

# EXHIBIT G

VOLUME I

AB 524 DOE

STATE OF NEW YORK  
SUPREME COURT : COUNTY OF ORLEANS

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AB 524 DOE,

Plaintiff,

-vs-

LYNDONVILLE CENTRAL SCHOOL DISTRICT  
and LYNDONVILLE ELEMENTARY SCHOOL,

Defendants.  
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Examination Before Trial of

AB 524 DOE, Plaintiff, taken pursuant to Notice under  
Article 31 of the Civil Practice Law and Rules, in the law  
offices of WEBSTER SZANYI, LLP, 1400 Liberty Building,  
Buffalo, New York, taken on December 12, 2023, commencing at  
10:08 A.M., before LESLIE E. PINZONE, Notary Public.

1 MS. VANDERMEER: What was my last question?

2 (Whereupon, the above-requested question was  
3 then read back by the reporter.)

4 MS. VANDERMEER: Okay. Thanks.

5 BY MS. VANDERMEER:

6 Q. Before we went off the record, we were talking  
7 about an incident that occurred in the classroom.  
8 And what I want to turn to next is, it sounds  
9 like after that incident you then went to  
10 Houseman's house for a third time. Is that  
11 correct?

12 A. Yes.

13 Q. How was it that you arrived at Houseman's house,  
14 how did you get there?

15 A. The same situation of leaving last day of school,  
16 him driving me there.

17 Q. So you went straight from school to Houseman's  
18 house?

19 A. Yes.

20 Q. Okay.

21 A. And the third time we actually saw Mr. Montag as  
22 we were leaving in the parking lot.

23 Q. Okay.

1 A. And they had, they said some words to each other  
2 and like friendly -- I don't know exactly what,  
3 just friendly words. And then off we went.

4 Q. Okay. So going back to the second time that you  
5 went to Houseman's house. I just want to  
6 confirm, did you go straight from school to his  
7 house the second time?

8 A. Yes.

9 Q. To your knowledge, did anyone see you and  
10 Houseman leaving school the second time that you  
11 went to his house?

12 A. I assumed someone saw because we weren't the only  
13 ones, we weren't alone. I mean, there was other  
14 people in the school.

15 Q. Okay. Who were those other people?

16 A. I don't remember specifically.

17 Q. Okay. Did anyone -- sticking with the going back  
18 to the second time. Did anyone ever tell you  
19 that they saw you and Houseman leaving?

20 A. No. No.

21 Q. And when the two of you were leaving the school  
22 the second time, was his son with you?

23 A. No.

1 MS. COSTANZO: By his son, do you mean Terry  
2 Houseman?

3 MS. VANDERMEER: Yes, Houseman's son.

4 BY MS. VANDERMEER:

5 Q. Still no?

6 A. No.

7 Q. Okay. Sticking with the second time that you  
8 left school with Houseman. Was Houseman in any  
9 way physically touching you at all when the two  
10 of you left school the second time? Do you need  
11 me to repeat the question?

12 A. So are you asking specifically like before  
13 leaving the school or after leaving the school?

14 Q. The whole time, I guess. Before --

15 A. Yeah. He would -- like when we would be walking  
16 he would a lot of times have a hand on my  
17 shoulder.

18 Q. Okay.

19 A. And then driving the vehicle he would be, you  
20 know, sometimes trying to be funny and he would  
21 usually be patting me on the leg when he was, you  
22 know, trying to be in that demeanor.

23 Q. Okay. You said that there were a lot of times

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