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09 DEC 2015 10:17 am
Civil Administration
E. MASCULLI

Exhibit L.

Pennsylvania State University Vs Pennsylvani-CLRDT



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Case ID: 131103195
Control No.: 15111035

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IN THE COURT OF COMMON PLEAS
OF PHILADELPHIA COUNTY, PENNSYLVANIA

PENNSYLVANIA MANUFACTURERS' :
ASSOCIATION INSURANCE :
COMPANY, :
PLAINTIFF : CIVIL ACTION
VS. : NO. 004126
THE PENNSYLVANIA STATE : JANUARY TERM, 2012
UNIVERSITY and JOHN DOE A, :
DEFENDANTS :

** C O N F I D E N T I A L **

Friday, November 21, 2014

- - -

Oral Deposition of JOHN DOE 102 held
at Hilton Garden Inn, 1221 East College Avenue,
State College, Pennsylvania, 16801, commencing at
11:53 a.m., on the above date, before Kelly M.
Johnston, Court Reporter and Notary Public in the
Commonwealth of Pennsylvania.

- - -

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deps@golkow.com

1 Q And so was someone you
2 trusted?

3 A Oh, yeah.

4 Q And was she one of the Penn State students
5 that was on duty at night?

6 A I -- I can't say a hundred percent; I
7 believe she may have been taking some kind of
8 psychology courses or something with childhood
9 development.

10 Eventually, I know she -- in the middle of
11 all this, she was interviewing for some post or
12 something in that she eventually went out
13 there for that I heard later.

14 Q Now, I'm assuming the sexual abuse
15 incident occurred at night?

16 A Oh, yeah.

17 Q Okay. So did you come back -- are we
18 talking, like, middle of the night that you come
19 back?

20 A I would imagine I was back by 10:30 at the
21 latest.

22 Q Okay. You come back into the Nittany
23 House at 10:30, the sexual abuse incident had
24 occurred. Did you go directly to and tell

1 her?

2 A No, no, she wouldn't have been there that
3 late.

4 Q Okay, that's what I was trying to --

5 A Yeah.

6 Q So would it be the next day?

7 A Yeah, it was the next morning.

8 Q And do you remember what she told you?

9 A I believe she prepared me to get in
10 trouble --

11 Q For sneaking out?

12 A Exactly. She was -- I believe it was
13 something along the lines of no matter what comes of
14 this, you should say something, but you should be
15 prepared to face consequences for how you got out --

16 Q Right.

17 A -- not, you know...

18 Q Now, did you relay to the
19 incident that occurred?

20 A Probably not in as much detail as written
21 there.

22 Q What do you remember telling her?

23 A I was a 16-year-old boy, so I would say I
24 95 percent trusted and five percent had a crush on

1 her, so I probably -- I can't remember a hundred
2 percent, but I would imagine I didn't go into full
3 detail as it is here.

4 Q Did you let her know there had been
5 inappropriate sexual contact --

6 A Yes.

7 Q -- with Mr. Sandusky?

8 A Yeah.

9 Q What did she tell you to do, other than be
10 prepared for possible getting in trouble for having
11 snuck out? Did she tell you you need to speak to
12 somebody?

13 A She recommended that I talk to the
14 assistant, before going to the director,
15 because the director may be focused on the fact that
16 we were sneaking out and flip out on us.

17 Q Okay. Did you, in fact, go speak to
18

19 A I tried to, but they -- like, the office
20 was so small that she, as soon as I told her I
21 needed to talk to her, she called him in on the
22 meeting, so he was there regardless.

23 Q Okay. And the "he" being Mr. Gordon?

24 A Yes.

1 Q And this is the next day, also, same day?

2 A This was -- yeah, we would have got up, so
3 it probably would have been somewhere 8:00,
4 9 o'clock.

5 Q In the morning?

6 A Yeah, very early.

7 Q So you're in Mr. Gordon's office with
8 and you communicate the fact that there had
9 been an inappropriate sexual abuse incident that
10 occurred?

11 A Yes.

12 Q Do you remember -- again, did you stay
13 away from details, or did you at least make sure
14 they knew that something inappropriate had occurred?

15 A I can't -- you know, again, this is 27,
16 whatever years of hindsight, I can't one hundred
17 percent remember, but I do remember I was, you know,
18 probably tiptoeing around the sneaking out part more
19 and trying to cover my own behind there. But I -- I
20 can't remember, I don't know a hundred percent, I
21 can't answer that.

22 Q Well, did you at least communicate to them
23 that something inappropriate had occurred between --

24 A Oh, yeah, and definitely involving the

1 parties involved here, definitely.

2 Q Okay. And you then -- at least you -- or
3 she says, 's report says that "they tried
4 to poke holes in my story". Do you remember
5 anything specifically about that?

6 A I always got the impression that the
7 director of the Nittany House, Cliff, I always
8 thought he didn't like me, but I would later come to
9 realize I don't think he liked anybody there or his
10 job, and I think that that guy would have poked
11 holes in anybody's story to cover his own ass.

12 But, yes, I definitely, from almost the
13 second sentence, was just more relentless
14 questioning than this, you know, and it was all over
15 the map, you know...

16 Q Did they try to question whether or not,
17 in fact, Mr. Sandusky had sexually abused you in
18 some fashion?

19 A I don't remember any direct questions that
20 he was trying to prove my story or not prove my
21 story. I remember it more as two almost separated
22 in the fact that, A, you admitted to sneaking out,
23 and I had to implicate a couple other people in the
24 house, and that, B, where was I gonna go with this?

1 You know, was it something I was just gonna tell him
2 or was I gonna call my mom, anybody at -- and pass
3 the information on.

4 Q And what did you say to that issue?

5 A Well, he didn't put it to me like that; he
6 didn't say, look, this is what I want you to do with
7 it. That's just where it was going was -- at some
8 point, it got to the point of, well, you're lying,
9 you know, this -- we never -- definitely didn't get
10 into details that were here, you know, about that,
11 but it was -- I would say, yeah, they were
12 definitely poking holes in my story.

13 Q Did you tell him what you wanted to do
14 with your reporting of this inappropriate sexual
15 conduct?

16 A No, no, because at that time, as a
17 16-year-old, I assumed they would handle it.

18 Q Now, again, I'm only going by what it
19 says, it says, and as you had feared, "the director
20 yelled at me".

21 A Yeah, the guy went nuts.

22 Q What was he yelling at you about?

23 A Well, pretty much everything. I mean, I
24 don't ever remember having a conversation with the

1 guy that he didn't yell, for one. But it was just
2 yelling about, you know, everything is this and you
3 guys are F'n it up, you know, every time I turn
4 around, you know, I got something to deal with, all
5 the, you know, the same thing anybody might say in
6 their job.

7 But it -- it kind of escalated slowly. So
8 at the first, I guess I was being yelled at for,
9 like I said, breaking the rules and then presenting
10 this story to him, and then I got the impression he
11 thought I was lying to him and just wasting his
12 time; and then at some point, they stopped
13 questioning me and talked amongst themselves.

14 Q And "themselves" being and Cliff
15 Gordon?

16 A Yeah.

17 Q And did they then send you back to your
18 room?

19 A No, I was at -- we had like a dining area,
20 I don't know if I'd call it a dining room, but there
21 was a big dining room table, and I was sitting out
22 there; they gave me a chair and made me turn around
23 and face the wall, seemingly as far away from that
24 office as I could be while they talked.

1 Q Okay. So you weren't privy --

2 A No.

3 Q -- you couldn't hear what they were saying?

4 A No.

5 Q Okay. It then says, several hours later,
6 you saw Sandusky and Jim Tarman leaving the house by
7 the front door.

8 A Yes. I didn't see them come in.

9 Q Okay. Who is Jim Tarman, do you know?

10 A Now, that, also, I never mentioned that
11 dude by name. The only thing I remember, 'cause as
12 they left -- the only thing I remember about that
13 guy is I was -- I was told his last name -- you're
14 gonna apologize to this guy and this guy; and he had
15 a blue polo shirt on that had the little script
16 embroidery of Penn State, and I believe it had an
17 embroidered little football.

18 Q Okay. So how do you know that was
19 Mr. Tarman?

20 A I -- at the time, I didn't. It was said
21 to me you're gonna apologize to Coach and you're
22 gonna apologize to Mr. -- and I'm just phonetically
23 remembering the name -- Harman, something like that.
24 And so I would -- if I had to -- I wouldn't testify

1 under oath it was Jim Tarman.

2 Q But you remember someone phonetically
3 saying to you that --

4 A Yes, you will -- you will write a letter
5 of apology to Coach and this man, and it was
6 Mr. Harman, Carman, something along those lines.

7 Q Now, do you have any idea how
8 Mr., assuming it was Mr. Tarman or Harman, and
9 Mr. Sandusky came to the Nittany House?

10 A No.

11 Q Do you know if Mr. Gordon called them?

12 A I can't say for sure.

13 Q Okay.

14 A I would -- I mean, no, I can't say for
15 sure.

16 Q Okay. It says: (Reading.) Mr. Gordon
17 told John Doe 102 to apologize to Sandusky and
18 Tarman for telling lies, adding that, "you're
19 probably going to be moved from Nittany House".

20 Did you, in fact, apologize to
21 Mr. Sandusky and Tarman?

22 A I was not told that I had to verbally
23 apologize to them. I was told that I would write
24 them a letter of apology.

1 Q And what was -- what were you to write a
2 letter apologizing for?

3 A It was -- what the situation was, they
4 were leaving the front door; this guy was -- I never
5 heard him say we'll take care of it or we'll handle
6 it, that's just what he said.

7 Q And who's the "he"?

8 A Clint Gordon.

9 Q Okay.

10 A He was leading them out the door, I was
11 sitting -- the front door's here (indicating); I was
12 probably 15 feet over there, still facing the wall,
13 you know, trying to see what was going on, and he
14 said to me, you're gonna write a letter of apology,
15 and then he added about, the part about being moved,
16 but he said, you're gonna get your ass kicked out of
17 the Nittany House.

18 And the threat all along was if you had to
19 get removed from the Nittany House, you got put in
20 Centre County Youth Detention until they figured out
21 what to do with you after that, send me to another
22 group home. So basically it was a threat of going
23 to the Bellefonte, the one in Bellefonte, the Centre
24 County Youth Detention Center.

1 Q Which is a more serious --

2 A It's prison for juveniles.

3 Q Okay. But my question is, what were you
4 told you needed to apologize for?

5 A Like I said, it was just a comment. It
6 was just -- he never said anything, it was nothing
7 more than you will write a letter of apology to him
8 and this man, and that was it. That was kind of his
9 way of, you know, we got this, I guess.

10 Q Okay. So do you know whether or not
11 Mr. Gordon communicated to Mr. Sandusky and,
12 assuming it's Mr. Harman or Tarman, what you had
13 told Mr. Gordon about the sexual abuse incident?

14 A I can't say a hundred percent sure, but I
15 doubt they just showed up to see how his day was
16 going.

17 Q That's my question, do you know how they
18 got there or why they were there?

19 A We had a back door -- the office was right
20 off the kitchen, so there was a back door, there was
21 like a set of steps, and there was a yard out back,
22 and then it faced like another street, so there was
23 not another house there or parking.

24 And there was a small, little door that

1 basically was only used for us to go out, and I
2 would assume that's how they came in, because it was
3 -- otherwise, they would've had to come past me
4 where I was sitting to come in the front door.

5 Q Had you ever seen this Mr. Harman or
6 Tarman in this house before?

7 A Nope.

8 Q Did you ever write a letter of apology?

9 A No, no, there's no -- if you read the next
10 paragraph, it went downhill pretty quick.

11 Q Okay. Did Mr. Gordon ever talk to you
12 about this -- your communication to him about this
13 incident again?

14 A Never had the chance.

15 Q Okay. So tell me what happened after you
16 were told you needed to apologize to these two
17 gentlemen or you needed to write a letter of apology
18 to these two gentlemen.

19 A They went back and -- Mr. Gordon and
20 I don't remember her last name, went back in
21 the office, and all I remember is a lot of screaming
22 and yelling. And at that point, I walked over to
23 the closet, I grabbed a coat that wasn't even mine,
24 and just hauled ass.

1 Q You left the house?

2 A I was gone, like --

3 Q You ran out of the house?

4 A -- 9:00, 9:30 in the morning, yeah.

5 Q Okay.

6 A Actually, I ran the whole way until I
7 reached campus because I thought for sure somebody
8 would be chasing me.

9 Q What were you -- well, let's just ask
10 this, why did you feel the need to get out of the
11 house so quickly?

12 A Again, I'm putting myself back, as a
13 42-year-old man, in the thoughts of a 16-year-old,
14 but at that time, it felt like there was no other
15 reason; I just had to get the hell out of there, I
16 had to. I didn't know where I was going, what I was
17 gonna do, but I just had to get out.

18 Q What were you worried about or why were
19 you --

20 A Everything. Everything. I didn't -- I
21 had no idea what was gonna happen next. I didn't
22 know if somebody was gonna come take me, I didn't
23 know if they were gonna call my probation officer
24 and say, look, we want this guy out of here, do

1 something with him.

2 I would say there was probably a million
3 thoughts running through my mind, and the flee
4 instinct just kicked in and I was gone.

5 Q Did you ever think about going and telling
6 anybody else about the sexual abuse incident other
7 than Mr. Gordon?

8 A At that moment, no. At that moment, I
9 just wanted to put as much distance between that
10 place and whoever may be looking for me as possible.

11 Q And did you ever tell anybody, other than
12 obviously your lawyer, about the sexual abuse
13 incident, other than Mr. Gordon?

14 A How far down the -- I mean, are we still
15 in the time line of this? (Indicating.)

16 Q Well, let's stay with the time line of
17 this and then I'll take you forward in time.

18 A All right. Yeah, yeah, down the road,
19 yeah, I did.

20 Q Who did you speak to?

21 A Well, when I went to the

22 After I had gotten, I don't know, recaptured
23 by the I was sent to the

24 for awhile, and

1 on the team that year, so they always had people who
2 had connections that would come in and either talk
3 to us or spend time with us as -- I don't know if it
4 was part of something or whatever, but it wasn't
5 unusual to see football people. But I don't
6 remember him just stopping by and coming in and
7 walking through the actual property.

8 Q And I assume you had never seen
9 Mr. Sandusky and this Mr. Tarman or Harman
10 together --

11 A No.

12 Q -- at the Nittany House; is that correct?

13 A No.

14 Q So at no point did you ever write the
15 apology letter --

16 A No.

17 Q -- that Mr. Gordon described?

18 A No. But the minute I walked out that
19 door, their responsibility was notify the police,
20 and as far as they were concerned, I'm sure I was
21 not their problem anymore.

22 Q And I assume there had never been -- there
23 still has never been any follow-up to what you had
24 told Mr. Gordon about the sexual abuse incident?

1 A Not that I'm aware of.

2 Q Okay.

3 MR. ENGELMYER: I have no further
4 questions.

5 - - -

6 EXAMINATION

7 - - -

8 BY MS. KORNFELD:

9 Q John Doe 102, I have only a couple of
10 questions for you. My name is Linda Kornfeld, and I
11 am insurance coverage counsel for the University.
12 And we've been speaking about the incident referred
13 to in the document we've been reviewing where you
14 spoke with Mr. Gordon, and just so I'm clear on your
15 testimony, your memory is that you told Mr. Gordon
16 about the actual abuse by Mr. Sandusky; is that
17 correct?

18 A Yes. Specifically, the golf course and
19 all that.

20 Q Right. And then you, in the report and
21 also as you've testified, an individual, whose name
22 you don't remember, but it's -- you have phonetic
23 memory, you don't know if it's Tarman or Harman or
24 some other name; is that correct?

FILED
09 DEC 2015 10:17 am
Civil Administration
E. MASCUILLI

Exhibit P.

Michael J. McQueary

1 IN THE COURT OF COMMON PLEAS
2 PHILADELPHIA COUNTY, PENNSYLVANIA
 - - -
3 PENNSYLVANIA MANUFACTURERS' : CIVIL ACTION
 ASSOCIATION INSURANCE :
4 COMPANY, :
 Plaintiff, :
5 - vs. - : JANUARY TERM, 2012
 THE PENNSYLVANIA STATE :
6 UNIVERSITY AND JOHN DOE A, :
 Defendants. : NO: 04126
7 - - - - -
 THE PENNSYLVANIA STATE : CIVIL ACTION
8 UNIVERSITY, :
 Plaintiff, :
9 - vs. - : NOVEMBER TERM, 2013
 PENNSYLVANIA MANUFACTURERS' :
10 ASSOCIATION INSURANCE :
 COMPANY, :
11 Defendants. : NO: 03195
 - - - - -
12 THE PENNSYLVANIA STATE : CIVIL ACTION
 UNIVERSITY, :
13 Plaintiff, :
 - vs. - : NOVEMBER TERM, 2013
14 PENNSYLVANIA MANUFACTURERS' :
 ASSOCIATION INSURANCE :
15 COMPANY, :
 Defendants. : NO: 03197
16 - - - - -
17 Wednesday, August 26, 2015
18 - - -
 Videotaped oral deposition of MICHAEL
19 J. McQUEARY, taken pursuant to notice, was held at the
 Hilton Garden Inn, 1221 East College Avenue, State
20 College, Pennsylvania 16801, at 9:44 a.m., on the
 above date, before Lisa DePascale, a Court Reporter
21 and Notary Public of the Commonwealth of Pennsylvania
 and Delaware.
22
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24

Michael J. McQueary

1 the offense?

2 A. Yes.

3 Q. Did there come a time when you observed Gerald
4 Sandusky engaged in what you believe to be
5 inappropriate conduct with a minor?

6 MS. ROMAGNOLI: Objection.

7 BY MR. GAGNE:

8 Q. You can answer.

9 A. Yes.

10 Q. And when did that occur?

11 A. It was the year of 2001.

12 Q. Do you recall what month that was?

13 A. February.

14 Q. Okay. And at that time, you were a graduate
15 assistant; is that right?

16 A. Yes.

17 Q. And I'd like you to describe for me in your own
18 words what it was that you observed?

19 A. Inappropriate sexual molestation of a minor.

20 Q. Okay. Let's see if we can break it down, what
21 happened. Where did you make this observation?

22 A. In one of the shower room facilities of the
23 Penn State football program.

24 Q. And what building was that?

Michael J. McQueary

1 A. Lasch football building.

2 Q. And what time of day did this take place?

3 A. Nighttime.

4 Q. And do you recall -- why did you -- why were in
5 that building at that time?

6 A. I had come to bring back some shoes and to do
7 some work on a Friday night.

8 Q. And tell me what you were doing. So you came
9 to bring back the shoes, were you -- did you have an
10 office you were bringing them to or where were you
11 going to bring the shoes?

12 A. I was --

13 MS. ROMAGNOLI: Objection.

14 BY MR. GAGNE:

15 Q. You can answer.

16 A. Okay. I was eventually going to my office, but
17 I had the shoes in my car and wanted to drop them off
18 in my locker in the shower room facility.

19 Q. Okay. So did you, in fact, approach your
20 locker?

21 A. Yes.

22 Q. Okay. And what did you hear, see -- just tell
23 me what happened as you were approaching your locker.

24 MS. ROMAGNOLI: Objection.

1 THE WITNESS: Okay.

2 BY MR. GAGNE:

3 Q. By the way, with respect to, you know, counsel
4 for Penn State, your own attorney may object to
5 questions, but I think your attorney will tell you
6 that unless he instructs you not to answer a question,
7 despite an objection, you can answer the question.

8 A. Okay.

9 MR. STROKOFF: I would also say to
10 pause, as you have been doing, in case
11 Ms. Romagnoli or Mr. Gagne want to debate the
12 issue --

13 THE WITNESS: Okay.

14 MR. STROKOFF: -- before you proceed.

15 THE WITNESS: Okay. So if you could
16 ask that question again.

17 MR. GAGNE: Okay.

18 BY MR. GAGNE:

19 Q. You -- were you approaching your locker to
20 place these shoes in the locker?

21 A. Yes. I was going to the locker room, yes.

22 Q. And tell when me what happened then?

23 A. Okay. I opened the door to the locker room,
24 heard noises coming from the shower room.

1 Q. Let's stop there.

2 A. Okay.

3 Q. What was the nature of the noise that you
4 heard?

5 MS. ROMAGNOLI: Objection.

6 THE WITNESS: Slapping sounds.

7 BY MR. GAGNE:

8 Q. Okay. And then what happened?

9 A. I entered another opening, doorway, but the
10 door was open. My locker is immediately to my right
11 as you enter that door, so I went to that locker and
12 stood in front of it.

13 Q. And there is a shower -- is there a shower in
14 the vicinity of your locker?

15 A. In the same locker room. It's not right next
16 to my locker, no.

17 Q. And -- and these slapping sounds, did it sound
18 like -- what did it sound like? Did it sound like
19 somebody hitting an object or --

20 A. No.

21 Q. How would you characterize the slapping?

22 MS. ROMAGNOLI: Objection.

23 THE WITNESS: Skin on skin, rhythmic
24 slapping.

1 BY MR. GAGNE:

2 Q. And what did you do then?

3 A. I looked over my right shoulder into a mirror
4 in the locker room that allowed me to look at a
5 45-degree angle, through the reflection into the
6 shower, actual shower area.

7 Q. And what did you see when you looked in the
8 mirror?

9 A. Mr. Sandusky standing behind a boy, back to --
10 or front to back, and his arms wrapped around him.

11 Q. Mr. Sandusky's arms wrapped around the child?

12 A. Yes. In a very extreme, close, close nature,
13 and it was extremely alarming.

14 Q. Were you able to observe, when you looked in
15 the mirror, whether there was any genital contact
16 between Mr. Sandusky and the boy?

17 MS. ROMAGNOLI: Objection.

18 THE WITNESS: "Genital contact"? I
19 need some more -- just tell me what you mean by
20 "genital contact."

21 BY MR. GAGNE:

22 Q. Well --

23 A. Just so I'm sure.

24

Michael J. McQueary

1 Q. -- you said that Mr. Sandusky and the boy were
2 physically very close, correct?

3 A. Absolutely.

4 Q. How much, if any, space was between them when
5 you were looking in the mirror?

6 A. None that I could see.

7 Q. Okay. Did you observe Mr. Sandusky's genital
8 inside of the young boy?

9 A. No. I can't say that I observed that.

10 Q. We're -- we're, again, limited to your
11 observation in the mirror. Were Mr. Sandusky and the
12 boy making any motions?

13 MS. ROMAGNOLI: Objection.

14 BY MR. GAGNE:

15 Q. Or were they standing still?

16 A. Slow, slight motions.

17 Q. Did you hear either of them at this time say
18 anything or make any verbal sounds?

19 A. No.

20 Q. After you made this observation in the mirror,
21 what did you do?

22 A. I turned back to my locker room, to my locker,
23 not my locker room, sorry, my locker, probably tried
24 to gather my thoughts for a second, then I stepped to

Michael J. McQueary

1 my right to make sure I was seeing through the mirror
2 what I thought I saw, and I looked directly into the
3 shower with my own eyes.

4 Q. And what -- did you step into the shower room?

5 A. No. No, the shower room is away.

6 Q. So how, just estimating if you can, how far
7 away were you from Mr. Sandusky and the boy?

8 MS. ROMAGNOLI: Objection. At what
9 point, Paul?

10 BY MR. GAGNE:

11 Q. When you -- when you looked directly into the
12 room, how far away were you from them?

13 A. Maybe four or five paces. Again, I'm guessing,
14 five yards.

15 Q. Was there anything obstructing your view of
16 Mr. Sandusky and the boy?

17 A. No, nothing obstructing it.

18 Q. Was the area lit well enough for you to see
19 them?

20 A. Yes.

21 Q. And what did you see when you looked directly
22 into the room?

23 A. The same exact as I've already described.

24 Q. Mr. Sandusky in very close front to back

1 physical contact with the boy?

2 A. Yes.

3 Q. Did he still have his arms around him?

4 A. Yes.

5 Q. When you looked directly into the room, did
6 either -- did you hear them say anything or make any
7 verbal noises?

8 A. No.

9 Q. And again, did you, when you looked directly
10 into the room, did you see any genital penetration --

11 MS. ROMAGNOLI: Objection.

12 BY MR. GAGNE:

13 Q. -- by Mr. Sandusky?

14 MS. ROMAGNOLI: Objection.

15 THE WITNESS: I did not see penetration
16 with my own eyes, no.

17 BY MR. GAGNE:

18 Q. Did you reach a conclusion as to what was
19 taking place?

20 MS. ROMAGNOLI: Objection.

21 THE WITNESS: Yes.

22 BY MR. GAGNE:

23 Q. And what was your conclusion?

24 A. He was doing something severely inappropriate

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1 and sexual to that boy.

2 Q. What did you do then?

3 A. Turned back to my locker. At some point, put
4 the shoes in my locker and slammed my locker door
5 shut.

6 Q. Okay. Why did you slam the door shut?

7 A. Out of haste, out of trying to let someone know
8 I was there. You can imagine I'm extremely flustered
9 by now.

10 Q. Did you say anything to Mr. Sandusky or to the
11 boy?

12 A. No.

13 Q. Can -- are you able to describe the boy that
14 you saw?

15 A. Describe him, no.

16 Q. Do you -- do you know what color he was?

17 A. A white, Caucasian.

18 Q. Can you estimate his height at all?

19 A. Strictly a guess.

20 Q. What was his age? What did his age appear to
21 be to you?

22 MS. ROMAGNOLI: Objection.

23 THE WITNESS: Eleven -- 11 or 12. But
24 again, that's a guess; could be, you know, give

Michael J. McQueary

1 or take a year or two.

2 BY MR. GAGNE:

3 Q. After you slammed your locker, what happened
4 then?

5 A. I stepped, again, toward the locker, which is
6 also towards -- or not towards the locker. Let me
7 backtrack -- towards the shower opening, which is also
8 toward the door to leave, paused for a moment, looked
9 directly into the shower again and then left.

10 Q. When you looked into the shower that second
11 time, what did you see?

12 A. That would be the third time.

13 Q. Including the mirror?

14 A. Yes, sir.

15 Q. Okay. So you had looked in the mirror directly
16 into the shower. This was your third view of the
17 situation?

18 A. Yes.

19 Q. Okay. And what did you see at that time?

20 A. Both people facing me and looking at me,
21 side-by-side.

22 Q. By the way, I'm assuming, but I shouldn't, both
23 Mr. Sandusky and the young boy were naked; is that
24 correct?

Michael J. McQueary

1 A. Yes.

2 Q. When you saw that they were both facing you,
3 did you make eye contact with either Mr. Sandusky or
4 the boy?

5 A. Yes.

6 Q. Do you have any doubt that they saw that you
7 were there?

8 A. No doubt.

9 MS. ROMAGNOLI: Objection.

10 BY MS. ROMAGNOLI:

11 Q. Did you say anything to either of them?

12 A. No.

13 Q. Did they say anything to you?

14 A. No.

15 Q. When Mr. Sandusky and the boy were facing you,
16 how far apart were they?

17 A. Were they from each other?

18 Q. From each other, yes.

19 A. Side by side, maybe a foot or two.

20 Q. Did the boy, based on his facial expression or
21 posture, appear to be in any discomfort or distress to
22 you?

23 MS. ROMAGNOLI: Objection.

24 THE WITNESS: Certainly maybe

Michael J. McQueary

1 embarrassed, but again, you're guessing by an
2 expression on someone's face.

3 BY MR. GAGNE:

4 Q. After you observed Mr. Sandusky and the boy
5 facing you in the shower, what did you do then?

6 A. I walked out the locker room.

7 Q. Were you concerned that Mr. Sandusky might
8 resume the conduct you had observed?

9 MS. ROMAGNOLI: Objection.

10 THE WITNESS: No.

11 BY MR. GAGNE:

12 Q. And why is that?

13 A. They had broken it up. They looked right at
14 me, and again, in a quick, hurried, hastened train of
15 thought, assumed that they were going to leave and he
16 knew someone had caught him.

17 Q. By the way, is there any doubt in your mind
18 that -- that this was Gerald Sandusky that you were
19 looking at?

20 A. No doubt.

21 Q. And was there any doubt in your mind that you
22 had observed something sexual occurring?

23 A. No doubt.

24 Q. Did you then leave -- leave the Lasch building?

Michael J. McQueary

1 A. No.

2 Q. And what did you do then?

3 A. I went up to my office.

4 Q. And where is your office in relation to the --
5 to the shower room?

6 A. It's on the second floor. So it's one floor
7 above the shower room.

8 Q. What did you do in your office?

9 A. Called my father at his home.

10 Q. Tell me about the conversation with your
11 father, please.

12 A. Again, I was extremely upset. I told him what
13 I had just saw. He asked me are you okay, and I think
14 he may have asked, is anyone else there? And he said
15 come over to the house right away.

16 Q. Did you -- did you tell your father the details
17 of what you had seen, on the phone?

18 A. Not extreme detail, no. No.

19 Q. To the best of your recollection, and that's --
20 that's all I'm looking for is your best recollection
21 at this point, what did you tell your father you had
22 seen?

23 A. That Mr. Sandusky was doing something sexual to
24 a boy in the shower.

1 MS. ROMAGNOLI: Objection.
2 BY MR. GAGNE:
3 Q. And is there any doubt in your mind that your
4 father and Mr. Dranov understood that what you had
5 seen was sexual in nature?
6 MS. ROMAGNOLI: Objection.
7 THE WITNESS: No doubt.
8 BY MR. GAGNE:
9 Q. And did you discuss with your father what --
10 what your next step should be?
11 A. Yes.
12 Q. And what decision did you arrive at with your
13 father?
14 A. The end decision was to call Coach Paterno
15 first thing in the morning and let him know right
16 away.
17 Q. Did you discuss with your father whether the
18 police should be contacted?
19 A. Yes.
20 Q. And did you do that that evening?
21 A. No.
22 Q. Why not?
23 A. We just thought it best that Coach Paterno knew
24 about it first and foremost.

Michael J. McQueary

1 Q. Why Coach Paterno?

2 A. There is background to it, but --

3 Q. Well, give me whatever background you feel I
4 should have to understand.

5 A. Okay. Coach Paterno has always made it clear
6 that anything that happens in the football office, the
7 football program, on the facilities, he know about it
8 first if it's of a nature that is -- I don't know how
9 to word -- high level or extreme or that he should be
10 aware of. And so after much debate, again, with my
11 father and Dr. Dranov, that's what we decided to do.

12 Q. Joe Paterno was your boss, correct?

13 A. Yes.

14 Q. So did you -- on the evening that you saw
15 Mr. Sandusky with the boy, other than talk to your
16 father and Dr. Dranov about it, did you talk to anyone
17 else about it?

18 A. I can't remember if I did, but I may have.

19 Q. Other than your father and Dr. Dranov, who may
20 you have discussed it with?

21 A. My girlfriend at the time, possibly.

22 Q. And what was her name?

23 A. At that time it was

24 Q. Was _____ employed by the University?

Michael J. McQueary

1 A. No.

2 Q. And did you subsequently talk to Coach Paterno
3 about the matter?

4 A. Yes.

5 Q. And please describe how that came to take
6 place.

7 A. Let me make sure we're clear. I did not talk
8 to Coach Paterno about it that night.

9 Q. Okay.

10 A. Okay. So the following morning, I called Coach
11 Paterno on the phone and said I need to come over to
12 his house to discuss something.

13 Q. And what did he say?

14 A. On the phone?

15 Q. Yes. I'm sorry, yes.

16 A. He said I'm not hiring you, so don't waste your
17 time. And I said, it's not about that, Coach. It's
18 about something very serious, and he said well, come
19 over right away.

20 Q. And did you do so?

21 A. Yes.

22 Q. When you arrived at Coach Paterno's residence,
23 was anyone else there?

24 A. I don't think I saw anyone else there that

Michael J. McQueary

1 morning.

2 Q. And did you talk to Coach Paterno about what
3 you had seen?

4 A. Yes.

5 Q. Again, to the best of your recollection, what
6 did you tell Coach Paterno you had seen?

7 MS. ROMAGNOLI: Objection.

8 THE WITNESS: Do you want word for
9 word?

10 BY MR. GAGNE:

11 Q. As best you can -- as best you can relay that,
12 yes.

13 A. I can't relay word-for-word, but I did tell him
14 that I saw Gerald Sandusky in an extreme,
15 sexually-natured situation and molesting a boy.

16 Q. Did you use the term "molesting," if you
17 recall?

18 A. I can't recall.

19 Q. Did you make clear to Coach Paterno that what
20 you had seen was sexual in nature?

21 MS. ROMAGNOLI: Objection.

22 THE WITNESS: Yes, no doubt.

23 BY MR. GAGNE:

24 Q. Do you have any doubt that Coach Paterno

1 understood that what you had seen was sexual in
2 nature?

3 MS. ROMAGNOLI: Objection.

4 THE WITNESS: No doubt.

5 BY MR. GAGNE:

6 Q. Did Coach Paterno ask you any questions?

7 A. I think he said -- he asked me on a personal
8 level, you know, psychologically, emotionally,
9 mentally, if I was okay. And I -- you know, he could
10 tell I was really upset. But I don't recall him
11 asking me any other questions, per se.

12 Q. He didn't ask you for additional detail about
13 what you had seen?

14 A. No.

15 MS. ROMAGNOLI: Objection.

16 BY MR. GAGNE:

17 Q. Did Coach Paterno seem surprised by what you
18 were telling him?

19 MS. ROMAGNOLI: Objection.

20 THE WITNESS: Seem surprised? I
21 don't -- I wouldn't characterize surprise, but
22 again, he may have been. I don't want to put a
23 reading of thoughts into his mind when he
24 clearly didn't say I'm surprised, you know, or

1 something.

2 BY MR. GAGNE:

3 Q. Did Coach Paterno instruct you to take any
4 further action?

5 A. Not that morning, no.

6 Q. Did Coach Paterno tell you what he intended to
7 do about the matter?

8 A. Somewhat, yes.

9 Q. And what did he tell you?

10 A. He said I need to think about this, who to
11 tell, and I'll let you know. He led me to believe he
12 was going to tell some people and try to handle it.

13 Q. And did he tell you who he was going to
14 contact?

15 A. I don't believe he did at that time, no.

16 Q. How long did the meeting or conversation with
17 Coach Paterno at his home last?

18 A. Not long. And again, I'm guessing, so it's a
19 guess but eight, ten, twelve minutes.

20 Q. And did you describe to Coach Paterno,
21 step-by-step, what you had seen, meaning you
22 approached your locker, you observed something in the
23 mirror, and then directly looked into the shower? Did
24 you give him that --

Michael J. McQueary

1 A. No, not --

2 MS. ROMAGNOLI: Objection.

3 THE WITNESS: -- not step by step.

4 BY MR. GAGNE:

5 Q. But you did tell him, is it correct, that you

6 had seen Gerald Sandusky engage in sexual conduct with

7 a young boy?

8 MS. ROMAGNOLI: Objection.

9 THE WITNESS: Are you quoting me or --

10 BY MR. GAGNE:

11 Q. I'm asking if that's the essence of what you

12 told him.

13 A. Yes.

14 Q. Okay. You're not able to say word-for-word

15 exactly what you told Coach Paterno?

16 A. No.

17 Q. Did you tell Coach Paterno that you had

18 observed Gerald Sandusky engaged in anal intercourse

19 with the boy?

20 MS. ROMAGNOLI: Objection.

21 THE WITNESS: No, I did not say that.

22 BY MR. GAGNE:

23 Q. Do you recall, at all, what words you did use

24 to describe what you had seen?

Michael J. McQueary

1 A. No. Again, that -- the message was, and the
2 message he received was, that it was extremely sexual.
3 It was bad. It was inappropriate, and it was
4 molestation of a boy.

5 Q. At that time was Coach Sandusky an active
6 member of the coaching staff at Penn State?

7 MS. ROMAGNOLI: Objection.

8 THE WITNESS: No.

9 BY MR. GAGNE:

10 Q. Were you aware at that time that he was
11 retired?

12 A. Yes.

13 Q. And was it unusual to see Coach Sandusky in the
14 Penn State facilities after his retirement?

15 MS. ROMAGNOLI: Objection.

16 THE WITNESS: No.

17 BY MR. GAGNE:

18 Q. When would you typically see Coach Sandusky in
19 the Penn State football facilities after his
20 retirement?

21 A. Oh, all the time in the facilities. There
22 was -- I guess the answer to your question is, there
23 were no typical times; he was in there sporadically
24 all the time.

Michael J. McQueary

1 Q. And was this the first time you had seen him in
2 the presence of a young child?

3 MS. ROMAGNOLI: Objection.

4 THE WITNESS: Up to that point?

5 BY MR. GAGNE:

6 Q. Up to that point?

7 A. No.

8 Q. Okay. You had seen him with children before?

9 A. Yes.

10 Q. Okay.

11 A. It was common.

12 Q. Did you know what The Second Mile was?

13 A. Yes.

14 Q. What was The Second Mile to your understanding?

15 A. It's a charity to help underprivileged
16 children. I'm not -- to be frank with you, I'm not
17 sure how they helped them, financially or through
18 scholarships or something, but it was a charity to
19 help underprivileged children. That's all I know.

20 Q. And to your knowledge, were the children that
21 you saw Gerald Sandusky with participants in Second
22 Mile?

23 MS. ROMAGNOLI: Objection.

24

Michael J. McQueary

1 BY MR. GAGNE:

2 Q. If you know.

3 A. I think you assume that as a player.

4 Q. Now, you said you communicated to Coach
5 Paterno, and he understood, that what you had seen was
6 sexual in nature; is that correct?

7 MS. ROMAGNOLI: Objection.

8 THE WITNESS: Yes.

9 BY MR. GAGNE:

10 Q. How did Coach Paterno communicate his
11 understanding to you? How do you know that's what he
12 understood?

13 A. Well, again, he -- he did, on a personal note
14 or a personal level, ask me if I was okay. And you
15 just came to understand that he knew it was very
16 serious at the end by saying he needed to think about
17 it, think about who to tell. That's how he
18 communicated it.

19 Q. And you clearly communicated to him -- did you
20 clearly communicate to him that what you had seen was,
21 in your opinion, sexual in nature?

22 MS. ROMAGNOLI: Objection.

23 THE WITNESS: Yes.

24

Michael J. McQueary

1 BY MR. GAGNE:

2 Q. Did you hear back from Coach Paterno,
3 subsequent to that, regarding the matter?

4 A. Yes.

5 Q. And tell me about that.

6 A. Are you tell -- are you asking me if
7 immediately, within a day or two --

8 Q. Let's --

9 A. -- or are you talking about the whole entire
10 span up until the end of Coach Paterno's life?

11 Q. Let's start with immediately, in the next day
12 or week or so, did you hear back?

13 A. Yes. Yes.

14 Q. And what did you hear from him?

15 A. I heard that he had taken it to some senior
16 officials at the University and that they would be
17 contacting me.

18 Q. And did he tell you who that was?

19 A. I don't believe he did, no.

20 Q. What else, if anything, did he say other than
21 that you would be contacted by officials?

22 A. He just asked me again on a personal note if I
23 was okay.

24 Q. And what did you tell him?

Michael J. McQueary

1 A. I said, yeah, Coach, I'm okay.

2 Q. Did you subsequently -- were you subsequently

3 contacted by any Penn State officials?

4 A. Yes.

5 Q. And who was that?

6 A. The first time --

7 Q. Yes.

8 A. -- I was contacted?

9 Q. Yes.

10 A. On a phone call from Mr. Curley.

11 Q. Timothy Curley?

12 A. Yes.

13 Q. And what was Mr. Curley's position at the

14 University at that time?

15 A. Athletic Director.

16 Q. And did Mr. Curley come to your office, meet

17 with you, did he call you?

18 A. Called me.

19 Q. Okay. What did he say in that phone call?

20 A. He said Coach Paterno had told him that I had

21 seen something that was serious and that he would like

22 to talk to me further.

23 Q. And did you arrange to talk to Mr. Curley?

24 A. Yes.

Michael J. McQueary

1 Q. By the way, how far -- how long, if you recall,
2 how long after the incident that you observed did
3 Mr. Curley call you?

4 A. Again, it's a guess, but roughly ten days or
5 so.

6 Q. In that intervening ten days or so, did you
7 talk further with Coach Paterno about what you had
8 seen?

9 A. Again, once or twice, only him checking on me
10 personally. I hope I'm getting that point across,
11 just to make sure I was okay.

12 Q. In that intervening ten days or so, did you see
13 Coach Sandusky again?

14 A. No.

15 Q. Other than the people you've already testified
16 about, your father, Dr. Dranov, possibly your
17 girlfriend, and Coach Paterno, before you spoke with
18 Mr. Curley, did you talk to anyone else about what you
19 had seen?

20 A. I may have mentioned it briefly, again, may
21 have, to one of my coworkers, but I can't say that I
22 know for sure that I did.

23 Q. And do you know who that was that you may have
24 mentioned it to?

Michael J. McQueary

1 A. No. I couldn't put a guess on it.

2 Q. So did you subsequently meet with Mr. Curley?

3 A. Yes.

4 Q. And how long was that after his initial phone
5 call to you?

6 A. Oh, it may have been that afternoon or the next
7 afternoon. It was -- after that phone call, it was
8 very quick.

9 Q. And where did you meet with Mr. Curley?

10 A. In a small conference room in the Bryce Jordan
11 Center.

12 Q. And was anyone else present when you met with
13 Mr. Curley?

14 A. Yes.

15 Q. And who was that?

16 A. Mr. Schultz.

17 Q. Is that Gary Schultz?

18 A. Yes.

19 Q. And do you know what Gary Schultz's title at
20 the University was at that time?

21 A. He was one of the vice presidents of the
22 University.

23 Q. Did you know what his responsibilities were?

24 MS. ROMAGNOLI: Objection.

1 THE WITNESS: They covered a lot of
2 things, I know that.

3 BY MR. GAGNE:

4 Q. Did you know at that time whether his
5 responsibilities included oversight or supervision of
6 the Penn State Police Department?

7 MS. ROMAGNOLI: Objection.

8 THE WITNESS: Yes.

9 BY MR. GAGNE:

10 Q. Yes, that was the case?

11 A. Yes.

12 Q. And to the best of your recollection, can you,
13 please, describe for me what you told Mr. Curley and
14 Mr. Schultz?

15 A. It was very much the same exact meeting that I
16 had with Mr. Paterno, that I had witnessed and walked
17 into a situation where Jerry Sandusky was in an
18 extreme, sexually-natured situation with a minor boy
19 in the shower, and it was awful and bad and, you know,
20 molestation of a boy.

21 Q. Did Mr. Schultz and Mr. Curley ask you any
22 questions about what you had seen?

23 A. I don't remember them asking me any questions.

24 Q. Did they seem surprised by what you were

1 telling them?

2 MS. ROMAGNOLI: Objection.

3 THE WITNESS: Again, like I said about
4 trying to read Mr. Paterno's feelings, I
5 wouldn't want to try to read into what they
6 were portraying to me. Maybe surprised, but
7 more or less blank.

8 BY MR. GAGNE:

9 Q. Did Mr. Schultz or Mr. Curley tell you that
10 they had previously heard of Mr. Sandusky engaged in
11 inappropriate conduct with children?

12 A. No.

13 MS. ROMAGNOLI: Objection.

14 THE WITNESS: No, they never mentioned
15 that to me.

16 BY MR. GAGNE:

17 Q. Did Coach Paterno tell you, when you met with
18 him at his house on Saturday morning, that he had had
19 previously heard of Mr. Sandusky engaged in
20 inappropriate contact with children?

21 MS. ROMAGNOLI: Objection.

22 THE WITNESS: Let me make sure I
23 understand the question. Are you saying
24 that -- ask it a different way if you could.

Michael J. McQueary

1 BY MR. GAGNE:

2 Q. When you met with Coach Paterno that Saturday
3 morning to describe to him what you had seen, did
4 he -- did Coach Paterno tell you that he had
5 previously heard anything about Coach Sandusky engaged
6 in inappropriate conduct with children?

7 MS. ROMAGNOLI: Objection.

8 THE WITNESS: I don't -- I don't know
9 if I remember him saying that.

10 BY MR. GAGNE:

11 Q. Is there any doubt in your mind that you
12 communicated to Mr. Curley and Mr. Schultz that what
13 you had observed Mr. Sandusky doing was sexual in
14 nature?

15 MS. ROMAGNOLI: Objection.

16 THE WITNESS: Ask the question again.

17 MR. GAGNE: Could you read that
18 question back, please?

19 - - -

20 (The court reporter read back the
21 pertinent testimony.)

22 - - -

23 THE WITNESS: No, no doubt.

24 BY MR. GAGNE:

Michael J. McQueary

1 Q. And do you have any doubt that Mr. Curley and
2 Mr. Schultz understood that, at least as you described
3 it to them, what you had observed was sexual in
4 nature?

5 MS. ROMAGNOLI: Objection.

6 THE WITNESS: No doubt.

7 BY MR. GAGNE:

8 Q. And how do you know that they understood that?

9 A. They said it was serious. They thanked me for
10 telling them, and they said they would handle it and
11 look into it more, and said that they would take it
12 seriously and handle it.

13 Q. Did they tell you what they were going to do to
14 handle it?

15 A. Not at that time, no, not at all.

16 Q. Did you discuss with Mr. Schultz and Mr. Curley
17 in that meeting whether the police or other
18 authorities should be informed about what you had
19 seen?

20 MS. ROMAGNOLI: Objection.

21 THE WITNESS: Did I discuss it with
22 them?

23 BY MR. GAGNE:

24 Q. Yes.

Michael J. McQueary

1 A. No, just that I thought it was extremely
2 serious. And again, by having Mr. Schultz there, it's
3 my belief that the police are being notified.

4 Q. And approximately how long did this meeting
5 with Mr. Schultz and Mr. Curley take place?

6 A. Again, it's a guess, 15 minutes.

7 Q. And did you describe to Mr. Curley and
8 Mr. Schultz that you had seen Mr. Sandusky in close
9 front-to-back contact with a child in the showers?

10 MS. ROMAGNOLI: Objection.

11 BY MR. GAGNE:

12 Q. Did you give them that detail?

13 A. I can't remember if I gave them that exact
14 detail.

15 Q. Do you remember what details you gave them?

16 A. That he was molesting a boy for sure, and that
17 it was extremely sexual and bad.

18 Q. Did you give them the step-by-step detail of
19 how you saw it in the mirror and then --

20 A. I can't remember if I did that, no.

21 Q. -- directly? And when you told them that you
22 had seen Mr. Sandusky molesting a boy in the showers,
23 did they ask you exactly, you know, what was he doing?

24 MS. ROMAGNOLI: Objection.

Michael J. McQueary

1 Q. And to the best of your recollection, what did
2 you talk about with Coach Bradley?

3 A. Frankly, at some point in time, I discussed,
4 briefly, what I had seen. And some -- I'm sure -- I
5 can't discuss -- I mean I can't -- not discuss, I
6 can't remember every single time Tom and I talked
7 about Sandusky. I mean, we lived together, the whole
8 nine yards. So, you know, I'm sure we talked about
9 several things --

10 Q. When --

11 A. -- but I can't --

12 Q. I'm sorry.

13 A. -- can't remember everything.

14 Q. When you told Coach Bradley what you had seen,
15 what was his reaction?

16 MS. ROMAGNOLI: Objection; foundation.

17 THE WITNESS: Not -- not shocked.

18 BY MR. GAGNE:

19 Q. Did he tell you that he had had information
20 concerning Gerald Sandusky and children?

21 A. He said he knew of some things.

22 Q. And did he tell you what he knew of?

23 A. Yeah.

24 Q. What did he tell you?

Michael J. McQueary

1 A. He said another assistant coach had come to him
2 in the early '90s about a very similar situation to
3 mine, and he said that he had -- someone had come to
4 him as far back as the early '80s about seeing Jerry
5 doing something with a boy.

6 Q. Did he identify who the other coaches were that
7 had given him this information?

8 MS. ROMAGNOLI: Objection.

9 THE WITNESS: The one in the early
10 '90s, yes.

11 BY MR. GAGNE:

12 Q. And who was that?

13 A. Greg Schiano.

14 Q. Greg Schiano?

15 A. Yes.

16 Q. And did he give you any details about what
17 Coach Schiano had reported to him?

18 MS. ROMAGNOLI: Objection.

19 THE WITNESS: No, only that he had -- I
20 can't remember if it was one night or one
21 morning, but that Greg had come into his office
22 white as a ghost and said he just saw Jerry
23 doing something to a boy in the shower. And
24 that's it. That's all he ever told me.

Michael J. McQueary

1 BY MR. GAGNE:

2 Q. Did he tell you what, if anything, he had done
3 about that?

4 MS. ROMAGNOLI: Objection.

5 THE WITNESS: No, he didn't share that
6 with me.

7 BY MR. GAGNE:

8 Q. You don't know if Coach Bradley reported that
9 to anyone?

10 A. I do not know that.

11 Q. And what detail did -- if any, did he give you
12 about the incident in the early '80s?

13 A. None, just that someone had seen him, him being
14 Jerry, doing something to a boy. But again, I don't
15 know anything other than setting. I mean, I don't
16 know setting, know nothing about that.

17 Q. To the best of your recollection, when did this
18 conversation with Coach Bradley take place?

19 A. Oh, it's sometime after 2001, mid -- when I say
20 mid 2000s, meaning like 2005, '06; it could have been
21 anywhere in there. But I can't remember an exact date
22 at all.

23 Q. I'll represent to you that when we took his
24 deposition, Fran Ganter testified that Coach Bradley

Michael J. McQueary

1 had verbally complained to Coach Ganter about Coach
2 Sandusky and his being permitted to be on the Penn
3 State facilities.

4 Did Coach Bradley ever express such
5 opinions to you?

6 MS. ROMAGNOLI: Objection.

7 THE WITNESS: Yeah. You know, Tom was
8 kind of a -- yeah, he would be upset and
9 frustrated about that, like I was. You know
10 when I said before, I think you asked a
11 question would I ever express if I was
12 frustrated or complained about Jerry being
13 around; it was probably both of us complaining
14 to each other about it.

15 BY MR. GAGNE:

16 Q. Did any other members of the football staff
17 communicate any -- communicate to you any knowledge
18 they had regarding Jerry Sandusky and kids?

19 MS. ROMAGNOLI: Objection.

20 THE WITNESS: Can I ask a time period,
21 like ever?

22 BY MR. GAGNE:

23 Q. After 2001.

24 A. After 2001?

FILED

07 JAN 2016 01:04 pm

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THE PENNSYLVANIA STATE UNIVERSITY,)	COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY,
)	PENNSYLVANIA
Plaintiff,)	
)	NOVERMBER TERM 2013
v.)	CIVIL ACTION NO. 03195
)	
PENNSYLVANIA MANUFACTURERS' ASSOCIATION INSURANCE COMPANY,)	
)	MOTION CONTROL No.
Defendant.)	15111033
)	

PRAECIPE TO SUPPLEMENT/ATTACH

TO THE PROTHONOTARY:

The documents being requested to be attached are requested to be filed under seal in accordance with this Court's December 4, 2015 Order, a copy of which immediately follows this Praecipe.

Kindly supplement The Pennsylvania State University's Opposition to Pennsylvania Manufacturers' Association Insurance Company's Motion for Partial Summary Judgment, Control No. 15111033, with the unredacted Answer, Opposition Memorandum of Law and Exhibits 3 and 4, all of which should be filed under seal.

Case ID: 131103195

Control No.: 15111033