

1 patient on an outpatient when I come back to the office.

2 Q And do you have a regular assistant employed for  
3 that purpose?

4 A No.

5 Q Do you -- is there any person that acts regularly as  
6 your assistant for purposes of --

7 A It's one of three.

8 JUDGE SIPPEL: Let, let, let him finish his ques-  
9 tion.

10 MR. SMITH: Sorry.

11 BY MR. GREENEBAUM:

12 Q -- purposes of dictating notes and/or follow-up  
13 care?

14 A One of the three.

15 Q One of the three people that work with you --

16 A Yes.

17 Q -- in supporting your practice?

18 A Yes.

19 Q As I understand it, the part-time work that you  
20 alluded to a little while ago when you weren't being paid goes  
21 back --

22 MR. LEADER: No.

23 MR. GREENEBAUM: -- to when you --

24 MR. LEADER: Ob-- objection. Is this part time as a  
25 dentist or part time when?

1 MR. GREENEBAUM: At, at -- if you'd let me finish my  
2 question, you might learn something.

3 JUDGE SIPPEL: All right, let's let him finish the  
4 question and then if you have an objection, raise your objec-  
5 tion.

6 BY MR. GREENEBAUM:

7 Q The part-time work that you talked about when you  
8 were going into the station before you became full time with  
9 Sinclair started at Channel 45 when you were about 12 years  
10 old, is that correct?

11 A Yes. Around thereabouts.

12 Q And what year when you were 12 years old?

13 A Well, it would be 1951.

14 Q How about '61 or '62? Wouldn't that be when you  
15 were 12?

16 A No.

17 Q 51?

18 A No, I'm sorry. Yes, I'm sorry, you're right, '50,  
19 '61, I'm sorry, sure, yes.

20 Q Okay, now --

21 A I can't add.

22 Q Isn't it a fact that Channel 45 didn't go on the air  
23 until 1971?

24 A Right.

25 Q So you couldn't have been working in 19-- in 1961 at

1 Channel 45 could you?

2 A No. It was with an FM station.

3 Q Hmm?

4 A It was with the FM station and other commercial  
5 radio --

6 Q Well, do you recall in your deposition, if you look  
7 at page 19, line 13, I asked you the same question I asked you  
8 here a few moments ago and it was your --

9 A What was the page again, please?

10 Q It was page 19, line 13. I asked you the same  
11 question about Channel 45, which was a TV station --

12 A Um-hum.

13 Q -- is that correct?

14 A Yeah.

15 Q So you misspoke then.

16 A Yes.

17 MR. LEADER: Well, may I -- I'm going to object to  
18 that because the reference to --

19 MR. GREENEBAUM: I don't think you should educate  
20 the witness.

21 MR. LEADER: Well, I'm not educating the witness.

22 MR. GREENEBAUM: Well, what's --

23 MR. LEADER: You as-- you were the one that put the  
24 facts in front of the witness. It was --

25 MR. GREENEBAUM: Yeah, I did, but --

1 MR. LEADER: It was your statement that he worked at  
2 Channel 45 when he was 12 years old, not the witnesses'.  
3 That's what the deposition says, and you asked him --

4 JUDGE SIPPEL: I can, I can, I can read what it  
5 says, Mr. Leader, but you -- what is the nature of your  
6 objection? He's on cross-examination; he's directed the  
7 witness to the deposition.

8 MR. LEADER: That he mischaracterized the witnesses'  
9 testimony. It was not the witnesses' testimony; it was  
10 Mr. Greenebaum's statement.

11 MR. GREENEBAUM: Your Honor, I didn't see any  
12 objection at the deposition?

13 JUDGE SIPPEL: I, I, I, don't have any problem with  
14 your pointing that out, Mr. Leader, but don't stop the process  
15 in the middle. I mean, wait until they're finished with this  
16 colloquy and then you can point that out.

17 MR. LEADER: Well, I just, I just --

18 JUDGE SIPPEL: I know, you said your position; you  
19 made your position, and you're absolutely right. It is -- it  
20 was Mr. Greenebaum's question that was on page 19 at line 13,  
21 and the answer that he gave, the witness gave, was "there-  
22 abouts." Now, that's -- so we will all now be aware of that  
23 in terms of the records but let, let's, let's go on with the  
24 cross-examination.

25 MR. GREENEBAUM: Thank you.

1 BY MR. GREENEBAUM:

2 Q Now, there, there came a time when your father asked  
3 you to come to the stations to work, is that correct?

4 A No, he asked me -- that's correct.

5 Q And that was around 1990, is that correct?

6 A No, he'd asked me before that but most recently was  
7 in 1990 when he was with it.

8 Q And as I understand it, you were again working full  
9 time for Sinclair on July 1, 1991, is that correct?

10 A Yes, sir. July 1, 19-- yeah, that's about right.

11 Q So earlier today I think you said June, is that  
12 correct?

13 A June or July. I said the middle of the year.

14 Q Which was it?

15 A I, I think it was July 1.

16 Q Thank you. And how did you define full time in  
17 July 1, 1991?

18 A Same way I define it now.

19 Q How many hours do you define full time?

20 A Same as I defined it previously.

21 JUDGE SIPPEL: I'm sorry to interrupt, and I don't  
22 like to do this, but I have in my notes when I asked him this  
23 question about when he started as -- it was June or July of  
24 1990. What, what year is it that --

25 MR. GREENEBAUM: Well, the reason -- and it may be

1 confusion between me and the witness. Let me refer everyone  
2 to page 16, line 22 in his deposition, and I asked you this  
3 question on line 22 of page 16: "As I understand it, you  
4 began working full time for Sinclair July 1, 1991, is that  
5 correct?"

6 MR. SMITH: Um-hum.

7 MR. GREENEBAUM: "Actually, full-time basis, which  
8 is every -- if you define full-time basis as every 20 hours a  
9 week, it was 1990, July of 1990." That's what I was trying to  
10 get to, to separate those dates.

11 JUDGE SIPPEL: All right, I -- you, you may proceed.

12 BY MR. GREENEBAUM:

13 Q Do you see the confusion we're all having?

14 A Yes, sir.

15 Q Could you explain it for us, please, sir?

16 A I think you explained it. What you just said is --

17 MR. LEADER: All right, can I --

18 JUDGE SIPPEL: Mr. Leader?

19 MR. LEADER: I mean, this is another example. It's  
20 Mr., Mr. Greenebaum's question that put the year 1991 into  
21 evidence, not the statement of the witness.

22 MR. GREENEBAUM: I, I don't, well, think there's any  
23 issue about that.

24 MR. LEADER: On, on, on page 22 --

25 JUDGE SIPPEL: I don't, I don't think anybody's

1 arguing about that. It's just that the record --

2 MR. LEADER: Okay.

3 JUDGE SIPPEL: -- came up a little bit unclear and  
4 we're trying to get it cleared up.

5 MR. GREENEBAUM: I assume you want me to do that.

6 MR. LEADER: You can do whatever you like,  
7 Mr. Greenebaum.

8 JUDGE SIPPEL: All right, now, if you, if you've got  
9 a question about what's going on, address it to me, please.  
10 The same thing for Mr. Greenebaum.

11 BY MR. GREENEBAUM:

12 Q And what fact or circumstance took you to Sinclair  
13 full time at that time?

14 A Is that the question?

15 Q Yes, sir.

16 A I, well, I -- as I stated in the deposition.

17 Q Well, do you recall on line 5 of page 17, and I  
18 assume this is what you're referring to, I asked you the same  
19 question: "What fact or circumstance took you to Sinclair  
20 full time at that time?" Answer: "Well, basically we were in  
21 a transition period in the sense that my father's health was  
22 going down. He always wanted me to come into the business,  
23 and at that point in time he essentially suggested to me that  
24 I start getting more involved in the business. And that's  
25 what really led to more of an involvement on a day-to-day

1 basis rather than just a board-level involvement." Do you  
2 recall that?

3 A Yes, sir.

4 Q Is that what you were referring to?

5 A Yes, sir.

6 Q Now, at that point, and as you indicated, your  
7 father's health was deteriorating, is that correct?

8 A Yes.

9 Q And how old was he at that time?

10 A 70, 69, 68 1/2.

11 Q And isn't fair that at that time he started thinking  
12 about how to pass this business on to his sons?

13 A I'm sure.

14 Q And to share it among them fairly and equally?

15 A I would assume -- I, I can't -- he never stated that  
16 to me in fact, but that would make reasonable sense.

17 Q And in that connection, didn't he consolidate by  
18 bringing all of you into the business in Baltimore and then  
19 selling that business to you prior to his death?

20 MR. LEADER: I'm going to object there because he --  
21 the witness is trying to get the test-- to get the --  
22 Mr. Greenebaum is trying to get the witness to testify what  
23 was in Julian Smith's mind in June 1990 when he asked his son  
24 to join the business, and I don't think this witness is  
25 competent to respond to that question as asked.

1 JUDGE SIPPEL: Well, unless he tells -- I mean,  
2 unless he answers the question to say that he doesn't know  
3 that for some reason, he -- if anybody is in a position to  
4 observe and understand what the father is, is going through in  
5 a situation like this, it seems to me it would be his son. I,  
6 I don't --

7 MR. LEADER: Well, but that's not the question that  
8 was asked, and I think if we go back to the record, the  
9 witness said he didn't know what was in his -- his father  
10 never really said that to him in those terms, so --

11 JUDGE SIPPEL: That's, that's two different things.

12 MR. LEADER: Well --

13 JUDGE SIPPEL: He said that the father never said it  
14 in so many terms, but he had formed --

15 MR. LEADER: And I didn't object to that question.

16 JUDGE SIPPEL: Oh, you didn't, and he, he had formed  
17 his own conclusion with respect to what he perceived the  
18 situation to be with his father vis-a-vis the business. Well,  
19 that's --

20 MR. LEADER: I don't have any problem with the  
21 witness --

22 JUDGE SIPPEL: I'm going to overrule the  
23 objection --

24 MR. LEADER: -- answering because I think the  
25 question is irrelevant.

1 JUDGE SIPPPEL: Well, that's a different objection.  
2 That's an entirely different objection. Your objection was as  
3 to the competency of the witness.

4 MR. LEADER: That's right.

5 JUDGE SIPPPEL: And I've overruled that objection,  
6 and I also consider this to be relevant as long as it doesn't  
7 go too far.

8 MR. LEADER: Okay.

9 JUDGE SIPPPEL: You may proceed, Mr. Greenebaum.

10 BY MR. GREENEBAUM:

11 Q Would you answer that question, sir?

12 A Would you restate the question, please?

13 JUDGE SIPPPEL: Would you please read it to him?  
14 (Whereupon, a portion of the record was played  
15 back.)

16 COURT REPORTER: Go ahead.

17 JUDGE SIPPPEL: All right?

18 COURT REPORTER: Yes.

19 JUDGE SIPPPEL: You may answer.

20 MR. SMITH: I don't remember him ever making any  
21 suggestion about what you suggested, about the process that  
22 you suggested.

23 BY MR. GREENEBAUM:

24 Q You didn't consider it, for lack of a better word,  
25 part of any estate planning he had in mind as you --

1 A Not -- no, I did not.

2 Q And did he articulate to you his reasons for wanting  
3 you to come into the business at that time?

4 A No.

5 Q Was there work for you to do?

6 A Yes.

7 Q And you've been working ever since? You have to  
8 speak up so the --

9 A Yes.

10 Q And there's been work for you to do?

11 A Yes.

12 Q And let me hand you a chart that's been marked and  
13 admitted into evidence.

14 JUDGE SIPPEL: Is this Scripps No. 27?

15 MR. GREENEBAUM: Yes, Your Honor.

16 BY MR. GREENEBAUM:

17 Q Do you have it in front of you, sir?

18 A Yes.

19 Q I will tell you so that you will know that on the  
20 right-hand side of the Keyser Communications, a fourth box has  
21 been put in for Gerstell Development Limited Partnership.

22 A Um-hum.

23 Q And the percentage change in Bay Television has been  
24 corrected, and CRI, Commercial Radio Institute, has been  
25 deleted based upon the testimony of your brothers --

1 A Um-hum.

2 Q -- in order to make this chart as accurate as  
3 possible. With those corrections in mind, do you see anything  
4 else on the chart, or do you see anything on the chart that  
5 does not reflect your understanding of your family's holdings?

6 A No, it looks accurate off the top of my head.

7 Q Are you aware of any other companies in which you  
8 have an interest that are part of this situation that are not  
9 reflected on the chart?

10 A Not that I can think of.

11 Q I would like to be sure that we're all talking about  
12 the same companies. On page 17 of your deposition, when I  
13 asked you on line 15: "What other companies other than  
14 Sinclair are you an officer or director of?" You answered:  
15 "Cunningham Communications, Keyser Electric Company, Keyser  
16 Communications, and I think that's about it." Now, there is  
17 a --

18 A You're right, there's a Keyser Electric Company, I  
19 believe.

20 Q Okay, so that we need another box on the chart --

21 A Right.

22 Q -- for Keyser Electric?

23 A Um-hum.

24 Q And who are the owners --

25 JUDGE SIPPEL: Can I ask you to acknowledge "yes" or

1 "no"?

2 MR. SMITH: Yes. I'm sorry.

3 BY MR. GREENEBAUM:

4 Q Who are the owners of Keyser Electric?

5 A Myself and my brothers.

6 Q And those are owned evenly?

7 A Yes, sir.

8 Q Twenty-five percent each?

9 A Right.

10 Q Who is the president of Keyser Electric?

11 A I would say it's David Smith.

12 Q He's kind of the president of everything?

13 A Yes, sir.

14 Q And who are the other officers of Keyser Electric?

15 A Duncan Smith, Robert Smith.

16 Q And yourself?

17 A Yes, sir.

18 Q And what is your office?

19 A VP, director, assistant treasurer.

20 Q How about Duncan?

21 A Duncan would be VP, secretary.

22 Q And how about Robert?

23 A Robert would be VP, assistant secretary, I would

24 assume.

25 Q What is the business of Keyser Electric?

1           A     We employ one electrician and an assistant electrician,  
2           and the purpose is basically to take care of the  
3           electrical problems at the transmitter and we also have the  
4           person take on other private sector jobs in electrical areas.

5           Q     So it's a, a general contractor?

6           A     No, electrician.

7           Q     Does it bid on jobs?

8           A     Yes. Historically.

9           Q     So it's an active company.

10          A     Yes.

11          Q     In the offices you gave us, is there also a treasurer,  
12          by the way?

13          A     Let's see, that would probably be my brother Rob.

14          Q     Are you just guessing or do you --

15          A     Yeah. I'm -- I can't remember what the structure  
16          exactly of the treasurer and secretary are, but I believe it  
17          would be Rob.

18          Q     And when was the last time you worked on anything  
19          pertaining to Keyser Electric?

20          A     Just the last 5 minutes.

21          Q     You mean in answer to my questions.

22          A     Yes, basically.

23          Q     Other, other than that, Dr. Smith.

24          A     Nothing that I can recall other than maybe just  
25          cursory discussions with my brother for 5 minutes about

1 payment of the electrician.

2 Q So it requires some attention between you and your  
3 brothers as well.

4 A I'd say 5 minutes a month maybe, something like  
5 that.

6 Q And are there any reports generated by that  
7 business?

8 A Not to me.

9 Q Who has primary responsibility, if anyone, for it?

10 A I would say probably Duncan.

11 (Whereupon, a brief recess was taken.)

12 BY MR. GREENEBAUM:

13 Q So your time in it is 5 minutes a month, is that  
14 right?

15 A Well, probably an exaggeration.

16 Q It's less than 5 minutes.

17 A It's very mi-- it's extremely minimal. I haven't  
18 checked the clock. I may have had a 1-minute, 2-minute  
19 discussion with Duncan in the last 2 or 3 months about paying  
20 the electrician's salary.

21 Q So your best recollection is at 1 minute and 2  
22 minutes a month.

23 A It's very, very minimal, yes.

24 Q How about Gerstell Development Limited Partnership?  
25 What is your connection with that entity?

1 A Vice president, director, assistant treasurer.

2 Q And what is the business of Gerstell Development  
3 Limited Partnership?

4 A The purpose of Gerstell Development is to  
5 incorporate our tower space and real estate space that we have  
6 in Pittsburgh. We lease out our tower space extensively to  
7 people that are interested in occupying tower space.

8 Q And is that an active business?

9 A Yes.

10 Q And what role, if any, do you play in the day-to-day  
11 business of that company?

12 A None.

13 Q Who is responsible for it on a day-to-day basis?

14 A I would say, primarily, probably Duncan Smith.

15 Q And how much time do you spend on it in an average  
16 week?

17 A Zero.

18 Q Do you ever spend any time on it?

19 A I haven't spent any time so far. Other than signing  
20 documents which took 2 seconds.

21 Q Does the partnership meet or send out reports?

22 A No, not as yet. We haven't had any formal meetings.

23 Q So we'll give you a "0" there, right?

24 A Not a good score.

25 Q With what frequency do you sign documents pertaining

1 to Gerstell Development Limited Partnership?

2 A In the last year, I've signed one document.

3 Q Does it have tax returns?

4 A I'm sure it will. It's just a recently-structured  
5 company.

6 Q How about Cunningham Communications? What is your  
7 connection or involvement with that entity?

8 A Same status as Gerstell.

9 Q You spend no time on that.

10 A I haven't spent any time on Keyser Communications  
11 other than signing documents.

12 Q I'm talking about Cunningham Communications.

13 A Oh, I'm sorry, Cunningham Communications. Same,  
14 same scenario.

15 Q So that you're an officer and a director, and you  
16 spend no time on it.

17 A Once again, other than maybe 5, 6 minutes a month.  
18 My -- one of my brothers might ask me a question about a --  
19 something about Cunningham, and that's about it. I'd say 5  
20 minutes a month of my time.

21 Q And do you have any recollection of any of your  
22 brothers asking you about Cunningham in the last month or so?

23 A No.

24 Q And who is primarily responsible for Cunningham on a  
25 day-to-day basis?

1 A I would say David/Duncan.

2 Q And what is the business of Cunningham  
3 Communications?

4 A It's just a, a rental company. It doesn't require  
5 any time. The monthly contractors make the checks and they  
6 just come in and we have an accountant who takes care of all  
7 that.

8 Q Well, does it own any property?

9 A Yes.

10 Q What does it own?

11 A It owns the tower. The primary, the primary asset  
12 in that company is the tower.

13 Q Where is the tower?

14 A Well, two towers. There's one in Catonsville and  
15 there's one downtown, inner-city Baltimore.

16 Q So it owns two towers.

17 A At least.

18 Q Well, what else does it at least own?

19 A It owns other real estate property.

20 Q What kind of real estate property?

21 A I believe it owns 3800, 3800 Parkdale, I believe.

22 Q And what is 3800 Parkdale?

23 A A vacant building, vacant -- yeah, a vacant  
24 building.

25 Q Does it own anything else?

- 1           A     It may also own -- I'm unclear -- I think it also  
2 owns the building in 2000 West 41st Street.
- 3           Q     That's your corporate office?
- 4           A     Yes. I believe. I'm not positive about that.
- 5           Q     There anything else?
- 6           A     No, don't think so.
- 7           Q     So do all of the entities with which you and your  
8 brothers are involved pay rent to Cunningham Communications  
9 for occupying space at 2000 West 41st Street?
- 10          A     Assuming that I've got it accurate that Cunningham  
11 Communications owns that space, that would be correct.
- 12          Q     And what is your position with Keyser Investments?
- 13          A     The same as the previous designations.
- 14          Q     Director and assistant treasurer?
- 15          A     Yes.
- 16          Q     I take it that, that David seems to be the president  
17 and you seem to be the assistant treasurer on everything, is  
18 that clear -- fair?
- 19          A     Yes.
- 20          Q     And what is the business of Keyser Investments?
- 21          A     Once again, Keyser Investments -- hmm. Keyser  
22 Investments -- the Keyser Investment -- Keyser Investments may  
23 actually own 2000 West 41st Street. I think it has one piece  
24 of, one piece of real estate.
- 25          Q     You're not sure what it owns?

- 1           A     Not really.
- 2           Q     Okay.  And how much time in a week or a month do you  
3 spend on Keyser Investments?
- 4           A     Other than signing documents, that's it.
- 5           Q     Well, what kind of documents do you sign?
- 6           A     When the doc-- when the company was incorporated.
- 7           Q     That's it?
- 8           A     Basically, yes.
- 9           Q     No ongoing documents.
- 10          A     No.
- 11          Q     And when was it incorporated?
- 12          A     Couldn't tell you.  The last couple of years.
- 13          Q     Been more or less than 1 year?
- 14          A     More than 1 year.
- 15          Q     How about more or less than 2 years?
- 16          A     I'd say approximately 2, 2 years or so.
- 17          Q     So other than signing the incorporation document,  
18 you --
- 19          A     I've signed no documents.
- 20          Q     And spent no other time on it in any respect whatso-  
21 ever.
- 22          A     That's correct.
- 23          Q     And these -- and who is in charge of Keyser  
24 Investments on a day-to-day basis?
- 25          A     I don't think really anyone is in charge of that, to

1 be honest with you.

2 Q It just runs itself?

3 A Right. Basically, that's the way pretty  
4 much everything we've talked about is.

5 Q And how about Keyser Communications? What is your  
6 role with that company?

7 A Same as previous.

8 Q Assistant -- director and assistant treasurer.

9 A Yes, sir, vice president, director, and assistant  
10 treasurer.

11 Q And who runs that company on a day-to-day basis?

12 A Basically the same group of people.

13 Q Well, which one has the primary --

14 A I would say probably Duncan/Dave.

15 Q Is there a reason you have to say one or the other?  
16 Don't you know?

17 A Well, that's not the way it's set up. If they  
18 needed me to do it, I would do it. It's, it's an all -- it's  
19 an executive-type scenario.

20 Q Well, have you ever done anything on behalf of  
21 Keyser Communications?

22 A No.

23 Q And how much time have you spent on Keyser  
24 Communications on a weekly or a monthly basis?

25 A Minimal.

1 Q What do you mean by minimal?

2 A A couple of minutes a month.

3 Q And what is the business of Keyser Communications?

4 A Keyser Communications own -- or is with -- within it  
5 is a company that essentially leases the time on a station in  
6 Pittsburgh, WPTT.

7 Q And -- I'm sorry, could you repeat that for me?

8 A Sure.

9 Q I was distracted. I apologize.

10 A Keyser Communications is a company, I believe, that  
11 leases air time on WPTT in Pittsburgh.

12 Q And who supervises that operation?

13 A David Smith, I'd say, primarily.

14 Q Now, as I understand it, you and your brothers work  
15 in one room kind of on a ad hoc basis so everybody talks to  
16 everybody and everything, is that correct?

17 A Essentially, yes.

18 Q And no -- but nobody ever talks to you about these  
19 co-- corporations?

20 A Nothing to really talk about.

21 Q Mr. Smith, let me direct your attention to page 18  
22 on your -- page -- I'm sorry, page 17 of your deposition,  
23 line 15.

24 A Um-hum.

25 Q Question: "What other companies other than Sinclair

1 are you an officer or director of?"

2 Answer: "Cunningham Communications, Keyser Electric  
3 Company, Keyser Communications, and I think that's about it."

4 Question: "How much time do you spend at  
5 Cunningham?"

6 Answer: "Virtually none, minimal time."

7 Question: "Where are Cunningham's offices?" On  
8 page 18, you answered, "2000 West 41st Street, Baltimore."

9 Question: "Same as Sinclair?"

10 Answer: "Yes, sir."

11 Question: "One telephone system for all the  
12 companies?"

13 Answer: "Yes."

14 Question: "How about Keyser Electric, how much time  
15 do you spend there?"

16 Answer: "Very minimal." "

17 Question: "What do you mean by very minimal?"

18 Answer: "Well, I might spend an hour a month."

19 Do you recall giving that question and answer?

20 A Oh, yeah.

21 Q And then I asked you, "How about Keyser  
22 Communications?"

23 Answer: "Same thing." Do you recall giving that  
24 question and answer?

25 A Yeah.

1 Q And then, "Any other companies that require your  
2 time?"

3 Answer: "Nothing but minimal time."

4 Then Mr. Leader objected and I don't have the -- I mean, so I  
5 could really pick up -- but in any event, you, you were  
6 talking about an hour a month when we took your deposition a  
7 few months ago, weren't you?

8 A Right.

9 Q And now you're talking about absolutely no time, or  
10 at most a minute or so, is that correct?

11 A I think the point is, is that it's minimal time.  
12 I've never kept a stopwatch analysis of 1-minute discussion on  
13 Keyser Electric, 5-minute discussion on Cunningham  
14 Communications, a 2-minute discussion on this or that.  
15 There's ongoing discussions all the time. That number was off  
16 the top of my head. I -- if you ask me to say, "Are you  
17 absolutely 100 percent sure," no, it is 0. I had -- I, I am  
18 trying to take something that is very ephemeral or ethereal  
19 and, and extrapolate to a specific number. You can't do it,  
20 because you're sitting around, as you suggested, and we're  
21 talking all the time about this stuff.

22 Q So you don't know how much time you spent on these  
23 three enter--

24 A It's very minimal.

25 Q Well, could it be as much as 2 hours a month?

1 A No, absolutely not.

2 Q But you did tell us when you were testifying in your  
3 deposition that it was an hour a month for each of them, is  
4 that correct?

5 A I don't think I ever said that.

6 Q Well, you said, "Well, I might spend --

7 A That, that is --

8 Q -- an hour a month."

9 A No, I think what I said was Keyser Electric, how  
10 much time was very minimal.

11 Q "Well, what do you mean by very minimal?" "Well, I  
12 might spend an hour a month."

13 A Just -- what I just said. Very minimal means that  
14 it may be 1 minute, it may be 10 seconds, it may be a half  
15 hour. There's -- I don't -- no one keeps track of this.  
16 It's, it's something that's minimal. That's all I can tell  
17 you.

18 JUDGE SIPPEL: I, I think that he's -- that's about  
19 it on this point.

20 MR. GREENEBAUM: I agree.

21 BY MR. GREENEBAUM:

22 Q Now, as I understand it, you have no assigned duties  
23 at Sinclair as vice president, is that correct?

24 A Nobody tells me to do this or that, that's correct.

25 Q Now, on page 13 of your deposition, line 3, I asked