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Transcript of Martha Crawford, Continued

Date: December 13, 2017

Case: American Small Business League -v- United States Department of Defense

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1 A P P E A R A N C E S:

2
3 CUNEO GILBERT & LaDUCA, LLP
4 Attorneys for the Plaintiff
5 4725 Wisconsin Avenue
6 Washington, DC 20016
7 Phone: 202.789.3960

8
9 BY: JONATHAN W. CUNEO, ESQ.
10 jonc@cuneolaw.com

11
12 UNITED STATES ATTORNEY'S OFFICE
13 NORTHERN DISTRICT OF CALIFORNIA
14 On behalf of the Department of Defense
15 450 Golden Gate Avenue
16 San Francisco, California 94102
17 Phone: 415.436.7288

18
19 BY: KIMBERLY FRIDAY, ESQ.
20 Assistant United States Attorney
21 kimberly.friday@usdoj.gov
22 (via telephone)

23
24 AKIN GUMP STRAUSS HAUER & FELD, LLP
25 On Behalf of Sikorsky and the witness
1999 Avenue of the Stars, Suite 600
Los Angeles, California 90067
Phone: 310.229.1000

BY: REX HEINKE, ESQ.
rheinke@akingump.com

20 A L S O P R E S E N T:

21 Aleksander Lamvol, Esq.,
22 In-house Counsel for Sikorsky

23 Omar Melendez, Videographer
24
25

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I N D E X P A G E

Witness Direct
Crawford 167

EXHIBITS MARKED

Plaintiff's Exhibits	Description	Page
18	Declaration of Martha Crawford	165

EXHIBITS REFERENCED

	Description	
16	Sikorsky 2013 Small Business Subcontracting Plan	173

1 (Declaration of Margaret
 2 Crawford was marked as Plaintiff's
 3 Exhibit No. 18 for identification, as
 4 of this date.)

5 THE VIDEOGRAPHER: Good 10:35:40
 6 morning. Here begins Tape No. 1 in 10:35:40
 7 the videotaped deposition of Margaret 10:35:42
 8 Crawford in the matter of American 10:35:45
 9 Small Business League, Plaintiff, 10:35:48
 10 versus Department of Defense, 10:35:51
 11 Defendant, in the court of the United 10:35:53
 12 States District Court, Northern 10:35:57
 13 District of California, San Francisco 10:35:59
 14 Division, Case No 3:14-cv-02166-WHA. 10:36:00

15 MR. HEINKE: One minor 10:36:14
 16 correction. It's Martha Crawford. 10:36:15

17 THE VIDEOGRAPHER: Today is 10:36:23
 18 December 13, 2017. The time on the 10:36:23
 19 video monitor is 10:36 a.m. The 10:36:27
 20 videographer today is Omar Melendez 10:36:32
 21 representing Planet Depos. The video 10:36:36
 22 deposition is taking place at One 10:36:38
 23 Bryant Park, New York, New York. 10:36:40

24 Would counsel please voice 10:36:45
 25 identify themselves and whom they 10:36:47

1	represent.	10:36:49
2	MR. CUNEO: Jonathan Cuneo,	10:36:49
3	Cuneo Gilbert & LaDuca, on behalf of	10:36:51
4	the American Small Business League,	10:36:55
5	Plaintiff.	10:36:58
6	MR. HEINKE: Rex Heinke on	10:36:59
7	behalf of Sikorsky Aircraft	10:37:00
8	Corporation. I'm with Akin Gump.	10:37:03
9	Sikorsky is a Defendant Intervenor.	10:37:06
10	MS. FRIDAY: And this is	10:37:10
11	Kimberly Friday from the United States	10:37:10
12	Department of Justice attending by	10:37:13
13	phone representing the Department of	10:37:15
14	Defense.	10:37:16
15	MR. LAMVOL: And I'm Alex	10:37:18
16	Lamvol, I'm in-house counsel at	10:37:20
17	Sikorsky Aircraft.	10:37:22
18	THE VIDEOGRAPHER: The court	10:37:23
19	reporter today is Pamela Grimaldi	10:37:24
20	representing Planet Depos.	10:37:26
21	Will the reporter please swear	10:37:28
22	in the witness.	10:37:30
23		10:37:30
24	(Continued on next page.)	10:37:30
25		10:37:30

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1	MARTHA CRAWFORD,	10:37:30
2	called as a witness, having been first	10:37:30
3	duly sworn/affirmed by Pamela Grimaldi,	10:37:30
4	Registered Professional Reporter and Notary	10:37:30
5	Public of the State of New York, was	10:37:30
6	examined and testified.	10:37:30
7	DIRECT EXAMINATION	10:37:43
8	BY MR. CUNEO:	10:37:44
9	Q Good morning.	10:37:45
10	I would ask you to look at what has	10:37:48
11	been marked as Exhibit 18. Do you recognize that	10:37:54
12	document?	10:38:01
13	A Yes.	10:38:02
14	Q Okay. What is it?	10:38:02
15	A It's my Declaration in Support of	10:38:05
16	the Defendant's Motion for Summary Judgment.	10:38:08
17	Q And to your knowledge, it's been	10:38:11
18	filed in court, correct?	10:38:13
19	A Yes.	10:38:14
20	Q Okay. And on page six, at the	10:38:15
21	bottom of page 6, is that your signature?	10:38:26
22	A Yes.	10:38:28
23	Q And in the course of preparing this	10:38:29
24	Declaration, who besides your lawyers did you	10:38:38
25	speak to?	10:38:44

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1	A	No one.	10:38:47
2	Q	So this, is it fair to say,	10:38:48
3		Declaration, is the product of a conversation	10:38:54
4		between you and your lawyers?	10:38:56
5	A	Yes.	10:38:57
6	Q	Okay. Now, since the last time we	10:38:58
7		spoke, or met, have you spoken with anybody at the	10:39:02
8		Department of Defense about this case?	10:39:08
9	A	No.	10:39:10
10	Q	Have you spoken with anybody,	10:39:12
11		besides the lawyers, at Sikorsky about this case?	10:39:13
12	A	No.	10:39:19
13	Q	So the opinions that are expressed	10:39:20
14		in here, in your Declaration, No. 18, Exhibit 18,	10:39:24
15		are yours and yours alone, correct?	10:39:29
16	A	That's correct.	10:39:32
17	Q	Now, I would like to just go through	10:39:32
18		your Declaration with you, if that's okay.	10:39:43
19	A	Okay.	10:39:45
20	Q	No. 5, your current position is	10:39:51
21		management administration of Sikorsky small	10:39:56
22		business contracting plan; is that correct?	10:39:58
23	A	Yes.	10:40:01
24	Q	Okay. And you also prepare and	10:40:02
25		submit subcontracting plans similar to the 2013	10:40:07

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1	Small Business Subcontractor Plan; is that	10:40:12
2	correct?	10:40:14
3	A Yes.	10:40:14
4	Q Okay. Now, when you submit those,	10:40:15
5	do you tell the Department of Defense specifically	10:40:20
6	what information you regard as confidential?	10:40:24
7	A No.	10:40:30
8	Q Do you put a legend on that says the	10:40:31
9	whole thing is confidential?	10:40:33
10	A Yes.	10:40:34
11	Q Are you responsible for monitoring	10:40:41
12	competition with other contractors?	10:40:45
13	A No.	10:40:51
14	Q Are you responsible for determining	10:40:51
15	what information Sikorsky makes public?	10:40:56
16	A No.	10:41:00
17	Q How many small business	10:41:11
18	subcontractors, approximately, does Sikorsky have?	10:41:13
19	MR. HEINKE: At the current	10:41:18
20	time?	10:41:18
21	MR. CUNEO: At the current	10:41:19
22	time.	10:41:20
23	A Probably over 600.	10:41:20
24	Q Over 600 small business contractors?	10:41:22
25	A Yes.	10:41:25

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1	Q	And in rough terms, has that been	10:41:25
2		true for the past decade?	10:41:27
3	A	I don't know.	10:41:29
4	Q	Do you know whether Sikorsky, in	10:41:30
5		2013, had -- approximately how many it had?	10:41:33
6	A	I don't know, no.	10:41:39
7	Q	So you wouldn't -- if I told you it	10:41:40
8		was 20, you couldn't disagree with that?	10:41:41
9	A	You're right.	10:41:45
10	Q	That's correct, you could not	10:41:48
11		disagree with it?	10:41:49
12	A	That's correct.	10:41:50
13	Q	If I told you it was 2,000, you	10:41:51
14		couldn't disagree with that either?	10:41:54
15	A	That's correct.	10:41:55
16	Q	So you don't know?	10:41:56
17	A	Yes.	10:41:56
18	Q	Okay. Looking at paragraph No. 7,	10:41:57
19		does Sikorsky take any steps to prevent an	10:42:24
20		employee who's working on this from taking it home	10:42:33
21		in his or her briefcase at night?	10:42:38
22	A	No.	10:42:41
23	Q	So it's possible that drafts of the	10:42:47
24		final report are located in people's homes; is	10:42:48
25		that correct?	10:42:51

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1	A	It's possible.	10:42:52
2	Q	In paragraph 8 you say, Sikorsky	10:43:04
3		does not publicly disclose any particular	10:43:07
4		suppliers as part of the plan, but it may	10:43:09
5		sometimes release the name of some suppliers for a	10:43:11
6		variety of reasons.	10:43:15
7		Is that correctly -- have I read	10:43:16
8		correctly what it says?	10:43:19
9	A	Yes.	10:43:20
10	Q	Okay. Who decides whether to make	10:43:21
11		something public?	10:43:24
12	A	I don't know.	10:43:26
13	Q	But you don't decide?	10:43:26
14	A	No.	10:43:28
15	Q	Okay. And you have no role in	10:43:28
16		making recommendations in that regard either?	10:43:31
17	A	No, I don't.	10:43:34
18	Q	In paragraph 10 you say that,	10:43:40
19		Sikorsky subcontracts with the subcontractors	10:43:43
20		includes language prohibiting the disclosure of	10:43:47
21		Sikorsky's proprietary information.	10:43:51
22		Correct?	10:43:54
23	A	Yes.	10:43:54
24	Q	Have you ever seen one of those	10:43:55
25		contracts?	10:43:56

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1	A	Yes.	10:43:57
2	Q	Does it prohibit the disclosure of	10:43:58
3		information about the amount that Sikorsky pays a	10:44:03
4		subcontractor?	10:44:11
5	A	It prohibits the disclosure of	10:44:12
6		proprietary information.	10:44:13
7	Q	Is "proprietary information"	10:44:15
8		defined?	10:44:16
9	A	I don't recall.	10:44:17
10	Q	Okay. Is it a standard contract?	10:44:19
11	A	Yes.	10:44:21
12	Q	But you cannot say today that that	10:44:30
13		disclosure -- that definition of proprietary	10:44:32
14		information includes the amount paid to	10:44:35
15		subcontractors; is that correct?	10:44:38
16	A	I can't say that, yes.	10:44:40
17	Q	Yes, you --	10:44:42
18	A	Yes, I cannot say that.	10:44:43
19	Q	Thank you. I'm sorry about that. I	10:44:45
20		didn't do the question...	10:44:46
21		Paragraph 14 you say, Redactions 1	10:45:07
22		and 2 consist of signatures of former Sikorsky	10:45:09
23		employees. And you say that it's redacted because	10:45:13
24		the employees have a privacy interest in the	10:45:17
25		information.	10:45:20

1	Correct?	10:45:20
2	A Yes.	10:45:21
3	Q But your information -- your	10:45:22
4	signature's now public, isn't it?"	10:45:24
5	THE COURT REPORTER: "Now"?	10:45:32
6	Did you say "now" or "not"?	10:45:32
7	Q Is it now public?	10:45:32
8	A It may be.	10:45:33
9	Q If it was filed in court --	10:45:34
10	A Right.	10:45:37
11	Q -- and it's on a public database,	10:45:37
12	you would agree it's public?	10:45:41
13	A Yes.	10:45:42
14	Q Okay. Do you think your privacy	10:45:43
15	interests have been invaded?	10:45:46
16	A Yes.	10:45:47
17	Q Then why did you sign it?	10:45:47
18	A Because it was in my best interests	10:45:50
19	to sign it.	10:45:52
20	Q Now let's go to -- I'd like you to	10:46:01
21	look at -- I'll go over some of the specific	10:46:03
22	redactions with you.	10:46:06
23	(Sikorsky 2013 Small Business	10:46:07
24	Subcontracting Plan, previously marked	10:46:07
25	as Plaintiff's Exhibit No. 16 for	10:46:07

1	identification, was placed before the	10:46:07
2	witness.)	10:46:07
3	BY MR. CUNEO:	10:46:07
4	Q Okay. Do you know what the term	10:46:07
5	"redactions" means, don't you?	10:46:08
6	A Yes.	10:46:11
7	Q Okay. Let's look at 41, 42, and 43.	10:46:19
8	Do these -- now, first of all, I would like	10:46:39
9	Mr. Heinke to show you a copy of the unredacted	10:46:42
10	plan.	10:46:49
11	A Okay.	10:46:49
12	Q With the understanding, as carryover	10:46:50
13	from yesterday, and every other day, that showing	10:46:54
14	it to you does not constitute a waiver of any	10:46:58
15	claim of confidentiality that may otherwise exist.	10:47:00
16	A Okay.	10:47:04
17	Q Okay?	10:47:05
18	MR. HEINKE: Do you want her	10:47:43
19	to read those redactions?	10:47:43
20	MR. CUNEO: Yes.	10:47:47
21	Q Please. I'm sorry. I wanted you to	10:47:47
22	read those redactions in the unredacted copy.	10:47:49
23	Have you had a chance to read --	10:47:52
24	A Yes.	10:47:54
25	Q I want to ask you questions	10:47:54

1 generally about what it is without, obviously, 10:47:56

2 asking you specifically the contents of it, okay. 10:48:01

3 A Okay. 10:48:06

4 Q I'm trying to understand what it is. 10:48:07

5 Does it repre -- now, let me go back a bit. 10:48:09

6 Sikorsky sells things to the United 10:48:13

7 States government, correct? 10:48:16

8 A Yes. 10:48:18

9 Q And it also sells some other things 10:48:18

10 to other entities; is that correct? 10:48:23

11 A Yes. 10:48:26

12 Q And that Sikorsky sometimes uses the 10:48:27

13 same contractor to help with both things; is that 10:48:34

14 correct? 10:48:41

15 A Yes. 10:48:42

16 Q Okay. 10:48:42

17 A That's possible. 10:48:43

18 Q And so that the same contractor 10:48:44

19 might be working on a helicopter, say, for the 10:48:48

20 government, as well as a helicopter for a private 10:48:53

21 corporation? 10:48:57

22 A They might be. 10:48:58

23 Q Okay. Now, does -- do I understand 10:48:59

24 that -- correctly that 21, 22, and 23 -- 10:49:03

25 MR. HEINKE: Wait a second. 10:49:09

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1 Q Excuse me -- 41, 42, and 43 -- 10:49:10
2 MR. CUNEO: Thank you. 10:49:13
3 Q -- represent some kind of an 10:49:13
4 allocation formula technique or method for 10:49:15
5 distinguishing between those costs to allocating 10:49:19
6 them? 10:49:25
7 MR. HEINKE: I'm not sure what 10:49:27
8 you're distinguishing. 10:49:27
9 MR. CUNEO: Well, between that 10:49:29
10 which is allocated to the 10:49:31
11 government -- 10:49:32
12 MR. HEINKE: The U.S. 10:49:33
13 government? 10:49:34
14 MR. CUNEO: The U.S. 10:49:35
15 government, and that which is 10:49:36
16 allocated elsewhere. 10:49:37
17 A It describes a method that 10:49:47
18 identifies direct government -- the allocation 10:49:50
19 rate as it relates to direct government 10:49:54
20 procurement. 10:49:56
21 Q Okay. So, for example, if \$10 were 10:49:57
22 involved, and eight of it went to direct 10:50:01
23 government procurement and two of it went 10:50:06
24 elsewhere, this would be -- describe how Sikorsky 10:50:09
25 would report that in the plan? 10:50:12

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1 A It describes the methodology, yes. 10:50:14

2 Q Of reporting it. Okay. 10:50:16

3 Is that something that the United 10:50:18

4 States government agrees to? 10:50:20

5 A Yes. If they've agreed to the plan, 10:50:27

6 then they've agreed to the methodology of the 10:50:29

7 plan. 10:50:31

8 Q Okay. And I think you testified 10:50:32

9 last time that part of your responsibilities are 10:50:33

10 going in and discussing these plans with the 10:50:36

11 government; is that correct? 10:50:41

12 A Yes. 10:50:47

13 Q And that -- essentially, is it fair 10:50:47

14 to say that it's an iterative process, that you 10:50:48

15 make proposals and negotiate and then come up with 10:50:51

16 a final plan? 10:50:54

17 A Yes. 10:50:55

18 Q And so this would be something, this 10:50:56

19 formula would be something that the United States 10:50:59

20 government, through the defense department, would 10:51:01

21 have agreed to; is that correct? 10:51:04

22 A Presumably. 10:51:07

23 Q Presumably. Okay. But in theory, 10:51:07

24 the idea or in practice, I should say, this is 10:51:10

25 something that is discussed with the government 10:51:14

1 and you reach some kind of accommodation? 10:51:15

2 A Yes. 10:51:20

3 Q Okay. So there's governmental 10:51:20

4 action that -- or approval, that is inherent, 10:51:22

5 presumably, in 41, 42, and 43? 10:51:27

6 A Yes. 10:51:32

7 Q Okay. 10:51:33

8 Okay. I would like you, please, to 10:51:57

9 turn to page 15 of the redacted plan. 10:51:59

10 MR. HEINKE: Exhibit 16? 10:52:11

11 Q Exhibit 16, ma'am. 10:52:15

12 Let me start by saying -- by asking, 10:52:21

13 do you know what a HUBZone is? 10:52:24

14 A Yes. 10:52:25

15 Q Okay. Can you describe what a 10:52:26

16 HUBZone is? 10:52:30

17 A It's an historically underutilized 10:52:34

18 business zone. 10:52:37

19 Q Is that something -- is that a 10:52:38

20 federal contracting term? 10:52:41

21 A No. I believe it's a term that 10:52:45

22 was -- it was developed by the Small Business 10:52:47

23 Administration. 10:52:54

24 Q Okay. And isn't it common knowledge 10:52:55

25 that Sikorsky's HUBZone is Bridgeport? 10:53:01

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1	A	No.	10:53:06
2	Q	It's not common knowledge?	10:53:07
3	A	No.	10:53:11
4	Q	Okay. Do you know what NAICS code	10:53:11
5		332710 is?	10:53:19
6	A	I don't.	10:53:23
7	Q	So if I told you it was machine	10:53:24
8		shops, that kind of thing, you wouldn't be in a	10:53:26
9		position to disagree?	10:53:28
10	A	Correct.	10:53:29
11	Q	Okay. Do you know what NAICS code	10:53:30
12		321211 is?	10:53:36
13	A	No.	10:53:38
14	Q	Okay. So if I told you it was	10:53:39
15		hardwood veneer and plywood manufacturing, you	10:53:41
16		would not be in a position to disagree with that?	10:53:45
17	A	That's correct.	10:53:48
18	Q	Now, from looking at the unredacted	10:53:56
19		copies of 56, 57, 58, 59, and 60, are those --	10:53:58
20		describe the commodities that are -- relate to the	10:54:07
21		commodities that are described in 50 and 53?	10:54:15
22	A	Yes.	10:54:27
23	Q	Now, is it your belief that	10:54:28
24		disclosure of that information would do damage to	10:54:40
25		Sikorsky now?	10:54:45

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1	A	Yes.	10:54:45
2	Q	What fact is that based on?	10:54:49
3	A	My knowledge of how the plans are	10:54:53
4		developed today.	10:54:55
5	Q	Do you develop the same plans in the	10:54:59
6		same way?	10:55:01
7	A	We use a similar methodology, yes.	10:55:01
8	Q	And do you think that your	10:55:04
9		competitors know what your HUBZones are?	10:55:09
10	A	I don't know.	10:55:12
11	Q	But they might?	10:55:16
12	A	They might.	10:55:17
13	Q	Do you think that your competitors	10:55:18
14		could make a pretty good guess as to who -- as to	10:55:21
15		what the commodities were from the NAICS code?	10:55:26
16	A	They could.	10:55:31
17	Q	Can you name a single example in	10:55:43
18		which Sikorsky has ever been injured by the	10:55:44
19		disclosure of commodities in a plan such as -- as	10:55:53
20		described in category 15?	10:56:07
21	A	No.	10:56:09
22	Q	Can you think of a single example in	10:56:10
23		which Sikorsky has benefited from knowing its	10:56:13
24		competitors' HUBZones and targets?	10:56:21
25	A	No.	10:56:25

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1	Q	Are you responsible for monitoring	10:56:36
2		Sikorsky's competition?	10:56:43
3	A	No.	10:56:46
4	Q	Do you have any idea, then, why you	10:56:58
5		were chosen to opine on this topic?	10:56:59
6		MR. HEINKE: What is "this	10:57:06
7		topic"?	10:57:07
8	Q	On whether disclosure would	10:57:10
9		competitively injure Sikorsky.	10:57:13
10	A	I'm an author of the current plan	10:57:18
11		that is similar to this.	10:57:20
12	Q	Are you an officer of the company?	10:57:22
13	A	No.	10:57:23
14	Q	Okay. Who do you report to?	10:57:24
15	A	I report to a Mr. Keith Richardson.	10:57:26
16	Q	Okay. And who does Mr. Richardson	10:57:30
17		report to?	10:57:34
18	A	Mrs. Amy Johnson.	10:57:34
19	Q	Okay. And who does Ms. Johnson	10:57:35
20		report to?	10:57:37
21	A	Mr. Mike Ciocca.	10:57:38
22	Q	And who does Mr. Ciocca report to?	10:57:40
23	A	He reports to Mr. Michael Sarpu.	10:57:43
24	Q	How do you spell that?	10:57:47
25	A	S-A-R-P-U.	10:57:49

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Transcript of Martha Crawford, Continued

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1	Q	Okay. And who does Mr. Sarpu report	10:57:52
2		to?	10:57:55
3	A	I don't know.	10:57:56
4	Q	Of those in the chain that you've	10:57:59
5		just mentioned, which one, if any, is an officer	10:58:01
6		of the company?	10:58:04
7	A	I believe Michael Sarpu.	10:58:09
8	Q	Is an officer. What's his position?	10:58:10
9	A	I don't know his formal title.	10:58:12
10	Q	Do you know him?	10:58:14
11	A	No.	10:58:15
12	Q	Now, Sikorsky was acquired by	10:58:35
13		Lockheed Martin since 2013, correct?	10:58:44
14	A	Yes.	10:58:56
15	Q	Now, do you file these Small	10:58:56
16		Business Subcontract Plans on behalf of Sikorsky	10:59:00
17		or Lockheed Martin?	10:59:03
18	A	On behalf of Sikorsky.	10:59:05
19	Q	So it's like Sikorsky's portion of	10:59:06
20		Lockheed Martin, division, or whatever it is?	10:59:11
21	A	Yes.	10:59:13
22	Q	Okay. I'd like, please, for you to	10:59:14
23		look at the unredacted plan at No. -- page 23 at	10:59:27
24		the top, which would correspond to redaction 193.	10:59:41
25		Ma'am, it's at the top of 23, and on the redacted	11:00:04

1	it looks like a big black box (indicating).	11:00:07
2	A Yep.	11:00:17
3	Q Okay. Generically, what is in that	11:00:17
4	box? What type of information?	11:00:22
5	A Information about suppliers.	11:00:31
6	Q Specific suppliers?	11:00:36
7	A Yes.	11:00:38
8	Q To rate them somehow?	11:00:40
9	A Not really.	11:00:51
10	Q Does it deal with the quality of	11:00:53
11	their work?	11:00:55
12	A Yes.	11:00:55
13	Q And does it classify them somehow?	11:00:56
14	A No.	11:01:03
15	Q From reading that, could a reader	11:01:15
16	say that you think supplier X is doing a better	11:01:20
17	job than supplier Y?	11:01:24
18	A Possibly.	11:01:29
19	Q Now, turning back to your	11:01:47
20	Declaration, No. 26 --	11:01:49
21	MR. HEINKE: You mean	11:01:51
22	paragraph 26?	11:01:52
23	MR. CUNEO: Paragraph 26.	11:01:53
24	Excuse me. Thank you.	11:01:54
25	Q You say that, This information would	11:02:11

1 likely result in substantial competitive injury to 11:02:15
2 Sikorsky. 11:02:21

3 What facts is that based on? 11:02:23

4 A Based on the knowledge that I have 11:02:27
5 of how the plans are developed today. 11:02:29

6 Q Okay. But what specific facts, as 11:02:34
7 opposed to your general knowledge? Is there a 11:02:39
8 specific fact that you can identify, any fact, 11:02:42
9 that would lead someone to conclude that that 11:02:44
10 disclosure would harm Sikorsky? 11:02:52

11 MR. HEINKE: Object, because I 11:02:54
12 don't know what a "specific fact" is. 11:02:55

13 BY MR. CUNEO: 11:02:57

14 Q Or a fact, as opposed to your 11:02:58
15 general feeling. 11:03:03

16 A Yes, the plan includes the 11:03:04
17 methodology -- describes the methodology by which 11:03:05
18 we run our business. 11:03:09

19 Q Well, but are we -- are the 11:03:12
20 redactions described in 25 methodologies? 11:03:15

21 A No. 11:03:25

22 Q They are specific amounts? 11:03:26

23 A Right. 11:03:27

24 Q Okay. Now, those amounts, if I 11:03:27
25 understood your prior testimony, are allocated 11:03:30

1 amounts for work done for the government, correct? 11:03:33

2 A They may be. 11:03:40

3 Q Okay. They may or may not be? 11:03:41

4 A They may be. They may be allocated. 11:03:43

5 Q Okay. So from reading those 11:03:45

6 amounts, the reader wouldn't necessarily know how 11:03:48

7 much Sikorsky's paid the subcontractor? 11:03:51

8 A Not necessarily. 11:03:56

9 Q Now, I can ask you specifically 11:04:19

10 about each redaction. Is there -- but I'm going 11:04:20

11 to ask you generally, besides your general 11:04:25

12 experience, is there any fact that supports your 11:04:30

13 conclusion that the release of any of these 11:04:36

14 redactions would harm Sikorsky? 11:04:40

15 A No. 11:04:46

16 Q I understand your answer to be no, 11:04:53

17 there are no facts. 11:04:55

18 A That's correct. 11:04:56

19 Q I would ask you to look at page 24, 11:05:13

20 the redaction that would be 195 -- is behind 195. 11:05:20

21 I'm asking you to look at the unredacted copy of 11:05:33

22 redaction 195, which is found on page 24 of the 11:05:36

23 plan. 11:05:41

24 Now, have you had an opportunity to 11:06:26

25 review it? 11:06:27

Transcript of Martha Crawford, Continued
Conducted on December 13, 2017

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1	A	Yes.	11:06:28
2	Q	Okay. What, generically, is the	11:06:28
3		type of information that's behind that redaction?	11:06:30
4	A	It describes an initiative to	11:06:40
5		increase subcontract awards to suppliers in a	11:06:43
6		category.	11:06:52
7	Q	Is that still going on today?	11:06:52
8	A	Not this specific initiative.	11:06:55
9	Q	That initiative is not going on	11:06:57
10		today?	11:07:00
11	A	No.	11:07:02
12	Q	When was the last year it went on?	11:07:02
13	A	I couldn't say.	11:07:04
14	Q	Have you ever worked on this	11:07:06
15		initiative?	11:07:08
16	A	We have initiatives that are	11:07:09
17		identified in each plan year.	11:07:11
18	Q	But have you, Ms. Crawford, your	11:07:13
19		person, ever worked on this initiative?	11:07:17
20	A	No.	11:07:19
21	Q	And you've had your current position	11:07:20
22		since 2014?	11:07:22
23	A	Yes.	11:07:24
24	Q	Okay. So is it fair to say that if	11:07:24
25		Sikorsky had worked on it since 2014, you would	11:07:31

1 have worked on it; is that correct? 11:07:34

2 A I'm not a buyer, so it's possible 11:07:36

3 that work was continued on this initiative without 11:07:39

4 my knowledge. 11:07:43

5 Q Well, okay. Have you ever reported 11:07:44

6 this initiative -- 11:07:45

7 A No. 11:07:47

8 Q -- to the government? 11:07:47

9 A No. 11:07:49

10 Q Do you know most of the suppliers 11:07:50

11 that are in the plan, in the 2013 plan? 11:07:58

12 MR. HEINKE: What do you mean 11:08:01

13 "know" them? 11:08:02

14 Q Are you familiar with them? Do you 11:08:04

15 know who they are? 11:08:06

16 A I'm familiar with some of them. 11:08:06

17 Q Are you familiar with MicroStrain? 11:08:20

18 A No. 11:08:25

19 Q How about Eagle? 11:08:35

20 A No. 11:08:36

21 Q If you look through the contractors 11:08:48

22 which start on page 19 by what was redaction 72, 11:08:57

23 do you see there are four companies listed, 11:09:22

24 Materials Technology, Defense Holdings, Eagle, 11:09:25

25 LLC, and Dayton T. Brown? 11:09:28

Transcript of Martha Crawford, Continued

Conducted on December 13, 2017

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1	A	Yes.	11:09:31
2	Q	Do you know any of those companies?	11:09:34
3	A	Yes.	11:09:36
4	Q	Which one?	11:09:37
5	A	Dayton Brown.	11:09:37
6	Q	Is that a person or is that a	11:09:38
7		company?	11:09:39
8	A	It's a company.	11:09:40
9	Q	Okay. Do you know how big it is?	11:09:41
10	A	It's a small business.	11:09:43
11	Q	Isn't it true that some of these	11:09:45
12		employees -- some of these contractors are two or	11:09:48
13		three people firms?	11:09:51
14	A	It's possible.	11:09:55
15	Q	What kind of work does Dayton T.	11:09:55
16		Brown do?	11:09:57
17	A	I don't know.	11:09:59
18	Q	Have you ever visited any of these?	11:10:01
19	A	I have not visited any of these	11:10:03
20		suppliers, no.	11:10:05
21	Q	Do you know how they came to be	11:10:11
22		suppliers?	11:10:13
23	A	I don't.	11:10:13
24	Q	I'd like you to look at the	11:10:23
25		redactions that begin at 91, the next bracket. It	11:10:24

1 starts with Sentient and ends with Metis Design 11:10:35
2 Corp. 11:10:45
3 Do you know any of these companies? 11:10:47
4 A No. 11:10:49
5 Q You don't know what they do? 11:10:53
6 A I don't. 11:10:54
7 Q Okay. Do you know whether any of 11:10:55
8 these contracts are research and design -- 11:10:57
9 research and development contracts? 11:11:01
10 A They may be. 11:11:03
11 Q They may be? 11:11:04
12 A They probably are. 11:11:05
13 Q They probably are. Is that true 11:11:06
14 with the previous Exhibit 1 -- under 72, Active 11:11:07
15 Rotor Component Demonstrator, are those R&D 11:11:13
16 contracts? 11:11:17
17 A I believe so. 11:11:19
18 Q Okay. And you believe those are. 11:11:19
19 And for Cost A, 91, starting at 91, and going down 11:11:25
20 through 119 in the left column, some of those are 11:11:30
21 and some of them aren't? 11:11:34
22 MR. HEINKE: You mean 11:11:39
23 research -- 11:11:40
24 Q Research development -- research 11:11:41
25 contracts. 11:11:41

Transcript of Martha Crawford, Continued
Conducted on December 13, 2017

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1 A I don't know which ones are or which 11:11:43
2 ones aren't. I -- this group, in general, this 11:11:47
3 section of the plan, talks about research and 11:11:53
4 development types of projects. 11:11:58
5 Q Okay. And when you say this portion 11:11:59
6 of the plan, that would include the box below 2 11:12:01
7 and -- starting at 124 and then going down to 153 11:12:07
8 with ExOne down to Parker Dynamics? 11:12:15
9 A Yes. 11:12:18
10 Q Okay. And so this part of the plan, 11:12:18
11 in general, deals with research and development? 11:12:22
12 A I believe so. 11:12:25
13 Q Okay. Now, what years would that 11:12:26
14 research and development have been conducted? 11:12:29
15 A I don't know. 11:12:31
16 Q Is it still being conducted now? 11:12:34
17 A I don't know. 11:12:37
18 Q Do you still use any of these 11:12:38
19 contractors today? 11:12:39
20 A Not to my knowledge. 11:12:40
21 I should clarify that. We may use 11:12:45
22 them. I don't -- I don't know. 11:12:47
23 Q You don't know if you do or you 11:12:51
24 don't? 11:12:53
25 A Right. 11:12:53

Transcript of Martha Crawford, Continued

Conducted on December 13, 2017

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1 Q Is it fair to say you don't use them 11:12:55
2 all but you may use some? 11:12:56

3 A That's possible. 11:12:59

4 MR. CUNEO: Can we take about 11:13:40
5 a two-minute break? 11:13:41

6 MR. HEINKE: Of course. 11:13:43

7 MR. CUNEO: I just want to 11:13:44
8 make sure I'm not missing anything 11:13:45
9 here. 11:13:47

10 (A discussion was held off the 11:13:54
11 written record.) 11:13:54

12 THE VIDEOGRAPHER: We're going 11:14:12
13 off the record. The time is 11:14 11:14:13
14 a.m. 11:14:15

15 (Whereupon, a recess was taken 11:14:18
16 between 11:14 and 11:17 a.m.) 11:14:18

17 THE VIDEOGRAPHER: We are back 11:17:58
18 on the record. The time is 11:17 a.m. 11:17:59

19 BY MR. CUNEO: 11:18:03

20 Q When you say you're the manager of 11:18:07
21 small business relationships, does that mean you 11:18:09
22 deal with the small businesses directly? 11:18:12

23 A I do in some cases, yes. 11:18:16

24 Q What does Sikorsky do to determine 11:18:18
25 that a small business is an adequate -- has the 11:18:28

1 adequate capability to be a Sikorsky 11:18:33

2 subcontractor? 11:18:36

3 A Depending on the goods or services 11:18:41

4 the supplier is providing, there may be various 11:18:46

5 quality requirements that suppliers need to -- 11:18:50

6 need to be able to meet. 11:18:58

7 Q Is it fair to say that a 11:19:00

8 subcontractor has to submit certain information to 11:19:02

9 Sikorsky? 11:19:08

10 A Yes. 11:19:08

11 Q About its production methods? 11:19:09

12 A Yes. 11:19:11

13 Q About where it makes its -- or how 11:19:12

14 it performs its contracts? 11:19:17

15 A Probably. 11:19:20

16 Q Does Sikorsky ever inspect the 11:19:22

17 plants of its subcontractors? 11:19:25

18 A The subcontractors that are 11:19:28

19 manufacturing aircraft parts go through a rigorous 11:19:30

20 qualification process which includes -- can 11:19:35

21 include on-site quality surveys. 11:19:38

22 Q Is it fair to say, overall, that 11:19:43

23 Sikorsky takes steps to ensure the quality of its 11:19:47

24 subcontractors? Correct? 11:19:51

25 A Yes. 11:19:53

1	Q	And it's fair to say that in every	11:19:53
2		case, Sikorsky elicits information from its	11:19:59
3		subcontractors about the subcontractor business	11:20:01
4		and its standards?	11:20:04
5	A	Yes.	11:20:06
6	Q	Okay. Now, do you also inquire of	11:20:06
7		your subcontractors whether they work for other	11:20:10
8		OEMs?	11:20:17
9	A	No.	11:20:18
10	Q	So is it possible that some of your	11:20:20
11		subcontractors are also -- work for Bell and	11:20:26
12		Boeing?	11:20:29
13	A	Yes.	11:20:29
14	Q	And that's not something that you	11:20:32
15		ask them?	11:20:34
16	A	I don't, no.	11:20:36
17	Q	Is it something Sikorsky asks them?	11:20:37
18	A	I don't know.	11:20:39
19	Q	You don't know. But the reason you	11:20:40
20		don't know is not -- is it's not important enough	11:20:42
21		for you to find out, is it?	11:20:46
22	A	It's not my concern.	11:20:47
23	Q	Not your concern.	11:20:49
24		If it was important for you to know,	11:20:52
25		wouldn't you go to the website, read the press	11:20:56

1 releases, and find out if any of them boast 11:20:58
2 relationships with their prime contractors? 11:21:01
3 A If it was important for me to know, 11:21:05
4 I would ask the subcontractor. 11:21:07
5 Q Okay. So it's not important for you 11:21:09
6 to know? 11:21:10
7 A It's not important for me to know. 11:21:11
8 Q Do you know which of the 11:21:23
9 subcontractors that are listed in the plan at 11:21:25
10 issue are still in business? 11:21:27
11 A I know that some of them are. 11:21:29
12 Q Okay. Do you know if any of them -- 11:21:31
13 which ones do you know are still in business? 11:21:33
14 MR. HEINKE: You want her to 11:21:38
15 go through every one? 11:21:39
16 MR. CUNEO: Sure. 11:21:41
17 Q Any one that you can identify as 11:21:41
18 still being in business. 11:21:43
19 A The one that we spoke of earlier, 11:21:45
20 Dayton -- Dayton Brown. 11:21:47
21 Q Okay. They are still in business? 11:21:48
22 A Yes. 11:21:50
23 Q Let's start -- ma'am, let's start on 11:21:50
24 page 19. Ones you can identify as being still in 11:21:53
25 business. 11:21:57

1 Q Do you ever, in the performance of 11:23:43
2 your duties, include information about programs 11:23:44
3 that have been canceled? 11:23:48
4 A Only if it would -- if it would have 11:23:53
5 impacted our small business outlook. 11:23:55
6 Q Well, how could this? I mean, I'm 11:23:59
7 just asking. 11:24:02
8 A I don't know. I didn't write this 11:24:02
9 plan, and it was before I was in the employ of 11:24:04
10 Sikorsky, so I don't know. 11:24:06
11 Q Okay. I know -- can you speculate 11:24:08
12 about why it would have? 11:24:12
13 A No. 11:24:13
14 MR. CUNEO: All right. Thank 11:24:14
15 you. I have no further questions. 11:24:14
16 MR. HEINKE: Kim -- sorry. 11:24:16
17 Kim, any questions? 11:24:19
18 MS. FRIDAY: No questions, 11:24:20
19 thank you. 11:24:21
20 MR. HEINKE: I don't have any 11:24:22
21 questions. So we're done. We can go 11:24:22
22 off the record. 11:24:24
23 THE VIDEOGRAPHER: This marks 11:24:40
24 the end of the deposition of Martha 11:24:40
25 Crawford. We're going off the record 11:24:43

1	at 11:24 a.m.	11:24:45
2	THE COURT REPORTER: So just	11:24:54
3	orders and time frame.	11:24:54
4	MR. CUNEO: Same.	11:24:56
5	THE COURT REPORTER: So you	11:24:58
6	would like it tomorrow?	11:24:59
7	MR. CUNEO: Yes. And at some	11:25:00
8	point, you package up the exhibits and	11:25:02
9	the formal -- you send it somewhere,	11:25:05
10	is that the way it works?	11:25:09
11	THE COURT REPORTER: Planet	11:25:10
12	Depos does.	11:25:10
13	MR. CUNEO: Planet Depos does.	11:25:10
14	My understanding is he's the	11:25:10
15	recipient.	11:25:14
16	THE COURT REPORTER: I told	11:25:28
17	them yesterday just that whatever --	11:25:28
18	MR. HEINKE: Whatever we	11:25:28
19	did...	11:25:28
20	THE COURT REPORTER: -- the	11:25:28
21	stan -- yeah. Because these are both	11:25:28
22	continuations, so --	11:25:28
23	MR. CUNEO: I don't have them.	11:25:28
24	I can tell you that. Okay.	11:25:28
25		11:25:28

Transcript of Martha Crawford, Continued

Conducted on December 13, 2017

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1	THE COURT REPORTER: And you	11:25:28
2	would like a copy as well?	11:25:28
3	MR. HEINKE: Yes, please.	11:25:30
4	THE COURT REPORTER: And,	11:25:41
5	Ms. Friday?	11:25:41
6	MS. FRIDAY: Yes.	11:25:42
7	THE COURT REPORTER: Would you	11:25:42
8	like --	11:25:42
9	MS. FRIDAY: Yes. Yeah, we	11:25:43
10	would like to order a copy, please.	11:25:43
11	THE COURT REPORTER: Thank	11:25:47
12	you.	11:25:47
13	MS. FRIDAY: Thank you.	11:25:47
14	Just a paper copy, though, not	11:25:47
15	a video.	11:25:48
16	MR. CUNEO: Right. Same here.	11:25:49
17	MR. HEINKE: Same here.	11:25:50
18	(Whereupon, at 11:25 a.m. the	
19	deposition was concluded.)	
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C E R T I F I C A T E

STATE OF NEW YORK)

) ss.

COUNTY OF NEW YORK)

I, Pamela Grimaldi,
Registered Professional Reporter and
Notary Public of the State of New
York, do hereby certify that the
foregoing Deposition, of the
witness, MARTHA CRAWFORD, taken at
the time and place aforesaid, is a
true and correct transcription of my
shorthand notes.

I further certify that I am
neither counsel for nor related to
any party to said action, nor in any
wise interested in the result or
outcome thereof.

IN WITNESS WHEREOF, I have
hereunto set my hand this 13th day
of December, 2017.



PAMELA GRIMALDI, RPR

Transcript of Martha Crawford, Continued
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