

SCOTIA PRINCE CRUISES, LIMITED,  
Claimant )

vs.

THE CITY OF PORTLAND, MAINE, Respondent.

**VIDEOTAPED DEPOSITION OF BRYAN D. HARDIN,**  
on December 16, 2006,

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Q. And do you know what the Manhattan Institute Center for Legal Policy is?

A: Again, I had never heard of them until we were retained by them to do the work. I don't know very much about them.

Q. Are you under the impression that they are lobbying groups of some sort?

A. Yes.

Q. And are you under the impression that they lobby for --well, let me strike that.

Is it your impression that the written work that you prepared for them was used by them as part of their lobbying efforts?

A. I would assume so, yes.

**Videotaped Deposition of Bruce Kelman  
On July 22, 2008 Kelman v Kramer, San Diego, Ca**

Q Do you remember how it came about; what was the genesis of how the Manhattan Institute report came about?

A I got a call. I remember the person I was talking to said they wanted to -- they read the ACOEM position statement on mold; that it was hard to understand, and I said that it had been written for physicians. And at the time, the question was, Well could you write something -- would you be willing to write an article that would be more assessable, for example, to judges.

Q Did he tell you why it was he wanted this to be assessable to judges?

A That's all he said.