

1 Q Do other employees at PILF give you specific
2 assignments?

3 A No.

4 Q So when you're doing research support related
5 to litigation how do you know what to do?

6 MR. VANDERHULST: Objection, work product and
7 beyond the scope of the limited discovery.

8 BY MS. BELL:

9 Q Okay. I will move on.

10 Are you currently employed anywhere else?

11 A No.

12 Q Do you do any contract work for anyone else?

13 A No.

14 Q I think you're Linked In page says you're an
15 assistant editor for Breitbart?

16 A Yes.

17 Q That's unpaid?

18 A It's a founding position, yes.

19 Q What does that mean?

20 A It means I have permission to have pieces
21 published there, communicate with the team whenever I
22 want to see an issue reported correctly but no, that's
23 really a former position. I just get some of the perks
24 of being able to publish.

25 Q Got it.