

Exhibit G

COPY

LINDA EDWARDS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

In the United States District Court
For the District of South Carolina
Rock Hill Division
Civil Action No.: 0:10-cv-2809-CMC

Kevin Faile, Louis C.)
Roman, Alan R. DePalma,)
and Brian Scott Craton,)
all individually and on)
behalf of all other)
similarly situated)
individuals,)
)
Plaintiffs,)
)
vs.)
)
Lancaster County, South)
Carolina,)
)
Defendant.)
_____)

Deposition of
LINDA EDWARDS

September 30, 2011

Deposition on oral examination of Linda
Edwards, reported by Jeffrey M. Thomas, Registered
Professional Reporter and Notary Public in and for
the State of South Carolina; said deposition taken
pursuant to agreement and in accordance with the
Federal Rules of Civil Procedure, at the Offices of
Gignilliat, Savitz & Bettis, LLP, 900 Elmwood
Avenue, Suite 100, Columbia, South Carolina, on
September 30, 2011, at the hour of 10:30 a.m.

GARBER REPORTING SERVICE, INC.
POST OFFICE BOX 12348
COLUMBIA, SOUTH CAROLINA 29211
(803) 256-4500

LINDA EDWARDS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Appearances

Representing the Plaintiffs:

DAVID E. ROTHSTEIN, ESQUIRE
Rothstein Law Firm, P.A.
514 Pettigru Street
Greenville, South Carolina 29601

Representing the Defendant:

CHRISTOPHER W. JOHNSON, ESQUIRE
Gignilliat Savitz & Bettis, LLP
900 Elmwood Avenue, Suite 100
Columbia, South Carolina 29201

LINDA EDWARDS

1 appear to be the pull-down menu for the wage and
2 hour?

3 A. Yes.

4 Q. And it lists you, Steve Savitz, Chris
5 Johnson, and Fred Williams?

6 A. Correct.

7 Q. How long would you say you've been
8 concentrating on wage and hour cases?

9 A. 1985. I concentrate on other things, too,
10 but I began working on wage and hour cases in 1985.

11 Q. Okay. And do you recall what the
12 circumstances were in 1985 that caused you to focus
13 on wage and hour cases?

14 A. The Supreme Court case.

15 Q. Garcia?

16 A. Garcia. And we had a number of public
17 sector clients. And Julian asked me to get up to
18 speed on the law and the new regulations.

19 Q. You would agree with me that the Fair
20 Labor Standards Act is a very technical, challenging
21 area of the law, wouldn't you?

22 A. Well, I agree that there are a lot of
23 areas that are technical and challenging.

24 Q. It's got a fairly complicated set of
25 statutes and regulations that can trip up employers?

LINDA EDWARDS

1 had -- let me ask you this way. What is the biggest
2 Fair Labor Standards Act liability your firm has
3 been involved in, either judgment, settlement,
4 verdict?

5 A. Probably the South Carolina Forestry
6 Commission, that I can recall. There may be others.
7 That is the one that comes to the top -- jumps to
8 mind.

9 Q. Okay. When was that case litigated?

10 A. Maybe the late '80s, early '90s.

11 Q. What were the issues in that case?

12 A. It involved the tower operators for the
13 South Carolina Forestry Commission and what
14 constituted compensable sleep and mealtime or
15 non-compensable sleep and mealtime.

16 Q. All right. Do you recall how many
17 plaintiffs were in that case?

18 A. I think there were 25.

19 Q. And were they 24-hour shift employees?

20 A. That was one of the issues. No, they were
21 not 24-hour shift employees.

22 Q. All right. So the sleep regulations, I
23 don't know if they had actually come into being at
24 that time. The 75.22, were those applicable in your
25 situation?

LINDA EDWARDS

1 A. Those came -- those became applicable, I
2 think, in '86 is when they were issued. I really
3 can't remember.

4 Q. Okay. And what was --

5 A. One thing I do need to point out. The
6 tower operators reside at the tower.

7 Q. Okay.

8 A. They live at the tower. They have a house
9 at the base of the tower. That is why their sleep
10 and mealtime issue came in. So they were not on a
11 shift or a tour of duty.

12 Q. Like a lighthousekeeper?

13 A. Probably a good analogy.

14 Q. What was the outcome of that case?

15 A. It settled.

16 Q. Do you recall what the settlement was?

17 MR. JOHNSON: Is it public record?

18 THE WITNESS: It's public record,
19 yeah, because it was handled through the court.

20 BY MR. ROTHSTEIN:

21 Q. Do you recall what the settlement was?

22 A. For some reason I want to say \$750,000,
23 but please don't hold me to that. It is in the
24 file.

25 Q. Now, you've mentioned that the Garcia case