

CONFIDENTIAL

Page 118

1 recall?

2 A. Not that I recall.

3 Q. Mr. Wallace, in connection with that work you
4 were doing for Wayfarer, do you have any recollection of
5 ever speaking with Ms. Jones?

6 MR. COOLEY: Objection.

7 THE WITNESS: Related to Wayfarer?

8 Q. (BY MS. TAHLER) Yes.

9 A. I do not have any recollection.

10 Q. Do you have any recollection of ever being --
11 being copied on any communications with Ms. Jones in
12 connection with the work you were doing for Wayfarer?

13 A. Not that I recall.

14 Q. Did you ever understand that Ms. Jones was
15 involved at all in the work that you were doing for
16 Wayfarer?

17 MR. COOLEY: Objection.

18 THE WITNESS: Yeah. Could you rephrase
19 that question?

20 Q. (BY MS. TAHLER) I'm wondering whether or not
21 you had any understanding that Ms. Jones was involved in
22 all -- at all in any of the work you were doing for
23 Wayfarer.

24 A. I knew Ms. Jones represented Wayfarer at one
25 point.

CONFIDENTIAL

Page 119

1 Q. But with regard to your work, you never spoke
2 to her, right?

3 A. I don't recall.

4 Q. Sitting here today, you don't have a
5 recollection of speaking with her in connection with
6 Wayfarer; is that right?

7 A. Not in collect -- connection with Wayfarer, no,
8 I don't recall.

9 MS. ANASTASIO: 72.

10 (Exhibit No. 72 was marked.)

11 MR. BABCOCK: Are you done with 1?

12 MS. TAHLER: I am.

13 MR. BABCOCK: Let's put that one back in
14 the stack so that we don't lose it.

15 THE WITNESS: You handed me this one.

16 Q. (BY MS. TAHLER) Mr. Wallace, you're now
17 reviewing what's been marked as Exhibit 72. It's a
18 document Bates stamped Jonesworks_MN_ several zeros 1249
19 through 1258.

20 Mr. Wallace, I'm not going to ask you about
21 any of the details of the article that you're being
22 forwarded.

23 A. Okay.

24 Q. Mr. Wallace, is Exhibit -- Exhibit 62 a forward
25 that Melissa sent you on or about August 13th, 2024?