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STATE OF LOUISIANA

PARISH OF NATCHITOCHES

10TH JUDICIAL DISTRICT COURT

CALVIN W. BRAXTON, SR.

DOCKET NO.: C-90,284 **VERSUS**

LOUISIANA STATE TROOPERS ASSOCIATION AND JAY OLIPHANT

The deposition of CRAIG BROWN, taken in connection with the captioned cause, pursuant to the following stipulations before Kim Taylor, Certified Court Reporter, at the Law Offices of McCoy, Roberts & Begnaud, 300 St. Denis Street, Natchitoches, Louisiana, on the 2nd day of October 2020, beginning at 2:32 p.m.

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2
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 1 APPEARANCES:
                                                                                    STIPULATION
                                                                      It is hereby stipulated by and among counsel
   FOR THE PLAINTIFF, CALVIN W. BRAXTON, SR.:
       JILL L. CRAFT
ATTORNEY AT LAW
                                                               3 for plaintiff and counsel for defense that the
        329 St. Ferdinand Street
                                                               4 deposition of
       Baton Rouge, Louisiana 70802 (225) 663-2612
                                                                                         CRAIG BROWN,
        jcraft@craftlaw.net
                                                               6 be taken before Kim Taylor, Certified Court
   FOR THE DEFENDANT, LOUISIANA STATE TROOPERS
                                                               7 Reporter, by counsel for the plaintiff for all
 8
   ASSOCIATION:
        FLOYD J. FALCON, JR.
 9
                                                               8 purposes, pursuant to notice and to the provisions
        AVANT & FALCON
10
        429 Government Street
                                                               9 of the appropriate statutes of the Code of Civil
        Baton Rouge, Louisiana 70802
                                                              10 Procedure of the State of Louisiana.
        (225) 387-4462
        floydfalcon@yahoo.com
                                                                      The parties hereto waive all formalities in
12
   FOR THE DEFENDANT, JAY OLIPHANT:
                                                              12 connection with the taking of said deposition,
13
        STEVEN M. OXENHANDLER
                                                              13 including the reading and signing thereof, except
        GOLD, WEEMS, BRUSER, SUES & RUNDELL 2001 MacArthur Drive
14
                                                              14 the swearing of the witness and the reduction of the
15
        Alexandria, Louisiana
                                                              15 questions and answers to typewriting.
        (318) 445-6471
  soxenhandler@goldweems.com
FOR THE DEFENDANT, LOUISIANA DEPARTMENT OF PUBLIC
                                                                      Per Article 1443(D) of the Louisiana Code of
   SAFETY & CORRECTIONS, OFFICE OF STATE POLICE:
                                                              17 Civil Procedure, counsel for all parties reserve all
18
                                                              18 objections until trial or other use of the
        BEN MAYEAUX
19
        NEUNER PATE
                                                              19 deposition.
        One Petroleum Center
       1001 West Pinhook Road, Suite 200
Lafayette, Louisiana 70503
(337) 237-7000
20
                                                              20
                                                              21
        bmayeaux@neunerpate.com
                                                              2.2
22
   ALSO PRESENT:
                                                              23
23
        LT. MAJOR JAY OLIPHANT
                                                              24
24
                                                              25
        CALVIN BRAXTON, SR.
25
                                                           4
 1
                           INDEX
                                                                               CRAIG BROWN,
 2
                                                              2 after having been duly sworn, was examined and did
 3 EXAMINATION BY MS. CRAFT . . . . . . .
                                                              3 testify as follows:
 4 EXAMINATION BY MR. OXENHANDLER . . . .
                                                              4 EXAMINATION BY MS. CRAFT:
 Mr. Brown, as you know from the reception room,
 6
                                                                    my name is Jill Craft. I represent Mr. Braxton
                                                              7
                                                                    seated to my left in connection with a lawsuit
 8
                                                              8
                                                                   that's pending here. It's very important
 9 OBJECTIONS:
                                                              9
                                                                    during the course of this deposition that you
10 NONE
                                                              10
                                                                    understand what I'm asking you. And if at any
11
                                                                    time you don't, just tell me to stop and
                                                              11
12
                                                              12
                                                                    rephrase it. I'm happy to do so for you.
13
                                                              13
                                                                       It's also important nods of the head "yes"
14 EXHIBITS:
                                                              14
                                                                    or "no" cannot be taken down by our court
15 NONE
                                                              15
                                                                    reporter, so you need to make sure to answer
16
                                                              16
                                                                    out loud.
17
                                                              17
                                                                       And my final instruction is unique to me
18
                                                              18
                                                                    insofar as I may ask you to spell names,
19
                                                              19
                                                                    places, or things. I'm not testing your
20
                                                              20
                                                                    spelling. It's just much easier for our court
21
                                                              21
                                                                    reporter who types actually in chunks of words
22
                                                              22
                                                                    instead of individual letters to get down who
23
                                                              23
                                                                    or what we were talking about. Is that fair
24
                                                              24
                                                                    enough?
25
                                                              25 A That's fine.
```

1 Q Can you give me your full name and address, 1 that because I had heard that. And I asked 2 him, I said, "Mr. Braxton," I said, "You know, 2 please, sir? 3 A Craig Brown, 443 Martin Luther King, 3 I've heard something that, you know, that rumor 4 that you got somebody watching Mr. Oliphant's Natchitoches, Louisiana, 71457. 5 Q I know you are friends with Mr. Braxton; am I 5 house." I said, "You know, I know him. I know 6 you." I said, "You know, I'm just asking, you 6 correct? 7 A Yes, ma'am. 7 know, because, you know, we're all friends, you 8 Q How long have you been friends? know." He said, "I'm not aware. I've never 8 9 A A long time. I used to work for him. 9 heard. This is my first time hearing it." And 10 Q Yes, sir. Are you also friends with Mr. 10 that was the last time we had that 11 Oliphant? 11 conversation. 12 A Yes, ma'am. 12 Q Did you tell Mr. Oliphant that you had asked 13 Q And how long have you been friends? 13 Mr. Braxton specifically if he had hired a 14 A I've been knowing him practically all my life. 14 private investigator and Mr. Braxton said no? 15 Q So I'm guessing this is a pretty uncomfortable 15 A I don't remember. 16 situation for you, sir? 16 Q Did you have any conversations with Mr. 17 A Somewhat. 17 Oliphant about Mr. Braxton hiring a private 18 Q Yes, sir. I'm going to try to make it as 18 investigator or having somebody follow him, painless as possible because I do have some 19 19 anything like that? 20 quick questions for you, and hopefully we'll 20 A 21 get you out of here. Did you ever tell anyone 21 22 that you knew Calvin Braxton had hired a 22 23 private investigator or somebody to follow Mr. 23

8

you know. So I asked Mr. Braxton about it. 2 Q Did you tell -- did you have a conversation with Mr. Oliphant to --4 A About that. That's what I'm saying, yeah. 5 Q So tell me about that conversation with Mr. 6 Oliphant. 7 A I told him, I said, "Jay," I said, "I heard that someone said that Mr. Braxton had somebody 9 out there watching you, watching your house, 10 investigating you." So he said, "Oh, yeah?" 11 just like that. And I said, "Well, I'm going 12 to ask him," you know, because like I said, you 13 know. I know both of them. 14 So when I seen Mr. Braxton the next 15 morning, I asked him, I said, "Mr. Braxton, I 16 want to ask you something," I said, "Because 17 somebody is saying that you got somebody out 18 there watching Mr. Oliphant' house in one of 19 your vehicles." And he said, "Well, I don't 20 know anything about it." And like I said, that 21 was the end of that conversation. 22 Q Well, then did you call Mr. Oliphant back and 23 say, "Look, I asked him and he said no." 24 A No, I didn't talk to him about that anymore. 25 Q When you talked to Mr. Oliphant, did you tell

25 A I had a conversation with Mr. Braxton about

24

Oliphant?

Only conversation that I had with Mr. Oliphant was when I heard because I called and asked him was it so, you know, because me and Mr. Braxton, you know, we all drink coffee every 24 morning. And I wanted to let him know, you 25 know, this is the rumor that's going around, 1 him anything other than, look, I'm hearing that 2 there's somebody following you or that Mr. 3 Braxton may have somebody following you, but 4 I'm going to ask him tomorrow morning for sure. 5 Is that what you told him? 6 A Yes, ma'am, something similar to that. 7 Q And you never told Mr. Oliphant that you had any evidence whatsoever that Mr. Braxton had 9 ever had anybody following him around; isn't 10 that right? 11 A No. No. 12 Q You never told him that? 13 A Huh-uh. 14 Q Who did you hear -- well, let me ask it this 15 way. Did Mr. Oliphant ever tell you that he 16 had seen a car at his house or anything? 17 A He had seen a car by -- yeah, out there by --18 you know, across from where he lived. You 19 know, somebody may have been sitting there 20 watching his house. 21 Q That's what he told you? 22 A Yeah, he told me that. 23 Q Did he tell you who the car was registered to? 24 A 25 Q Did he tell you whether he had run the plates?

11

10 1 A No, ma'am. Did Mr. Oliphant ever tell you at any other 2 Q Was that before or after you told Mr. Oliphant, 2 time that he felt like he was being followed or 3 look, I'm hearing these rumors, but I'm going 3 watched? to ask Mr. Braxton if it's true. 4 A One time, yeah. 5 A That was after we talked about that. 5 Q Tell me about that, please. 6 Q That was after you talked about that? 6 A He just told me, you know, he said the car that 7 A Yeah, after I talked to him about that. 7 he saw, you know, he saw it a couple of times, 8 Q And so after you talked about it, Mr. Oliphant 8 you know. He left home. The car left after he 9 left, you know, and that was -- you know, that 9 told you that he had found somebody at his 10 10 house watching his house? was, you know, that was the only conversation 11 A That he had spotted a car. 11 we had on that, you know. 12 Q So I got my timing right? 12 Q When you had that conversation, that was after 13 A Uh-huh. 13 you had already asked Mr. Braxton. Did you 14 Q You had the conversation with him, and you 14 tell Mr. Oliphant, look, I asked Calvin. He 15 said, "I'm going to ask Mr. Braxton." Then the 15 said no, it ain't him? 16 next conversation you had with Mr. Oliphant, 16 A Well, I didn't talk to Mr. Oliphant about me 17 Mr. Oliphant said, I saw somebody at my house. 17 and Calvin having a conversation, you know. I 18 A Yeah, he saw somebody, you know. He felt like 18 never -- you know, I didn't, you know, get back 19 they were watching his house. 19 20 Q And Mr. Oliphant didn't tell you who he thought 20 21 21 that person was or that he had run a plate or 22 anything like that? 22 23 A No, ma'am. 23 24 Q Or chased them down or anything like that? 24

12

1 Q Did you ever hear anyone make an allegation that Calvin Braxton was in any way involved in 2 3 the suicide of Ms. Rachal? 4 A No. ma'am. 5 Q Did Mr. Oliphant ever speak about that? 6 A No, ma'am. 7 Q Did you ever -- did you ever know anything about a Facebook posting by Mr. Oliphant? 9 A I heard something about Facebook, but I didn't 10 say who done it. They didn't say that he had 11 done it. You know, they just asked -- people 12 were just asking, have you seen that on 13 Facebook, but they didn't say where it come 14 from. 15 Q Did you ever see Mr. Braxton with a Facebook 16 posting --17 A I don't know anything about Facebook and that 18 all so I can't say. 19 Q I got it. Did you ever -- did you ever tell

25 A No, ma'am.

20 Mike Wilson that Calvin Braxton had hired a 21 private investigator? 22 A No, ma'am. I don't know anything about that. 23 Me and Mike Wilson never talked about anything 24 about this. 25 Q Did you ever hear Mr. Braxton make any

with him and tell him, you know, that I had talked to Calvin, you know, because I felt like, you know, we're all friends. We drink -he didn't -- he come one day. He didn't drink coffee with us, but we drink coffee every day, so, you know, whatever is going to come out, 25 you know, is going to come out, you know.

1 statements about he was going to get Mr. 2 Oliphant or anything like that?

3 A No, ma'am. Only thing Mr. Braxton ever said was that he didn't have any hard feelings. You 4 5 know, he didn't have nothing against, you know,

6 Mr. Oliphant, you know. That's all, you know, 7 he repeated, you know. He said to me two or

8 three times, you know, "I don't have no hard

9 feelings toward Mr. Oliphant," you know. So

10 that's what I said. I thought, you know,

whatever was going on, it had been resolved. 11 12

you know. Mr. Oliphant come out there one 13 morning, and he said, "You know, I heard they

14 make good coffee in here." You know, he come

15 in and got coffee and --

16 Q When you and Mr. Braxton were there?

17 A Yeah. You know, and he got him coffee and he 18 left, you know. They spoke and that was -- you 19

know, that was that, you know. So, you know --

20 Q Was that the only time you ever saw Mr. 21 Oliphant and Mr. Braxton together in the same

22 place was when Mr. Oliphant went to the place

23 where you and Mr. Braxton have coffee?

24 A Yes, ma'am.

25 Q Did you ever hear Mr. Braxton complain at all

13

Pages 14 to 17 14 about his daughter getting a DWI? 1 Q Hi, Mr. Brown. My name is Steve Oxenhandler, 2 and I'm a lawyer and I represent Colonel 2 A No, ma'am. 3 Q Would it be fair to say that Mr. Braxton had 3 Oliphant. Sir, could you just give us your troubles with his daughter? 4 address? 5 A 443 Martin Luther King Drive, Natchitoches, 5 A I mean, there's been some issues, yeah, probably. You know, he had -- you know. 6 Louisiana, 71457. 6 7 Q Thank you. Do you remember telling Colonel 7 Q Would it be fair to say in your conversations Oliphant that Mr. Braxton had someone following with Mr. Braxton his approach towards his 8 9 9 daughter is that she's going to have to get out **Colonel Oliphant?** 10 A I told him that I had heard that. 10 of trouble on her own? She's going to have to 11 find her own way, and sometimes she needs to 11 Q And who did you hear that from? 12 suffer consequences for things, right? 12 A You know, we all, like I said, we go to the 13 A I can't --13 store. There was gossip in the store where we 14 MR. FALCON: 14 drink coffee every morning, you know because 15 Is that testimony? 15 they know me and Mr. Braxton are friends, you 16 know, and they were -- they said, you know, 16 A I can't speak to that. 17 there's a rumor going around. And that's why I 17 MS. CRAFT: 18 Q Well, that's all right. I'm just asking if you 18 asked him about the rumor, you know, because I 19 ever had a conversation like that. 19 had never heard it, you know, and we talk every 20 A I never had that kind of conversation with him. 20 -- we drink coffee every morning, every day, 21 21 you know. There's about six of us, you know, MS. CRAFT: 22 22 Got it. Mr. Brown, that's all I have and I had never heard that. But then when I --23 from you. These lawyers may have some 23 when I heard the people talking about it, they 24 24 questions for you. were standing outside the store. 25 EXAMINATION BY MR. OXENHANDLER: 25 Q And do you know who -- what people are you 16 17 talking about? 1 Pilgrim's Pride. 2 A Some older guys sitting out there, you know, 2 MS. CRAFT: 3 Pilgrim's Pride. Okay. Yeah. You 3 gossiping like they do. 4 Q Do you know their names? 4 knew. I just wanted to make sure. Got it. 5 MR. OXENHANDLER: 5 A I don't know their names, you know. I just came, you know. They come in and get their 6 Q The place you're talking about where you had 6 7 beer or whatever. They sit there and gossip 7 coffee, is that Zippy B's? 8 sometimes and they walk out. 8 A Yes. sir. 9 9 Q Do you still drink coffee at Zippy B's? MS. CRAFT: 10 I'm sorry, you said get their beer? 10 A Yes, sir. Well, we did, but after this come out, no, we don't drink coffee there no more. 11 A Yeah, they come in and buy their beer. They 12 12 Q Is it coronavirus or -get off from Pilgrim's Pride in the morning. 13 They come in and get their beer, then they'll 13 A Yeah, after the coronavirus come up, we don't 14 laugh and gossip, then they, you know, they 14 drink coffee there no more. 15 15 Q Do you go down to the Riverfront and have leave. 16 coffee? 16 MR. OXENHANDLER: 17 Q And by --17 A Yes, we do. 18 MS. CRAFT: 18 Q Where do you go to the Riverfront to have 19 19 And let me make sure. Get off from coffee? 20 Freedom Pride? 20 A Under the stage. Down at the stage. 21 Q Does Mr. Braxton still come there in the 21 A From Pilgrim's Pride.

22

25 A

morning?

No, sir.

23 A Mr. Braxton, Mr. John, Mr. Belo.

24 Q Are you still working for Mr. Braxton?

22

23

25

MS. CRAFT:

24 A Pilgrim's Pride.

From what is it?

MR. OXENHANDLER:

Pages 18 to 21 1 Q Do you remember Mr. Braxton coming to Zippy B's The conversation that you had with Mr. Oliphant one day and showing you a Facebook page by Mr. where you told Colonel Oliphant that you had 2 3 Oliphant? 3 heard that Mr. Braxton was having somebody 4 A He showed me a page, but he didn't say where it 4 follow him, was that some time in 2018? was from. He just showed me something somebody 5 A It may have been. I'm not -- I don't -- you 6 had put on Facebook. He didn't say where it 6 know. 7 was from. 7 MR. OXENHANDLER: 8 Q Do you know if it was from Colonel Oliphant? 8 That's all the questions I have. Thank 9 A I don't know. 9 you, sir. 10 Q But he did -- you remember him showing you 10 A Yes, sir. 11 something from Facebook? 11 EXAMINATION BY MR. FALCON: 12 A Yeah, I remember that. 12 Q Mr. Brown, my name is Floyd Falcon. I 13 Q Did anybody ever tell you who was following 13 represent the Louisiana Troopers Association. 14 Colonel Oliphant? 14 A Yes, sir. 15 A No, sir. 15 Q Are you familiar with the Louisiana Troopers 16 Q Do you remember Calvin Braxton ever saying 16 Association? 17 anything else to you about Colonel Oliphant 17 A Yes. sir. 18 when you were at Zippy B's? 18 Q You ever talk to anyone who represented to you 19 A Like I said, the only thing he ever said was 19 that they were the representative of or an 20 that he didn't have any hard feelings, you 20 official or officer of the Louisiana Troopers 21 know, and, you know, as far as he was 21 Association? 22 concerned, you know, everything was good. 22 A I mean, I know people that work for the 23 Q Did Calvin Braxton ever mention Trooper 23 troopers, you know. 24 Linebaugh to you? 24 Q For the troopers, for the state police you're 25 A No, sir. 25 talking about? 20 21 1 A Yeah. 1 ago? 2 Q I'm talking about the Louisiana --2 A Yes. 3 A No. 3 Q And what did you do for him? 4 Q -- State Troopers --4 A I used to detail cars, transport cars. 5 A No. 5 Q And what kind of salary was he paying you? 6 Q You have no contact with that organization as 6 A Ten Dollars (\$10.00) an hour. 7 Q And you got a better job somewhere? far as you know; is that right? 7 8 A Well, I went to work for the people that I had 8 A No. sir. 9 Q How long did you work for Calvin Braxton? been working for since I was 16, Ben Johnson. 10 A About five, six years. 10 Q And what were you doing for them? 11 Q And when did you last work for Calvin? 11 A Picking up bodies. I worked for Winnfield

12 A I don't remember when it was that I departed. 13 THE COURT REPORTER: 14 I'm sorry --

16 Q I couldn't understand a word you said. 17 A I don't know when it was that we departed, but 18 19 Q Well, was it in the last year?

20 A No, it's been --

21 Q Ten years?

15 MR. FALCON:

22 A -- probably been about three, four years now.

23 Q What were the circumstances of you leaving? 24 A I went to work for someone else.

25 Q And so you think it's about three or four years 25

Funeral Home. 12

13 Q At the funeral home?

14 A Yeah.

15 Q Is that the same funeral home as Calvin owns?

16 A Owns now, yeah.

17 Q So you just switched jobs with Calvin's

18 organization?

19 A Well, Calvin -- when I was working for Calvin,

20 I was working for Winnfield also. And I just

21 decided to work for one company.

22 Q It seems to be --

23 A Mr. Braxton had no ties to Winnfield then.

24 Q It seems in the back of my mind he said

something about him owning a funeral home.

23 Does he own another funeral home here in town? covid, you would periodically work for Mr. 1 2 A Mr. Calvin? 2 **Braxton?** 3 Q Yes. 3 A Yeah. 4 A He owns Winnfield. 4 Q Or one of his companies; is that right? 5 Q So I want to clarify the situation. You worked 5 A Just the funeral home. If they needed me, I 6 for Mr. Braxton at his automobile dealership? worked for them. 7 A At his -- yeah. 7 Q Now, you said y'all have drank coffee. You had 8 Q And then you left there and you went to work six people. You used that number. for the Winnfield Funeral Home? 9 A Every day. 10 A I worked for Winnfield Funeral Home. 10 Q That on a frequent basis would have coffee. 11 Q And Calvin Braxton owns the Winnfield Funeral 11 You still have six? 12 Home? 12 A No. 13 A Not at that time. 13 Q Who were the six that had coffee on a regular 14 Q He owns it now? 14 basis at Zippy B's? 15 A Yeah. 15 A Mr. Calvin Braxton, Thurman Miller, Mr. John 16 Q When he took over, did you continue -- when he 16 Seff ---17 took over the Winnfield Funeral home, did you 17 Q Spell that last name. 18 continue to work for Calvin? 18 A I guess he spells it S-e-f-f, I guess. 19 A On a part-time basis when he needed help. 19 Q You think --20 Q And when was the last time you did any part-20 A Vic Belo and myself. 21 time work for any company owned by Mr. Braxton? 21 Q John Belo? 22 A I hadn't worked for Mr. Braxton in three months 22 A No, Vic Belo. 23 since this -- three or four months from this --23 Q Vic. 24 when this covid thing come up. 24 A Related to John Belo. 25 Q Since the covid, up until the time of the 25 Q And now y'all meet at a different location and 24 25 have coffee. Is there still six? conversation, you know, me, him, and Thurman, 1 2 A No, there's just four of us, Mr. --2 we always laugh and talk, you know. 3 Q Who is the four now? 3 Q And what did he say? 4 A Mr. Belo, Mr. Seff, myself, and Mr. Braxton. 4 A He said, you know, he was no longer on it. 5 Q Now, did you know Calvin was a member at one That's all he -- you know. time of the Louisiana -- the State Police 6 Q He didn't say why? 7 A No. 7 Commission? 8 A Yeah, he told me that. 8 Q He didn't say if he was asked to leave or if he 9 Q Do you know what that is? resigned? 10 A No, sir. 10 A No. sir. 11 Q Do you know when he got on the State Police 11 Q It didn't make any difference to you, did it? Commission? 12 12 A I mean --13 A No. sir. 13 Q Did the fact that he was no longer in the State 14 Q Do you know how he got on the State Police Police Commission for whatever reason change 15 Commission? your opinion or your favoritism of Mr. Braxton? 15 16 A No. sir. 16 A No. 17 Q Do you know when he left the State Police 17 Q It didn't -- you didn't think any less of Mr.

18 Braxton because he was either removed or quit 19

the State Police Commission?

20 A No. I didn't.

21 Q Didn't change your opinion of him at all.

22 Whatever it was before is still the same now?

23 A Yeah.

24 Q Anything involving J.D. Oliphant, any

conversations you might have had, any rumors

18

21

22

19 A No, sir.

it?

23 A Yes, sir.

Commission?

24 Q How do you know that?

20 Q Do you know that, in fact, he did leave the

25 A Any time, you know, when you're having a

State Police Commission, that he's no longer on

27 26 1 you might have heard about Mr. Oliphant or 1 Q Did it lessen your respect for Mr. Braxton in 2 about Calvin Braxton, did they affect your 2 any fashion? 3 relationship with Calvin Braxton in any way? 3 A No. 4 A No. 4 Q Did it lessen your respect for J.D. Oliphant in 5 Q Did it lessen your opinion of Calvin Braxton in any fashion? 6 6 A No, sir. any way? 7 A Somewhat. It was just, you know, I kind of --7 MR. FALCON: you know, I know both of them and when, you 8 That's all the questions I have. 9 EXAMINATION BY MR. MAYEAUX: 9 know, I heard about this going on, you know, I 10 wasn't, you know, I didn't really care for it, 10 Q Mr. Brown, my name is Ben Mayeaux. I represent 11 you know. Louisiana State Police. 12 Q You didn't care for it, but did it --12 A Yes, sir. 13 Q I just have a couple of questions for you. You 13 A Because they're two powerful black people that, 14 you know, people have respect for too, you 14 mentioned that Mr. Braxton said he had no hard 15 15 know, have to -feelings against J.D. Oliphant. Did I hear 16 that correctly? 16 Q But it didn't lessen your --17 A Yeah. 17 MS. CRAFT: 18 Can you let him finish his answer, 18 Q Why would he say that? 19 19 A I guess when all this come up, you know, the please? 20 MR. FALCON: 20 rumors about he had somebody watching him and 21 this and that, you know. I guess it was just, 21 Q Yes, go ahead. 22 22 A But when you hear gossip like that about two you know, the way he felt, you know. He never 23 people that are well respected, you know, it's 23 said -- when J.D. come in the store, you know, 24 24 kind of a hard thing because I know both of and, you know, nobody looked like they were, 25 25 you know, had animosity between each other, you them, you know. 28 29 1 1 was, you know. Because it was like -- it was know. And he said, you know -- he said, you like -- almost like a family deal, you know. 2 know, "I've never, you know, had anything 2 3 3 We'd get together every morning, you know, and against J.D.," you know. And that was just 4 that. 4 so we're not going to listen to gossip. 5 Q Did Mr. Braxton tell you that J.D. Oliphant had 5 Q What state troopers were you hearing that Mr. 6 done something to him? 6 Braxton was getting into it with? 7 A No. No, he didn't. 7 A We just heard about, you know, the deal with 8 Q Did Mr. Braxton complain about anything J.D. him and J.D., you know. They was going, you Oliphant had done? 9 know, going against each other, you know, 10 A No, sir, not to me. 10 having animosity between each other, you know. 11 Q So what was the context? What were v'all 11 And I couldn't believe, you know, because I 12 talking about when Mr. Braxton said I got no 12 know J.D. I know him, you know. 13 hard feelings? 13 Q You know Trooper Linebaugh? 14 A I guess because the people that -- the group 14 A No. 15 that we had, you know, we would always laugh 15 Q You don't? 16 A No. 16 and talk, you know, about different things, you 17 know. And we would hear gossip about that, you 17 Q Did you ever hear Mr. Braxton say anything 18 know. People would be gossiping every morning, 18 about Trooper Linebaugh? 19 you know, you know, there's Mr. Braxton. Him 19 A No. I don't know anything about DWI, his 20 and the state troopers, you know, they're into 20 daughter getting a DWI. I don't know a thing 21 it, and this and that, you know. So, you know, 21 about that. 22 I'd always, you know, left it alone. You know, 22 MS. CRAFT: 23 we don't want to talk -- we don't want to hear 23 There it is. 24 all that, you know. We don't want to hear all 24 A That was just --25 this, you know. And that's just the way it 25 MR. MAYEAUX:

CRAIG BROWN

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30
                                                                                                                    31
                                                             1
                                                                                      CERTIFICATE
             I thought they had. Anybody else got
 1
                                                             2
2
         any questions for him? All right, thank
                                                                   This certification is valid only for a
3
         you very much.
                                                             4 transcript accompanied by my original signature and
4 A
       Yes, sir.
                                                             5 original required seal on this certificate.
5
         MS. CRAFT:
                                                                   I, Kim Taylor, Certified Court Reporter in and
6
             I don't have any other questions.
                                                             7 for the State of Louisiana, as the officer before
7
         MR. FALCON:
                                                             8 whom this testimony was taken, do hereby certify
8
             Thank you, Mr. Brown.
                                                             9 that CRAIG BROWN, after having been duly sworn by me
         MS. CRAFT:
9
                                                            10 upon authority of R.S. 37:2554, did testify on the
10
             You do have the right to read and sign
                                                            11 2nd day of October 2020, at Natchitoches, Louisiana,
11
          your deposition, which means the court
                                                            12 as hereinbefore set forth in the foregoing 30 pages;
12
          reporter is going to type out what you said
                                                            13 that this testimony was reported by me in the
13
          today. She can send it to you with a sheet
14
                                                            14 Stenographic reporting method, was prepared and
          if you need to make corrections or change
                                                            15 transcribed by me or under my personal direction and
15
          spellings or anything like that, or you can
                                                            16 supervision, and is true and correct to the best of
16
          waive that and say however she typed it out
                                                            17 my ability and understanding; that the transcript
17
          is fine with you.
                                                            18 has been prepared in compliance with the transcript
18
          THE WITNESS:
19
                                                            19 format guidelines required by statute and rules of
             It's fine.
                                                            20 the board; that I am informed about the complete
20
          MS. CRAFT:
                                                            21 arrangement, financial or otherwise, with the person
21
              You're going to waive it?
                                                            22 or entity making arrangements for deposition
22
          THE WITNESS:
23
                                                            23 services; that I have acted in compliance with the
             That's fine.
                                                            24 prohibition on contractual relationships, as defined
24 THE WITNESS WAS EXCUSED.
                                                            25 by Louisiana Code of Civil Procedure Article 1434
25 DEPOSITION CONCLUDED AT: 2:56 P.M.
                                                        32
 1 and rules of the board; that I have no actual
 2 knowledge of any prohibited employment or
 3 contractual relationship, direct or indirect,
 4 between a court reporting firm and any party
 5 litigant in this matter, nor is there any such
 6 relationship between myself and a party litigant in
 7 this matter; that I am not related to counsel or to
 8 any of the parties hereto, I am in no manner
 9 associated with counsel for any of the interested
10 parties to this litigation, and I am in no way
11 concerned with the outcome thereof.
       This 15th day of November 2020, Lafayette,
13 Louisiana.
14
15
                        Kim Taylor, CCR
                                         #91244
17
18
19
20
21
22
23
2.4
25
```

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