

Exhibit A

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

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

9 Plaintiffs :

10 vs. :

11 CHRISTOPHER BASHORE, Ind. :
12 and in his capacity as WEST :
13 GOSHEN TOWNSHIP MANAGER, :
14 WEST GOSHEN TOWNSHIP, and :
15 WEST GOSHEN TOWNSHIP BOARD :
16 OF SUPERVISORS, :

17 Defendants :

18 No. 23-5126

19 Monday, July 1, 2024

20 Oral Deposition of DOREEN WOODWARD,
21 taken at the Law Offices of Saltz, Mongeluzzi &
22 Bendesky, 1650 Market Street, 52nd Floor, One
23 Liberty Place, Philadelphia, Pennsylvania
24 19103, commencing at 10:00 a.m. before Denise
25 M. O'Rourke, Professional Court Reporter and
Notary Public; in and for the Commonwealth of
Pennsylvania.

* * *

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I N D E X
- - -

Testimony of: Doreen Woodward

By Mr. Alexander.....4, 43
By Mr. Dehon.....40

- - -

E X H I B I T S

- - -

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2 DOREEN WOODWARD, after having
3 been first duly sworn/affirmed, was examined
4 and testified as follows:

5 - - -

6 (EXAMINATION)

7 - - -

8 BY MR. ALEXANDER:

9 Q. Okay. Ms. Woodward, I am Paul
10 Alexander and I have been assigned --

11 MR. DEHON: Paul, I am sorry,
12 can I cut you off real quick. I just want to
13 put something on the record.

14 MR. ALEXANDER: Sure.

15 MR. DEHON: For purposes of the
16 transcript to be consistent with prior
17 pleadings and for anonymity, can we stipulate
18 for the court reporter for any reference to
19 E.W. be transcribed to initials for E.W., just
20 for future pleadings to the Attachments?

21 MR. ALEXANDER: I have no
22 objection to that.

23 MR. DEHON: Okay, thank you.

24 BY MR. ALEXANDER:

25 Q. Okay. Ms. Woodward, I have been

1 assigned by an insurance company in regards to
2 representation of West Goshen Township, as well
3 as people named in the Complaint from the Board
4 of Supervisors and Christopher Bashore.

5 We are going to be conducting a
6 deposition this morning and before we start, I
7 am just going to give you some basic ground
8 rules for depositions and I always start with
9 this question, have you ever been deposed
10 before, been part of a deposition?

11 A. Yes.

12 Q. Okay. And how long ago was
13 that?

14 A. Four months maybe.

15 Q. And was that in relationship to
16 these facts and circumstances?

17 A. Yes.

18 Q. Okay. Anything other than that?

19 A. No.

20 Q. Well, I believe that you may be
21 referring to the workers' comp -- referring to
22 the workers' compensation case?

23 A. Yes.

24 Q. These depositions are a little
25 different, but the basics are more or less the

1 same. So I am just going to give my
2 instructions now and if you don't understand
3 anything, just let me know that you don't
4 understand.

5 I am going to start with this:
6 I understand this is extremely sensitive and
7 this is about a very specific topic in dealing
8 with this and I want to be mindful of that and
9 if at any point during this deposition, you
10 want to take a minute, need a break, need to
11 excuse yourself, just let us know.

12 A. Okay.

13 Q. There is no problem with that,
14 okay. The only thing we generally ask if there
15 has been a question asked that you answer the
16 question and we can take a break for whatever
17 you need, whenever. Okay?

18 A. Okay.

19 Q. All right. I am going to ask
20 you some basic questions now, just about what
21 is going on, some background questions and then
22 we will get into some questions about -- more
23 about, you know, the period of time in July of
24 2023. Okay?

25 A. Okay.

1 Q. If you don't understand
2 anything, a question that I ask or anything,
3 just ask me to clarify if, I will repeat it,
4 rephrase it, whatever you need me to do. I
5 want to make sure that you understand the
6 questions before you answer them.

7 A. Okay.

8 Q. We are going to do our best not
9 to speak over each other. I am definitely
10 guilty of this, but we are going to do our best
11 for the Court reporter on this, so she can make
12 an accurate record. Okay?

13 A. Okay.

14 Q. If you don't know or you don't
15 remember, say you don't know or you don't
16 remember. That is a perfectly acceptable
17 answer. We don't want you to guess. Okay?

18 A. Okay.

19 Q. If you do guess or approximate
20 or estimate, let us know that is what you are
21 doing. Okay?

22 A. Okay.

23 Q. Sometimes some questions I ask
24 may sound simple, may sound obvious, you are
25 saying this guy obviously knows the answer to

1 this question, I may be laying a foundation for
2 something, so just bear with me on that, so
3 just listen the questions and answer the
4 questions as they go. Okay?

5 A. Okay.

6 Q. Are you on any medication or
7 anything like that that may impede your memory
8 or ability do understand my questions?

9 A. No.

10 Q. All right. Let's start with
11 some basic questions. Where do you live,
12 ma'am?

13 A. I live in Sellersville,
14 Pennsylvania.

15 Q. Okay. And what is the address?

16 A. 1060 Millcreek Road.

17 Q. And how long have you been
18 there?

19 A. Since Friday.

20 Q. So you just moved last week?

21 A. Yes.

22 Q. Okay. And where were you living
23 prior to that?

24 A. Kennett Square, Pennsylvania,
25 616 Ridge Avenue, Kennett Square, Pennsylvania.

1 Q. And how long were you there?

2 A. 21 years.

3 Q. Okay. How far away is
4 Sellersville? I am not familiar with that
5 town.

6 A. What, Sellersville?

7 Q. Yeah.

8 A. It is in Bucks County, so it is
9 an hour and fifteen north of Kennett Square.

10 Q. Are you from Chester County
11 originally?

12 A. No, Bucks County.

13 Q. Is this closer to where you grew
14 up?

15 A. A little bit. It is about a
16 half hour. My sister lives in Sellersville, so
17 I am close by to her.

18 Q. Is that one of the reasons that
19 you moved up there?

20 A. Yes.

21 Q. In regards to 21 years you lived
22 in Kennett Square, were you with Mr. Woodward
23 when you moved there?

24 A. Yes.

25 Q. Were you married at that time?

1 A. Yes.

2 Q. How long were you married?

3 A. We were married in 2002, so that
4 would be 21 -- almost 21 years.

5 Q. And E.W., only child?

6 A. Yes.

7 Q. And how old is she now?

8 A. She is 18.

9 MR. DEHON: And, Paul, I am
10 sorry if I misspoke earlier, you can say E.W.,
11 just so you are not messing with initials. I
12 was asking the court reporter, any reference to
13 E.W., will be E.W. on the transcript.

14 COURT REPORTER: Sure.

15 BY MR. ALEXANDER:

16 Q. She is going to college now is
17 my understanding?

18 A. In the fall, yes.

19 Q. Penn State?

20 A. Yes.

21 Q. Okay. And do you work?

22 A. Yes.

23 Q. What do you do?

24 A. I am a para-educator.

25 Q. And what is a para-educator?

1 A. So I work with special ed kids
2 in the school districts.

3 Q. And what school district are you
4 with?

5 A. I am currently with Kennett --
6 Consolidated School District, however, my
7 company is not with the school district, it is
8 contracted by the school district, so I work
9 for a company called Ccres.

10 Q. Is that an acronym?

11 A. I don't know what it stands for,
12 to tell you the truth, so C-C-R-E-S.

13 Q. Are you going to stay in Kennett
14 Square after this move, are you transferring?

15 A. No, Ccres has opportunities
16 throughout Bucks County as well.

17 Q. Okay. So you plan to relocate
18 your work --

19 A. Yes.

20 Q. -- to be closer?

21 A. Yes.

22 Q. Is that a full-time position
23 or --

24 A. Full time through the school
25 year.

1 Q. Okay. 40 hours a week or --

2 A. 35.

3 Q. Is it salary, hourly?

4 A. Hourly.

5 Q. How long have you been doing
6 that?

7 A. 13 years.

8 Q. Do you have any intent to change
9 your profession or anything like that or is
10 this --

11 A. I don't know.

12 Q. You don't know. Have you
13 considered anything else?

14 A. Right now, I was just getting
15 through the move and E.W. getting ready for
16 school, so...

17 Q. Okay, understood. I am going to
18 ask you just some background questions. Moving
19 back to July of 2023 for some background
20 questions. In regards to yourself and Mr.
21 Woodward -- first of all, what name did you
22 call him by?

23 A. Dave.

24 Q. Dave. At the period of time
25 July of '23, were you guys having any financial

1 issues, anything like that?

2 A. No.

3 Q. Credit card debt, anything like
4 that?

5 A. No.

6 Q. Did you have a mortgage on the
7 house in Kennett Square?

8 A. Yes.

9 Q. Any past due bills, mortgage,
10 anything like that?

11 A. No.

12 Q. Other than the mortgage, any
13 other loans, anything like that?

14 A. We had a line of credit on the
15 house.

16 Q. Were you doing any projects on
17 the house, additions, anything like that?

18 A. We just did a bunch.

19 Q. You had just done a bunch in
20 July of '23?

21 A. No, within the years prior to
22 that, we renovated our kitchen, put on a screen
23 porch, put in a pool.

24 Q. Were they completed at the time
25 in July of '23?

1 A. Yes.

2 Q. In regards to Mr. Woodward, did
3 he have any health issues that you knew of back
4 in July of '23?

5 A. No.

6 Q. Did he have like a regular
7 doctor or family doctor that he went to?

8 A. Not on a regular basis.

9 Q. Did he ever have any past
10 issues, like heart disease or diabetes,
11 anything like that?

12 A. No.

13 Q. Now, you said that he didn't go
14 to a doctor on a regular basis. Do you mean
15 that he didn't go for checkups or he just
16 didn't go for --

17 A. Correct. He just didn't
18 go -- if he got sick or had a cold or
19 something or bad cold that he couldn't shake,
20 he would go to the doctor, but not anything on
21 a regular basis.

22 Q. Was he someone that didn't like
23 going to doctors?

24 MR. DEHON: Objection to form.

25 THE WITNESS: I mean he is a

1 guy, I mean.

2 BY MR. ALEXANDER:

3 Q. Excuse me?

4 A. He just didn't need to.

5 Q. All right. Do you know if he
6 took any prescription medications?

7 A. No.

8 Q. Any other supplements, vitamins,
9 anything like that that he was on?

10 A. Sure. He would take Vitamin C,
11 multi-vitamin.

12 Q. Did he have any physical
13 injuries or anything?

14 A. No.

15 Q. Did he have any in the past?

16 A. He did, yes, in 2018.

17 Q. And what was that?

18 A. He tore his ACL.

19 Q. So he tore his knee?

20 A. Yes.

21 Q. How did he do that?

22 A. He was mowing the lawn, we had a
23 retaining wall and he fell off the wall.

24 Q. Is there any psychological
25 history in regards to him seeing a psychologist

1 or a therapist or anything like that?

2 A. No.

3 Q. What about marriage counseling,
4 did you guys have ever go to marriage
5 counseling?

6 A. No.

7 Q. Do you know the last time that
8 Mr. Woodward went to a doctor, prior to July of
9 '23?

10 A. I don't.

11 Q. Okay. In regards to -- I noted
12 from discovery, I saw that there were three
13 life insurance policies, including one of them
14 is from the town and two, I guess I would call
15 them, private life insurance policies, is that
16 correct?

17 A. Yes.

18 Q. And all three of those paid out?

19 A. Yes.

20 Q. Were there any other life
21 insurance policies?

22 A. No.

23 Q. Any other death benefits?

24 A. No.

25 Q. So there is nothing that didn't

1 payout?

2 A. Correct.

3 Q. I guess we will just get to it.
4 All right. I am going to start just asking you
5 some questions about the morning of July 28,
6 2023.

7 Do you recall what day of the
8 week it was?

9 A. Friday.

10 Q. Now, judging by what you told me
11 you do for a living, do you work at all in the
12 summers?

13 A. No.

14 Q. I am going to ask you to run
15 through that morning for me.

16 A. That morning I woke up, I didn't
17 have to be anywhere, so I wound up watching a
18 show that I had DVR'd in the morning. After
19 that was over, I took a shower, while I was in
20 the shower, the police knocked on the bathroom
21 door and that is how I found out about my
22 husband.

23 Q. Okay. Do you recall
24 approximately what time you woke up?

25 A. Maybe about 8 o'clock.

1 Q. And you said that you watched a
2 show. Did you watch that in your bedroom?

3 A. Yes.

4 Q. Do you remember what you
5 watched?

6 A. No.

7 Q. And when you woke up, could you
8 tell -- obviously, was Mr. Woodward there?

9 A. No.

10 Q. Had he been there at all the
11 night before to your knowledge?

12 A. No.

13 Q. Were you able to tell whether or
14 not he came in or --

15 A. I didn't notice he was there.

16 Q. Okay. Now, you said that you
17 then went and took a shower?

18 A. Yes.

19 Q. And the police knocked on your
20 bathroom door?

21 A. Yes.

22 Q. Do you recall what time that
23 was?

24 A. Maybe about 9:30.

25 Q. Was E.W. home?

1 A. Yes.

2 Q. Did you see her that morning
3 before you went to take the shower?

4 A. No.

5 Q. Was it normal for Mr. Woodward
6 not to sleep in the bedroom?

7 MR. DEHON: Objection to the
8 form. You can answer.

9 THE WITNESS: Occasionally he
10 would fall asleep downstairs in his recliner.
11 BY MR. ALEXANDER:

12 Q. Okay.

13 A. Most times he would come
14 upstairs, but occasionally he did just sleep
15 all night downstairs.

16 Q. You say that happened
17 occasionally, you said?

18 A. Yes.

19 Q. So when you woke up and he
20 wasn't there, you weren't concerned?

21 A. No.

22 Q. Did you go look for him or call
23 to him or anything?

24 A. No. When he woke up, he
25 usually -- especially because it was a Friday,

1 he didn't normally work on a Friday anyway and
2 he drank coffee, so he would get his coffee and
3 I don't drink coffee, so my routine is wake up,
4 get my shower, go downstairs.

5 Q. So I guess this was kind of like
6 a typical morning then?

7 A. For the most part.

8 MR. DEHON: Objection to form.
9 You can answer.

10 BY MR. ALEXANDER:

11 Q. I guess --

12 MR. ALEXANDER: She did already.

13 THE WITNESS: Yeah.

14 MR. DEHON: Yes.

15 BY MR. ALEXANDER:

16 Q. I am just saying -- I guess what
17 I am saying is when you woke up in the morning
18 and he wasn't there and you watched the DVR and
19 everything, there was nothing unusual at that
20 point in time?

21 A. Correct.

22 Q. Okay. So the police knocked on
23 your door, what happens then?

24 A. The police knocked on the
25 bathroom door, asked me to come downstairs, so

1 I had to get out of the shower, I was literally
2 in the shower, got out of the shower, dried
3 off, got dressed, went downstairs.

4 Q. And the police were downstairs?

5 A. Yes.

6 Q. Was your daughter E.W. there?

7 A. She was still in her bedroom.

8 Q. And what did the police say when
9 you got downstairs?

10 A. That is when he -- they told me
11 that he had passed away.

12 Q. And there was a suicide note,
13 correct?

14 A. Correct. That was on the
15 island.

16 Q. And how many pages was it?

17 A. I don't recall.

18 Q. It was just one note?

19 A. Yes.

20 Q. What were you doing the night
21 before, the night of July 27th?

22 A. The night before we were
23 watching a movie.

24 Q. And who is "we" just to be
25 clear?

1 A. Dave and I.

2 Q. Was E.W. home the night before
3 when you were watching the movie?

4 A. No.

5 Q. Do you know when she got home?

6 A. I don't remember.

7 Q. Okay. And approximately what
8 time were you guys watching a movie together?

9 A. Maybe from 8:00 to 10:00.

10 Q. Do you recall what the movie
11 was?

12 A. I don't recall.

13 Q. And when you say downstairs, is
14 this downstairs in the house or --

15 A. In our family room.

16 Q. Okay, in the family room. Is
17 this where the Dave's recliner is?

18 A. Yes.

19 Q. So after the movie, after you
20 watched the movie, what happens?

21 A. After the movie, I went upstairs
22 to bed. He stayed downstairs, which he often
23 did, sat on the recliner.

24 Q. And is that the last time that
25 you saw him?

1 A. Yes.

2 Q. Anything unusual about watching
3 the movie, anything --

4 MR. DEHON: Objection to form.
5 You can answer.

6 THE WITNESS: Not really.

7 BY MR. ALEXANDER:

8 Q. Okay. That evening on
9 July 27th, you didn't have any conversation
10 with Mr. Woodward that lead you to believe that
11 he might harm himself?

12 A. No.

13 Q. Was there anyone else in the
14 house besides yourself, Mr. Woodward and E.W.
15 on July 27th?

16 A. No.

17 Q. What about in the week leading
18 up, the period of time July 20th to July 27th,
19 did you have any house guests during that
20 period of time?

21 A. Yes.

22 Q. Who was that?

23 A. My sister.

24 Q. And when was that, if you
25 recall?

1 A. July 20th -- actually, July 19th
2 and 20th.

3 Q. Overnight guests?

4 A. Yes.

5 Q. Do you remember why, anything
6 particular?

7 A. Yes, the 19th my sister and I
8 went to a concert in the city. My birthday is
9 the 20th, so she stayed overnight.

10 Q. Do you recall what concert?

11 A. What is that?

12 Q. Do you recall what concert?

13 A. Yes, Bare Naked Ladies.

14 Q. And then she left on the 20th?

15 A. She left early on the 20th.

16 Q. Okay.

17 A. Because of when Dave came home.

18 Q. Before Dave came home or when
19 Dave home?

20 A. No. When Dave came home and
21 notified me that he was on leave, she left.
22 She was supposed to stay.

23 Q. Oh, she left when he came home
24 and told you --

25 A. When he came home and talked to

1 me about the letter that he received.

2 Q. All right.

3 A. He was very upset, I was upset,
4 so my sister left early. She was supposed to
5 stay, but she left early that night.

6 Q. Okay. And he came home, that
7 was later in the day, probably late afternoon?

8 A. About 4:30.

9 Q. Just going back to the 27th,
10 on that day, there was nothing that occurred
11 that day that lead you to believe that Dave
12 might hurt himself that evening or the next
13 morning?

14 A. No.

15 Q. I guess, let me just ask you
16 some questions now from the time period of
17 July 24th, which was a Monday through that
18 Thursday, July 27th.

19 First of all, for this period of
20 time from July 20th to July 27th, were you home
21 the entire time, did you go away at all?

22 A. No, I was home.

23 Q. What about Mr. Woodward? I am
24 not talking about leaving the house for a
25 second, I am asking if you went on a trip or

1 overnight somewhere?

2 A. No.

3 Q. Do you remember travelling
4 anywhere together, whether it was to the store
5 or anything during that week?

6 A. I don't remember.

7 Q. Were there any normal like
8 summer activities that you do or something,
9 projects since you are not working in the
10 summer?

11 A. We have a pool, so I usually
12 hang out by the pool a lot.

13 Q. Okay.

14 A. Had a pool, I should say.

15 Q. Any vacations or anything
16 planned for the summer as a family or --

17 A. I don't recall last summer
18 if -- actually, that is not true. We were
19 planning, I believe it was the first week in
20 August, to go to the beach, which then we
21 cancelled when he was placed on leave.

22 Q. When you say the beach, where do
23 you mean?

24 A. Ocean City, Maryland.

25 Q. Were you renting a place or

1 staying at a hotel?

2 A. Hotel.

3 Q. Was this a vacation that you
4 guys did normally or was this --

5 A. No.

6 Q. Had you ever gone there before?

7 A. Yes, we had been there before,
8 but that is not our normal vacation.

9 Q. Do you have a normal vacation,
10 like an annual vacation?

11 A. Usually we would go to Disney
12 every year.

13 Q. Was E.W. home all week too from
14 the 20th to the 27th?

15 A. Yes.

16 Q. Was she working or anything that
17 summer?

18 A. Yes.

19 Q. What was she doing?

20 A. She worked for a place called
21 the Country Butcher, she was a cashier/server.

22 Q. Do you have a house phone or
23 just cell phones?

24 A. House phone then.

25 Q. Yes, yes.

1 A. Not now.

2 Q. What was the house phone number
3 back in July of '23?

4 A. (610) 444-2724.

5 Q. Did anyone ever use this phone
6 or is it like anybody else's house phone, just
7 collects dust?

8 A. Occasionally we would use it,
9 but mostly collects dust.

10 Q. Now, during the period of time I
11 am going to go from that Monday, July 24th
12 through July 27th, do you recall anything that
13 you and Dave did together that week?

14 A. I don't remember.

15 Q. Did he have any home projects or
16 anything that he was doing that week or work
17 around the house?

18 A. He didn't do much that week, he
19 mostly just sat in his chair.

20 Q. Are you aware that he was
21 interviewed on July 24th in regards to the
22 investigation at work?

23 A. Yes.

24 Q. Did he talk to you about that
25 interview?

1 A. He told me -- no, not about
2 the interview specifically, he just told me
3 that -- I was in the shower and he told me that
4 he just got the text to come in for the
5 meeting.

6 Q. And what about after the
7 meeting, did you talk about the interview with
8 him?

9 A. I don't recall.

10 Q. Did you help him prepare for the
11 meeting or support him in any way in regards to
12 the investigation?

13 MR. DEHON: Objection to the
14 form. You can answer.

15 THE WITNESS: I didn't help him
16 prepare for the meeting.

17 BY MR. ALEXANDER:

18 Q. Did you -- what did you say to
19 him in regards to the meeting? And I am
20 talking about July 24th specifically at this
21 time. Did you say anything to him after he got
22 back from it or ask him how it went?

23 A. I don't remember.

24 Q. At this point in time, we have
25 been doing this deposition process for it seems

1 like months now and I have talked to a number
2 of Dave's co-workers that have been deposed and
3 they would describe his demeanor, some would
4 describe it, as even-keeled or called him calm,
5 do you think that is a fair description of his
6 demeanor?

7 MR. DEHON: Objection to form.
8 Mischaracterization.

9 BY MR. ALEXANDER:

10 Q. Well, I will ask you this, would
11 you describe Dave's demeanor as even-keeled?

12 A. Yes.

13 Q. Calm?

14 A. Yes.

15 Q. Not -- no sudden mood changes,
16 things like that?

17 MR. DEHON: Objection to form
18 again.

19 THE WITNESS: No.

20 BY MR. ALEXANDER:

21 Q. Was that his demeanor from the
22 period of time from July 24th through
23 July 27th?

24 MR. DEHON: Objection to form.
25 You can answer.

1 THE WITNESS: Yes, but he was
2 more withdrawn.

3 BY MR. ALEXANDER:

4 Q. What do you mean by that?

5 A. When I said that he would sit in
6 his chair, I would mean he would sit in his
7 chair, Stare at the TV, but not really watch
8 the TV. He would do -- go out and mow the lawn
9 almost religiously four or five days, it was
10 way longer than that, he wouldn't get up and do
11 the normal things that he would normally do
12 that week.

13 Q. Did you talk to him about that?

14 A. No, I didn't push it because I
15 knew he was very upset.

16 Q. Did Dave tell you about a
17 meeting that he had on July 18, 2023 with
18 Christopher Bashore?

19 A. I don't remember.

20 Q. Do you know Mark Bertolami?

21 A. Yes.

22 Q. How long have you known him?

23 A. 23 years. He was one of the
24 groomsman in our wedding.

25 Q. And you knew he worked with

1 Dave, right?

2 A. Yes.

3 Q. And do you know Dorine McClune?

4 A. Yes.

5 Q. And how long did you know her?

6 A. Last, I don't know -- I don't
7 recall exactly.

8 Q. Okay. Mike Moffa, did you know
9 him?

10 A. A little bit.

11 Q. And Lisa Covatta?

12 A. Yes.

13 Q. How well did you know her?

14 A. As long as she was working with
15 Dave as his secretary. I don't know, however
16 long she has been there.

17 Q. Did you ever discuss the
18 investigation and the administrative leave or
19 the administrative leave with any of them?

20 A. I talked briefly to Lisa a few
21 months ago.

22 Q. A few months ago?

23 A. (Witness nods.)

24 Q. What about back in July of '23?

25 A. Sorry, not a -- yes, a few

1 months ago. In July of '23? No.

2 Q. Did you talk to any of them at
3 all back in July of '23 that you recall?

4 A. No.

5 Q. Did you ever get any information
6 about what was going on at work and the
7 investigation having -- or the investigation
8 from Mark Bertolami, Dorine McClune, Mike Moffa
9 or Lisa Covatta?

10 A. No.

11 Q. So it would be fair to say that
12 everything that you knew about what was going
13 on at work was from Dave?

14 A. Yes.

15 Q. Did anyone else talk to you
16 about what was going on with work regarding the
17 investigation?

18 MR. DEHON: Can you clarify the
19 time period again?

20 BY MR. ALEXANDER:

21 Q. Start with July of '23.

22 A. I have heard some information
23 from the attorney, Fran, but that was after he
24 had passed.

25 Q. I was -- that was the next

1 question that I was going to ask, okay.

2 So I guess on July 20th you said
3 Dave came home around 4:30 and he had a letter,
4 right?

5 A. (Witness nods.)

6 MR. ALEXANDER: I just want to
7 confirm. We will call this Exhibit 1.

8 - - -

9 (Whereupon, Exhibit D.W.-1 was
10 marked for identification.)

11 - - -

12 BY MR. ALEXANDER:

13 Q. Is this the letter, take a
14 chance to look at it.

15 MR. DEHON: Paul, will you send
16 us copies of this letter?

17 MR. ALEXANDER: Here you go.

18 THE WITNESS: Yes.

19 BY MR. ALEXANDER:

20 Q. Did you read it on July 20th?

21 A. I don't recall.

22 Q. So you said Dave came home and
23 obviously you said he was upset, right?

24 A. Yes.

25 Q. And your sister decided to go

1 home early?

2 A. Yes.

3 Q. What did you say to Dave in
4 response to the letter or him telling you that
5 he was on administrative leave?

6 A. I consoled him and I said that
7 we will get through this. See what happens
8 with the investigation and go from there.

9 Q. So you supported him throughout
10 it, would that be fair?

11 A. Absolutely.

12 Q. Did that ever change?

13 A. No.

14 Q. Did you get in any arguments or
15 fights in regards to this?

16 A. No.

17 Q. And I asked you the question
18 earlier about July 24th to July 27th about
19 Dave's demeanor.

20 What was his demeanor like from
21 the period of July 20th through July 24th, the
22 morning of July 24th?

23 A. He was very upset, withdrawn,
24 just shocked that the township placed him on
25 leave.

1 Q. Was it any -- substantially any
2 different than it was after the July 24th
3 meeting with the investigators?

4 A. I don't recall.

5 Q. You don't recall any change, is
6 that what you are saying, from before that
7 meeting with the investigators on July 24th and
8 after?

9 A. I am sorry, can you clarify
10 that?

11 Q. I guess what I am asking and
12 trying to do it best is did you notice any
13 change in his demeanor from before the
14 July 24th meeting with the investigators and
15 after the meeting?

16 A. He was still very upset and,
17 like I said, just overall very upset at the
18 whole investigation.

19 Q. So it was about the same before
20 and after?

21 A. About the same.

22 Q. I am just trying to see if there
23 was think change on that date.

24 Did he ever tell you that he
25 thought he was going to be fired?

1 A. He said that was a possibility.

2 Q. Now, you understood it was
3 unpaid leave, correct?

4 A. Yes.

5 Q. And he had used vacation time?

6 A. Yes.

7 Q. Is that why you had to cancel
8 the vacation for Ocean City?

9 A. Yes.

10 Q. Other than being fired, did he
11 tell you any other possibilities that he was
12 concerned about?

13 A. I don't recall.

14 Q. So he never told you that he
15 thought he was going to jail?

16 A. He did mention that was a
17 possibility.

18 Q. What did you say in response to
19 that?

20 A. I said let's just see -- I was
21 trying to be positive and let's see what
22 happens with the investigation, since we knew
23 he did nothing wrong.

24 Q. Did you ever discuss what was
25 going on with Dave's work with your daughter,

1 E.W.?

2 A. I don't remember.

3 Q. During this period of time, from
4 July 20th through July 27th, was this something
5 that you discussed with Dave everyday or --

6 A. No.

7 Q. -- did you just discuss it on
8 July 20th?

9 A. Specifically the letter or
10 what --

11 Q. What was going on at work with
12 the investigation. I am just trying to figure
13 out is that something that you talked about
14 everyday or something you only talked about
15 once?

16 A. I tried not to bring it up
17 because I knew it was not something that was a
18 pleasant conversation for him and he was
19 already stewing, thinking about the
20 situation.

21 Q. Okay. So other than what you
22 talked briefly July 20th and July 24th, where
23 you said that he talked to you in the shower
24 that he was going, do you recall any other
25 conversations with him about the investigation

1 at work?

2 A. I don't remember.

3 MR. ALEXANDER: I am just going
4 through my notes. We don't have very much
5 left.

6 BY MR. ALEXANDER:

7 Q. So during the week of July 20th
8 through July -- the night of night 27th, when
9 you went to sleep, at no time did you think
10 that Dave was going to hurt himself, is that
11 fair to say?

12 A. No.

13 Q. At no time did you think that he
14 was going to commit suicide?

15 A. No.

16 Q. So it was -- you were shocked to
17 find this out?

18 A. Absolutely, yes.

19 Q. I am not asking you anything
20 Dave might have said to an attorney, but do you
21 know anyone else Dave discussed what was going
22 on at work with, other than yourself?

23 A. I don't remember.

24 Q. Did you discuss it with anyone
25 else?

1 A. I may have discussed briefly
2 with my sister, just -- not anything that was
3 going on at work, but just that -- his
4 demeanor.

5 Q. What is your sister's name?

6 A. Michelle McMahon.

7 Q. You said she lives up in
8 Sellersville?

9 A. Yes.

10 Q. Did Dave go out at all that week
11 by himself and I am talking July 20th through
12 July 27th, do you recall?

13 A. I don't recall.

14 MR. ALEXANDER: Max, I don't
15 know if you have any questions?

16 MR. DEHON: Yeah, I just have a
17 few. Are you done?

18 MR. ALEXANDER: Yeah.

19 - - -

20 (EXAMINATION)

21 - - -

22 BY MR. DEHON:

23 Q. It is fair to say that Dave
24 generally was pretty even-keeled?

25 A. Yes.

1 Q. On July 20th when he came home
2 from being placed on unpaid leave after the
3 meeting, was he upset?

4 A. Absolutely.

5 Q. Was he distraught?

6 A. Yes.

7 Q. Was he visibly upset?

8 A. Yes.

9 Q. Was it out of character for
10 him, as in he was not even-keeled in that
11 scenario?

12 A. Correct.

13 Q. From the 20th to 27th, again, he
14 is typically an even-keeled guy?

15 A. Yes.

16 Q. But the 20th to 27th, he was not
17 even-keeled?

18 A. He was -- I mean, even-keeled to
19 me is just -- he was withdrawn, he was not
20 doing his usual activities of, you know, mowing
21 the lawn or any of the yard work, so I guess I
22 am not understanding exactly what you are
23 asking.

24 Q. He was out of character?

25 A. Yes.

1 Q. He wasn't himself?

2 A. Correct.

3 Q. Could you tell that he was upset
4 because he was not himself?

5 A. Yes.

6 Q. That something was bothering
7 him?

8 A. Yes.

9 Q. And this caused him to be
10 withdrawn?

11 A. Correct.

12 Q. On July 20th, when you had
13 discussed him saying there was a possibility
14 that he would be terminated, he also mentioned
15 the possibility of going to jail?

16 A. Yes.

17 Q. And did he say that this was
18 relayed to him during that meeting?

19 A. Yes.

20 Q. By Mr. Bashore?

21 A. Yes.

22 Q. That Mr. Bashore said that he
23 could potentially go to jail?

24 A. Yes.

25 MR. ALEXANDER: Objection. That

1 is a mischaracterization of what Mr. Bashore
2 said.

3 MR. DEHON: Mr. Bashore has not
4 been deposed. That is consistent with
5 everything that every witness has testified to.

6 MR. ALEXANDER: I disagree.

7 BY MR. DEHON:

8 Q. You can answer.

9 A. Yes.

10 Q. Did Dave say that Mr. Bashore
11 conveyed to him that it was possible for him to
12 go to jail?

13 A. Yes.

14 Q. That he could potentially go to
15 jail for what had happened?

16 A. Yes.

17 Q. And this made Mr. Woodward
18 upset?

19 A. Yes.

20 MR. DEHON: Those are all of the
21 questions that I have, Doreen. Thank you.

22 THE WITNESS: Okay.

23 - - -

24 (EXAMINATION)

25 - - -

1 BY MR. ALEXANDER:

2 Q. Just one more question.

3 Despite all of the leading
4 questions that you were just asked by your
5 Counsel, at no time during that week did you
6 think that Dave would take his life, is that
7 correct?

8 A. No.

9 MR. ALEXANDER: I have no
10 questions.

11 MR. DEHON: I have nothing. I'm
12 good.

13 (Witness is excused.)

14 - - -

15 (Whereupon, the deposition was
16 concluded at approximately 10:45 a.m.)

17 - - -

18

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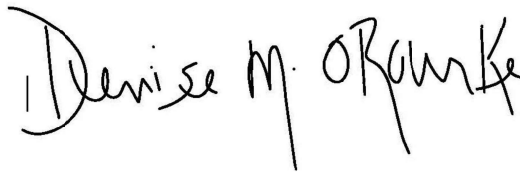
24

25

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

1 INSTRUCTIONS TO WITNESS

2
3 Please read your deposition over
4 carefully and make any necessary corrections.
5 You should state the reason in the appropriate
6 space on the Errata Sheet for any corrections
7 that are made.

8 After doing so, please sign the Errata
9 Sheet and date it.

10 You are signing same subject to the
11 changes you have noted on the Errata Sheet,
12 which will be attached to your deposition.

13 It is imperative that you return the
14 original Errata Sheet to the deposing attorney
15 within thirty (30) days of receipt of the
16 deposition transcript by you. If you fail to
17 do so, the deposition transcript may be deemed
18 to be accurate and may be used in court.

19
20
21
22
23
24
25

E R R A T A

- - - - -

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ACKNOWLEDGMENT OF DEPONENT

I, _____, do hereby certify that I have read the foregoing Pages __ to ___ and that the same is a correct transcription of the answers given by me to the questions therein propounded, except for the corrections or changes in form or substance, if any, noted in the attached Errata Sheet.

DATE SIGNATURE

Subscribed and sworn to before me this _____ day of _____, 2024.

My commission expires:

Notary Public

JOB NUMBER ___ 30759 _____

Doreen Woodward

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Mark (2)	need (5)	part (2)	psychological (1)
MARKED (2)	neither (1)	particular (1)	psychologist (1)
Market (2)	never (1)	party (1)	Public (4)
			purposes (1)

pursuant (1)		stayed (2)	time (27)
push (1)	< S >	staying (1)	times (1)
put (3)	salary (1)	stewing (1)	told (7)
	Saltz (2)	stipulate (1)	topic (1)
< Q >	sat (2)	store (1)	tore (2)
question (8)	saw (2)	Street (2)	town (2)
questions (18)	saying (5)	subject (1)	TOWNSHIP (5)
quick (1)	scenario (1)	Subscribed (1)	transcribed (2)
	school (7)	substance (1)	transcript (4)
< R >	screen (1)	substantially (1)	transcription (2)
read (3)	seal (1)	sudden (1)	transferring (1)
ready (1)	second (1)	suicide (2)	travelling (1)
real (1)	secretary (1)	Suite (1)	tried (1)
really (2)	see (5)	summer (5)	trip (1)
reason (8)	seeing (1)	summers (1)	true (2)
reasons (1)	Sellersville (5)	supervision (1)	truth (4)
recall (21)	send (1)	SUPERVISORS (2)	trying (4)
receipt (1)	sensitive (1)	supplements (1)	TV (2)
received (1)	shake (1)	support (1)	two (1)
recliner (3)	Sheet (5)	supported (1)	typical (1)
record (3)	shocked (2)	supposed (2)	typically (1)
recorded (1)	shorthand (1)	Sure (4)	
reference (2)	show (2)	sworn (2)	< U >
referring (2)	shower (10)	sworn/affirmed (1)	understand (6)
regarding (1)	sick (1)		understanding (2)
regards (10)	sign (1)	< T >	understood (2)
regular (4)	SIGNATURE (1)	take (6)	UNITED (1)
relationship (1)	signing (1)	taken (2)	unpaid (2)
relayed (1)	simple (1)	talk (5)	unusual (2)
religiously (1)	sister (6)	talked (7)	upset (11)
relocate (1)	sister's (1)	talking (3)	upstairs (2)
remember (13)	sit (2)	tell (8)	use (2)
renovated (1)	situation (1)	telling (1)	usual (1)
renting (1)	sleep (3)	terminated (1)	usually (3)
repeat (1)	sorry (4)	testified (2)	
rephrase (1)	sound (2)	Testimony (4)	< V >
Reporter (5)	space (1)	text (1)	vacation (6)
representation (1)	speak (1)	thank (2)	vacations (1)
Representing (2)	special (1)	therapist (1)	visibly (1)
response (2)	specific (1)	thereof (1)	Vitamin (1)
retaining (1)	specifically (3)	thing (1)	vitamins (1)
return (1)	Square (6)	things (2)	vs (1)
Ridge (1)	standing (1)	think (5)	
right (9)	stands (1)	thinking (1)	< W >
Road (1)	Stare (1)	thirty (1)	wake (1)
room (2)	start (6)	THOMAS (2)	wall (2)
routine (1)	State (2)	thought (2)	want (6)
rules (1)	STATES (1)	three (2)	watch (2)
run (1)	stay (3)	Thursday (1)	watched (4)

watching (5)
way (2)
wedding (1)
week (14)
well (5)
went (10)
WEST (4)
withdrawn (4)
WITNESS (16)
woke (6)
WOODWARD (18)
work (17)
worked (2)
workers (2)
working (3)
wound (1)
wrong (1)

< Y >

yard (1)
Yeah (4)
year (2)
years (6)