

1 IN THE COURT OF COMMON PLEAS
 2 PHILADELPHIA COUNTY, PENNSYLVANIA
 3 - - -
 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 - - - - -
 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 - - - - -
 12 THE PENNSYLVANIA STATE : CIVIL ACTION
 UNIVERSITY, :
 13 Plaintiff, :
 - vs. - : NOVEMBER TERM, 2013
 PENNSYLVANIA MANUFACTURERS' :
 14 ASSOCIATION INSURANCE :
 15 COMPANY, :
 Defendants. : NO: 03197

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 17 ** C O N F I D E N T I A L **
 18 Friday, May 22, 2015
 19 - - -

19 Oral deposition of TOM BRADLEY, taken
 20 pursuant to notice, was held at the law offices of
 Kleinbard Bell & Brecker, LLC, 1650 Market Street, One
 21 Liberty Place, 46th Floor, Philadelphia, Pennsylvania
 19103, at 8:57 a.m., on the above date, before Lisa
 22 DePascale, a Court Reporter and Notary Public of the
 Commonwealth of Pennsylvania and Delaware.
 23 GOLKOW TECHNOLOGIES, INC.
 877.370.3377 ph|917.591.5672 fax
 24 deps@golkow.com

1 don't remember that.

2 BY MR. GAGNE:

3 Q. Do you have any reason to believe he was being
4 untruthful, whatever he told you?

5 A. Truthful meaning in what regard? What he
6 saw -- what he thought he saw?

7 Q. Yes. Do you believe he was lying to you when
8 he told you that story?

9 MS. ROMAGNOLI: Objection.

10 MR. WINNING: You can answer.

11 THE WITNESS: I don't think so.

12 BY MR. GAGNE:

13 Q. Did you do anything at all after hearing of
14 this incident from Mr. McQueary?

15 A. No, because it was reported.

16 Q. Did you believe that reporting to Coach
17 Paterno, Mr. Curley and Mr. Schultz was the
18 appropriate thing to do on Mr. McQueary's part?

19 MS. ROMAGNOLI: Objection, foundation.

20 MR. WINNING: Yeah, I don't know that
21 he's prepared or --

22 THE WITNESS: I'm not qualified to
23 answer.

24 MR. WINNING: -- or qualified to answer

1 what was inappropriate under the circumstances.
2 He can only say what he recalled happening and
3 what he did, period.

4 MR. GAGNE: Well, I think he can tell
5 me whether he believed that Mr. McQueary had
6 followed appropriate procedure in reporting
7 what he had seen to Coach Paterno, Mr. Curley
8 and Mr. Schultz.

9 MS. ROMAGNOLI: Objection, foundation
10 and also calls for opinion and speculation.

11 MR. WINNING: Yeah, I join in the
12 objection. Mr. Bradley is not qualified to
13 speak as to what constitutes appropriate
14 procedure.

15 BY MR. GAGNE:

16 Q. Can you answer the question.

17 MR. WINNING: He can only say what he
18 did, what he heard, what he saw.

19 THE WITNESS: I don't know what
20 appropriate -- I believe that that's what he
21 was supposed to do was report it to his
22 superior, which obviously Coach Paterno was and
23 Tim Curley and Gary Schultz.

24

1 BY MR. GAGNE:

2 Q. Had you received any kind of training as
3 coaches on how to proceed if you saw something that
4 you believed was inappropriate or illegal?

5 A. No.

6 Q. What would you have done if you had seen
7 something you thought was inappropriate between
8 another coach and a young boy? Who would you have
9 reported to?

10 MS. ROMAGNOLI: Objection, vague --

11 MR. WINNING: Objection, don't answer
12 that question. It calls for total speculation.

13 MS. ROMAGNOLI: -- and calls for
14 speculation.

15 MR. WINNING: I am instructing the
16 witness not to answer the question.

17 MS. ROMAGNOLI: And I will just note
18 for the record that PMA has taken the position
19 in every deposition of one of its witnesses
20 that they are not to speculate or answer
21 hypothetical questions.

22 BY MR. GAGNE:

23 Q. Did Coach Paterno ever talk to you about the
24 incident that Mr. McQueary had reported to him?