EXHIBIT P

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1
               IN THE UNITED STATES DISTRICT COURT
 2
              FOR THE NORTHERN DISTRICT OF ILLINOIS
 3
                          EASTERN DIVISION
 4
 5
      GAMES WORKSHOP LIMITED, )
 6
               Plaintiff, )
 7
                               ) Case No. 1:10-cv-08103
               -vs-
8
      CHAPTERHOUSE STUDIOS
                                )
9
      LLC,
10
               Defendant.
11
12
13
             Videotaped Deposition of MARTIN FOOTITT,
     taken on February 14, 2013, at the hour of 9:06
14
15
     a.m. at 233 South Wacker Drive, Suite 6300,
16
     Chicago, Illinois, taken before Kathleen J.
     Hendrix, Certified Shorthand Reporter, C.S.R.
17
18
     Licence No. 84-004180
19
20
21
22
23
2.4
25
      PAGES 1 - 148
                                                   Page 1
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1	produced to counsel and that they produced them to	12:15:15
2	us. Is that your understanding?	12:15:17
3	A. Yes.	12:15:19
4	(Whereupon, Footitt Deposition	12:15:19
5	Exhibit No. 3 was marked for	12:15:19
6	identification.)	12:15:35
7	BY MS. KALEMERIS:	12:15:35
8	Q. You have in front of you what's marked	12:15:43
9	as Exhibit 3. In the bottom corner, you will see	12:15:45
10	numbers that have a GW and then numbers after them.	12:15:48
11	Those are called Bates numbers, and they are used by	12:15:52
12	counsel to identify documents that have been	12:15:55
13	produced in litigation.	12:15:58
14	Do you see that number on the	12:16:00
15	front, GW 0017741?	12:16:02
16	A. Yes.	12:16:06
17	Q. Is that the same number as is on on	12:16:06
18	Exhibit 2?	12:16:09
19	A. Yes.	12:16:10
20	Q. Okay. So if you'll turn in that	12:16:12
21	document to the page labeled GW 0017786, it's near	12:16:14
22	the back. If you could take a look at that and the	12:16:21
23	next couple of pages through to GW 0017789. And let	12:16:41
24	me know when you are finished looking at those.	12:16:49
25	Do you recognize these images?	12:17:00
	Pa	age 102

1				
1		Α.	Yes.	12:17:03
2		Q.	Where do you recognize these images	12:17:03
3	from?			12:17:07
4		Α.	Images I searched for.	12:17:07
5		Q.	Why did you search for these images?	12:17:11
6		Α.	In relation to a project I was	12:17:13
7	working	g.		12:17:17
8		Q.	Which project was that?	12:17:17
9		Α.	The Lizardman Kroxigor.	12:17:19
10		Q.	So what is a Lizardman Kroxigor?	12:17:32
11		Α.	A large humanoid lizard warrior.	12:17:37
12		Q.	So why were you searching for these	12:17:51
13	images'	?		12:17:53
14		Α.	I was looking to see how typically say	y 12:17:54
15	lizard	skin w	ould crease, and looking at how the	12:18:00
16	scale :	is patt	erned.	12:18:17
17		Q.	Why is it important to look at how	12:18:24
18	lizard	skin w	ould crease?	12:18:27
19		Α.	I want my models to look like they had	d 12:18:29
20	more re	ealisti	c lizard skin texture.	12:18:35
21		Q.	And why is it important to look at how	w 12:18:40
22	scales	are pa	tterned?	12:18:49
23		Α.	The Kroxigor is going to have scales.	12:18:53
24	I was <u>:</u>	just cu	rious to see how real world lizards,	12:18:57
25	how the	eir sca	les looked.	12:19:03
				Page 103

1	Lizardman Krox	igor?	12:22:54
2	Α.	Not on these, no.	12:22:56
3	Q •	And when we say "these," we're	12:22:57
4	referring to -	_	12:23:00
5	Α.	The models that yeah, I made.	12:23:02
6	Q.	Do you know if others do you know	12:23:09
7	of others at G	ames Workshop that have worked on	12:23:12
8	Lizardman Krox	igor?	12:23:17
9	Α.	Yes.	12:23:18
10	Q.	Who are those others?	12:23:19
11	Α.	Ellie Morrison. And he made the	12:23:20
12	addition of mo	dels before the ones I made. And	12:23:30
13	there are mode	ls before that I think were done by	12:23:33
14	Michael Perry,	but I'm not sure.	12:23:38
15	Q.	Who assigned you the Lizardman	12:23:40
16	project?		12:23:47
17	Α.	Ted Williams I think.	12:23:48
18	Q.	So how did you begin the Lizardman	12:23:54
19	project?		12:24:06
20	Α.	By looking at the old army books and	12:24:08
21	the old models		12:24:13
22	Q.	And at some point you did some	12:24:14
23	research on th	e internet?	12:24:30
24	А.	Yes.	12:24:31
25	Q.	When did you do that research?	12:24:32
			Page 106

1	A. A:	t some point during the project.	12:24:35
2	Q. WI	hy did you do that research?	12:24:40
3	MI	R. KEENER: Objection. Asked and	12:24:43
4	answered.		12:24:45
5	BY THE WITNESS:		12:24:46
6	А. То	o look at how the skin could wrinkle	, 12:24:47
7	the scale patte:	rn.	12:24:52
8	Q. We	ere you provided with any sketches of	f 12:24:53
9	the Lizardman?		12:24:58
10	A. Th	here might have been some older	12:24:59
11	concept with it		12:25:07
12		(Whereupon, Footitt Deposition	12:25:07
13		Exhibit No. 5 was marked for	12:25:07
14		identification.)	12:25:46
15	BY MS. KALEMERIS	S:	12:25:46
16	Q. Yo	ou've been handed Exhibit 5. Have	12:25:47
17	you ever seen tl	hese sketches before? You can take	12:25:52
18	your time and lo	ook through them.	12:25:54
19	А. Ү	es, I think so.	12:26:16
20	Q. We	ere these some of the sketches that	12:26:21
21	you looked at wh	hen you were creating the new version	n 12:26:24
22	of the Lizardman	n?	12:26:27
23	A. WI	hat do you mean by "new Lizardman"?	12:26:33
24	Q. Th	he model that you created, the	12:26:40
25	Lizardman Kroxi	gor.	12:26:43
			Page 107

1	BY THE WITNESS:	12:40:30
2	A. I can't remember.	12:40:36
3	Q. So your your inspiration for this	12:40:36
4	particular project was looking at the older models	12:40:49
5	and looking at pictures of lizards and looking at	12:40:51
6	concept art?	12:40:55
7	A. My yes. My inspiration would have	12:40:56
8	been to look at the older models and current models	12:40:59
9	in Lizardman range. Not necessarily looking at	12:41:03
10	these images.	12:41:08
11	Q. But you do excuse me.	12:41:09
12	But you did look at images from	12:41:24
13	the internet when creating the Lizardman Kroxigor?	12:41:26
14	A. Yes.	12:41:32
15	(Whereupon, Footitt Deposition	12:41:32
16	Exhibit No. 6 was marked for	12:41:32
17	identification.)	12:41:54
18	BY MS. KALEMERIS:	12:41:54
19	Q. You've been handed Exhibit 6. You	12:41:55
20	could take a second to look through it, if you would	12:42:04
21	like. If you look to the first page. These are	12:42:08
22	pictures that counsel provided us of the Lizardman	12:42:47
23	Kroxigor that you sculpted; is that correct?	12:42:51
24	A. Yes.	12:42:54
25	Q. If you look at the first page, I	12:42:54
	Pa	age 111

1	notice at the end of the Lizardman Kroxigor tail	12:42:57
2	there's what would you call that end piece on the	12:43:02
3	end of the tail?	12:43:04
4	A. Protrusion, spike.	12:43:05
5	Q. Why did you choose to include that	12:43:19
6	protrusion or spike in this model that you made?	12:43:31
7	A. To look like the Kroxigor could use	12:43:34
8	his tail as a fancy weapon.	12:43:40
9	Q. Is that the fact that the Kroxigor	12:43:43
10	could use his tail as a defensive weapon, is that	12:44:03
11	something that's important to the overall Lizardman	12:44:07
12	Kroxigor?	12:44:11
13	MR. KEENER: Objection. Form.	12:44:12
14	BY THE WITNESS:	12:44:13
15	A. I'm not sure.	12:44:13
16	Q. Are there any other reasons why you	12:44:13
17	chose to include that protrusion or spike at the end	12:44:21
18	of the tail?	12:44:24
19	A. To make a more visually exciting	12:44:25
20	model.	12:44:33
21	Q. Are there any other reasons?	12:44:34
22	A. Not that I can think of right now.	12:44:49
23	Q. Did anyone tell you to include that	12:44:51
24	spike or protrusion at the end of the tail?	12:44:55
25	A. I can't remember.	12:44:58
	Pa	age 112

1	Q.	Would you have submitted this model t	0 12:44:58
2	Ben Jefferson	when you had finished it?	12:45:08
3	Α.	No.	12:45:11
4	Q.	Who would you or would you have	12:45:12
5	submitted this	s model to anyone?	12:45:14
6	Α.	Yes.	12:45:15
7	Q.	Who would you have submitted that to?	12:45:17
8	Α.	Ted Williams I think.	12:45:20
9	Q.	Did you go through any drafts with Te	d 12:45:24
10	Williams of t	he model?	12:45:39
11	Α.	Yes.	12:45:40
12	Q.	Did he provide you any feedback?	12:45:40
13	Α.	Yes.	12:45:42
14	Q.	What sort of things did he provide	12:45:43
15	feedback on?		12:45:46
16	Α.	I I can't remember, but he would	12:45:58
17	have been invo	olved in the process.	12:46:00
18	Q.	So he would have made design	12:46:03
19	decisions?		12:46:07
20		MR. KEENER: Objection. Form.	12:46:07
21	BY THE WITNES:	S:	12:46:08
22	Α.	He would have provided feedback.	12:46:08
23	Q.	But you can't recall what sort of	12:46:11
24	feedback he wo	ould have provided?	12:46:13
25	Α.	No.	12:46:15
			Page 113

1	Q.	If you look at the figure on the right	12:46:15
2	there on that	first page, how would you characterize	2:46:25
3	the area betw	een the shoulder blades of the model?	12:46:29
4	Α.	Carapace.	12:46:34
5	Q.	I'm sorry?	12:46:34
6	Α.	Carapace.	12:46:34
7	Q.	I'm not sure I heard you.	12:46:34
8	Α.	Carapace, C-A-R-A-P-A-C-E.	12:46:46
9	Q.	What is a carapace?	12:46:50
10	Α.	It's like a natural armor plate is how	12:46:54
11	I would descr	ibe it.	12:47:01
12	Q.	Why did you decide to include that	12:47:02
13	carapace on t	he model?	12:47:19
14	Α.	I thought it would look cool.	12:47:21
15	Q.	Did you receive any feedback on the	12:47:23
16	carapace from	Ted Williams?	12:47:27
17	Α.	I can't remember.	12:47:29
18	Q.	Did you receive any feedback from	12:47:30
19	anyone else o	n the carapace?	12:47:32
20	Α.	I can't remember.	12:47:34
21	Q.	If you look at the figure on the left,	12:47:39
22	it looks like	there are perhaps what what	12:47:48
23	would you cal	l those going down the center of the	12:47:51
24	back there?		12:47:55
25	Α.	Spikes.	12:47:56
			Page 114

ı			
1	Q.	Can you tell me why you chose to	12:47:57
2	include those s	spikes?	12:48:09
3	Α.	I think it was a feature of the older	12:48:11
4	Kroxigor models	5.	12:48:19
5	Q. 3	If you turn to the fourth page marked	12:48:44
6	GW 0011840. Yo	ou notice the model in the middle?	12:48:47
7	Can you charact	terize the pose that he's in?	12:48:55
8	Α. (Characterize the pose?	12:48:59
9	Q.	Can you describe it for me, please.	12:49:00
10	A. F	He's holding his weapon above his	12:49:02
11	head.		12:49:06
12	Q. 3	Is there a reason that you chose to	12:49:06
13	have him holdir	ng his weapon above his head?	12:49:18
14	Α. 1	To looks like he's about to smash his	12:49:22
15	opponent.		12:49:33
16	Q. <i>I</i>	And this is opposed to the character	12:49:34
17	on the right, h	now is he holding his weapon?	12:49:50
18	A. 3	In both hands.	12:49:53
19	Q. I	Does he look like he's about to smash	12:49:55
20	something?		12:50:10
21	Α. 1	No.	12:50:10
22	Q.	Can you tell me why you made that	12:50:20
23	decision?		12:50:27
24	Α.	The three models are in different	12:50:27
25	poses to make t	them more interesting as a unit.	12:50:43
			Page 115

1	Q. Can you tell me why you made that	12:50:47
2	particular decision to have that model standing in	12:50:49
3	that pose?	12:50:53
4	A. I guess I wanted a braced pose, and	12:50:54
5	there's not many poses you can do with a model	12:51:03
6	that's carrying his weapon in two hands.	12:51:09
7	Q. Is there a reason why yeah, excuse	12:51:11
8	me is there a reason why the models are carrying	12:51:17
9	their weapons in two hands?	12:51:21
10	A. Yes.	12:51:23
11	Q. Why is that?	12:51:23
12	A. They are big weapons. And in the	12:51:24
13	rules they have a great weapon.	12:51:31
14	Q. A great what?	12:51:31
15	A. A great weapon. It's a double-handed	12:51:38
16	weapon. There are rules and distinctions between	12:51:40
17	the types of weapons they get. So it should have	12:51:47
18	been depicted in both hands.	12:51:54
19	Q. If you will turn to the page marked GW	12:51:57
20	0011844, it shows the models in profile. Do you see	12:52:06
21	the model in the center? Can you describe his face,	12:52:16
22	please.	12:52:20
23	A. How do you mean?	12:52:22
24	Q. What expression does he have?	12:52:26
25	A. Like he is roaring, screaming,	12:52:29
	P	age 116

1	snarli	ng.		12:52:49
2		Q.	And why did you make that decision?	12:52:49
3		Α.	Because it looks cool.	12:52:51
4		Q.	Are there any other reasons?	12:52:55
5		Α.	When you're making more than one	12:52:59
6	model,	you wa	nt each one to look slightly different	. 12:53:05
7	So the	differ	ent expressions in their heads.	12:53:10
8		Q.	Okay. Why do you want each model to	12:53:14
9	look d	ifferen	t?	12:53:16
10		Α.	If they all looked the same, it would	12:53:17
11	be bor	ing.		12:53:20
12		Q.	If you look at the weapon that that	12:53:21
13	center	Kroxig	or is holding, can you describe the	12:53:27
14	weapon	to me?		12:53:32
15		Α.	How do you mean?	12:53:33
16		Q.	Well, was there something that you had	d 12:53:42
17	a prob	lem wit	h in the way that I asked that?	12:53:46
18		Α.	Do you mean describe what it is or the	e 12:53:51
19	visual	?		12:53:55
20		Q.	We can start with what it is and then	12:53:56
21	you ca:	n descr	ibe the visual after?	12:53:58
22			MR. KEENER: Objection. Form.	12:54:00
23	BY THE	WITNES	S:	12:54:02
24		Α.	It's a double-headed spiked base,	12:54:05
25	double	-handed		12:54:12
				Page 117

1	Q. And can you describe what it looks	12:54:20
2	like?	12:54:22
3	A. It has a wooden shaft with a gold bit	12:54:22
4	and stained top, with little spikes on both sides	12:54:40
5	and a spike on the bottom.	12:54:47
6	Q. Would it be fair to say that on the	12:54:49
7	head of the weapon there are some spikes that are	12:55:13
8	longer than others?	12:55:17
9	A. Yes.	12:55:18
10	Q. Was that a design decision?	12:55:18
11	A. Yes.	12:55:20
12	Q. Why did you make that decision?	12:55:21
13	A. To make it look more interesting.	12:55:23
14	Q. No other reasons?	12:55:27
15	A. Not that I can think of.	12:55:37
16	Q. So you mentioned that it's a wooden	12:55:49
17	shaft. Can you tell me why you made that decision?	12:55:56
18	A. Just one of the materials that the	12:55:59
19	Lizardmen use.	12:56:15
20	Q. What other materials do the Lizardmen	12:56:18
21	use?	12:56:33
22	A. Stone and gold.	12:56:34
23	Q. And you say the staff is gold worked.	12:56:35
24	Can you tell me why you made that decision?	12:56:39
25	A. It's links related to how we make	12:56:40
	P	age 118

1	Lizardman weapons.	12	:56:54
2	Q. How do you make Lizardman w	eapons? 12	:56:56
3	A. The weapons that are in the	Lizardman 12	:57:00
4	range on the other units.	12	:57:06
5	Q. What type of features do the	e Lizardmen 12	:57:06
6	weapons have?	12	:57:11
7	A. Like a stone attached to a	weapon with 12	:57:11
8	a gold fitting around the edge.	12	:57:16
9	Q. Any others?	12	:57:19
10	A. There probably are, but I can	an't think 12	:57:20
11	of them right now.	12	:57:31
12	Q. You mentioned that there is	also a 12	:57:32
13	spike on the bottom of the weapon. Was to	hat a 12	:57:34
14	design decision?	12	:57:37
15	A. Yes.	12	:57:37
16	Q. Why did you make that decis	ion? 12	:57:38
17	A. A Kroxigor is a brutal crea	ture, he 12	:57:39
18	could use both ends of the weapon to atta-	ck people. 12	:57:49
19	(Whereupon, Footitt D	eposition 12	:57:49
20	Exhibit No. 7 was mar	ked for 12	:57:49
21	identification.)	12	:57:49
22	MR. KEENER: Counsel, I not	e for the 12	:58:44
23	record this is a Chapterhouse document de	signated 12	:58:46
24	highly confidential and you are showing i	t to the 12	:58:51
25	witness. He only looked the first page.	12	:58:55
		Page	119

1	MS. KALEMERIS: Yes. 13822 and	13:00:27
2	MR. KEENER: The three last pages?	13:00:32
3	I've got 322 and then 323.	13:00:32
4	MS. KALEMERIS: You can pull off the	13:00:37
5	last one. Sorry about that. This should not have	13:00:39
6	been added.	13:00:43
7	MR. KEENER: So you want us to remove	13:00:44
8	18324 from Exhibit 8?	13:00:46
9	MS. KALEMERIS: Yes.	13:00:48
10	BY MS. KALEMERIS:	13:01:02
11	Q. If you are looking at CHS 00018322.	13:01:03
12	If you will look at the center image. Do you see a	13:01:08
13	carapace on that?	13:01:19
14	A. No, not like the one I did.	13:01:22
15	Q. Do you see any spikes down the center	13:01:27
16	of the back?	13:01:30
17	A. No.	13:01:31
18	Q. Is this Lizardman holding his weapon	13:01:34
19	above his head?	13:01:42
20	A. Yes.	13:01:43
21	Q. Is he holding it above his head in the	13:01:43
22	manner that your Kroxigor is holding his weapon?	13:01:48
23	A. Not exactly, no.	13:01:52
24	Q. What does that pose make you think of	13:01:53
25	when you look at it?	13:02:03
	Pa	age 121

1	MR. KEENER: Objection. Form.	13:02:04
2	BY THE WITNESS:	13:02:05
3	A. What's it make me think of?	13:02:05
4	Q. Does it evoke any feeling?	13:02:11
5	MR. KEENER: Objection. Form.	13:02:14
6	BY THE WITNESS:	13:02:15
7	A. Feeling?	13:02:18
8	Q. For example, the Kroxigor that you	13:02:18
9	created, you said that you put him in that pose to	13:02:25
10	create a brutal feeling. Do you get that same	13:02:28
11	feeling from this Kroxigor excuse me, this model?	13:02:32
12	A. Slightly, yeah.	13:02:41
13	Q. I'm frazzled that's all.	13:02:44
14	Okay. So if you look at the	13:02:50
15	weapon that's in the Kroxigor's hand the model is	13:02:51
16	holding. I got to stop for a second, I'm sorry.	13:02:56
17	If you look at the weapon that	13:03:15
18	this model is holding, do you see a spike on the	13:03:17
19	bottom?	13:03:24
20	A. No.	13:03:24
21	Q. The spikes on that weapon, would you	13:03:25
22	consider those to be brutal spikes?	13:03:34
23	A. Yeah.	13:03:36
24	Q. You would consider those spikes to be	13:03:38
25	the same type of spikes that you have on the model	13:03:42
	Pa	age 122

1	that yo	ou creat	ted?	13:03:48
2		Α.	The same type, yes.	13:03:49
3		Q.	And if you will turn to the next page,	13:03:58
4	18323.	Does	this model have a carapace?	13:04:13
5		Α.	No.	13:04:23
6		Q.	Does this model have spikes down the	13:04:26
7	center	of its	back?	13:04:30
8		Α.	No.	13:04:31
9		Q.	If you look at the weapon that this	13:04:32
10	model :	is hold:	ing, does it have a wooden shaft?	13:04:38
11		Α.	It's got a binding around the shaft.	13:04:47
12	It coul	ld be wo	ood under the binding.	13:04:53
13		Q.	Does it appear to be wood to you?	13:04:56
14		Α.	No.	13:04:58
15		Q.	Does it have a spike on the bottom?	13:04:59
16		Α.	No.	13:05:01
17		Q.	Does that model's tail have a what	13:05:01
18	did we	call i	t? a protrusion or spike at the end?	13:05:09
19		Α.	No.	13:05:10
20		Q.	You can put that to the side.	13:05:11
21			What are Space Marines?	13:05:16
22		Α.	It's quite a broad subject.	13:05:33
23		Q.	If you had to describe what the Space	13:05:40
24	Marines	s were	to a layperson, what would you say?	13:05:45
25		Α.	Is seven-foot tall domestically	13:05:47
			Po	age 123

		10.01.01
1	would not have bare metal on your head.	13:21:34
2	Q. Why did you chose to include the	13:21:37
3	medieval style skull cap?	13:21:42
4	MR. KEENER: Objection. Form.	13:21:44
5	THE WITNESS: I think it fits into our	13:21:45
6	other work.	13:21:48
7	(Whereupon, Footitt Deposition	13:21:48
8	Exhibit No. 11 was marked for	13:21:48
9	identification.)	13:22:59
10	BY MS. KALEMERIS:	13:22:59
11	Q. Handing you Exhibit 11. If you could	13:22:59
12	flip to Page 11813. Is this an image of a Grey	13:23:07
13	Knight?	13:23:19
14	A. Yes.	13:23:19
15	Q. Can you describe the torso area of the	13:23:19
16	Grey Knight?	13:23:27
17	A. Armored chest plate. There is some	13:23:28
18	runic words written across it. And I think there is	13:23:37
19	a book sword through it in the center. He has some	13:23:41
20	high collar.	13:23:54
21	Q. If you go to page there is no Bates	13:24:02
22	number on this page. It's the third to the last	13:24:25
23	page in the document.	13:24:38
24	MR. KEENER: Are you counting each	13:24:48
25	page as double-sided as one page?	13:24:50
	Pa	age 133

1	MS. KALEMERIS: Yes.	13:24:50
2	THE WITNESS: Here is the number.	13:25:04
3	MR. HORTON: Hand, or	13:25:04
4	THE WITNESS: Written on the frame.	13:25:04
5	BY MS. KALEMERIS:	13:25:04
6	Q. Oh, look at that. My bad.	13:25:04
7	If you look in the bottom	13:25:07
8	right-hand corner of that image, do you see some of	13:25:10
9	the torsos of the Grey Knight there? It appears	13:25:13
10	there are six of them.	13:25:18
11	MR. KEENER: What page are we on?	13:25:19
12	MS. KALEMERIS: 832.	13:25:23
13	MR. KEENER: Third from the back?	13:25:23
14	MS. KALEMERIS: It's my third in the	13:25:26
15	back.	13:25:28
16	BY THE WITNESS:	13:25:32
17	A. Can you repeat?	13:25:33
18	Q. Do you see these six torsos right	13:25:34
19	here?	13:25:37
20	A. Yes.	13:25:37
21	Q. Can you describe those torsos to me?	13:25:38
22	A. One of them would have been the one	13:25:41
23	that I just described earlier. They've all got	13:25:50
24	runic war writing across the chest. They all got	13:25:56
25	high collar. And they all got a sword going	13:26:03
	E	Page 134

1	vertically down the center. Some of them have got	13:26:08
2	books in the middle, various belt buckle detail.	13:26:11
3	Q. If you look in the upper right-hand	13:26:27
4	corner of that page, do you see the shoulder pads	13:26:30
5	there?	13:26:33
6	A. Yes.	13:26:33
7	Q. Can you describe those shoulder pads	13:26:33
8	to me?	13:26:36
9	A. Five of the shoulder pads have a book	13:26:36
10	and a sword going through. Some have a high trim on	13:26:45
11	them. Some of scroll work going across them. Some	13:26:50
12	have the shields hanging off.	13:27:04
13	THE REPORTER: I'm sorry. Say that	13:27:04
14	again.	13:27:04
15	THE WITNESS: Some have their shields	13:27:06
16	hanging off. And three of them have icons hanging	13:27:06
17	off the edge.	13:27:10
18	BY MS. KALEMERIS:	13:27:11
19	Q. So going back to the torsos. Can	13:27:11
20	you can you tell me why you made the design	13:27:18
21	decision to include the runic ward writing on the	13:27:23
22	torsos?	13:27:28
23	A. It's a feature of the Grey Knights,	13:27:28
24	that their armory is protected by these runic wards.	13:27:36
25	Q. Would it be fair to say that that's a	13:27:47
	Po	age 135

1	component that makes this a Grey Knight?	13:27:50
2	A. One of them, yeah.	13:27:52
3	Q. Can you explain why you made the	13:27:53
4	design decision of the high collar?	13:27:57
5	A. I can't remember. I worked on this	13:28:05
6	project, I didn't I was one of three people on	13:28:12
7	it.	13:28:15
8	Q. Uh-huh.	13:28:15
9	Can you tell me why you made the	13:28:22
10	design decision of the vertical sword?	13:28:26
11	A. I saw it on the book, is the Grey	13:28:29
12	Knight symbol I think.	13:28:41
13	Q. Can you explain the belt buckle	13:28:42
14	detail, why you made that design decision?	13:28:46
15	A. I didn't work on that part.	13:28:50
16	Q. Moving to the shoulder pads, can you	13:28:53
17	explain to me the design decision for the book with	13:29:01
18	the sword?	13:29:06
19	A. As I said, the book with the sword is	13:29:06
20	a Grey Knight symbol.	13:29:14
21	Q. Can you explain to me the significance	13:29:16
22	of the scrolls?	13:29:24
23	A. It's a place where you can write the	13:29:26
24	name of that Grey Knight on.	13:29:29
25	Q. And the significance of the purity	13:29:37
	Pag	je 136

1	seals?	13:29:41
2	A. They were a common feature of all	13:29:41
3	Space Marines.	13:29:45
4	Q. And to the other icons that are	13:29:46
5	hanging off, can you explain that as well?	13:29:57
6	A. Yeah. There is a sword hanging off	13:30:00
7	one and a book hanging off another. So relating to	13:30:04
8	the Grey Knight symbol. And the other one is	13:30:08
9	inquisitor eye symbol. Then the Grey Knights work	13:30:12
10	for the inquisition, which have the eye.	13:30:15
11	Q. Okay.	13:30:19
12	(Whereupon, Footitt Deposition	13:30:38
13	Exhibit No. 12 was marked for	13:30:38
14	identification.)	13:30:39
15	BY MS. KALEMERIS:	13:30:39
16	Q. This is Exhibit 12, which are not	13:30:40
17	confidential.	13:30:42
18	MR. KEENER: Again, these Bates	13:30:44
19	numbers are not in any sequence order. Is that	13:30:46
20	intentional?	13:30:51
21	MS. KALEMERIS: Yes, that's	13:30:54
22	intentional.	13:30:55
23	BY MS. KALEMERIS:	13:30:56
24	Q. If you flip to the first page, it's	13:30:57
25	Bates stamped 21338.	13:30:59
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1		On these shoulder pads, do you see	e 13:31:02
2	any books wit	h swords?	13:31:04
3	Α.	No.	13:31:06
4	Q.	Do you see any with a high trim?	13:31:06
5	Α.	Oh, the bottom right one.	13:31:09
6	Q.	The bottom right one.	13:31:12
7		Do you see any scrolls?	13:31:14
8	Α.	No.	13:31:15
9	Q.	Do you see any purity seals?	13:31:17
10	Α.	No.	13:31:20
11	Q.	Do you see any icons hanging off of	13:31:20
12	the shoulder	pads?	13:31:26
13	Α.	No.	13:31:27
14	Q.	Turn to the next page. It's Bates	13:31:27
15	stamped 21343	. Do you see any runic ward writing or	n 13:31:33
16	these torsos?		13:31:42
17	Α.	No.	13:31:43
18	Q.	Do you see a high collar on these	13:31:43
19	torsos?		13:31:46
20	Α.	The left one has a high collar.	13:31:47
21	Q.	Do you have a vertical sword on these	13:31:49
22	torsos?		13:31:52
23	Α.	No.	13:31:53
24	Q.	Do you see any books on these torsos?	13:31:53
25	Α.	No.	13:31:55
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