

**The (---) Law Offices, LLP
Deposition Summary
Privileged and Confidential**

Case Caption: (---), (---) vs. (---)
(---) File Number: (---)
Date of Deposition: April 7, (---)
Responsible Attorney: (---), Esq.
Date of Records Review: May 12, (---)
Reviewed by: (---)

Overview:

This is a summary of the telephone deposition of (---), sister of (---), testifying to the character of her brother's relationship with his Polish wife, (---).

Summary of Testimony:

---Although she lived for years in California, (---) testifies that she made frequent trips to her brother's home in Philadelphia, staying for extended periods of time. (P-8, L-7)

--- (---) claims her brother, (---), had a fictitious marriage with (---) in order to help her remain in the country. (P-11, L-6)

--- (---) claims that her brother lived alone. (P-13, L-13)

--- (---) testifies that her brother, (---), went to the trouble of setting up a fake woman's bedroom so that if immigration ever checked, it would appear that a woman was living at the house with him. (P-14, L-4)

--- (---) testifies that (---) lived in a separate domicile. (P-16, L-15)

--- (---) suggests that (---) is in some kind of relationship with another man. (P-18, L-21)

--- (---) testifies that her brother, (---), told her his wife, (---), did not come to visit him when he was hospitalized. (P-20, L-15)

--- (---) testifies that (---) was present when the decision was made to take (---) off of life support, but that she had no part in it. (P-22, L-20)

--- (---) says her brother, (---), will testify erroneously that (---) occupied his brother, (---)'s home because he feels sorry for her. (P-24, L-14)

--- (---) says she received a "very offensive letter" from (---). (P-24, L-22)

--- (---) testifies that her brother admitted to her that he and his wife never shared a sexual relationship. (P-26, L-18)

--- (---) rejects the idea that the neighbors would claim that (---) ever shared her brother, (---)'s house since she is convinced that they never did. (P-33, L-19)

--- (---) says that with the possible exception of her brother, (---), the rest of her siblings will all testify that her brother, (---), and his wife, (---), never lived under the same roof. (P-35, L-13)

--- (---) finds it hard to believe that (---) was ever involved painting the bathroom of her brother, (---)'s house. (P-41, L-2)

--- (---) testifies that to the best of her knowledge (---) never came to visit her brother, (---), during his last hospitalization before he died. (P-42, L-17)

--- (---) claims that (---) and (---) filed joint tax returns in the beginning to make their marriage seem legitimate, but that later on they began filing separately. (P-44, L-24)

--- (---) denies that (---) had belongings that had to be removed from (---)'s house after he passed away. (P-47, L-20)

--- (---) testifies that her brother, (---), paid the majority of (---)'s funeral expenses and not his wife, (---). (P-50, L-16)

--- (---) says that as far as she knows (---) only attended one party with her brother, (---), and that even then, she did not sit at the same table with him. (P-53, L-4)