

Exhibit B

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

- - -

DOREEN WOODWARD, Ind. and as:
Administrator of the ESTATE :
OF JOHN DAVID WOODWARD, JR., :
deceased, and as Parent and :
Natural Guardian of E.W., :
a minor, :

Plaintiffs

vs.

CHRISTOPHER BASHORE, Ind. :
and in his capacity as WEST :
GOSHEN TOWNSHIP MANAGER, :
WEST GOSHEN TOWNSHIP, and :
WEST GOSHEN TOWNSHIP BOARD :
OF SUPERVISORS, :

Defendants

No. 23-5126

Monday, July 1, 2024

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Oral Deposition of E.W., a minor,
taken at the Law Offices of Saltz, Mongeluzzi &
Bendesky, 1650 Market Street, 52nd Floor, One
Liberty Place, Philadelphia, Pennsylvania
19103, commencing at 10:55 a.m. before Denise
M. O'Rourke, Professional Court Reporter and
Notary Public; in and for the Commonwealth of
Pennsylvania.

* * *

1 APPEARANCES:

2
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I N D E X
- - -

Testimony of: E.W.

By Mr. Alexander.....4
By Mr. Dehon.....13

- - -

E X H I B I T S

- - -

EXHIBIT NUMBER DESCRIPTION PAGE MARKED

(No Exhibits were marked.)

1 - - -

2 E.W., after having been first
3 duly sworn/affirmed, was examined and testified
4 as follows:

5 - - -

6 (EXAMINATION)

7 - - -

8 BY MR. ALEXANDER:

9 Q. Okay. E.W., I am Paul
10 Alexander, I have been retained by West Goshen
11 Township in regards to the facts regarding this
12 case. As part of that, I am going to depose
13 you.

14 Have you ever been through a
15 deposition before?

16 A. No.

17 Q. Okay. Well, I understand this
18 is a sensitive matter and this is upsetting and
19 I don't want to act like I am not concerned
20 about things. If you need a break at any
21 time in this, the most important thing, you
22 know, is that you can ask for one and you can
23 have a break at any time if you need to do
24 that. We just ask you that if there is a
25 question, you answer that question before you

1 do that. Okay?

2 A. Uh-huh.

3 Q. Basically a deposition is kind
4 of a question and answer session, so I will ask
5 you some questions, answer them to the best
6 that you can.

7 If you don't understand a
8 question, say you don't understand it, I
9 will try to rephrase it for you. Understood?

10 A. Yeah.

11 Q. Okay. The court reporter is
12 here, she is typing down everything that we
13 say, so we will do our best to keep our answers
14 verbal.

15 A. Okay.

16 Q. I mean we all shake our heads,
17 nod, I talk with my hands, but we have to do
18 our best to be verbal. Okay?

19 A. Okay.

20 Q. We will do our best not to speak
21 over each other, so I will try to let you
22 finish your answers, try to let me finish my
23 questions. Okay?

24 A. Okay.

25 Q. If you don't remember, that is

1 fine, just say you don't remember. If you
2 don't recall, say you don't recall, that is
3 fine.

4 A. Okay.

5 Q. If you don't know the answer to
6 the question, say you don't know the answer to
7 that. Okay?

8 A. Uh-huh.

9 Q. It is not a memory contest.
10 Understood?

11 A. Yeah.

12 Q. Okay. Some questions may sound
13 simple, but there might be a follow up coming
14 to that, so just bear with me. Okay?

15 A. Okay.

16 Q. I am just going to ask you some
17 basic background questions. I got some of it
18 from your mother, who was just deposed. So my
19 understanding is you just moved Friday?

20 A. Yeah.

21 Q. Okay. And prior to that, you
22 lived your entire life in Kennett Square?

23 A. Yes.

24 Q. And my understanding is you are
25 going to Penn State this fall?

1 A. Yes.

2 Q. And will you be living at Penn
3 State?

4 A. Yes.

5 Q. Okay. And are you currently
6 working?

7 A. Yes, I am. It is complicated.
8 I am still working at the restaurant that I
9 used to work at at Kennett, but I am like
10 covering people, I am not fully on the
11 schedule, but I am still --

12 Q. Okay. Are you looking for
13 something closer to Sellersville now?

14 A. Yes.

15 Q. Okay. Well, good luck. And
16 what about did you work during the school year,
17 during this past school year?

18 A. Yes.

19 Q. Where did you work?

20 A. Floga Bistro.

21 Q. What is the name of it?

22 A. Floga Bistro.

23 Q. Is that where you are working
24 now and looking --

25 A. Yes.

1 Q. Did you work there last summer
2 in 2023?

3 A. Yes.

4 Q. How long have you worked there?

5 A. Since May of '23.

6 Q. And what do you do there?

7 A. I am a waitress.

8 Q. And fair to say you have lived
9 at home last summer 2023?

10 A. Yes.

11 Q. All right. I am going to be
12 asking you questions about that period of time
13 between July 20th and July 28th now.

14 First, I am going to ask you
15 during that period of time from July 20th to
16 July 28th, do you recall were you home that
17 entire week?

18 A. Yes.

19 Q. And when I say that, I mean you
20 spent the night at home everyday?

21 A. Yes.

22 Q. Did you know that your father
23 had been placed on administrative leave?

24 A. Yes.

25 Q. How did you find that out?

1 A. My mom told me after he had told
2 her.

3 Q. Okay. Did you ever have a
4 conversation with your father about that?

5 A. No, not in detail.

6 Q. When you say not in detail,
7 just --

8 A. I just knew he was on
9 administrative leave.

10 Q. Okay. Now, when you were
11 working at this bistro, was that full time?

12 A. No.

13 Q. About how many hours a week?

14 A. Probably around 10 to 15.

15 Q. Okay. So you were working
16 lunches --

17 A. Mostly dinners.

18 Q. So what is that, maybe two days
19 a week, three days a week?

20 A. Yeah.

21 Q. Weekends?

22 A. Yes, sometimes.

23 Q. Do you recall if you were
24 working the night of July 27th?

25 A. I don't think so.

1 Q. Would it be fair -- in regards
2 to your father's demeanor or personality, would
3 it be fair to say he was a calm person?

4 A. He -- overall he was a calm
5 person.

6 Q. Do you know what the term
7 even-keeled means?

8 A. Is that like calm?

9 Q. If you don't know what it means,
10 I am not going to ask you to adopt it. Don't
11 adopt the terminology just because an attorney
12 asks you a question. Okay?

13 A. All right.

14 Q. But you said he was overall a
15 calm person?

16 A. Yes.

17 Q. Was he moody?

18 A. No.

19 Q. Okay. Emotional, was he an
20 emotional person?

21 A. No.

22 Q. Do you recall seeing your father
23 the night of July 27th?

24 A. Yes.

25 Q. When did you see him?

1 A. I came home, I was actually at a
2 friend's house, I came home that night around
3 11:00 because that was my curfew.

4 Q. Okay. And where was he?

5 A. He was in the family room.

6 Q. Did you have any discussion?

7 A. I just said love you, goodnight
8 and went to bed.

9 Q. Was he awake or --

10 A. Yeah.

11 Q. Anything unusual about that
12 interaction?

13 A. No.

14 Q. How did you find out your father
15 had passed?

16 A. My mom came in to my room. I
17 knew there were cops outside, my mom came to my
18 room and said that my dad was dead.

19 Q. I am sorry. So you were
20 shocked?

21 A. Yeah.

22 Q. Was there anything from your
23 interactions with your father the day before
24 that you saw this coming or --

25 A. No.

1 Q. What about in the week leading
2 up to that from July 20th to 27th, did you see
3 anything in your interactions with your father
4 that you saw this coming or believed that he
5 might hurt himself?

6 MR. DEHON: Objection to form.
7 You can answer.

8 THE WITNESS: He was really
9 distraught and he was really upset, but I never
10 in a million years thought that he would do
11 something like this. It just wasn't him.

12 BY MR. ALEXANDER:

13 Q. Did you -- during the week from
14 July 20th to July 27th did you guys go anywhere
15 as a family together to eat or anything?

16 A. We actually came here to Philly
17 to the Franklin Institute because there was a
18 Disney Exhibit and me and him love Disney.

19 Q. Okay. I remember that Exhibit.
20 And that was the whole family came?

21 A. Yes.

22 Q. Anything else?

23 A. Not that I recall, no.

24 Q. Did you know any of the details
25 of what was going on with the investigation at

1 work with your father?

2 A. I knew that he was -- I knew
3 that he had been placed on administrative
4 leave for he just said false -- like a
5 false accusation and that there was going to be
6 a -- not an interrogation, but an investigation
7 until the following Thursday when we would find
8 out what the results were. I didn't really
9 know the details.

10 Q. Anything else?

11 A. No.

12 Q. Did he tell you that or did your
13 mother tell you that?

14 A. I think they both said along the
15 lines of it wasn't fair or something like that.

16 Q. All right. Other than that
17 conversation, did you have any conversations
18 with him about work?

19 A. No.

20 MR. ALEXANDER: I have no more
21 questions for E.W. Do you have any?

22 - - -

23 (EXAMINATION)

24 - - -

25 BY MR. DEHON:

1 Q. I just have one question, E.W.
2 The week of the 20th when he
3 came home after being placed on unpaid leave
4 and then until when he passed, is it fair to
5 say that say that your father wasn't
6 himself?

7 A. Yes.

8 MR. DEHON: I have no further
9 questions.

10 MR. ALEXANDER: Thank you, E.W.,
11 for coming down here, I appreciate it.

12 THE WITNESS: Thank you.

13 (Witness is excused.)

14 - - -

15 (Whereupon, the deposition was
16 concluded at approximately 11:05 a.m.)

17 - - -

18 COURT REPORTER: Counsel,
19 copies?

20 MR. DEHON: Yes, please.

21 MR. ALEXANDER: Yes.

22

23

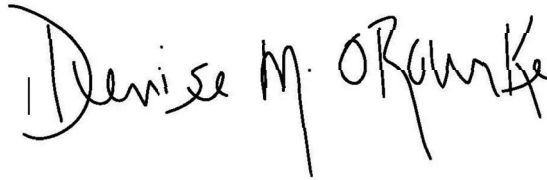
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C E R T I F I C A T E

I, do hereby certify that I am a Notary Public in good standing, that the aforesaid testimony was taken before me, pursuant to notice, at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth, and nothing but the truth; that the testimony of said deponent was correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the deposition is a true record of the testimony given by the witness; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.

WITNESS my hand and official seal this 9th day of July, 2024.



Denise M. O'Rourke
Notary Public