

Deposition of
Jodi Dossegger
January 19, 2021

York-Goldman
vs.
Goldman



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Jodi Dossegger

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO - NORTH COUNTY DIVISION

_____)
 In re the Marriage of:)
)
 Petitioner: DIANNE YORK GOLDMAN,)
)
 and) Case No.: DN149413
)
 Respondent: MITCHEL PAUL GOLDMAN,)
)
 _____)

VIDEOCONFERENCE DEPOSITION OF JODI DOSSEGGER

Tuesday, January 19, 2021, 3:31 p.m.

Via Remote Zoom Videoconference

Reported by:
 Doreen Furuta Landes
 RPR, CSR No. 5778
 Job No.: 10076611

Jodi Dossegger

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and)	Case No.: DN149413
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Respondent: MITCHEL PAUL GOLDMAN,)	
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VIDEOCONFERENCE DEPOSITION OF JODI DOSSEGER

Taken on behalf of the Petitioner Via Remote
Zoom Videoconference, beginning at 3:31 p.m. and ending at
3:41 p.m., on Tuesday, January 19, 2021, before Doreen
Furuta Landes, RPR, Certified Shorthand Reporter No. 5778 in
and for the State of California.

Jodi Dossegger

1 APPEARANCES (Via Remote Zoom Videoconference):

2

3 For the Petitioner:

4 GRIFFITH, YOUNG & LASS, APC
5 BY: JEFFREY T. WITTLIFF, ESQ.
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8 (858) 345-1720
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7

8 For the Deponent:

9 LAW OFFICE OF PHILIP H. DYSON
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14 phil@phildysonlaw.com

10

12 For Gordon Cruse:

13 ENGLISH & GLOVEN
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18 dae@englishapc.com

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17 Also present:

18 RYAN ASANAS, Tech Monitor
19 Aptus Court Reporting
20 600 West Broadway, Suite 300
21 San Diego, California 92101
22 (619) 546-9151

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I N D E X

Deposition: JODI DOSSEGGER

Tuesday, January 19, 2021

Examination:	Page
By Mr. Wittliff	6

E X H I B I T S

(NONE OFFERED)

Additional Information Requested:

(NONE)

Witness Declaration Page:	Page 14
Witness Correction Page:	Page 15,16

Jodi Dossegger

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TUESDAY, JANUARY 19, 2021, 3:31 P.M.

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THE REPORTER: The attorneys participating in this deposition acknowledge that I am not physically present in the deposition room and that I will be reporting this deposition remotely. They further acknowledge that in lieu of an oath administered in person, the witness will verbally declare her testimony in this matter is under penalty of perjury. The parties and their counsel consent to this arrangement and waive any objections to this manner of reporting.

Please indicate your agreement by stating your name and your agreement on the record.

THE WITNESS: Jodi Dossegger.

MR. DYSON: Philip Dyson representing Ms. Dossegger.

MR. ENGLISH: Donald English representing nonparty Gordon Cruse.

MR. WITTLIFF: Jeffrey Wittliff representing Dianne York.

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Jodi Dossegger

1 JODI DOSSEGGER,
2 a witness herein, called by the Petitioner and having
3 been first duly placed under oath, testified as follows:
4

5 EXAMINATION

6 BY MR. WITTLIFF:

7 Q. Good afternoon. How are you?

8 A. I'm fine. How are you?

9 Q. Fine. Have you ever had your deposition taken
10 before?

11 A. Yes.

12 Q. First, I'll state for the record that you are
13 under oath, which means that you're giving testimony as if
14 you were in court. Your testimony carries the penalty of
15 perjury, so if you do not tell the truth, that means there
16 could be civil or criminal consequences. Do you understand?

17 A. Yes.

18 Q. Everything you and I say today is being taken down
19 by the court reporter. We cannot talk to each other -- we
20 cannot talk over each other because the reporter will not be
21 able to accurately write down what we are saying. So please
22 wait until I completely finish my question before I begin
23 your -- before you begin to answer. Does that make sense?

24 A. Yes.

25 Q. And we do need audible answers for the deposition

1 because the reporter cannot take down nods of your head or
2 sounds that are not words like "uh-huh". Does that make
3 sense?

4 A. Yes.

5 Q. In your deposition we are entitled to your
6 personal knowledge. That means that I will ask you
7 questions about what you know, but you do not have to guess.
8 I'm going to go over the difference between a guess and an
9 estimate. An estimate is something you can determine based
10 upon your knowledge. For example, you could estimate the
11 length of the desk you are sitting at. However, you cannot
12 estimate the length of my couch because you've never seen
13 it.

14 Do you understand the difference between a guess
15 and an estimate?

16 A. Yes.

17 Q. Is there any reason today that you cannot give
18 your best testimony?

19 A. No.

20 Q. Do you have any problems with memory?

21 A. No.

22 Q. Are you feeling abnormally tired today?

23 A. No.

24 Q. Do you -- Are you under the influence of alcohol?

25 A. No.

Jodi Dossegger

1 Q. Have you consumed any drugs that may impair your
2 memory?

3 A. No.

4 Q. Okay. Great. Have you spoken with anybody in
5 preparation of your testimony today?

6 MR. DYSON: I'm going to object to the question.
7 Assumes facts. Potential attorney-client privilege. If you
8 could just rephrase it outside of her attorney, I'd have no
9 problem.

10 BY MR. WITTLIFF:

11 Q. Have you spoken to anybody besides Mr. Dyson in
12 preparation for your testimony today?

13 A. No.

14 Q. Have you reviewed any document besides with
15 Mr. Dyson in preparation for your testimony today?

16 A. No.

17 Q. Okay. We'll jump right into it.
18 Where are you currently employed?

19 A. At the Law Office of Philip Dyson.

20 Q. And how long have you worked there?

21 A. Since 1998.

22 Q. What is the business address of your employer?

23 A. 8461 La Mesa Boulevard, La Mesa, California.

24 Q. And what is your job position?

25 A. Office Administrator.

Jodi Dossegger

1 Q. Has that been your position the entire time?

2 A. Yes.

3 Q. What are your ordinary duties?

4 A. Answer the phone, make photocopies, make scans, do
5 the legal filing through One Legal or whatever other
6 electronic filings we have to do now.

7 Q. Do you sit in one spot in the office?

8 A. Yes.

9 Q. Where is that?

10 A. In the front.

11 Q. Do you have a clear view of the front door?

12 A. Yes.

13 Q. How big is the office, approximately?

14 A. I couldn't guess. It's an old house.

15 Q. Is it one room? Is it multiple rooms?

16 A. It's multiple rooms.

17 Q. Do you generally have an idea of who is in the
18 office at all times?

19 A. Yes.

20 Q. From where you are situated at your desk, can you
21 see anyone who enters the office?

22 A. I sit in the front office.

23 Q. Can you see --

24 A. So yes.

25 Q. -- anyone who enters the front door?

Jodi Dossegger

1 A. Yes.

2 Q. Okay. Are you familiar with the name Dianne York?

3 A. Yes.

4 Q. Have you ever met Dianne York?

5 A. Yes.

6 Q. When did you meet her?

7 A. A long time ago.

8 Q. Do you recall approximately how many years ago?

9 A. Maybe six or seven.

10 Q. Six or seven. Have you met her multiple times?

11 A. No.

12 Q. Six or seven years ago would be approximately 2013
13 or 2014?

14 A. Yes.

15 Q. Have you spoken to Ms. York on the phone at any
16 time?

17 A. Recently, yes.

18 Q. How recently?

19 A. Three or four months ago.

20 Q. Have you spoken to Ms. York on the phone any time
21 before that?

22 A. No.

23 Q. Do you recall when Ms. York came into the office
24 six or seven years ago if she had any documents with her?

25 A. I do not recall.

1 Q. Do you recall if she had any boxes with her?

2 A. I do not recall.

3 Q. Do you recall ever scheduling Ms. York to meet
4 with Mr. Dyson?

5 A. No.

6 Q. Do you recall scheduling Ms. York to meet with
7 anyone else in the office?

8 A. No.

9 Q. Do you recall seeing Ms. York meet with Mr. Dyson?

10 A. Yes.

11 Q. Do you recall seeing Ms. York meet with anyone
12 else in the office?

13 A. No.

14 Q. Approximately how long do you recall Ms. York
15 meeting with Mr. Dyson?

16 A. Ten minutes at the most.

17 Q. And to your knowledge, she has not met with
18 Mr. Dyson at any other time?

19 A. Yes.

20 Q. Do you know anything about the York-Goldman case?

21 A. No.

22 MR. WITTLIFF: That's everything I have to ask.
23 Simple. We can go off the record.

24 MR. ENGLISH: No questions.

25 MR. DYSON: I have no questions of the witness.

Jodi Dossegger

1 MR. WITTLIFF: We can off the record.

2 MR. DYSON: Do you want to just enter into a quick
3 stipulation, Jeff, that we'll relieve the court reporter of
4 her duty under the Code, she will then transmit the
5 transcript to me. I will forward it to Ms. Dossegger. She
6 will review it and within 30 days of receipt, I will notify
7 you of any changes. And I will have it signed under penalty
8 of perjury. And I will transmit it to you, Jeff. In this
9 day and age, I'm assuming that you'll get the original of
10 that.

11 Is that correct, Doreen, you'll just transmit an
12 electronic copy to me instead of a hard copy. Okay?

13 THE REPORTER: Yes, we can.

14 MR. DYSON: And then, Jeff, you'll maintain the
15 original and the signed copy. And if that's not available
16 at any time you guys go to court, anybody can use a copy of
17 the transcript. So stipulated?

18 MR. WITTLIFF: So stipulated to all of that.

19 MR. ENGLISH: So stipulated.

20 MR. DYSON: Okay. Thank you very much.

21 (Whereupon, the deposition was concluded
22 at 3:41 p.m.)

23 * * *

24

25

Jodi Dossegger

1 I, the undersigned, a Certified Shorthand Reporter
2 of the State of California, do hereby certify:

3 That the foregoing proceedings were taken before
4 me at the time and place herein set forth; that any
5 witnesses in the foregoing proceedings, prior to testifying,
6 were duly sworn; that a record of the proceedings was made
7 by me using machine shorthand, which was thereafter
8 transcribed under my direction; that the foregoing
9 transcript is a true record of the testimony given.

10 Further, that if the foregoing pertains to the
11 original transcript of a deposition in a federal case,
12 before completion of the proceedings, review of the
13 transcript {X} was { } was not requested.

14

15 I further certify I am neither financially
16 interested in the action nor a relative or employee of any
17 attorney or party to this action.

18 IN WITNESS WHEREOF, I have this date subscribed by
19 name.

20

21 Dated: January 27, 2021

22



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Doreen Furuta Landes
RPR, CSR No. 5778
State of California

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Jodi Dossegger

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DECLARATION UNDER PENALTY OF PERJURY

Case Name: York-Goldman vs. Goldman

Date of Deposition: 01/19/2021

Job No.: 10076611

I, JODI DOSSEGGER, hereby certify
under penalty of perjury under the laws of the State of
_____ that the foregoing is true and correct.

Executed this _____ day of
_____, 2021, at _____.

JODI DOSSEGGER

NOTARIZATION (If Required)

State of _____

County of _____

Subscribed and sworn to (or affirmed) before me on
this _____ day of _____, 20__,

by _____, proved to me on the
basis of satisfactory evidence to be the person
who appeared before me.

Signature: _____ (Seal)

Jodi Dossegger

1 DEPOSITION ERRATA SHEET

2 Case Name: York-Goldman vs. Goldman
3 Name of Witness: Jodi Dossegger
4 Date of Deposition: 01/19/2021
5 Job No.: 10076611
6 Reason Codes: 1. To clarify the record.
7 2. To conform to the facts.
8 3. To correct transcription errors.

9 Page _____ Line _____ Reason _____
10 From _____ to _____

11 Page _____ Line _____ Reason _____
12 From _____ to _____

13 Page _____ Line _____ Reason _____
14 From _____ to _____

15 Page _____ Line _____ Reason _____
16 From _____ to _____

17 Page _____ Line _____ Reason _____
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Jodi Dossegger

1 DEPOSITION ERRATA SHEET

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7 From _____ to _____

8 Page _____ Line _____ Reason _____

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13 From _____ to _____

14 Page _____ Line _____ Reason _____

15 From _____ to _____

16 Page _____ Line _____ Reason _____

17 From _____ to _____

18 Page _____ Line _____ Reason _____

19 From _____ to _____

20 Page _____ Line _____ Reason _____

21 From _____ to _____

22 _____ Subject to the above changes, I certify that the
transcript is true and correct

23 _____ No changes have been made. I certify that the
transcript is true and correct.

24 _____

25 JODI DOSSEGGER

<hr/> <p>1</p> <hr/> <p>19 5:1 1998 8:21</p> <hr/> <p>2</p> <hr/> <p>2013 10:12 2014 10:13 2021 5:1</p> <hr/> <p>3</p> <hr/> <p>30 12:6 3:31 5:1 3:41 12:21</p> <hr/> <p>8</p> <hr/> <p>8461 8:23</p> <hr/> <p>A</p> <hr/> <p>able 6:21 abnormally 7:22 accurately 6:21 acknowledge 5:4,6 address 8:22 administered 5:7 Administrator 8:25 afternoon 6:7 age 12:9 ago 10:7,8,12,19,24 agreement 5:12,13 alcohol 7:24</p>	<p>answer 6:23 9:4 answers 6:25 anybody 8:4,11 12:16 approximately 9:13 10:8,12 11:14 arrangement 5:10 Assumes 8:7 assuming 12:9 attorney 8:8 attorney-client 8:7 attorneys 5:3 audible 6:25 available 12:15</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>based 7:9 best 7:18 big 9:13 Boulevard 8:23 boxes 11:1 business 8:22</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p>California 8:23 called 6:2 carries 6:14 case 11:20 changes 12:7 civil 6:16 clear 9:11 Code 12:4 completely 6:22</p>	<p>concluded 12:21 consent 5:9 consequences 6:16 consumed 8:1 copy 12:12,15,16 correct 12:11 couch 7:12 counsel 5:9 court 6:14,19 12:3,16 criminal 6:16 Cruse 5:17 currently 8:18</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>day 12:9 days 12:6 declare 5:8 deposition 5:4,5,6 6:9,25 7:5 12:21 desk 7:11 9:20 determine 7:9 Dianne 5:18 10:2,4 difference 7:8,14 document 8:14 documents 10:24 Donald 5:16 door 9:11,25 Doreen 12:11 Dossegger 5:14,15 6:1 12:5 drugs 8:1 duly 6:3 duties 9:3</p>	<p>duty 12:4 Dyson 5:15 8:6,11, 15,19 11:4,9,15,18, 25 12:2,14,20</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>electronic 9:6 12:12 employed 8:18 employer 8:22 English 5:16 11:24 12:19 enter 12:2 enters 9:21,25 entire 9:1 entitled 7:5 estimate 7:9,10,12,15 EXAMINATION 6:5 example 7:10</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>facts 8:7 familiar 10:2 feeling 7:22 filing 9:5 filings 9:6 fine 6:8,9 finish 6:22 first 6:3,12 follows 6:3 forward 12:5 four 10:19 front 9:10,11,22,25 further 5:6</p>
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<hr/> <p>G</p> <hr/> <p>generally 9:17 give 7:17 giving 6:13 go 7:8 11:23 12:16 going 7:8 8:6 Good 6:7 Gordon 5:17 Great 8:4 guess 7:7,8,14 9:14 guys 12:16</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>hard 12:12 head 7:1 house 9:14</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p>idea 9:17 impair 8:1 indicate 5:12 influence 7:24</p> <hr/> <p style="text-align: center;">J</p> <hr/> <p>JANUARY 5:1 Jeff 12:3,8,14 Jeffrey 5:18 job 8:24 Jodi 5:14 6:1 jump 8:17</p>	<hr/> <p>K</p> <hr/> <p>know 7:7 11:20 knowledge 7:6,10 11:17</p> <hr/> <p style="text-align: center;">L</p> <hr/> <p>La 8:23 Law 8:19 legal 9:5 length 7:11,12 lieu 5:6 long 8:20 10:7 11:14</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>maintain 12:14 manner 5:10 matter 5:8 means 6:13,15 7:6 meet 10:6 11:3,6,9,11 meeting 11:15 memory 7:20 8:2 Mesa 8:23 met 10:4,10 11:17 minutes 11:16 months 10:19 multiple 9:15,16 10:10</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>name 5:13 10:2 need 6:25</p>	<p>never 7:12 nods 7:1 nonparty 5:16 notify 12:6</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>oath 5:7 6:3,13 object 8:6 objections 5:10 office 8:19,25 9:7,13, 18,21,22 10:23 11:7, 12 Okay 8:4,17 10:2 12:12,20 old 9:14 ordinary 9:3 original 12:9,15 outside 8:8</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>p.m. 5:1 12:21 participating 5:3 parties 5:9 penalty 5:8 6:14 12:7 perjury 5:9 6:15 12:8 person 5:7 personal 7:6 Petitioner 6:2 Philip 5:15 8:19 phone 9:4 10:15,20 photocopies 9:4 physically 5:4 placed 6:3</p>	<p>please 5:12 6:21 position 8:24 9:1 Potential 8:7 preparation 8:5,12,15 present 5:4 privilege 8:7 problem 8:9 problems 7:20</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>question 6:22 8:6 questions 7:7 11:24, 25 quick 12:2</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>reason 7:17 recall 10:8,23,25 11:1,2,3,6,9,11,14 receipt 12:6 record 5:13 6:12 11:23 12:1 relieve 12:3 remotely 5:6 rephrase 8:8 reporter 5:3 6:19,20 7:1 12:3,13 reporting 5:5,11 representing 5:15,16, 18 review 12:6 reviewed 8:14 right 8:17</p>
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<p>room 5:5 9:15</p> <p>rooms 9:15,16</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>saying 6:21</p> <p>scans 9:4</p> <p>scheduling 11:3,6</p> <p>see 9:21,23</p> <p>seeing 11:9,11</p> <p>seen 7:12</p> <p>sense 6:23 7:3</p> <p>seven 10:9,10,12,24</p> <p>signed 12:7,15</p> <p>Simple 11:23</p> <p>sit 9:7,22</p> <p>sitting 7:11</p> <p>situated 9:20</p> <p>six 10:9,10,12,24</p> <p>sounds 7:2</p> <p>spoken 8:4,11 10:15, 20</p> <p>spot 9:7</p> <p>state 6:12</p> <p>stating 5:12</p> <p>stipulated 12:17,18, 19</p> <p>stipulation 12:3</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>take 7:1</p> <p>taken 6:9,18</p> <p>talk 6:19,20</p>	<p>tell 6:15</p> <p>Ten 11:16</p> <p>testified 6:3</p> <p>testimony 5:8 6:13, 14 7:18 8:5,12,15</p> <p>Thank 12:20</p> <p>Three 10:19</p> <p>time 9:1 10:7,16,20 11:18 12:16</p> <p>times 9:18 10:10</p> <p>tired 7:22</p> <p>today 6:18 7:17,22 8:5,12,15</p> <p>transcript 12:5,17</p> <p>transmit 12:4,8,11</p> <p>truth 6:15</p> <p>TUESDAY 5:1</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>uh-huh 7:2</p> <p>understand 6:16 7:14</p> <p>use 12:16</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>verbally 5:7</p> <p>view 9:11</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>wait 6:22</p> <p>waive 5:10</p> <p>want 12:2</p> <p>we'll 8:17 12:3</p>	<p>witness 5:7,14 6:2 11:25</p> <p>Wittliff 5:18 6:6 8:10 11:22 12:1,18</p> <p>words 7:2</p> <p>worked 8:20</p> <p>write 6:21</p> <hr/> <p style="text-align: center;">Y</p> <hr/> <p>years 10:8,12,24</p> <p>York 5:19 10:2,4,15, 20,23 11:3,6,9,11,14</p> <p>York-goldman 11:20</p>
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