

Dr. Braun - Direct

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A. Yes.

Q. Prior to commencing this deposition, you handed to me a folder that was available for inspection by other counsel -- I believe most of the documents have been seen before by them -- headed "IHF Articles of Incorporation, Code of Regulations, By-Laws, Articles of Amendment, Records Retention Policies" with the date September, 1980.

From where did those documents come and how was that file itself created?

A. They were accumulated for this purpose and put into this file.

Q. This purpose being the testimony that you are giving?

A. That is right, and they were taken from the various files in which they would automatically be put into.

Q. Those files that you refer to, are those files that are regularly kept in the scope and course of the business of the foundation?

A. Yes, they are.

Q. Did you supervise the accumulation of this folder with these documents in it?