

EXHIBIT D

8/21/2002 Hall, Arthur

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF COLUMBIA

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4 ROSEMARY LOVE, et al., |

5 Plaintiffs, | Case Number:

6 v. |

1:00CV02502

7 ANN VENEMAN, SECRETARY |

Judge: Robertson, J.

8 UNITED STATES DEPARTMENT OF |

9 AGRICULTURE, |

10 Defendant. |

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12 30(b)(6) Deposition of UNITED STATES DEPARTMENT
13 OF AGRICULTURE by and through its representative,

14 ARTHUR VELDON HALL

15 Washington, D. C.

16 Wednesday, August 21, 2002

17 10:00 a.m.

18
19 Job No: 1-4029

20 Pages 1 - 154

21 Reported by: Stephany L. Jerome

22

1 a closed loan.

2 Once that loan is paid back in full, then
3 it's a paid-in-full loan. At that time, if the
4 farmer actually paid us in full, then we would --
5 based on AS 25, we would keep that file for three
6 years. If that loan was closed and later on the guy
7 was not able to pay us in full, but we had to go to a
8 settlement because he no longer could pay his debt,
9 then we would charge it off. The farmer would still
10 be liable for the part that he couldn't pay, and then
11 we would retain that file for ten years because it
12 was not paid in full. It was settled, but he was not
13 released from liability.

14 Q Is it ten years from settlement -- when
15 does the ten year demarcation line begin?

16 A It starts at the time the approving
17 official signs the settlement document which is at
18 settlement.

19 MS. WAHL: Stop for one minute.

20 (A brief recess was taken.)

21 MS. WAHL: Let the record reflect that
22 Stephen Hill has joined us.

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1 MR. QUINLIVAN: And let the record reflect
2 that it is our position this is not a public
3 deposition and therefore counsel for the Garcia
4 plaintiffs do not have the right to be present during
5 the deposition.

6 MS. WAHL: We don't have an objection to
7 them being present. I understand the government
8 feels otherwise. It's my understanding that Mr. Hill
9 is going to be here as an observer, and with the
10 understanding that he is not going to participate in
11 any other way, we don't have a problem with him being
12 here.

13 MR. QUINLIVAN: Understood. But the law is
14 quite clear that depositions are not public matters
15 and that is our position on this. And in the absence
16 of agreement by both sides, it's our position that
17 this deposition cannot go forward.

18 MS. WAHL: Well, I appreciate that. My
19 intention is to continue with the deposition, and if
20 someone has a different feeling about that, then I
21 think it ought to be sorted out between counsel for
22 the government and Mr. Hill, and I welcome you to use