. It was -- it was -- it was in New 8 York City. I'm not sure exactly which borough 9 though. 10 Q. And is it possible that your work 11 would take you back into New York again in the 12 future? 13 A. It's very unlikely in my current 14 position. 15 Q. Can you tell me why not? 16 A. Because when I went originally in 17 -- I believe, like I said 2017, I was working the 18 help desk, and they needed help. Like they -- they 19 needed staffing, so I went there for a week. My 20 current position is much more stable, and I work 21 remote completely, now there's no longer a need for 22 in-person work. 23 And then in 2019, 2020, I went to New 24 York again, because we had a data center where we 25 needed to move equipment. And I only went there --</p> <p>Page 19</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 in 2017, where was the New York City office located? 3 Do you know what borough? 4 A. I don't know the boroughs. I 5 believe it was in Chelsea, the Chelsea market area, 6 if that means anything. 7 Q. Okay. So -- 8 A. Yes, yeah. 9 Q. And what company do you work for? 10 A. I work for Google. 11 Q. And the second time that you -- 12 and did you work for Google back in 2017 as well? 13 A. Since 2016 I worked for Google, 14 yes. 15 Q. And you still work for Google? 16 A. I still do, yes. 17 Q. The second time that you came out 18 to the data center in 20 -- was it 2021, is that 19 correct? 20 A. It -- it was either 2019 or 2020. 21 Q. 2020 or 2019. 22 A. Yeah. 23 Q. Do you recall where the data 24 center was? 25 A. I -- I don't, I would have to</p> <p>Page 18</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 we were moving equipment actually to Boston, so it'd 3 be closer to my -- to my main office, which would be 4 in Cambridge, Massachusetts. So, I only went there 5 to kind of get an inventory and know what we need to 6 move from New York to Massachusetts. 7 Q. So, would it be correct to say 8 that it's possible that your work would take you to 9 New York, but you don't anticipate it? 10 A. That would -- that would be true. 11 I would say that's very accurate, yeah. 12 Q. Do you have any other connections 13 to New York State? 14 A. My wife's family live in New York 15 State, and we visit them, I would probably say once 16 or twice or year, birthdays and so on. Holidays. 17 Q. And where in New York State do 18 they live? 19 A. There is Queens Borough and then 20 South Seneca Falls, I believe. 21 Q. Okay. And do you know which 22 counties those are in? 23 A. One is in Warren, and the other 24 is in -- I'm trying to remember, it begins with an S. 25 I don't remember off the top the second one.</p> <p>Page 20</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 Q. Schuyler, Schenectady? 3 A. No. It's a -- I'm trying to 4 think it's a revolutionary -- I'm trying -- I can't 5 remember the -- Saratoga. There it is, 6 Saratoga.Saratoga County. 7 Q. Other than to visit your wife's 8 family, do you ever go into New York? 9 A. No. Not to visit or anything, 10 no. 11 Q. No vacations, no trips? 12 A. Nope. Nothing on the horizon. 13 Q. Understood. And other than what 14 we've said so far, do you have any other connections 15 to New York State? 16 A. No. 17 Q. All right. Mr. Harris, do you 18 hold any firearm or concealed weapons permits? 19 A. Yes, I do. 20 Q. And from what states? 21 A. My current state of residence, 22 which is the Commonwealth of Massachusetts. I hold 23 one for Maine, Rhode Island, Connecticut, Texas, 24 Florida, Utah, and Pennsylvania. I think I have them 25 all.</p> <p>Page 21 800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 MR. THOMPSON: And Ms. Foster, could I 3 ask that this document, Harris eleven through sixteen 4 be marked as Exhibit One? 5 THE COURT REPORTER: Okay. It is. 6 Thank you. 7 BY MR. THOMPSON: (Cont'g.) 8 Q. So, I'll -- I'll represent that - 9 - I think there's -- on here, Massachusetts, 10 Pennsylvania, Rhode Island, Connecticut, Texas, 11 Florida, and Maine. I -- I don't think Utah is on 12 here. Did you recently get a Utah permit? 13 A. Yes. I -- I can explain that. 14 When -- when this information was requested, my Utah 15 permit was still being under -- not under 16 consideration but being -- the application was still 17 going through Utah. I did not have it in hand yet. 18 Q. Understood. And when did you get 19 the Utah permit? 20 A. I -- I have it next to me. I 21 could check when it was issued, but I think I got it 22 in the mail, around Independence Day, maybe a little 23 after. So early to mid, early to mid-July, if I 24 remember correctly. 25 Q. Okay. So, let's -- if you don't</p> <p>Page 23 800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 Q. All right. If you'll hold on one 3 minute, sir. 4 A. Sure. 5 Q. I'm going to put a document up on 6 the screen for us. 7 A. Sure. 8 Q. And let me see if I can pull off 9 the screen share without breaking our -- all of our 10 computers. Does everyone see that, this window? 11 A. Yes. 12 Q. And Mr. Harris, do you recognize 13 this? 14 A. Yes. That's -- that is the back 15 of my Florida license to carry. 16 Q. And you see this page is marked 17 Harris underscore eleven, correct? 18 A. I do. 19 Q. And let me just scroll down 20 through the additional pages. And do you recognize 21 all this? 22 A. I do, yes. 23 Q. And so what -- 24 A. It's my -- they're my licenses to 25 carry.</p> <p>Page 22 800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 mind, let's just quickly go through each of these -- 3 these licenses. And let's start with Massachusetts 4 because that's where you live. Is that the first 5 firearms license that you had? 6 A. No. Well, it's -- it's been 7 renewed. I originally got my Massachusetts license 8 to carry I believe in 2013 when I turned twenty-one. 9 I believe that's included in this Exhibit, the 10 expired permit. 11 Q. And is that the first state that 12 you got a license from? 13 A. That's correct, yes. 14 Q. And so, why did you apply for a 15 firearms license in Massachusetts? 16 A. Well, I wanted to exercise my 17 Second Amendment Rights. And in order to do that in 18 Massachusetts, even to purchase a firearm, you have 19 to be licensed through the state. So, I -- I -- I 20 found out what I had to do to become licensed, and I 21 applied, and I was issued nonrestrictive license to 22 carry from my home city, which is Lynn. 23 Q. And so what were the application 24 requirements in Massachusetts? 25 A. The application requirements were</p> <p>Page 24 800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 obviously I'd have to fill out an application with 3 (unintelligible) Police. I had to take a basic -- 4 they call it a basic pistol safety course in 5 Massachusetts, which is created by the State Police. 6 I had to pass that, which I did. 7 I brought the application in with the 8 certificate that I took that class, and I believe 9 there was a hundred dollar fee and then finger -- and 10 then fingerprinting and everything else. And then I 11 just had to wait. 12 Q. And was there any investigation 13 or in-person interview in connection with that? 14 A. You know, so Lynn didn't require 15 me to meet with the chief or anything. I don't 16 recall having to talk to any law enforcement or 17 anything. It was all within the application. The 18 State Police do a background check on the 19 application. So I think Lynn decided to, you know, 20 rely on their investigation. 21 Q. And can you tell me about the 22 training that you had to do for Massachusetts? 23 A. Yes. It was -- it was a safety 24 course that went over among other like the 25 Massachusetts firearm laws, which is good to know if</p> <p>Page 25 800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 Q. And so -- and you said that 3 there's a requirement to renew the license in 4 Massachusetts, is that correct? 5 A. Yes. If you want to keep your 6 license to carry, you have to renew when it expires. 7 Q. And so do you think that that 8 Massachusetts licensing process is constitutional? 9 MR. STAMBOULIEH: I object to the form 10 -- hold on real quick. I'm going to just object to 11 the form of the question. He's not a lawyer. 12 BY MR. THOMPSON: (Cont'g.) 13 Q. You can answer. 14 A. Do I -- do I think -- am I being 15 asked to answer? I'm sorry. I think I got cut off. 16 Q. Yes, please answer the question. 17 A. Okay. Do I think it's 18 constitutional? I think from the text of the 19 Constitution -- from the Second Amendment, this is 20 something I really haven't thought about that -- I 21 haven't really thought about because I live in the 22 state. But if you're strictly looking at the text, 23 I'd say probably not because you need a license to 24 even purchase a firearm, and it seems that wouldn't 25 be constitutional, even though I think the training's</p> <p>Page 27 800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 you're going to be carrying and -- and exercising 3 your Second Amendment in Massachusetts. It also went 4 over, you know, basic handling of a firearm and you 5 know, essentially how to safely handle it, so you 6 don't accidentally hurt yourself or others. 7 And we had a -- it wasn't a live fire 8 reco -- we didn't have a live fire like at the range 9 to get the certificate. The class I took, they had a 10 -- it was a non-lethal pistol that had some type of 11 infrared technology that told you if you're hitting 12 the target or not because I think they had the place 13 they were teaching the class just wasn't equipped 14 with a -- like an inside live fire range, I guess. 15 Q. And how many hours roughly would 16 you say it took to complete the course in 17 Massachusetts? 18 A. So, that took all day. It was 19 very early in the morning -- I just -- I'm thinking 20 back to 2013, so I'm sorry. But it -- it was -- I 21 remember it took all day. I took a day off of -- I 22 was in college at the time, and I took a day off of 23 classes and work. I think it was nine a.m. till 24 probably three, two or three o'clock in the 25 afternoon, something around there.</p> <p>Page 26 800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 a good thing. Yeah. 3 Q. And can you explain a little 4 further why you think it's unconstitutional? 5 A. Well, because nowhere in The 6 Constitution does it say you need a -- like to pass a 7 class or get a -- a certificate or anything from the 8 state to practice your right. 9 Q. All right. So what -- which 10 license did you get next after the Massachusetts 11 license? 12 A. I got the Texas license to carry 13 a handgun because I actually lived in Texas for about 14 a year. 15 Q. And when was that? 16 A. That must have been the -- excuse 17 me, that was 2018, I believe is when it was issued. 18 Q. And what brought you to Texas? 19 A. Work. I actually transferred 20 from the Mountain View office to the Austin office. 21 Q. And was that for -- for Google as 22 well? 23 A. That was also for Google, yes. 24 Q. And so what did the Texas 25 application process consist of?</p> <p>Page 28 800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 A. The Texas application process was 3 actually fairly similar to Massachusetts. We had to 4 pass a course, pass their version of a pistol safety 5 course. There was a live fire requirement, so that 6 may have been the biggest difference. And that was 7 probably, I'd say maybe half a day, maybe like nine 8 to like noon, nine to one. I'm not really sure if I 9 remember correctly. 10 Q. And were there any other 11 application requirements in addition to the training 12 course? 13 A. You had to give your 14 fingerprints. There was a fill out an application 15 and send it off to the Department of Public Safety of 16 Texas. Yeah. 17 Q. And was there any -- was there 18 any in-person interview or hearing? 19 A. Not -- not for Texas, no. 20 Q. And is there any requirement to 21 renew or cert -- recertify that license? 22 A. Yes. If the licenses is expired, 23 they -- then you have to fill out an application to 24 renew it. 25 Q. And -- I should have looked more</p> <p>Page 29</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 could you scroll up, so I could actually see the 3 license plate? 4 Q. Oh yeah, of course. 5 A. I don't remember -- yeah thank 6 you. I don't know if it says issued -- it looks like 7 it was issued back in -- is that March? So I think - 8 - yeah, so I -- I got it within the year back in 9 March. 10 Q. And so why did you apply for the 11 Connecticut license? 12 A. I applied for the Connecticut 13 license because I'm back in Massachusetts, and the 14 states here are much closer together. So, if I'm 15 ever driving while armed, I'd rather not come into a 16 follow-up with the law if I, you know, driving past 17 the state line or -- or you know, take a wrong turn 18 off an exit and accidentally be over the state line 19 or anything. 20 Q. And do you travel to Connecticut 21 often? 22 A. Not -- not often, no. 23 Q. Do you have any particular 24 connection to Connecticut? 25 A. I do not, no.</p> <p>Page 31</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 closely at the license. Has -- has yours expired or 3 -- or will it be soon? 4 A. So I -- I'd have to check as 5 well. It looks like looking at the screenshot, it 6 expires in 2028. When I originally got it, I was 7 obviously living in Texas. So, that license had to 8 be updated to my Massachusetts residency, and I 9 updated it. I'm not entirely sure if it expired, or 10 if I just called and said, hey, I moved, can I have 11 an out-of-state license? And they granted it. 12 Q. And same question for Texas. Do 13 you think that that licensing process is 14 unconstitutional? 15 MR. STAMBOULIEH: Same objection. 16 BY MR. THOMPSON: (Cont'g.) 17 Q. You can answer. 18 A. I -- I would say the same, yes. 19 Despite the state, I -- I think it goes against the 20 Second Amendment. Yeah. 21 Q. All right. After Texas, what was 22 the next state you got a license in? 23 A. That was Connecticut. 24 Q. And when was that? 25 A. That was very recent. Could --</p> <p>Page 30</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 Q. And what were the application 3 requirements for Connecticut? 4 A. You had to take a pistol safety 5 course, there was a live fire requirement and 6 fingerprinting. 7 Q. And about how long was the safety 8 course? 9 A. The safety course? That was 10 early in the morning until maybe mid-afternoon, like 11 two or three o'clock. So it was almost kind of a 12 full work day if you want to look at it like that. 13 Q. And was there any investigation 14 or interview in Connecticut? 15 A. No. I didn't have to sit down 16 with anyone or anything, but they did their 17 background checks without having to speak with me. 18 Q. I apologize because I should have 19 asked this for some of the previous dates as well. 20 Was there a fee for Connecticut? 21 A. There was, yes. 22 Q. Do you remember about what it 23 was? 24 A. Not counting the course fee, 25 probably around a hundred or so dollars. That seems</p> <p>Page 32</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 to be most of the states when you actually file. 3 Q. And when you say the course fee, 4 was that for the use of the -- the range at the live 5 fire training? 6 A. Live fire and just to be educated 7 and -- and -- and -- and have the -- the opportunity 8 to pass the course and get a certificate. So, and 9 that's usually private companies if you don't do 10 those and they charge whatever they charge. I forget 11 exactly what it was, probably a hundred dollars or 12 so. That seems to be the range of fees for these 13 things. 14 Q. And were there a -- a similar fee 15 in Texas and Massachusetts? 16 A. Yes. Massachusetts, the course 17 fee I think, again, probably around a hundred or so 18 dollars, and then I believe it's a hundred dollars in 19 Massachusetts to -- to file. In Texas it was 20 somewhere around there similar, probably closer to 21 just a hundred dollar range for everything in Texas. 22 Q. And so same question for 23 Connecticut. Do you think the Connecticut process is 24 unconstitutional? 25 MR. STAMBOULIEH: Same objection.</p> <p>Page 33</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 recently took, I think Connecticut's, and I -- I 3 supplied them with Connecticut's. And then I think 4 within a week I got a call saying it's ready to be 5 picked up. 6 Q. And do you know, was there any 7 investigation in connection with that? 8 A. I don't know for sure. The 9 turnaround time was very quick, so if there was, they 10 did it very fast. 11 Q. And no interview in Pennsylvania? 12 A. No interview. 13 Q. And so I know you said you got a 14 number in -- in roughly the same time period, so I'll 15 just ask about the rest sort of (unintelligible). 16 What about Rhode Island? What was the interview 17 process in Rhode Island? 18 A. So, Rhode Island is interesting 19 in how they do their licensing. You -- they're 20 completely -- you either go through, I guess the 21 state or the -- the local police that will issue to 22 nonresidents. I went to the closest police, but I 23 think I called. I called the -- the closest police 24 department near my home that would take applications 25 from nonresidents.</p> <p>Page 35</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 THE WITNESS: I -- I would -- I would 3 say so, yes. 4 BY MR. THOMPSON: (Cont'g.) 5 Q. And so after Connecticut, what 6 state did you get a license in next? 7 A. It was either Pennsylvania, I -- 8 I think it was Pennsylvania. I think that was the 9 next one I got. 10 Q. And so what was -- 11 A. Yeah, I'm sorry -- 12 Q. I'm sorry. No, no. 13 A. I -- I said I believe it's 14 Pennsylvania. I got all these within like a year. 15 So now that I have a home, it is settled, so -- 16 Q. Got you there. So let's -- let's 17 go on with Pennsylvania. What was the application 18 process there? 19 A. That -- that application process, 20 was much more streamlined. It -- they had a -- you 21 had to file electronically. There was a fee. It was 22 -- it was a hundred dollars. It really was -- it was 23 very low. I -- I think it was closer to fifty. I 24 fill out my information. They -- Pennsylvania 25 accepts safety courses from other states, so I</p> <p>Page 34</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 And the application process for that 3 was -- it was fingerprinting, there was an 4 application. I had to write a letter saying why I 5 want a license to carry in Rhode Island, so I did do 6 that, and I believe there were references. And then 7 I handed it in and paid like a hundred dollars or so 8 and then I was issued the license. 9 Q. And so can you summarize what you 10 put in your letter? 11 A. I -- yes. I said -- I said I 12 live, you know, close to Rhode Island and if I'm ever 13 -- you know, I -- I just want to be on the right side 14 of the law. In -- in the event I'm carrying a 15 firearm for self-defense, I just want to, you know, 16 make sure that I'm following the law within Rhode 17 Island. Rhode Island requires a license to carry. 18 Q. Apologies. You -- you said that 19 you spoke with several police departments in Rhode 20 Island. Is that correct? 21 A. Not -- not -- oh, like over the 22 phone. I just called to inquire if they take 23 nonresidents applications under consideration. Some 24 do, some don't. Yeah. 25 Q. And which ones did, and which</p> <p>Page 36</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 ones didn't? 3 A. I'm trying to -- I don't remember 4 off the top -- I -- I remember speaking to one or two 5 of them. They said -- they said either they had a 6 big backlog, like it was going to take like over a 7 year, or they don't take non -- they don't take non 8 Rhode Island residents at all, so they kind of 9 steered me away. 10 And this -- the Town of North 11 Smithsfield is closer to me -- closer to the border 12 for Massachusetts and Rhode Island, and they were 13 taking applicants from nonresidents from there that 14 weren't Rhode Island residents. And they didn't have 15 a backlog of applications and time and everything. 16 Q. And so is -- are the licensing 17 decisions in Rhode Island made by county police or -- 18 or town police or local police or -- or -- or by 19 whom? 20 A. My understanding is it's -- it's 21 by the -- I -- I'm not sure if they send a background 22 check up to a state authority in Rhode Island, but I 23 know that the local police that will issue licenses, 24 they make that determination if you should -- if 25 they'll issue you one or not.</p> <p>Page 37</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 would take nonresidents. And he -- he explained the 3 application process and things like that, but no 4 official interview or anything. 5 Q. And was there a fee? 6 A. Yes. I -- I think it was, again, 7 around a hundred dollars or so. 8 Q. And what about Maine? When -- 9 when did you get your Maine license, roughly? 10 A. The Maine -- all these are around 11 the same time. Pardon me, sorry for the cough. 12 Maine -- Maine was very simple as well. I printed an 13 application, physically mailed it in. I don't 14 remember if they -- well, they -- I didn't take a 15 specific main course like to get a -- a certificate. 16 They may have also accepted the Connecticut one, I 17 don't know. I don't remember if they asked for a 18 safety course; they may have been satisfied with my 19 Massachusetts license to carry. But that was 20 relatively quick through the mail. 21 Q. And so do you know if Maine has a 22 training requirement? 23 A. I believe they do if you're -- if 24 you are a -- a resident of Maine, like if you're 25 looking to do this for the first time. They may not</p> <p>Page 39</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 Q. And some -- some would for 3 nonresidents, and some wouldn't? 4 A. Yeah, some -- some departments 5 just -- they -- they don't want the hassle to also 6 deal with nonresidents. That was my understanding 7 when I spoke to them. 8 Q. And I apologize if -- if you've 9 already answered this question, did you have to 10 participate in any training for Rhode Island? 11 A. I'm -- not for Rhode Island 12 specifically. I'm trying to think back to the 13 application. I don't know if they required it. They 14 may have just required -- they may have just been 15 satisfied that I had a license from Massachusetts 16 because they know the requirements needed for that. 17 I -- I'm not -- I -- I don't exactly remember if I 18 did something similar to Pennsylvania where they 19 would accept the Connecticut basic pistol safety 20 course. I don't remember, so I can't say for sure. 21 Q. And do you remember if there was 22 an interview? 23 A. There was no interview. No, 24 there was no interview. I did call the captain a few 25 times just to -- well, one, initially to see if he</p> <p>Page 38</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 have a training requirement if you already have other 3 licenses to carry and -- and so on. 4 Q. And is that also the case for 5 Connecticut? 6 A. Connecticut that is not the case. 7 Connecticut, you have to take a Connecticut -- yeah, 8 I'm sorry. 9 Q. Oh, I -- I'm sorry. I -- I meant 10 to ask Rhode Island. Is that also the case for Rhode 11 Island? 12 A. Oh, I -- I'm sorry. Can you ask 13 the question again? 14 Q. Yeah, sure, of course. So, do 15 you know whether Rhode Island has any training 16 requirement? 17 A. For their residents? Oh, you 18 know what? I'm sorry, they do. I'm just remembering 19 this now. With Rhode Island, there was a -- I had to 20 -- I can't believe I forgot this -- sorry. All these 21 are kind of jumped into my mind. The training 22 requirement -- they was actually a live fire 23 requirement that I completed with an N.R.A. certified 24 instructor. And he signed off on it that basically 25 said, I forget the exact parameters but like within I</p> <p>Page 40</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 think twenty or so minutes at twenty five yards with 3 whatever pistol and caliber I plan on carrying in 4 Rhode Island or lower. 5 I had to hit a very large target, it's 6 almost like an archery target, I forget exactly what 7 it's called. But in twenty five yards with a pistol, 8 it's still pretty challenging. And I had to get a 9 score of I think like -- I think two hundred out of 10 three hundred. However, they scored, and I passed 11 that. So yeah, there was a firearm live fire 12 requirement for Rhode Island, yes. 13 Q. All right. And lastly, what 14 about Utah? 15 A. Utah -- Utah, I had to take a 16 Utah safety course, and there is a live fire 17 requirement that I did do in the class. Sorry? Oh, 18 I thought someone was speaking. Yeah, so there -- 19 there was a -- there was a pistol safety course I had 20 to pass for Utah. Fill out an application and pay 21 what -- you know, fingerprints and pay whatever fee, 22 and then send in the mail out to Utah. 23 Q. And how long was the Utah course? 24 A. The Utah course must have been 25 probably like nine a.m. to one or two, somewhere</p> <p style="text-align: right;">Page 41</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 don't know if that says county or it says York and 3 they also do it by county, I believe. But most -- 4 most of the licenses I have, they're done by the 5 state itself, not a county or town. 6 Q. All right. And so I -- I guess I 7 have to ask the overarching question. That's a 8 number of states, quite a bit of time and kind of a 9 decent amount of money. 10 A. Yeah. 11 Q. Why go to all that effort? 12 A. Because like I said, I want to be 13 on the right side of the law when exercising my 14 Second Amendment Rights. And this is how certain 15 states require me to do so. 16 Q. And how did you pick the states 17 to -- to apply to? 18 A. I picked the states to apply to, 19 obviously, for like what -- I'm trying to think of 20 the right word. You know, proximity, I suppose, to 21 Massachusetts. Because living out in Texas, kind of 22 in the middle of the state, you don't really -- you 23 go two hundred miles, you're still in Texas. You go 24 two hundred miles in Massachusetts, you can be in 25 Rhode Island, you could be in New York, you could be</p> <p style="text-align: right;">Page 43</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 around there. 3 Q. So about four hours? 4 A. Nine a.m. to one or two -- I 5 don't know. Well, could be four to six, I don't 6 exactly remember. Whatever you have to do live fire, 7 it can vary. You know because it takes time to get 8 everybody out on the range. 9 Q. And were there any other 10 application requirements for Utah? 11 A. Besides the -- besides filling 12 out the application in the safety course, I don't 13 remember if they require you to have a -- a license 14 in your home state. I don't think that's true. But 15 -- yeah, I think it was just the safety course and a 16 live fire and the fingerprints. 17 Q. So did you -- you mentioned Rhode 18 Island, did you have any other troubles in any of 19 these other states finding a jurisdiction that would 20 accept a nonresident application? 21 A. Besides Rhode Island? No. 22 Because they -- I think except for Pennsylvania, each 23 state that I have a license, it's managed by the 24 state itself not certain counties or cities or towns. 25 I believe Pennsylvania it's -- it's the issuing -- I</p> <p style="text-align: right;">Page 42</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 in Maine. 3 So, there's much -- there -- there's 4 different jurisdictions in a much closer -- in a much 5 more condensed area. So I started getting them -- I 6 started getting them to the proximity. 7 Q. And so why Utah? 8 A. Utah is a -- it's a license that 9 many people who carry get because it has a lot of 10 reciprocity throughout the United States, yeah. And 11 -- and that's why. 12 Q. And what do you mean by 13 reciprocity? 14 A. What I mean by reciprocity is 15 other states recognize the Utah license. So, for 16 example -- and a lot of this has changed since the 17 Bruen Decision and -- well, not the Bruen Decision, 18 but since a lot of states have become constitutional 19 carry, it's starting to matter a little less. But 20 Utah, for example -- I'm trying to think of a state. 21 I -- I -- I have a map I usually refer to. So if I'm 22 wrong, I apologize. 23 But for instance, I think like a state 24 like Virginia would recognize Utah, a state like -- a 25 state like Arkansas and so on, they would recognize</p> <p style="text-align: right;">Page 44</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 Utah license. But I don't know how applicable that 3 is because of constitutional carry in those states 4 now. 5 Q. And before I get off of it, why - 6 - why did you choose Pennsylvania? 7 A. Pennsylvania? It's -- it's still 8 in proximity. If I always have it in my mind, if I 9 am going to do a road trip or something, if I'm going 10 to head out, if I head out west, I'm going to 11 probably pass through to Pennsylvania in those other 12 states. So, it's just good to have. 13 Q. And you used the phrase 14 constitutional carry; what does that mean? 15 A. Constitutional carry means that a 16 state doesn't require licensure to carry a firearm. 17 Q. And so do any of the states that 18 you've referenced have constitutional carry? 19 A. I believe so. The states that I 20 referenced -- you mean the states that I have a 21 license for? 22 Q. Yes. Utah, Pennsylvania, Rhode 23 Island, Connecticut, Massachusetts, Texas, and Maine 24 A. I -- I definitely have to verify 25 it, but I'm almost sure that Utah, Texas, Florida and</p> <p style="text-align: right;">Page 45</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 check if I have a felonious record or, you know, have 3 done jail time, or anything like that. 4 Q. So, is it correct to say that 5 different states have different requirements? 6 A. Yes. 7 Q. Some more and some less? 8 A. I would say so, yes. 9 Q. And is it correct to say that 10 some states don't require a license at all to carry a 11 gun? 12 A. That's true. 13 Q. All right. So I have a -- 14 careful questions that I want to run by you -- 15 A. Yes. 16 Q. -- at this point. Well, I 17 apologize if some of them are a little personal. 18 Please don't -- please don't take it personally. 19 It's just going down the list. So Mr. Harris, how 20 old are you? 21 A. I'm thirty-two. 22 Q. And are you a United States 23 citizen? 24 A. Yes. 25 Q. Have you ever renounced your</p> <p style="text-align: right;">Page 47</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 Maine are constitutional carry. Maine has a weird 3 asterisk though with some of their forests. You -- 4 you need a license to carry if you want to carry 5 other forest lands, which is why I have that license, 6 just in case. 7 Q. And I -- I realized I neglected 8 to ask you about Florida. Why did you apply for a 9 license in Florida? 10 A. So -- well, I -- at the time, 11 Florida was not constitutional carry and the -- the 12 application process was very similar to Utah, and I 13 could use the Utah course to also apply for Florida. 14 So, I figured since I did all the work, I might as 15 well get two licenses out of it. 16 Q. And so what were the application 17 requirements in -- in Florida? 18 A. In Florida? So I didn't take a 19 Florida safety course because they -- they accepted 20 Utah. So I took the Utah safety course, they were 21 fingerprinting, an application and they did a 22 background check. 23 Q. And do you know what the 24 background check consisted of? 25 A. I don't. I -- I assume they</p> <p style="text-align: right;">Page 46</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 citizenship? 3 A. No. 4 Q. And have you always been a United 5 States citizen? 6 A. Yes. 7 Q. Have you ever been convicted 8 anywhere of a felony or a serious offense? 9 A. No. 10 Q. Have you ever been convicted of 11 anything? 12 A. No. 13 Q. Have you ever had a warrant out 14 for your arrest? 15 A. Nope. 16 Q. Have you ever had any contacts 17 with law enforcement? 18 A. Besides being pulled over, no, 19 no. 20 Q. And when you say pulled over, is 21 that just for speeding? 22 A. Yeah, speeding. Yeah, speeding, 23 car accident, things like that. 24 Q. And other than that, have you 25 ever been investigated by law enforcement?</p> <p style="text-align: right;">Page 48</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris</p> <p>2 A. Besides getting my licenses to</p> <p>3 carry, no.</p> <p>4 Q. Are you -- are you a fugitive</p> <p>5 from justice?</p> <p>6 A. No.</p> <p>7 Q. Do you use any illegal drugs?</p> <p>8 A. No.</p> <p>9 Q. Not even pot?</p> <p>10 A. No.</p> <p>11 Q. Have you ever suffered from a</p> <p>12 mental illness?</p> <p>13 A. No.</p> <p>14 Q. Have you ever been committed or</p> <p>15 spent time in a mental health institution?</p> <p>16 A. No.</p> <p>17 Q. Have you ever had any</p> <p>18 professional license that was revoked?</p> <p>19 A. No.</p> <p>20 Q. Ever had a driver's license</p> <p>21 revoked?</p> <p>22 A. Nope.</p> <p>23 Q. Did you ever serve in the</p> <p>24 military?</p> <p>25 A. I have not.</p> <p>Page 49</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris</p> <p>2 require character references?</p> <p>3 A. Yes, actually that was something</p> <p>4 that slipped my mind. I apologize.</p> <p>5 Q. Sure. Which ones?</p> <p>6 A. Rhode Island, Pennsylvania,</p> <p>7 Massachusetts did when I initially got it, not for</p> <p>8 renewals; Connecticut, and I believe that's all.</p> <p>9 Q. And so whom would your character</p> <p>10 references be?</p> <p>11 A. I have friends who've known me</p> <p>12 most of my life. I would -- I would reach out to</p> <p>13 them and see if they would be willing to be a</p> <p>14 character reference for me.</p> <p>15 Q. And who were your character</p> <p>16 references for these other states?</p> <p>17 A. Close friends of mine.</p> <p>18 Q. Can you be more specific?</p> <p>19 A. I mean, do you -- what -- what</p> <p>20 information would you like?</p> <p>21 Q. It's just who they are.</p> <p>22 A. I mean, there was my friend</p> <p>23 Frankie, Danielle -- just trying to think back. My</p> <p>24 friend Mike, who's in -- who's in New Hampshire.</p> <p>25 That's all I can recall at the moment of what I put</p> <p>Page 51</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris</p> <p>2 Q. Have you ever had a guardian</p> <p>3 appointed for you to manage your affairs?</p> <p>4 A. No.</p> <p>5 Q. Have you ever been convicted of</p> <p>6 assault?</p> <p>7 A. No.</p> <p>8 Q. Ever had a D.U.I.?</p> <p>9 A. No.</p> <p>10 Q. So New York State requires</p> <p>11 certain information to be submitted in connection</p> <p>12 with a firearms permit application. Would you be</p> <p>13 able and willing to submit the name of your spouse</p> <p>14 and any adults residing in your home?</p> <p>15 A. I would be.</p> <p>16 Q. And are you married?</p> <p>17 A. I am.</p> <p>18 Q. And do you have any other adults</p> <p>19 other than your spouse residing in your home?</p> <p>20 A. Nope.</p> <p>21 Q. New York State requires four</p> <p>22 character references. Would you be able and willing</p> <p>23 to submit those?</p> <p>24 A. I would be.</p> <p>25 Q. Did any of the other states</p> <p>Page 50</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris</p> <p>2 on the applications when they asked.</p> <p>3 Q. There -- New York requires a</p> <p>4 firearms training course. Is there any reason to</p> <p>5 think that you wouldn't be able to take that firearms</p> <p>6 training course?</p> <p>7 A. No.</p> <p>8 Q. Would you be willing to provide a</p> <p>9 photograph?</p> <p>10 A. Of myself? Of course.</p> <p>11 Q. To provide fingerprints?</p> <p>12 A. Of course.</p> <p>13 Q. Is there any reason to think that</p> <p>14 a background check would flag anything that might</p> <p>15 lead to denial of a license?</p> <p>16 A. Absolutely not.</p> <p>17 Q. Is there any reason to think that</p> <p>18 you would use a weapon in a way that it would</p> <p>19 endanger yourself or others?</p> <p>20 A. Absolutely not.</p> <p>21 Q. And have you ever been present</p> <p>22 for an incident where someone was shot or hurt with a</p> <p>23 weapon?</p> <p>24 A. No.</p> <p>25 Q. Great, thank you. So I have a</p> <p>Page 52</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 couple questions now about -- about this lawsuit. 3 So, you explained how -- why are you suing New York? 4 A. I -- I want to apply for a 5 nonresidential carry permit, so I can exercise my 6 rights in New York as I do in Massachusetts and other 7 states. 8 Q. And what's your understanding of 9 New York State law regarding a nonresidential carry 10 permit? 11 A. My understanding of the law is 12 they only -- well, they don't issue nonresident 13 licenses unless your principle -- the word they -- 14 that's used is principally employed in New York, or 15 if you owned property in New York. 16 Q. And what's the basis for that 17 understanding? 18 A. My -- when I was -- the last year 19 or so when I was going through these applications, I 20 -- I said, hey, I should probably look to see if I 21 can get one in New York. And I was surprised I 22 couldn't. 23 Q. And how did you find out that you 24 couldn't? 25 A. I called the New York State</p> <p style="text-align: right;">Page 53</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 A. At the state police, I believe it 3 was Sergeant Brennan. I think that he was -- he 4 identified himself. 5 Q. Can you describe what happened on 6 the call? 7 A. I called and I asked if I could - 8 - if that -- I just said, I'm a Massachusetts 9 resident, and I'm interested in applying for a 10 nonresident license for New York. I think he asked, 11 do I own property or is my employer here? And I 12 said, no. And he said, oh well, we can't. There's 13 no pathway for you to apply. And then I asked if my 14 Massachusetts license to carry had any reciprocity or 15 any standing. He said, no. So, there's nothing I 16 could do. 17 Q. And do you know if the New York 18 State Police has any role in deciding firearms 19 applications? 20 A. For New York applications -- 21 Q. For licensing. 22 A. -- for New York, I'd imagine they 23 would. I'm not entirely sure, but I would think so. 24 Q. And apologies for asking an -- an 25 obvious question. Are you a retired member of the</p> <p style="text-align: right;">Page 55</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 Police and just to see if what I -- just to see if I 3 could or not with my -- or if they would accept my 4 Massachusetts license. And I called the -- the 5 county sheriffs and stuff, and I got the same answer. 6 Q. And is there anyone else in New 7 York that you spoke to about out-of-state permits? 8 A. Not -- not that I think of, no. 9 Q. So let's -- let's talk about each 10 of those. So, do you recall when you spoke to the 11 New York State Police? 12 A. It must have been -- it was 13 either January or -- no, December, I believe, of last 14 year. 15 Q. And so, why then? 16 A. I was looking -- like I said, I 17 was looking to apply for nonresident licenses, and I 18 wanted to see if I could apply for New York. 19 Q. And did you call the New York 20 State Police before or after you spoke with those two 21 counties? 22 A. I don't remember the order. I 23 don't know. 24 Q. And so who did you speak to at 25 the state police?</p> <p style="text-align: right;">Page 54</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 New York State Police? 3 A. I am not. 4 Q. So, let me ask about your calls 5 to Columbia County. Do you re -- do you recall when 6 that was? 7 A. It -- I believe that was also in 8 December of last year. 9 Q. And why did you call Columbia 10 County? 11 A. I -- I wanted to see if I could 12 get the same answer. And I did, so yeah. And I 13 think Columbia County is the county I'd have to go 14 through to visit family, so it made sense to ask that 15 as well. 16 Q. And you said your family was in 17 Saratoga County, and was there another county as 18 well? 19 A. Warren, I believe. 20 Q. Did you call either Saratoga or 21 Warren County? 22 A. No. 23 Q. Why not? 24 A. Well, it made sense to -- it made 25 sense to call the counties that I would enter first,</p> <p style="text-align: right;">Page 56</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 I guess, when entering the state. 3 Q. Not the counties that you would 4 ultimately be going to? 5 A. No because I'd still have to pass 6 through those -- all those other counties first. 7 Q. And who did you speak to at 8 Columbia County? 9 A. I -- I don't -- I think it was -- 10 it wasn't like a -- I don't think it was a police 11 officer or anyone, but it was someone who picked up 12 the phone. I think it was Stephanie maybe, is that 13 the name? And I asked the same questions, and I got 14 the same answers. 15 Q. And can you describe what 16 happened on the call? 17 A. I asked -- I asked if it was 18 possible for me to get a nonresident license because 19 I'm a nonresident in New York. And -- and I think 20 she said I needed a -- well, she may have said I 21 needed a driver's license in New York and own 22 property, which I didn't. So, I was unable to apply. 23 Q. And how about Rensselaer County? 24 When did you call Rensselaer County? 25 A. It was also in December, all</p> <p style="text-align: right;">Page 57</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 Q. And did you speak with any other 3 counties other than those two? 4 A. No, it was just those two. 5 Q. Do you know if any of the other 6 sixty counties in New York would accept your 7 application? 8 A. From the two I called, I'd 9 imagine no. 10 Q. So, I guess my question is, you 11 know, we spoke about Rhode Island and how you had to 12 contact a number of jurisdictions in order to find 13 one that would be willing to take a request from a 14 nonresident. Why didn't you keep looking in New York 15 as well? 16 A. Well, I got a no and -- and it 17 wasn't just like a, no, our -- our office doesn't do 18 nonresident applications, it was New York State 19 doesn't do it. And I found -- I just found that 20 there wasn't much of a point to continue. 21 Q. And so you don't know whether 22 there is any other county other than Rensselaer and 23 Columbia that would or would not take your 24 application, is that correct? 25 A. I don't know for sure, but from</p> <p style="text-align: right;">Page 59</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 around the same time. 3 Q. And you don't remember which 4 order you called them in? 5 A. I -- I -- I don't remember which 6 order, yeah. 7 Q. And why -- why call Rensselaer 8 County? 9 A. That is an -- that is another 10 county that I would possibly pass through first, I 11 believe, entering New York. 12 Q. And who did you speak to at 13 Rensselaer County? 14 A. I don't know if -- I don't know 15 if I got a name, but I did speak to someone, I 16 believe. 17 Q. And what happened on the call? 18 A. I asked the same questions. I'm 19 a Mass resident, I have an L.T.C., can I apply for a 20 nonresident permit? And I was told I can't because 21 I'm -- I don't own property in New York, nor am I 22 principally employed in New York. 23 Q. And did you ever actually submit 24 an application to New York? 25 A. No, I did not.</p> <p style="text-align: right;">Page 58</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 the answers I got, no other county would because of 3 the law. 4 Q. And is it correct to say that 5 your understanding of New York law is based on those 6 conversations that were discussed with the state 7 police with Columbia and Rensselaer County? 8 A. I -- I would say, I mean, as far 9 as firearms go that in any side research I've done 10 online, which isn't always reliable, but yeah. 11 Q. Can you talk to me about that 12 side, research? 13 A. Just -- I don't know. Googling 14 like when the Bruen Decision that happened with the 15 Supreme Court. I was interested in -- in the firearm 16 laws there and things like that. Like as far as like 17 where you can and can't carry in New York and things 18 like that. 19 Q. All right. 20 A. Little simple Google searches, 21 yeah. 22 Q. Have you ever read the New York 23 licensing statute? 24 A. I -- I believe I did last year 25 when I got involved with this case, but not like</p> <p style="text-align: right;">Page 60</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 before then, yeah. 3 Q. And when did you get involved 4 with this case? 5 A. It was -- it must have been back 6 in December, yeah. That is of last year. 7 Q. Do you remember, was it before or 8 after you made these phone calls? 9 A. Yeah, it was before. 10 Q. So, can you tell me the process 11 by which you became involved in this case? 12 A. There was a -- I -- I was -- like 13 I said, I was interested in getting other state's 14 license to carry around me. And it was a video on -- 15 on YouTube that -- it's a channel that talks about 16 gun laws and things like that. And that I would 17 watch, and they said that -- that case was coming up 18 with New York because -- for reciprocity. And they 19 were interested in looking for plaintiffs that 20 actually want to get a license to carry in New York. 21 And I decided to get involved because I do want a 22 license to carry in New York. And it seems there's 23 no way for me to do so -- to apply anyway. 24 Q. And which channel was this? 25 A. I think it's called Guns and</p> <p style="text-align: right;">Page 61</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 A. I think he got me in 3 communication with -- with Stephen. 4 Q. We -- we would ask for the -- the 5 conversation with the YouTube channel person to be 6 produced, Mr. Stamboulieh. Have you -- did you have 7 any conversations with anyone else on YouTube or 8 social media prior to becoming a Plaintiff in this 9 case? 10 A. Prior to? No. 11 Q. Do you know any of the other 12 Plaintiffs from this lawsuit? 13 A. Not personally. 14 Q. How so? 15 A. Just from the -- just from the 16 names I see on the complaint and stuff. 17 Q. And have you ever spoken with Mr. 18 Higbie or Mr. Vortuba? 19 A. Not in person, no. 20 Q. By phone? 21 A. I think over an email thread in 22 regards to this case. 23 Q. Okay. And so are you a member of 24 the Gun Owners of America? 25 A. Of G.O.A.? I -- I've donated to</p> <p style="text-align: right;">Page 63</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 Gadgets. On YouTube, it's called Guns -- Guns and 3 Gadgets. I don't know if you heard me, sorry. 4 Q. Guns and Gadgets. 5 A. Yeah. 6 Q. And do you know who runs that 7 channel? 8 A. I don't know his name, I forget. 9 Q. Did you have any communications 10 with the person who runs that channel? 11 A. Yeah, I did email him because he 12 said, if you're interested, contact, and I did. 13 Q. And did you produce -- do you 14 know if those emails have been produced in this case? 15 A. I don't know. I don't -- 16 Q. And what's the name of the person 17 who you emailed? 18 A. I'd have to check. It -- it's 19 the -- I'm almost positive it's the person who runs 20 the channel. I emailed to. 21 Q. And did this person respond to 22 you? 23 A. Yes. 24 Q. And what did -- what did he or 25 she say?</p> <p style="text-align: right;">Page 62</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 them. I don't have like a carry -- like a card or 3 anything that says I'm a member, but -- 4 Q. Are you a member of the Second 5 Amendment Foundation? 6 A. I've donated to them, but I don't 7 think I'm a member like in -- in that capacity. 8 Q. Do you know, do they have 9 members? 10 A. I don't know. 11 Q. And did you contact either of 12 those organizations independently of -- of Mr. 13 Stamboulieh? 14 A. No. 15 Q. So when you contacted the state 16 police, Columbia County and Rensselaer County, did 17 anyone tell you to do that? 18 A. I -- 19 MR. STAMBOULIEH: Hold on real quick. 20 I'm going to hold on. I'm going to object in case 21 you're asking about any attorney-client privileged 22 information. Other than that, you can still answer 23 the question. 24 BY MR. THOMPSON: (Cont'g.) 25 Q. Go ahead.</p> <p style="text-align: right;">Page 64</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 A. I -- so I -- I was -- I was 3 suggested to by Mr. Stamboulieh, yes. 4 Q. Did you pick the counties to 5 reach out to? 6 A. I did not, no. 7 Q. Did you choose not to reach out 8 to any other counties? 9 A. I -- I chose not to, yeah. 10 MR. THOMPSON: So, Ms. Foster, give me 11 one moment. I'm about to put up another document. 12 THE COURT REPORTER: Okay. 13 MR. THOMPSON: Oh, maybe if -- maybe I 14 am, if I can get the technology to work. 15 THE COURT REPORTER: Yes. 16 MR. THOMPSON: Everyone, do you -- 17 Mr. Harris, can you see the document? 18 THE WITNESS: Yes, I can. 19 MR. THOMPSON: And can everyone else 20 see the document? 21 THE COURT REPORTER: Yes. 22 BY MR. THOMPSON: (Cont'g.) 23 Q. And Mr. Harris, what is this 24 document? 25 A. This is a text message I had. I</p> <p style="text-align: right;">Page 65</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 initially emailed. 3 Q. What about after that? 4 A. No, I didn't. He -- I like I 5 said, he just got me in contact with Mr. Stamboulieh. 6 Q. And so who is Eric? 7 A. Eric is someone I've met recently 8 at the gun -- my local gun range that I'm -- that I'm 9 a member. 10 Q. And does he have any involvement 11 in this case? 12 A. No, not that I'm aware of. 13 Q. Does he have any involvement in 14 any gun litigation? 15 A. Not that I'm aware of, no. 16 Q. So, further down on the second 17 page, marked Harris underscore twenty eight, you say, 18 thanks G.O.A. is helpful -- helping with the funds. 19 What does that mean? 20 A. That just meant from my 21 understanding of how this case is getting funded. 22 G.O.A. was -- was helping with the funds. 23 Q. And do you know where G.O.A. gets 24 its money from? 25 A. I don't.</p> <p style="text-align: right;">Page 67</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 sent the video. I guess it says G.O.A. Zooms New 3 York for lack of reciprocity. 4 Q. And this document is two pages. 5 It's marked Harris underscore O two seven and two 6 eight. Is that correct? 7 A. Yes. 8 MR. THOMPSON: And Ms. Foster, I'd ask 9 for this to be marked as Exhibit Number Two. 10 THE COURT REPORTER: Okay, thank you. 11 BY MR. THOMPSON: (Cont'g.) 12 Q. And so Mr. Harris, what is the 13 video that's referenced? 14 A. That's the video, the Guns and 15 Gadgets YouTube video that was looking -- that was 16 explaining the case. 17 Q. And did you have any 18 communications with the Guns and Gadgets YouTube 19 channel about the production of that video? 20 A. About the production of that? 21 No. About the production, no. 22 Q. Did you have any conversations or 23 -- or communications with the Guns and Gadgets 24 YouTube channel about this case? 25 A. About this case, yes. When I</p> <p style="text-align: right;">Page 66</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 Q. Do you know who's funding this 3 lawsuit? 4 A. No. 5 Q. Have you received any money in 6 connection with this lawsuit? 7 A. No. 8 Q. You say, in theory it should be a 9 slam dunk because I don't think there's any 10 historical precedent to disallow non-New Yorkers from 11 carrying, is that right? 12 A. That's what I said, yes. 13 Q. And what do you mean by that? 14 A. I ju -- I just think that 15 especially since the -- since there isn't like a 16 historical precedent of just like disallowing someone 17 to exercise their Second Amendment over state lines. 18 I just don't -- I couldn't think of an argument to 19 disallow someone like me for applying and being able 20 to carry New York. 21 Q. And when you say since there 22 isn't a historical precedent, what's -- what's the 23 basis of your understanding? 24 A. My basics -- my basis for that 25 understanding is probably out of what occurred with</p> <p style="text-align: right;">Page 68</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 the Bruen Decision. That was my language that was 3 used for that however many years ago it was. 4 Q. And other than the Bruen 5 decision, have you looked at any historical documents 6 in connection with that? 7 A. No. 8 Q. Have you done any historical 9 study as to licensing or nonresident carry? 10 A. No. 11 Q. And are you a -- are you a 12 historical expert in this case? 13 A. No. 14 Q. So further down you say, that 15 would be awesome, could trigger the removal of 16 licensing altogether. Can you tell me what you mean 17 by that? 18 A. I would imagine that if like so 19 many years passed, the -- the Second Amendment would 20 be looked at as any -- like all the other rights that 21 you wouldn't need licensure to cross state lines, 22 like how it is in most of the country now. 23 Q. And is that what you're hoping to 24 accomplish through this case to have licensing 25 declared unconstitutional?</p> <p>Page 69 800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 Q. And what do you think a 3 constitutional measure would be? 4 A. I think people with a history of 5 felonious activity, things like that. There's some 6 well-established law with that where you can't be a 7 violent felon and then purchase a firearm. 8 Q. Would -- and how would you make 9 sure that people like that don't get access to guns? 10 A. By doing a background check, 11 which you -- everyone has to do when purchasing a 12 firearm. 13 Q. So do you think background checks 14 are constitutional? 15 A. Yeah, I think I do. If -- yeah, 16 I would say so. 17 Q. What is the difference between a 18 background check and a background check that's 19 involved in getting a license? 20 A. So I'm not -- when I speak of a 21 background check to purchase a firearm, that's the 22 NICS system, which is the national database that 23 checks your name and address and make sure that, you 24 know, you're not fugitive with justice and -- and 25 things like that, you're not a felon or -- or</p> <p>Page 71 800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 A. No, definitely not. I'm just 3 looking to get a -- a carry permit for New York. 4 Q. And do you support any method of 5 the government or the state knowing who is buying or 6 possessing guns? 7 A. Could you say that one more time? 8 I'm sorry. 9 Q. Sure. Do you support any method 10 of the government knowing who is buying or possessing 11 guns? 12 A. Do I support it? This is just 13 kind of a -- I -- I see arguments both sides. 14 Personally, I don't because like if we're talking 15 constitutionally, it is unconstitutional that like a 16 list of who owns firearms and things like that. I'm 17 pretty sure some states do that. You know, it's just 18 the reality of it. 19 Q. Is it constitutional to do 20 anything to make sure that someone who buys a gun is 21 someone who will have it safely? 22 A. Not -- I mean, they could -- it 23 could be. I -- I don't, I'm not a constitutional 24 scholar in any sense, but I would think there may be 25 a way. Yes.</p> <p>Page 70 800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 anything. And that -- that's needed to purchase a 3 firearm like that day for the licensure. The problem 4 with the licensure is -- yes, it has those background 5 checks and everything like that, but it seems to me 6 it's easy for the state to just kind of take that 7 away over maybe infra -- like infractions that 8 wouldn't level up to a felony if they so choose. 9 Q. I guess that's what I'm trying to 10 get at. Because you have licenses in a number of 11 states. 12 A. Yeah. 13 Q. Have any of them tried to take 14 your license away? 15 A. I -- I've been law abiding, so 16 no. Of course not. 17 Q. And so I guess the question is, 18 what's the problem? 19 A. What's the problem with 20 licensure? 21 Q. Yes. 22 A. So for me it's just not a 23 requirement in the Second Amendment. I would still 24 be law abiding whether or not I had a license or not 25 I guess. That's kind of my own philosophical -- I'm</p> <p>Page 72 800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 just like my own, that's just what I -- what I know 3 would -- to be true. 4 Q. But other people wouldn't be 5 right? 6 A. Some obviously would not, of 7 course. 8 Q. And so doesn't it make sense to 9 have a licensing requirement to keep them from 10 getting guns? 11 A. I think it -- it makes sense at 12 the time of purchase. If someone is looking to 13 commit a crime that has a firearm, there's methods to 14 disarm them and things like that, while there's an 15 investigation undergoing. My -- my objection is 16 just, it's not a requirement laid out in the Second 17 Amendment anywhere. 18 Q. So further -- 19 A. That's just my -- that's just my 20 opinion, you know, so -- sorry to interrupt you, I 21 didn't mean to. 22 Q. Oh no, no, no, no. I'm sorry to 23 talk over you. Further down the chest -- the text 24 chain you say, or at least forced reciprocity like a 25 driver's license. Can you tell me what you mean by</p> <p style="text-align: right;">Page 73</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 different states have different requirements to get a 3 firearms license. Is that right? 4 A. That's correct. 5 Q. And so for instance, Utah has 6 much lesser requirements than New York does. Is that 7 right? 8 A. My understanding is yes, that's 9 true. 10 Q. So if there was this forced 11 reciprocity, why wouldn't everyone just go to Utah or 12 other states in order to get the easiest possible 13 license? 14 A. That would be -- that would be an 15 outcome. Maybe there'd be more of a national 16 standard that would be developed, I don't know. But 17 if that happens today, that's most likely what most 18 people would do. Yes. 19 Q. Is that something you want New 20 Yorkers to be able to do? 21 A. Sorry, could you rephrase? 22 Q. Would you want New Yorkers to be 23 able to apply for a Utah license instead of a New 24 York license? 25 A. What I want them to? Oh, you</p> <p style="text-align: right;">Page 75</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 that? 3 A. Well, so my Massachusetts 4 driver's license would be recognized if I drive a 5 vehicle into New York. And that, you know, you don't 6 have a right to drive, it's a privilege and yet that 7 license works in all fifty states. And I have a 8 license to carry for Massachusetts, but that's not 9 recognized at all fifty states if that's supposedly a 10 right. 11 Q. How is reciprocity for driver's 12 license forced? 13 A. How is it enforced? 14 Q. When you use the word forced in 15 this text message, what do you mean by that? 16 A. I -- I guess I mean that the law 17 is just built like -- I don't -- and again, I don't 18 know if there could ever be a situation where like, 19 you know, Arkansas says we're not going to recognize 20 Massachusetts driver's licenses. Like I don't know 21 if they could do that. But it seems to me that the - 22 - because each state recognizes a driver's license 23 from your home state, there seems to be some type of 24 forced compliance with that. 25 Q. So you previously said that</p> <p style="text-align: right;">Page 74</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 mean in place -- in replacement of? Is that what 3 you're asking? 4 Q. Let -- sure, let me rephrase the 5 question. Is part of what you're trying to achieve 6 with this case, a rule where people who live in New 7 York could apply to Utah and then use that license to 8 carry in New York? 9 A. That's not what I'm trying to 10 achieve with this case, no. I just want to be able 11 to carry in New York. I -- I recognize states to 12 have other state -- different states have different 13 requirements, and I want to be able to -- I want to 14 be able to satisfy them. And I -- I'm not looking to 15 -- I'm not looking to change the country like -- or 16 anything like that. I'm just looking for my own 17 life. It's kind of you pick your battles, right? 18 It's -- this is what's required for me to do this 19 then I'll do it. 20 MR. THOMPSON: All right. I'm going 21 to take this down. And before I do Ms. Foster, this 22 is Exhibit Two, correct? 23 THE COURT REPORTER: Yes, it is. 24 MR. THOMPSON: Great. Let me take 25 that down.</p> <p style="text-align: right;">Page 76</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 BY MR. THOMPSON: (Cont'g.) 3 Q. And Mr. Harris, I'm going to put 4 up another document. Again, if I can manage the 5 technology. Do you recognize this document? 6 A. Yes. 7 Q. And what is it? 8 A. It's a text message between my 9 friend Frankie and myself. 10 Q. And are these text messages that 11 you sent and received? 12 A. I sent and received, yes. 13 Q. And these are marked Harris 14 underscore zero two nine through zero three one, is 15 that correct? 16 A. That is correct. 17 MR. THOMPSON: And Ms. Foster, could I 18 ask this to be marked as Exhibit Three? 19 THE COURT REPORTER: Yes, it is. 20 BY MR. THOMPSON: (Cont'g.) 21 Q. Mr. Harris, who is Frankie? 22 A. Frankie is a friend of mine. 23 Q. What's -- how do you know him? 24 A. I've known him since high school. 25 Went to school together.</p> <p style="text-align: right;">Page 77</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 A. I want to be able to carry, to 3 exercise my Second Amendment throughout the country. 4 Q. And how come? 5 A. I -- I want the ability to do so 6 because I believe I have it under the Second 7 Amendment. 8 Q. And why are the quotation marks 9 around legally? 10 A. I said that obviously I'm being 11 tongue in cheek because to -- like -- like you said 12 earlier, to legally carry in certain states, there's 13 other requirements and this and that that I have to 14 satisfy, like everything's different. 15 Q. What's your understanding of New 16 York City law regarding who can apply for a firearms 17 license? 18 A. I believe it's only -- it's only 19 New York City residences, right? 20 Q. What's -- what's the basis for 21 that belief? 22 A. I don't remember how I came to 23 know that initially, but maybe it might have been my 24 family up in New York that has a license with New 25 York. They said they can't carry in New York City</p> <p style="text-align: right;">Page 79</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 Q. I see, from Lynn too? 3 A. Originally, yeah. 4 Q. And so let me scroll down here. 5 I will actually -- first, let me see. This link at 6 the top was the -- the play button, is that the same 7 video from Guns and Gadgets? 8 A. Yes. 9 Q. And I have to ask, does Governor 10 Hochul have red eyes in that video? 11 A. I think he put that yes, as the - 12 - as the thumbnail. 13 Q. I'm guessing he's not a fan of 14 Governor Hochul. 15 A. I don't think he is, no. 16 Q. So I'm going to scroll down to 17 the third page, Harris underscore zero three one. Do 18 you -- do you see that? 19 A. He -- it's three one, yes. 20 Q. You say -- you say, I'm just on a 21 mission to be able to legally carry in all fifty 22 states plus D.C. and New York City. Is that right? 23 A. I did say that, yes. 24 Q. And what do you mean by I'm on a 25 mission?</p> <p style="text-align: right;">Page 78</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 being carried to other state. 3 Q. Did you ever contact the N.Y.P.D. 4 about whether you could apply for a license in New 5 York City? 6 A. I -- no, I don't think so. 7 Q. And did you ever apply for a -- a 8 license in New York City? 9 A. No. 10 Q. And if you applied for a New York 11 City license and you got one, wouldn't that 12 essentially give you everything you want from this 13 case? 14 A. I believe it would now because 15 there has been a change, I think, with New York City. 16 There's -- I could be wrong, but I think -- and I'm 17 not sure if this is set up yet, but they -- they have 18 a -- they're -- they're accepting nonresident license 19 -- license requests now, I think. 20 Q. And what's the basis for that 21 belief? 22 A. I -- I -- maybe it was a couple 23 months ago, I saw -- I saw an article or someone 24 talked about it on YouTube, one of the gun channels I 25 look at for, you know, changes in the gun laws and</p> <p style="text-align: right;">Page 80</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 things like that. 3 Q. And did you do anything after you 4 heard that to inquire into that? 5 A. To inquire into New York? No, I 6 didn't call them or contact them. New York City, no. 7 Q. Do you still want to carry in New 8 York City? 9 A. Because practically there's no 10 reason for me to, I don't go to New York City. When 11 I visit, I'm going more upstate so, yeah. 12 Q. So, sitting here today, do you 13 think that you would be ineligible for a New York 14 City firearms license? 15 A. Ineligible? I don't believe so. 16 No. 17 Q. You're -- you're right. Let me 18 ask the question another way. Sitting here today, do 19 you think that you would be eligible for a New York 20 City firearms license? 21 A. I think I would be, yes. 22 Q. And would that New York City 23 firearms license give you the ability to carry in New 24 York State? 25 A. That's -- that's my understanding</p> <p style="text-align: right;">Page 81</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 City and throughout New York. But if I go through 3 New York, and this is kind of what I'm thinking now 4 that this law has changed, I'd have to go into New 5 York City to do whatever paperwork they require. 6 I'm not sure what the backlog is, I'd 7 imagine it's a lot higher than a county in New York 8 State than going directly to New York City where 9 there's a high population. It just -- it seems 10 easier for me to get the state permit that's closer 11 and one that I would actually use for the state -- 12 rather than just New York City and now the rest of 13 the state. 14 Q. Lastly, would it surprise you to 15 hear that the New York State licensing statute says 16 that licenses can be issued to quote a non-citizen or 17 to a person not a citizen of and usually a resident 18 in the state. 19 A. That would surprise me greatly, 20 yes. 21 Q. Does that describe you? 22 A. Does that -- just could you say 23 the description one more time, please? 24 Q. Sure, of course. It's quote a 25 non-citizen or to a person not a citizen of and</p> <p style="text-align: right;">Page 83</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 now, yes because things recently changed. 3 Q. And so if you applied and got 4 that license, wouldn't that essentially give you 5 everything you want here? 6 A. In this case technically it 7 would, yes. 8 Q. So, why haven't you applied? 9 A. Well, for one, I don't know -- I 10 don't know the process with New York City exactly. I 11 haven't inquired and it -- it just seems to me 12 similar to what I did with Rhode Island. I ended up 13 -- I ended up getting my license through a closer 14 police department. It seems to me I should get a 15 license with a closer county, the one that I would 16 frequently pass through than New York City, which I 17 don't visit. 18 Q. But you said in this text message 19 that you wanted to get a New York City license. Has 20 that changed? 21 A. Did I say -- well, I -- I -- it 22 would be, has it changed? Is -- I'm not sure. 23 Because of that change, this would -- this would give 24 me -- excuse me. Because of the change in the New 25 York law, it would enable me to carry in New York</p> <p style="text-align: right;">Page 82</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 usually a resident in the state. 3 A. That would describe me, yes. 4 Q. Understood. 5 MR. THOMPSON: Let's -- Ms. Foster, if 6 you don't mind, can we take a quick five-minute 7 break? 8 THE COURT REPORTER: Sure. I'll take 9 us off the record. 10 (Off the record) 11 (On the record) 12 MR. THOMPSON: Go back on if -- if 13 everyone else is. 14 THE COURT REPORTER: Okay, we're all 15 set. You are on the record. 16 BY MR. THOMPSON: (Cont'g.) 17 Q. So thank you very much, Mr. 18 Harris. Just a couple more very quick questions. 19 Did you speak to anybody while we were on the break? 20 A. No, I did not. 21 Q. Two more very quick questions. 22 Have you ever had a firearms license suspended or 23 revoked? 24 A. I have not. 25 Q. And have you ever applied for a</p> <p style="text-align: right;">Page 84</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 firearms license and had it denied? 3 A. No. 4 Q. That's all the questions from the 5 state defendants. 6 MR. THOMPSON: So Mr. Fitzsimmons, 7 your Witness if you have anything. 8 MR. FITZSIMMONS: I do not have any 9 questions. Thank you. 10 MR. THOMPSON: Stephen? 11 MR. STAMBOULIEH: Yeah, I don't -- I 12 don't have any questions. Joe, you have the 13 opportunity to read and sign your deposition to make 14 sure that the testimony you've given is accurate that 15 the Court Reporter has taken it down accurately. 16 It's your right to do so. You can waive that right 17 if you don't want to read and sign it. It's just 18 completely up to you. 19 THE WITNESS: Okay. 20 MR. STAMBOULIEH: But you have to 21 decide if you want to read and sign, just say I want 22 to read and sign, or if not, that's okay too. 23 THE WITNESS: If -- if I -- if I say I 24 want to read and sign, is this off the call that 25 you'll send it to me, or -- or is it off the call?</p> <p>Page 85</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 STATE OF) 3 COUNTY OF) 4 I, JOSEPH HARRIS, have read the foregoing 5 record of my testimony taken at the time and place noted 6 in the heading hereof and do hereby acknowledge: 7 (Please check one) 8 () That it is a true and correct transcript of 9 same. 10 () With the exceptions noted in the attached 11 errata sheet, it is a true and correct transcript of same. 12 X 13 JOSEPH HARRIS 14 Sworn to before me this 15 _____ day of _____, 2024. 16 X 17 NOTARY PUBLIC 18 My Commission Expires: 19 _____ 20 21 22 23 24 25</p> <p>Page 87</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 MR. STAMBOULIEH: Yeah, they'll send - 3 - no, no, no. They'll send it to you in some amount 4 of days and then you'll have an opportunity to go 5 through it to make sure that the testimony is 6 accurate. 7 THE WITNESS: Okay. Yeah, I'll -- I - 8 - I'd like to do that. Sure. 9 MR. STAMBOULIEH: Okay, perfect. I 10 don't have any questions. Thank you. 11 MR. THOMPSON: And other than that Mr. 12 Harris, thank you for taking the time with us. 13 THE WITNESS: Thank you. 14 MR. STAMBOULIEH: Thanks guys. 15 THE COURT REPORTER: Thank you, 16 gentlemen. 17 (The deposition concluded at 2:39 18 p.m.) 19 20 21 22 23 24 25</p> <p>Page 86</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G. James – 10-16-24 – Joseph Harris 2 I, BECKY FOSTER, do hereby certify that the foregoing 3 testimony of JOSEPH HARRIS was taken by me, in the cause, 4 at the time and place, and in the presence of counsel, as 5 stated in the caption hereto, at Page 1 hereof; that 6 before giving testimony said witness was duly sworn to 7 testify the truth, the whole truth and nothing but the 8 truth; that the foregoing typewritten transcription, 9 consisting of pages number 1 to 86, inclusive, is a true 10 record prepared by me and completed by Associated 11 Reporters Int'l., Inc. from materials provided by me. 12 13 BECKY FOSTER, Reporter 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>Page 88</p> <p>800-523-7887 ARII@courtsteno.com</p>

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3 Date:
4 Case Name: Carl Higbie v Steven G. James
5 Index Number: 24-cv-0174 MAD/TWD
6 Deponent: Joseph Harris
7 Deposition Date: 10-16-24
Examining Attorney: James Thompson, A.A.G.
Dear Mr. Harris:

Please read and make any changes and/or corrections in your testimony and sign the transcript in the presence of

9 a notary public. Please do so within thirty (30) days.
10 If you fail to sign the transcript within thirty (30)
11 days, it will be delivered to the appropriate parties
without signature. Return the transcript with
corrections, if any, to:

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