

1 WILLIAM F. BROWDER (4/15/15)

2 A. No.

3 Q. Isn't it true that Mr. Magnitsky
4 turned down legal assistance from you?

5 A. No.

6 Q. He always accepted your legal
7 assistance?

8 A. Yes.

9 Q. So you provided him with lawyers?

10 A. His firm did and we reimbursed
11 them.

12 Q. Firestone and Duncan?

13 A. Correct.

14 Q. And they would periodically provide
15 him with statements -- provide Mr. Magnitsky
16 with statements that he should sign?

17 A. Who?

18 Q. Firestone Duncan or his lawyers
19 hired by Firestone Duncan.

20 A. I'm -- I'm not -- I don't know what
21 you're talking about.

22 Q. Did you consult with
23 Mr. Magnitsky's lawyers from time to time?

24 A. No.

25 Q. Somebody on your team do that?

1 WILLIAM F. BROWDER (4/15/15)

2 A. Possibly. I don't know.

3 Q. People at Firestone Duncan would
4 have, right?

5 A. Surely.

6 Q. Did you have Brown Rudnick
7 representing you at the time?

8 A. No.

9 Q. So Firestone Duncan was your lawyer
10 at the time?

11 A. Not the only ones. We had other
12 lawyers.

13 Q. So did anybody coordinate on your
14 behalf with Firestone Duncan about the
15 death -- the defense of Mr. Magnitsky?

16 A. I don't know.

17 Q. You don't know?

18 A. I don't remember.

19 Q. You were being criminally
20 prosecuted along with Mr. Magnitsky at that
21 time. You didn't pay attention?

22 A. I don't know. I don't remember.

23 Q. Did you ever have somebody suggest
24 to Mr. Magnitsky that he should take
25 responsibility for the Saturn and Dalnaya Step

1 WILLIAM F. BROWDER (4/15/15)

2 tax returns?

3 A. I don't remember.

4 MR. CYMROT: Okay. Why don't we

5 take a break.

6 THE VIDEOGRAPHER: The time is

7 6:24 p.m. We're off the record.

8 (Whereupon, at this time, a short

9 break was taken.)

10 THE VIDEOGRAPHER: The time is

11 6:34 p.m. We are back on the record.

12 BY MR. CYMROT:

13 Q. I asked you about taping. We

14 talked about specific taping, but does

15 Hermitage have a taping system for taping

16 incoming and outgoing calls generally for

17 regulatory purposes or otherwise?

18 A. Yes.

19 Q. And how long do you keep those

20 tapes?

21 A. I don't know the details.

22 Q. Do you know whether those tapes

23 have been searched for any relevant

24 conversations?

25 A. I don't know.