

Jennifer Susan Gerrish-Lampe ~ March 21, 2015

*** Individually & Corporate Representative of Dear Author Media Network, LLC ***

1 UNITED STATES DISTRICT COURT
 2 NORTHERN DISTRICT OF OHIO
 3 EASTERN DIVISION
 4

5 ELLORA'S CAVE)
 PUBLISHING, INC., et) Case No. 5:14CV2331
 6 al.,)
) JUDGE JOHN R. ADAMS
 7 Plaintiffs,)
)
 8 vs.)
)
 9 DEAR AUTHOR MEDIA)
 NETWORK, LLC, et al.,)
 10)
 11 Defendants.)
 _____)

**CERTIFIED
COPY**

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 14 DEPOSITION OF JENNIFER SUSAN GERRISH-LAMPE
 15 INDIVIDUALLY AND AS
 16 CORPORATE REPRESENTATIVE OF DEAR AUTHOR MEDIA NETWORK, LLC

17 Taken on Saturday, March 21, 2015

18 At 9:14 a.m.

19 At 1160 North Town Center Drive

20 Suite 300

21 Las Vegas, Nevada

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 23
 24
 25 REPORTED BY: JO A. SCOTT, RPR, CCR NO. 669

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1 DEPOSITION OF JENNIFER SUSAN
2 GERRISH-LAMPE, taken at 1160 North Town Center
3 Drive, Suite 300, Las Vegas, Nevada, on Saturday,
4 March 21, 2015, at 9:14 a.m., before Jo A. Scott,
5 Certified Court Reporter on behalf of All-American
6 Court Reporters, 1160 North Town Center Drive,
7 Suite 300, Las Vegas, Nevada 89144.

8 APPEARANCES:

9 For the Plaintiffs:

10 STEVEN W. MASTRANTONIO, ESQ.
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17 For the Defendants:

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19 THERESA M. HAAR, ESQ.
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23 Las Vegas, Nevada 89135
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I N D E X

28 WITNESS: JENNIFER SUSAN GERRISH-LAMPE
29 EXAMINATION PAGE
30 BY MR. MASTRANTONIO 5, 272, 290
31 BY MR. RANDAZZA 268, 276

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1 chance to review this Counterclaim?

2 A. Around the time it was filed, yes.

3 Q. And in your words, what do you believe is
4 the basis of your Counterclaim?

5 A. That Ellora's Cave and Jasmine Jade are
6 attempting to suppress people's free speech rights
7 to speak out about how they feel and what they
8 believe in as it relates to Ellora's Cave, and
9 that they are using me as an example to silence
10 their critics.

11 Q. So it's your belief that this is just an
12 exercise to silence critics?

13 A. Yes.

14 Q. Do you not believe that -- strike that.

15 As part of the allegations that you make
16 in the Counterclaim, you have the allegation
17 that -- and I'll just read it for you, Ellora and
18 Jasmine have deliberately perverted this
19 particular legal process for their own personal
20 benefits, specifically to intimidate other
21 authors, editors, and cover artists into silence,
22 so that they do not attempt to recover monies owed
23 by them to Ellora and Jasmine.

24 Do you have any evidence of intimidation
25 by either Ellora or Jasmine?

1 A. Yes.

2 Q. And what is that?

3 A. This lawsuit.

4 Q. Other than this lawsuit, is there any
5 other evidence you have?

6 A. Yes.

7 Q. What's that?

8 A. At one point Romantic -- an author spoke
9 out against Romantic Times and was kicked off the
10 business loop. There are other individuals who
11 report that they've been threatened. In fact, one
12 of their officers came to the Dear Author blog in
13 2009, 2010 reminding authors that they were under
14 a confidentiality clause, and that they could be
15 in breach if they continued to comment.

16 Q. That was when?

17 A. 2009 or 2010.

18 Q. You mentioned --

19 A. And there were statements by Tina Engler
20 on her blog where she said, We have not sued any
21 authors yet, but that may change.

22 Pavienty (phonetic) also referred to
23 forthcoming lawsuits.

24 Q. Well, you mentioned an author that was
25 kicked off the business loop. Which author was