

**In The Matter Of:**

*Bostock v.  
Clayton County*

---

*Paul Holland  
January 24, 2022  
Video Deposition*

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*Regency-Brentano, Inc.  
13 Corporate Square  
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Atlanta, Georgia 30329  
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Min-U-Script® with Word Index

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1 IN THE UNITED STATES DISTRICT COURT  
 2 FOR THE NORTHERN DISTRICT OF GEORGIA  
 3 ATLANTA DIVISION

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4 GERALD LYNN BOSTOCK,  
 5 Plaintiff,  
 6 vs. CIVIL ACTION  
 7 CLAYTON COUNTY, | FILE NO. 1:16-CV-01460-ELR-WEJ  
 8 Defendants. |

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10 VIDEO RECORDED DEPOSITION OF  
 11 PAUL HOLLAND  
 12 Monday, January 24, 2022  
 13 1:00 p.m.  
 14 Suite 3900  
 15 600 Peachtree Street  
 16 Atlanta, Georgia  
 17 Tammy G. Mozley, CCR-B-1032, RPR

---

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 13 original transcript.)  
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1 APPEARANCES OF COUNSEL  
 2  
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 17 Atlanta, Georgia 30339-5948  
 18 678 996-9033  
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 22 Mr. Devin Walker  
 23 Legal Technology Services  
 24 - - -  
 25

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1 (Reporter disclosure made pursuant to  
 2 Article 10.B of the Rules and Regulations of the  
 3 Board of Court Reporting of the Judicial Council  
 4 of Georgia.)  
 5 **THE VIDEOGRAPHER:** We are now on video  
 6 record. The date is January 24th, 2022. The  
 7 time is 12:54 p.m., and this is beginning of  
 8 media file number one.  
 9 Will the court reporter, please, swear in  
 10 the witness.  
 11 PAUL HOLLAND,  
 12 having been first duly sworn, was examined and  
 13 testified as follows:  
 14 **MR. BUCKLEY:** All right. This will be the  
 15 deposition of Paul Holland. It's taken in the  
 16 case of Gerald Lynn Bostock versus Clayton  
 17 County, Civil Action No. 1:16-CV-461 ELR, WEJ.  
 18 It's taken pursuant to notice.  
 19 **EXAMINATION**  
 20 **BY MR. BUCKLEY:**  
 21 **Q. And were you subpoenaed, Mr. Holland?**  
 22 **A. No.**  
 23 **Q. You were not. Okay. So you're appearing**  
 24 **here voluntarily?**  
 25 **A. Uh-huh.**

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1 Q. All right. Very good. So I'm going to be  
2 asking you questions today. My purpose is to get  
3 information. If you don't understand a question, just  
4 tell me and I'll try to rephrase it. Okay?  
5 A. Okay.  
6 Q. All right. And when you're testifying in  
7 response to my questions, if I cut you off in the  
8 middle of an answer, it's only because I think you're  
9 done. And, of course, your wearing a mask might make  
10 that a little harder because I read lips.  
11 A. Okay.  
12 Q. When I can. And so if I think you're done  
13 and you're not, just say so and I'll let you finish  
14 your answer, okay, because I want your answers to be  
15 complete?  
16 A. Okay.  
17 Q. All right. By the same token, you may  
18 anticipate my question when I'm in the middle of a  
19 question and you may cut me off. I will tell you so  
20 that you can allow me to finish my question and then  
21 we'll have a complete record going both ways. Agreed?  
22 A. Yeah.  
23 Q. All right. Now, you understand you have  
24 been sworn in. You are under oath under penalty of  
25 perjury. You understand that, right?

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1 A. Yes.  
2 Q. And you understand a penalty of perjury --  
3 that there are criminal penalties for perjury?  
4 A. Yes.  
5 Q. Okay. Including, but not limited to,  
6 incarceration, right?  
7 A. Okay. Yeah.  
8 Q. All right. So let me ask you a few  
9 baseline questions and we'll get under way.  
10 A. Okay.  
11 Q. What is your full name, Mr. Holland?  
12 A. Paul Garnett Holland.  
13 Q. Garnett?  
14 A. Garnett, G-a-r-n-e-t-t.  
15 Q. What is your address?  
16 A. 641 North Avenue, No. 3017, Atlanta,  
17 Georgia, 30308.  
18 Q. 30308?  
19 A. Yes, sir.  
20 Q. You have -- do you mostly use a cell  
21 phone?  
22 A. Yes.  
23 Q. All right. And is your cell phone, you  
24 use it for both personal and business purposes or  
25 just --

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1 A. Yes.  
2 Q. For both.  
3 A. Yes.  
4 Q. Okay. What is cell phone number?  
5 A. (404) 307-6880.  
6 Q. How long have you had that cell phone  
7 number?  
8 A. A long time.  
9 Q. A long time. Ten years? Five years?  
10 What?  
11 A. Gosh.  
12 Q. Longer?  
13 A. Longer, yeah. Yeah, a long time.  
14 Q. I have only had one cell phone number  
15 myself and I just --  
16 A. Yeah. I don't even know because I think  
17 flip phones and all that.  
18 Q. You think that was the same number you had  
19 when you were partners with Gerald Bostock?  
20 A. I'm not completely sure.  
21 Q. Okay. All right. So what is your email  
22 address, your personal email address?  
23 A. Paulhollandatl@outlook.com.  
24 Q. At outlook.com?  
25 A. Yes.

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1 Q. All right. Great. Where do you work,  
2 Mr. Holland?  
3 A. Aml-i Residential, A-m-l-i.  
4 Q. That is a company that owns apartment  
5 complexes?  
6 A. Yes.  
7 Q. And do you -- what is your job there?  
8 A. I'm the director of tier support and  
9 analysis.  
10 Q. Tier, t-i-e-r?  
11 A. T-i-e-r, uh-huh. Tier support and  
12 analysis.  
13 Q. Explain what that does.  
14 A. It's IT project management kind of. I  
15 analyze functionality of software and help with  
16 enhancements and training of it and that kind of  
17 thing, a rollout.  
18 Q. Is the apartment you live in an Aml-i  
19 apartment?  
20 A. Yes.  
21 Q. Okay. So they own apartments -- are they  
22 Atlanta centric, or do they own apartments all over  
23 the country?  
24 A. We're national.  
25 Q. National.

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1 A. Uh-huh.  
 2 **Q. All right. Do you work, in your job as**  
 3 **director of tier and analysis, do you work on a**  
 4 **national scale or local scale?**  
 5 A. National.  
 6 **Q. National scale?**  
 7 A. Uh-huh.  
 8 **Q. How long have you worked for Amli?**  
 9 A. 23 years next month.  
 10 **Q. Have you had any other businesses during**  
 11 **that period of time?**  
 12 A. (Witness shakes head negatively.)  
 13 **Q. During the 23 years?**  
 14 A. (Witness shakes head negatively.)  
 15 **Q. Did you ever have a consulting company of**  
 16 **some kind, Mr. Holland?**  
 17 A. Consulting company?  
 18 **Q. Right. Let me ask you a question**  
 19 **differently. Have you ever formed an LLC or an LLP or**  
 20 **a corporation of any kind that was not Amli related**  
 21 **but was related to you and where you were the business**  
 22 **owner?**  
 23 A. Not that I know of, no.  
 24 **Q. All right. So you have signed a**  
 25 **declaration that's being used in this case and you're**

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1 **aware of that, of course?**  
 2 A. Yes.  
 3 **Q. Right. You signed it not that long ago,**  
 4 **sir. You signed it back in November 1st of 2021.**  
 5 **Sound about right?**  
 6 A. Yes, sir.  
 7 **Q. Okay. And did you, when you signed this**  
 8 **declaration -- this is an official court document?**  
 9 A. Uh-huh.  
 10 **Q. You obviously were talking with lawyers**  
 11 **for Clayton County --**  
 12 A. Yes.  
 13 **Q. -- in preparation of that, right?**  
 14 A. Yes.  
 15 **Q. Okay. And was that Mr. Buechner here**  
 16 **or --**  
 17 A. Yes.  
 18 **Q. -- was it somebody else?**  
 19 A. It was Mr. Buechner.  
 20 **Q. Mr. Buechner. Okay. Now, how many times**  
 21 **in the -- since this litigation has started, have you**  
 22 **talked to Mr. Buechner?**  
 23 **MR. BUECHNER:** Mr. Buechner.  
 24 **MR. BUCKLEY:** Or Mr. Buechner, either one.  
 25 **MR. BUECHNER:** Let's get the correct

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1 pronunciation.  
 2 **MR. BUCKLEY:** Sorry.  
 3 **THE WITNESS:** Just a few times.  
 4 **Q. (By Mr. Buckley) Just a few times.**  
 5 A. Yeah.  
 6 **Q. Five or more? Ten or less?**  
 7 A. Probably five or less.  
 8 **Q. Five or less times?**  
 9 A. Yeah.  
 10 **Q. First contact you had with Mr. Buechner,**  
 11 **did you -- did you reach out to him, or did he reach**  
 12 **out to you?**  
 13 A. He reached out to me.  
 14 **Q. Okay. How do you know -- do you know how**  
 15 **he got your contact information?**  
 16 A. Through Judge Teske.  
 17 **Q. Why did Judge Teske have your contact**  
 18 **information?**  
 19 A. He -- I had messaged him a while back, I  
 20 think 2019, when I saw him on the news and just said,  
 21 hey, I saw you on the news. And to be honest, my  
 22 message was, I'm sorry you're having to go through  
 23 this because I felt bad for him because he was such a  
 24 nice person and just -- and then he, after the case  
 25 thing, he reached out and was doing an AJC article,

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1 and the AJC guy wanted to interview me. I said, okay.  
 2 And then the court thing came about and he  
 3 said, would you be willing to speak to Clayton County  
 4 lawyers. I guess he had mentioned me maybe.  
 5 **Q. To speak to who? Clayton --**  
 6 A. The Clayton --  
 7 **Q. -- County attorneys?**  
 8 A. Yeah, attorneys. And I guess maybe he had  
 9 mentioned me. And I said, yeah, that's fine. And  
 10 that's when they reached out.  
 11 **Q. Okay. You never reached out to Gerald's**  
 12 **lawyers or gave us any kind of time to discuss the**  
 13 **case --**  
 14 A. No.  
 15 **Q. -- right?**  
 16 A. No, sir. Nobody -- no, nobody ever came  
 17 to me.  
 18 **Q. Now, the last time -- if I understand your**  
 19 **declaration correctly, the last time you had anything**  
 20 **to do with Gerald Bostock was in April of 2012, right?**  
 21 A. Probably around there. Probably later.  
 22 It's probably most likely May because we did meet  
 23 after and -- that was around the time we broke up.  
 24 **Q. Okay. You broke up and then maybe you met**  
 25 **one more time in May?**

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1 A. A month or so later. Yeah. So a week, I  
 2 guess, he moved his stuff out and then he actually  
 3 kept the dog twice and then -- so those were the last  
 4 times so.  
 5 **Q. In terms of what he was doing after that,**  
 6 **with respect to Clayton County CASA, you had no**  
 7 **personal knowledge, right?**  
 8 A. No, no.  
 9 **Q. And to this day, you have no personal**  
 10 **knowledge about what Gerald was doing with respect to**  
 11 **Clayton County CASA after the two of you broke up?**  
 12 A. I mean, no, I -- I assumed he worked there  
 13 and did what he did before.  
 14 **Q. You assumed. You don't know anything**  
 15 **about the softball team he was involved with, for**  
 16 **example?**  
 17 A. No. I found out later.  
 18 **Q. You heard about it?**  
 19 A. Yeah, I heard about it.  
 20 **Q. But you have no -- when I say personal**  
 21 **knowledge, that means you were there, you saw it.**  
 22 **You --**  
 23 A. No.  
 24 **Q. -- talked to him about it, any of that**  
 25 **kind of thing.**

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1 A. No.  
 2 **Q. Okay. And in terms of his comings and**  
 3 **goings in any restaurants or bars or establishments of**  
 4 **any kind in metropolitan Atlanta, Clayton County,**  
 5 **Midtown Atlanta, you have no knowledge after the two**  
 6 **of you broke up?**  
 7 A. No.  
 8 **Q. No, you do not have any knowledge?**  
 9 A. I do not have any knowledge of anything  
 10 after that.  
 11 **Q. All right. So -- and you, you relate in**  
 12 **your declaration that he lived in your apartment for a**  
 13 **period of time.**  
 14 A. He lived with me in my townhouse, yes.  
 15 **Q. Your townhouse, it was in a building that**  
 16 **had a gate of some kind with a lock on it?**  
 17 A. The courtyard has a gate, yes.  
 18 **Q. Courtyard had a gate. And you had to --**  
 19 **what did you use, a card or a key or something to get**  
 20 **in?**  
 21 A. Key.  
 22 **Q. Key?**  
 23 A. Yeah.  
 24 **Q. And during that time Mr. Bostock lived in**  
 25 **your apartment, he did not always have that key right?**

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1 **You ultimately gave him one, but he didn't have one at**  
 2 **first?**  
 3 A. Probably not at first. I wouldn't give  
 4 anybody I was dating at first access to, yeah.  
 5 **Q. Okay. All right. So, so and I understand**  
 6 **that your apartment was maybe four blocks or so away**  
 7 **from Frogs, the restaurant?**  
 8 A. Yeah. Yeah, pretty close.  
 9 **Q. All right. Pretty close. And so you**  
 10 **mentioned in here you met Judge Teske, I think, maybe**  
 11 **at some CASA events. Is that right?**  
 12 A. I met him in the office because Gerald  
 13 would take me to his office because he had an office,  
 14 and then there was also another office that was -- it  
 15 was like a more training kind of office or something.  
 16 **Q. Okay.**  
 17 A. But there was like the office that was in  
 18 the court building.  
 19 **Q. Down at Clayton County?**  
 20 A. Yeah, yeah. So, yes, I had gone and met  
 21 Judge Teske there before, yes.  
 22 **Q. And Teske was cordial, friendly?**  
 23 A. Yes, very nice.  
 24 **Q. Okay. And now, let me ask you a question.**  
 25 **Have you -- you're a gay man, right?**

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1 A. Yes, sir.  
 2 **Q. And as a gay man, have you ever**  
 3 **experienced any bias against you because you're gay?**  
 4 A. Yes.  
 5 **Q. Okay. Give me a couple of for instances.**  
 6 A. I mean how far back? Do you mean as a  
 7 child?  
 8 **Q. Let's not go to your childhood.**  
 9 A. Okay.  
 10 **Q. Let's talk about on a day-to-day, walking**  
 11 **around adult life that you have.**  
 12 A. Well, I mean, as a gay man, when you're  
 13 outside the perimeter, you act different.  
 14 **Q. Okay.**  
 15 A. And you're pretty careful about what you  
 16 say and how you act.  
 17 **Q. Okay.**  
 18 A. There was one time that we were both at  
 19 some Italian restaurant on I think it was Valentine's  
 20 Day and some kid was running around and we asked to be  
 21 moved or something and the father came chasing after  
 22 us calling us names and it was -- that was scary.  
 23 **Q. Have you had any experience where a person**  
 24 **was at least personally friendly but actually you**  
 25 **later learned they harbored some bias against you**

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1 because of your sexuality?  
2 A. Not that I know of.  
3 Q. Not that you're aware of?  
4 A. Yeah, not that I'm aware of, no.  
5 Q. You, after this case, this case came back  
6 from the Supreme Court, you sent Gerald an email?  
7 A. Uh-huh.  
8 Q. I'm going to read it into the record.  
9 Okay.  
10 A. Okay.  
11 Q. It was dated April 22, 2019. Okay. Hey,  
12 Gerald. I was watching the news and saw a story about  
13 you and a lawsuit.  
14 I said after, it wasn't after. It was  
15 before it came back from the Supreme Court, but I  
16 said -- was watching the news and saw a story about  
17 you and a lawsuit going to the Supreme Court about  
18 sexual orientation protection under the sex status of  
19 the Civil Rights Act. I applaud the pursuit of  
20 nondiscrimination and including sexual orientation  
21 under that status.  
22 However, as I read it, stated you sued  
23 stating you were fired because you were gay and they  
24 found out you joined a gay softball league. During  
25 our time together, I met most of your coworkers, boss,

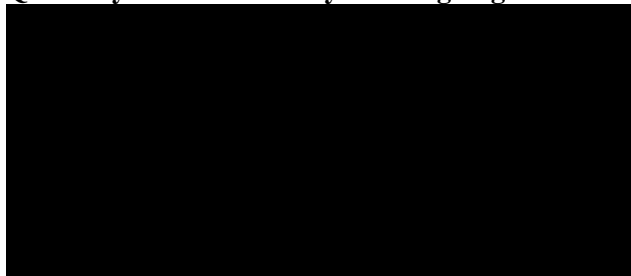
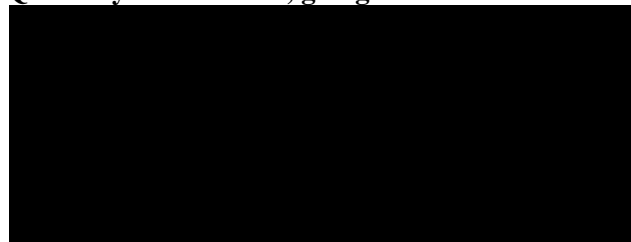
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1 and some board members and they all knew you were gay  
2 and were very supportive, I thought. I just wanted to  
3 reach out to see why you thought you got fired for  
4 that reason when that is not what I perceived at all.  
5 I'm just curious as to what happened and  
6 what made you feel that was the case. With a national  
7 story, I want to make sure I'm up to speed on  
8 everything to be best prepared as I'm getting texts  
9 and phone calls from friends.  
10 That's what you said, right?  
11 A. Yes.  
12 Q. Okay. April 22, 2019. At that point in  
13 time, had you been contacted by Mr. Buechner?  
14 A. No. This was recent.  
15 Q. Who was contacting you to ask you  
16 questions?  
17 A. Just friends, like people. I mean, my  
18 friends knew Gerald. So they would ask, say, what's  
19 going on, what's up with that --  
20 Q. Okay.  
21 A. -- or just normal.  
22 Q. And so your question is, well, what  
23 happened to make you --  
24 A. Well, I was confused.  
25 Q. Okay.

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1 A. I was confused.  
2 (Plaintiff's Exhibit P-43 was previously  
3 marked.)  
4 Q. I want to show you an exhibit, okay,  
5 that's been produced to us in this case only recently.  
6 It's Exhibit 43.  
7 Let me hand that to you, and I'll  
8 represent to you, it has been represented to us as  
9 being part of a journal or diary of Steven Teske.  
10 Okay. Mr. Teske whom you met, right?  
11 A. Yes.  
12 Q. Okay. So you need your glasses?  
13 A. Yes.  
14 Q. Go ahead and get them.  
15 A. Getting old, so.  
16 Q. All right. So I'm not asking you to read  
17 every word of it, but what I do want to do is refer  
18 you to some pages in this document, which make  
19 reference to Gerald's sexual orientation.  
20 Now, before -- let's go to page -- you  
21 will see at the bottom of each page a little  
22 reference, what's called a Bates number. It will say  
23 Clayton and it will give a number. Okay?  
24 A. Uh-huh.  
25 Q. Clayton 014202. Go to that page and

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1 zero -- and the preceding page, 014201.  
2 A. Okay.  
3 Q. Okay. And here it says -- I'm going to  
4   
5  
6  
7  
8  
9  
10  
11  
12 And I want to reference you further down  
13 to the next page, 14202, left column. Okay.  
14 A. Okay.  
15 Q. Okay. And it said, going down to the  
16   
17  
18  
19  
20  
21  
22  
23 All right. Now, you see that language  
24 there?  
25 A. Uh-huh.



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1 [REDACTED]  
2 [REDACTED]  
3 that anytime anybody goes out on a date, whatever  
4 their particular sexual orientation, anytime anybody  
5 goes on a date and they spend money, maybe they're  
6 spending money for their own interest, maybe just to  
7 socialize or have a friendly conversation or maybe  
8 something else.  
9 You, you have stated in your declaration  
10 at a certain point you went through Gerald's wallet.  
11 A. Uh-huh.  
12 Q. Okay. You went through his wallet while  
13 he was asleep, right?  
14 A. Yes.  
15 Q. He didn't know you were doing it?  
16 A. No.  
17 Q. And after you went through his wallet, did  
18 you tell him, I went through your wallet?  
19 A. Yes.  
20 Q. Okay. So and you went through the wallet  
21 and you said you found some receipts.  
22 A. Yes.  
23 Q. These were credit card receipts?  
24 A. Yes.  
25 Q. Did you keep any of those receipts?

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1 A. No.  
2 Q. Did you memorize the credit card numbers?  
3 A. No.  
4 Q. Do you remember what credit cards they  
5 were even?  
6 A. No.  
7 Q. And you really don't know whether they  
8 were Gerald's personal credit card --  
9 A. No.  
10 Q. -- or CASA credit cards --  
11 A. No.  
12 Q. -- right?  
13 A. I do not.  
14 Q. Okay. So, so as far as that goes -- and  
15 do you know, of your own knowledge, when Gerald spent  
16 CASA funds whether he, you know, kept the credit card  
17 receipt for a CASA expenditure in his wallet?  
18 A. I don't -- I mean, I would assume, but I  
19 don't know for sure whether he had some special folder  
20 but -- or something like that.  
21 Q. Do you really know what his process was  
22 for keeping track of CASA-related expenditures?  
23 A. I have to be honest. I don't remember.  
24 Q. And he did tell you, he did tell you that  
25 he met people and recruited people for CASA-related

Page 23

1 purposes, right?  
2 A. Yes, not in that specific instance always;  
3 but, yeah, I mean, yeah, he would meet people, try to  
4 recruit them.  
5 Q. Okay. All right.  
6 A. Yes. Uh-huh.  
7 Q. And is it possible that he both socialized  
8 at the F.R.O.G.S. establishment and did business at  
9 the F.R.O.G.S. establishment?  
10 A. That is possible.  
11 Q. Sometimes I go to Manuel's Tavern just to  
12 have a drink with a friend and sometimes I go to  
13 Manuel's Tavern to meet a colleague and discuss a  
14 business matter.  
15 A. Right.  
16 Q. It's altogether possible that you can do  
17 both things at different times in a given  
18 establishment.  
19 A. It is possible. It's odd that he never  
20 mentioned it.  
21 Q. Right.  
22 A. That would be odd.  
23 Q. But in any event, these credit card  
24 receipts that you went through, you have no knowledge,  
25 as you sit here today under oath, as to whether those

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1 credit card receipts were for business-related  
2 purposes --  
3 A. No.  
4 Q. -- or for personal purposes?  
5 A. No, I do not.  
6 Q. Okay. In any event, as you said in your  
7 declaration, you became suspicious. So you decided to  
8 break it off with him, right?  
9 A. Yes.  
10 Q. Having reviewed Mr. Teske's notes --  
11 A. Uh-huh.  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 A. Uh-huh.  
16 Q. -- does that give you any pause as to what  
17 his motives might be in terms of reasons that he  
18 terminated Gerald?  
19 A. Well, it would be hard to say reading just  
20 a blurb of something without reading an entire  
21 contextual, you know, narrative.  
22 Q. Okay.  
23 A. But, I mean, just because -- I mean, to me  
24 it kind of sounds like maybe he was conflicted and  
25 because he cared for or liked Gerald and was concerned

Page 25

1 that the gay might be an issue or I mean, it could be  
2 read like that too.  
3 **Q. Okay. It could be read --**  
4 A. Yeah.  
5 **Q. It could be read that Gerald being gay was**  
6 **at least an issue in this whole thing, right?**  
7 **MR. BUECHNER:** Object to the form.  
8 **THE WITNESS:** I'm not sure I'd read it  
9 that way but.  
10 [REDACTED]  
11 [REDACTED]  
12 **what he said in there?**  
13 A. Yeah. But I don't know his mind when he  
14 wrote this, and I don't -- and you just read it to me.  
15 So I can't make an assumption off of somebody else's  
16 words.  
17 **Q. If I told you that Mr. Teske testified**  
18 **that Gerald's sexual orientation was a contributing**  
19 **factor in his decision to terminate him, would that**  
20 **persuade you that there might be something to the idea**  
21 **that Gerald was fired because of his sexual**  
22 **orientation?**  
23 A. At no --  
24 **MR. BUECHNER:** Object to form.  
25 **THE WITNESS:** At no time did I get that

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1 feeling anytime I met him. I went to his  
2 daughter's wedding --  
3 **Q. (By Mr. Buckley) Right.**  
4 A. -- with Gerald. I mean, it's hard for me  
5 to say because I never personally perceived that. So  
6 what he said to you or what's in this, that's --  
7 **Q. Right. You're saying --**  
8 A. That's hearsay to me.  
9 **Q. You're not able personally -- you're**  
10 **saying, I can't get into his mind, so I don't know?**  
11 A. Yeah.  
12 **Q. Okay. All right. So I want to kind of**  
13 **establish the scope of your knowledge.**  
14 A. Okay.  
15 **Q. And if it is what I think it is, this**  
16 **could be a very short deposition.**  
17 A. Okay.  
18 **Q. Okay.**  
19 A. All right.  
20 **Q. All right. So looking at your**  
21 **declaration, you say I met Gerald Bostock in 2007 and**  
22 **we began dating shortly thereafter.**  
23 A. Uh-huh.  
24 **Q. Mr. Bostock and I broke up sometime in**  
25 **April of 2012.**

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1 A. Yeah.  
2 **Q. Okay. Was your relationship continuous**  
3 **from 2007 until 2012, or was it intermittent?**  
4 A. It was continuous.  
5 **Q. Okay.**  
6 A. I mean, once we started dating, we started  
7 dating. I mean, granted now, he lived at his house  
8 and I lived at mine. We wouldn't see each other every  
9 day for the first year.  
10 **Q. All right. So do you recall specifically**  
11 **how -- you said you began dating in 2007.**  
12 **You said in 2008 or 2009, Mr. Bostock**  
13 **moved in with me and lived with me at my Midtown**  
14 **Atlanta townhouse. You don't remember the exact year?**  
15 A. No, I don't remember.  
16 **Q. All right.**  
17 A. We discussed it and it was just --  
18 **Q. And when he moved in, did you give him a**  
19 **pass card then or did you not do that immediately?**  
20 A. I don't remember.  
21 **Q. Okay.**  
22 A. I mean, typically he came in the garage  
23 anyway.  
24 **Q. Did he -- what were your normal work hours**  
25 **back then?**

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1 A. Gosh, I think back then we were in the  
2 Kennesaw office. And I usually did early, like I do  
3 now, typically 8:00 to 4:00.  
4 **Q. Okay. And so if you're in Kennesaw,**  
5 **you've got to drive back to town, right?**  
6 A. Yeah.  
7 **Q. And did you catch any traffic, or was it**  
8 **an easy drive?**  
9 A. Because I was going opposite traffic, you  
10 know, I was going out when everybody else was coming  
11 in, it wasn't horrible.  
12 **Q. What are you talking about, a 45-minute**  
13 **drive? Hour drive?**  
14 A. Oh, no. Like 30 minutes. Less than that.  
15 **Q. So what time were you normally getting**  
16 **home?**  
17 A. 4:00, 4:30. Sometime around there, I  
18 would think.  
19 **Q. Were there times when you got off work and**  
20 **got home before Gerald got off and got to your place?**  
21 A. Yes.  
22 **Q. Okay.**  
23 A. Mostly, yes.  
24 **Q. And so if he didn't have a pass key, he'd**  
25 **have to wait for you, right?**



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1 A. No. He had access through the garage.  
2 **Q. So he could go in through the garage --**  
3 A. Yeah.  
4 **Q. -- and he didn't need a passkey that way?**  
5 A. Huh-uh. No.  
6 **Q. That doesn't sound like a very good**  
7 **security system.**  
8 A. Well, I mean, he had the remote or I think  
9 we may have programmed his car. You know how you can  
10 program your car, because I moved a lot of stuff out  
11 of the garage. It was a two-car garage, but I had  
12 washer and dryer and all the stuff in there. And I  
13 actually moved it all so he could fit his car in there  
14 when we decided he, you know.  
15 **Q. Did that happen immediately or was there**  
16 **any pause in time before you --**  
17 A. It was a few months after we started  
18 dating so but.  
19 **Q. A few months after you started dating.**  
20 **Was it before he moved in that you got the car**  
21 **arrangement?**  
22 A. I think it was before he moved in.  
23 **Q. All right. Okay. So you said in your**  
24 **declaration, Frogs has predominantly gay clientele and**  
25 **advertises in various local gay periodicals.**

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1 **Have you ever done a head count at Frogs**  
2 **to figure out who was gay and who wasn't?**  
3 A. No. I was just asked that question if it  
4 was a, more of a gay clientele.  
5 **Q. You were asked that by Mr. Buechner here?**  
6 A. Yes, and I replied, yes.  
7 **Q. But you've never done a head count to**  
8 **see --**  
9 A. No.  
10 **Q. -- who's straight, who's gay, blah, blah,**  
11 **blah, blah?**  
12 A. No. I mean, I've been there a lot and I  
13 know.  
14 **Q. All right.**  
15 A. I mean, I've done fundraisers there.  
16 **Q. And Cowtipper's, you said in here**  
17 **Cowtipper's is a gay restaurant and bar or was until**  
18 **it closed in December of 2018 and had predominantly**  
19 **gay clientele.**  
20 A. Uh-huh.  
21 **Q. Do you know -- I mean, did you ever do a**  
22 **head count there in terms --**  
23 A. No.  
24 **Q. -- of who was gay and who was not?**  
25 A. No. I mean, they had drag shows.

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1 **Q. Okay.**  
2 A. So it was marketed towards the gay  
3 community.  
4 **Q. And that was probably --**  
5 **MR. BUECHNER:** Please let him finish his  
6 answers before you --  
7 **Q. (By Mr. Buckley) Oh, I'm sorry.**  
8 A. No. I mean, it was marketed towards the  
9 gay community. I mean, it's --  
10 **Q. Do you know if straight people like to go**  
11 **to drag shows?**  
12 A. Yeah. I do know some straight people do  
13 go to drag shows.  
14 **Q. So the drag shows weren't necessarily**  
15 **exclusively for the gay clientele?**  
16 A. No, no.  
17 **Q. So you said Gayborhood was a marketing**  
18 **term commonly used in advertising directed towards the**  
19 **gay community before, during, and after 2013. This**  
20 **term referred to Midtown Atlanta and the fact that it**  
21 **was a gay friendly area, where many gay people lived**  
22 **and where many businesses catered to a predominantly**  
23 **gay clientele.**  
24 **It's not your testimony that Midtown**  
25 **Atlanta is an exclusively gay area, is it?**

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1 A. No, no. I was asked a question what  
2 Gayborhood kind of meant.  
3 **Q. Right.**  
4 A. So that was my response. No, Midtown is  
5 not solely gay.  
6 **Q. It's an area of Atlanta that's not hostile**  
7 **to gay people, right?**  
8 A. No, no, no. It's much more mixed now than  
9 it was --  
10 **Q. Right.**  
11 A. -- back then; but, yeah.  
12 **Q. And people, people in that area of town**  
13 **live and let live?**  
14 A. They feel comfortable, yes.  
15 **Q. This building is in Midtown Atlanta?**  
16 A. Uh-huh.  
17 **Q. Okay. And so -- but it's not your**  
18 **testimony that the people who occupy this building are**  
19 **all gay or anything like that, right?**  
20 A. No.  
21 **Q. All right. And do you consider -- strike**  
22 **that.**  
23 **Okay. So you mentioned in your**  
24 **declaration, paragraph 11, in April 2012, Mr. Bostock**  
25 **told me he was going to a CASA-related event.**

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1 Sometime in April 2012, Mr. Bostock told me he was  
2 going to a CASA-related event that evening. However,  
3 Mr. Bostock did not return home until extremely late,  
4 sometime around 2:00 a.m.  
5 A. Uh-huh.  
6 Q. I was upset about this because I had been  
7 trying to call Mr. Bostock that night and he did  
8 answer his cell phone -- it says and he did answer his  
9 cell phone or return my calls. Did you mean to say --  
10 A. Did not.  
11 Q. -- he did not answer your cell phone?  
12 A. Did not. Yeah, he didn't.  
13 Q. Okay. I mean, I'll just show you. It  
14 says --  
15 A. Oh, I understand. I assumed, I was --  
16 Q. He did answer his cell phone is what it  
17 says, but that's not what you --  
18 A. Oh, no, he didn't because I didn't know  
19 where he was and I was worried.  
20 Q. Okay. And so he comes in at 2:00 a.m.  
21 You just heard him come in or what?  
22 A. Uh-huh.  
23 Q. Yes? Yes? You have to say yes.  
24 A. Yes, yes.  
25 Q. And did you ever find out conclusively

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1 what he was doing that evening?  
2 A. No. He told me that they went out -- so  
3 this was an event that he had asked me to before. And  
4 he said something, they went out. And I was like,  
5 where, where in the world would you -- because it was  
6 like a Tuesday or Thursday night. I'm like where in  
7 the world do you go until 2:00 a.m.  
8 Q. Right.  
9 A. And he never gave me like a solid  
10 answer --  
11 Q. Okay.  
12 A. -- that I remember and that's why I was  
13 just like, okay, I assumed he was fooling around.  
14 Q. So you assumed that. You don't know?  
15 A. I don't, no.  
16 Q. And you don't know how late the CASA event  
17 went or whether --  
18 A. Well, he told me he went out after --  
19 Q. Yeah, he went after --  
20 A. -- after the event. And it was at  
21 somebody's house typically. So I assumed it was this  
22 time and at somebody's house.  
23 Q. And it's quite possible he was at a CASA  
24 event and then afterwards, he was just socializing,  
25 right?

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1 A. I don't know.  
2 Q. Again --  
3 A. He never explained it to me in a definite  
4 manner so that I knew.  
5 Q. And that -- that was the next morning that  
6 you went through his wallet, right?  
7 A. Yes. His wallet was sitting on my  
8 computer stand thing and was open. And so, yes, I  
9 looked in.  
10 Q. Okay. Is it your practice to go through  
11 people's wallets?  
12 A. No.  
13 Q. Have you ever gone through somebody's  
14 wallet before, before this one?  
15 A. Maybe my stepfather when I was looking for  
16 money when I was young. I was a kid so.  
17 Q. Have you ever gone through anybody's  
18 wallet since then?  
19 A. No.  
20 Q. I mean, I'm just curious. I mean, how  
21 would you feel about people going through your wallet?  
22 A. I probably would be upset, but I also  
23 would not have stayed out all night and told -- not  
24 told my partner what was going on. So I was trying to  
25 find out what was, what was going on.

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1 Q. And you say you found some receipts. Did  
2 you find receipts that -- did you look at the dates on  
3 the receipts?  
4 A. Yeah. That's why I specifically asked  
5 him, I was like, okay, I saw a couple of receipts  
6 about Friday afternoon.  
7 Q. Okay.  
8 A. Why were you there and I didn't know about  
9 it.  
10 Q. But you didn't know whether those receipts  
11 concerned him going to Frogs for personal reasons or  
12 him going to Frogs for business-related reasons?  
13 A. I did not know up front, no, until I asked  
14 him.  
15 Q. Okay. And so -- and he told you he went  
16 there to relax, but he also had told you, he was  
17 consistent with that, that he went there for  
18 business-related reasons too, right?  
19 A. Initially, he said that he was meeting  
20 clients.  
21 Q. Right.  
22 A. And then I pressed and said then why, why  
23 didn't you let me know. I mean, it's probably a day  
24 or so -- I mean, this went on for a couple of days.  
25 But I was like I don't understand why you were there

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1 all the time and you -- I live right here. You  
2 couldn't have swung by or let me know you were half a  
3 mile away or something. And that's when he was kind  
4 of like, well, I was just relaxing and blah, blah. So  
5 the story change-ish.  
6 **Q. Changed-ish, but he could have met clients**  
7 **there and then the client matter was concluded and**  
8 **then he decided to relax there. That's also possible**  
9 **too?**  
10 A. That is totally possible, sure.  
11 **Q. So the -- so as far as the -- did Gerald**  
12 **ever tell you that he recruited volunteers for**  
13 **CASA-related activities such as the guardian ad litem**  
14 **program?**  
15 A. The --  
16 **Q. The guardian ad litem program.**  
17 A. I'm not familiar with that phrase, no.  
18 **Q. You're not familiar.**  
19 A. No.  
20 **Q. Are you -- you're familiar with the term**  
21 **"CASA," though, right?**  
22 A. Yes. I know CASA.  
23 **Q. And did he ever tell you that he was**  
24 **meeting people to recruit for CASA-related purposes?**  
25 A. I knew that was part of his job was to

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1 recruit people.  
2 **Q. Okay.**  
3 A. Whether, how he met them or how that  
4 happened because they had events and things like that,  
5 I think --  
6 **Q. Okay. Right.**  
7 A. -- if I remember correctly.  
8 **Q. They actually had CASA, the Clayton County**  
9 **CASA had events in Midtown, right?**  
10 A. Not that --  
11 **MR. BUECHNER:** Object to form.  
12 **THE WITNESS:** -- I remember, no.  
13 **Q. (By Mr. Buckley) Not that you remember?**  
14 A. No. I always went to Clayton County when  
15 there was an event.  
16 **Q. Okay. Do you, do you see any harm in him**  
17 **recruiting volunteers for Clayton County CASA in**  
18 **Midtown Atlanta?**  
19 **MR. BUECHNER:** Object to form.  
20 **THE WITNESS:** That's -- I don't know. I  
21 mean, that's not -- I don't -- I mean, I'm not  
22 sure why someone would drive all that way when  
23 there is a CASA, I think, here. But I mean, if  
24 they were going to do it, you'd think they'd do  
25 it close by and not drive all the way to Clayton

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1 County. That seems a -- that's half odd but.  
2 **Q. (By Mr. Buckley) But if -- did you**  
3 **know -- you don't know anything about the softball**  
4 **team, though, right?**  
5 A. No. Just from what I've heard on the news  
6 and heard from other people, yeah.  
7 **Q. Okay. All right. So do you -- you don't**  
8 **know of any moral problem with recruiting gay people**  
9 **to be volunteers in the CASA program, do you?**  
10 A. No.  
11 **Q. All right.**  
12 A. I mean, there are gay people in Clayton  
13 County. So it wouldn't matter.  
14 **Q. Well, I'm sure there are gay people pretty**  
15 **much everywhere.**  
16 A. Yeah.  
17 **Q. But I'm just saying there's -- and you**  
18 **don't know of any prohibitions to recruiting people**  
19 **across the county line to do volunteer work, for**  
20 **example?**  
21 A. Not that I'm aware of.  
22 **Q. All right.**  
23 A. No, I'm not that familiar.  
24 **Q. And were you ever present in Midtown with**  
25 **Gerald when he was doing any CASA-related work?**

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1 **MR. BUECHNER:** Object to form.  
2 **THE WITNESS:** Not that I remember. Every  
3 time, like I said, we were in Clayton County when  
4 there was some type of event or I was at his  
5 office or that kind of thing or his training  
6 thing, you know.  
7 **Q. (By Mr. Buckley) Okay. Do you recall**  
8 **that the larger CASA organization would sometimes have**  
9 **events in metropolitan Atlanta for the various CASA**  
10 **organizations throughout metropolitan Atlanta?**  
11 A. Not --  
12 **MR. BUECHNER:** Object to form.  
13 **THE WITNESS:** -- personally I'm not aware  
14 of.  
15 **Q. (By Mr. Buckley) You just don't --**  
16 A. I don't remember that. If there was ever  
17 and I knew it, but I don't know of that really, no.  
18 I mean, I went to the national in DC with  
19 him once.  
20 **Q. The national in DC. Well, tell me about**  
21 **that. That's a national --**  
22 A. We -- it was some national CASA conference  
23 and we went there in Washington DC. It was extremely  
24 hot. And I met a lot of his coworkers, I mean, you  
25 know, counterparts from all over the country and

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1 several of them are gay and had dinner with them and  
2 chatted with them and --  
3 **Q. Okay. But it was a CASA business --**  
4 A. -- they were nice.  
5 **Q. -- related event, right?**  
6 A. Yes. It was a conference for CASA.  
7 **Q. Okay. Did you actually go to the**  
8 **conference, or you were just accompanying Gerald?**  
9 A. I was just accompanying Gerald.  
10 **Q. Okay. But based on what you saw, it was a**  
11 **legitimate conference --**  
12 A. Yes.  
13 **Q. -- out of state for CASA and that it was a**  
14 **legitimate matter for Gerald as the coordinator for**  
15 **Clayton County CASA to go to that conference, right?**  
16 A. Yes. It was a conference like they had  
17 sessions and things like that and I just --  
18 **MR. BUCKLEY:** All right. All right. Give  
19 me one minute. I'm very close to being done.  
20 Okay.  
21 **THE VIDEOGRAPHER:** Going off video record  
22 at 1:33 p.m.  
23 (Recess from 1:33 p.m. to 1:41 p.m.)  
24 **THE VIDEOGRAPHER:** Back on video record at  
25 1:41 p.m.

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1 **Q. (By Mr. Buckley) So the first time you**  
2 **reached out to Mr. Buechner was after the 20 -- the**  
3 **recent AJC article where Mr. Teske was interviewed and**  
4 **ultimately you were interviewed, right?**  
5 A. Well, no, I believe he reached out to me  
6 initially.  
7 **Q. Oh, sorry. He reached out to you.**  
8 A. Yeah. Uh-huh.  
9 **Q. And but Teske had given you or given the**  
10 **reporter contact information concerning you so that**  
11 **you could be interviewed. Is that right?**  
12 A. Yeah. I gave -- yeah.  
13 **Q. Okay.**  
14 A. Yeah, because I think the reporter called  
15 me. And I think I gave Teske the info.  
16 **Q. Did you ever discuss the case with Teske?**  
17 A. We -- I mean, we discussed the Supreme  
18 Court thing. Yeah, we did discuss -- I mean, back and  
19 forth message just about -- I mean, I felt bad for him  
20 because, you know, that he was being labeled a  
21 homophobe and I didn't think he was such. And I  
22 always thought he was nice and I felt bad that he was  
23 going to go through that.  
24 **Q. Okay.**  
25 A. And we talked about the Supreme Court

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1 thing. And then after that decision, there was some  
2 discussion just about this -- I don't want to say this  
3 case but about what was going on in the baseball thing  
4 and all that.  
5 **Q. Were these text messages between you and**  
6 **him?**  
7 A. Facebook messages.  
8 **Q. Instant messages?**  
9 A. Yeah. Facebook Messenger, Facebook  
10 Messenger.  
11 **Q. Is Mr. Teske is also on Facebook?**  
12 A. Yes. Uh-huh.  
13 **Q. How many messages do you think you**  
14 **exchanged with him concerning this case?**  
15 A. Over 2019, we had a couple of messages and  
16 then after the Supreme Court thing, there were just  
17 more or it was just questions like, why -- I saw the  
18 AJC thing or I saw him on the news or that kind of  
19 thing.  
20 **Q. Okay. Did you -- so Mr. -- if I**  
21 **understand correctly, Teske asked you if he could give**  
22 **your name to his lawyers, to the County's lawyer?**  
23 A. I believe so, yes. It was --  
24 **Q. Okay.**  
25 A. -- would you be willing to speak to the

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1 Clayton County -- I don't know if he mentioned me to  
2 them or I don't remember the context right off.  
3 **Q. Okay. But in any event, Mr. Buechner, he**  
4 **called you? Did he email you? What did he do?**  
5 A. I don't remember whether it was a call or  
6 email.  
7 **Q. How many -- and you said you had five or**  
8 **less conversations with him?**  
9 A. I think so. He's only called me a  
10 couple -- I mean, just this was two or three calls  
11 just to let me know where or email or whatever.  
12 **Q. Did he email you a draft of your**  
13 **declaration?**  
14 A. To sign, yes.  
15 **Q. Okay. Did you edit that in any way?**  
16 A. I told him -- there was a word that he  
17 used that was a word that I wouldn't use.  
18 **Q. Okay.**  
19 A. And emailed him that and he made a change  
20 and sent it back.  
21 **Q. Do you remember what that word was?**  
22 A. No.  
23 **Q. Okay.**  
24 A. I'd have to go back and look.  
25 **Q. Okay. So he calls you on the phone. Did**



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1 he interview you at that point in time over the  
2 telephone about what you knew and what you didn't  
3 know?  
4 A. Yeah, yeah. He just said, you know, my  
5 understanding, I guess, is you were with Gerald and  
6 would you mind sharing, blah, blah. And he asked me  
7 questions and I just answered.  
8 **Q. Did he ask you if you knew anything about**  
9 **Gerald's activity after the two of you broke it off?**  
10 A. Not that I remember.  
11 **Q. Okay. Was it -- you mentioned this whole**  
12 **incident involving the wallet and looking through his**  
13 **wallet.**  
14 **Is it, in fact, the case that after you**  
15 **told Gerald you went through his wallet that he said**  
16 **that this wasn't going to work and he decided to end**  
17 **the relationship?**  
18 A. That's not how I remember it.  
19 **Q. Okay.**  
20 A. I mean, to be honest, I was very upset;  
21 and if I remember correctly, he went to go stay at his  
22 house and we didn't speak for a while.  
23 **Q. Okay.**  
24 A. So --  
25 **Q. So it may have been more of a mutual**

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1 **parting of the ways?**  
2 A. Yes. I'm not saying I broke it off, per  
3 se, and said get out, blah, blah, blah. I'm just  
4 saying I was angry.  
5 **Q. Okay.**  
6 A. And I tried to talk it through, got  
7 nowhere, and we just drifted and things happened. I  
8 don't remember everything exactly.  
9 **Q. When you were interviewed by Mr. Buechner,**  
10 **was it one conversation or was it several**  
11 **conversations, sort of a continuing interview over the**  
12 **telephone?**  
13 A. I don't remember. I think it was just the  
14 one time.  
15 **Q. Okay. Did you ever meet with him in**  
16 **person?**  
17 A. No. This is the first time we've met.  
18 **Q. Okay. I'm looking at your -- I'm going to**  
19 **give you a copy of your statement. Oh, well, let me**  
20 **see if I can give you a copy of your statement.**  
21 A. Oh, I've got one right here.  
22 **Q. You've got a copy there?**  
23 A. Yeah.  
24 **Q. Okay. Let's do this, let's identify that**  
25 **as an exhibit in this case. Can I borrow that,**

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1 **Mr. Holland?**  
2 A. Sure.  
3 **Q. Thank you. Okay. When you, when you**  
4 **signed this statement, did it have your email to**  
5 **Gerald attached to it because it was sent to us with**  
6 **an email attached?**  
7 A. I don't remember.  
8 **Q. I don't know if it was because they were**  
9 **producing documents in the case or because what --**  
10 A. I don't recall. I don't think the email  
11 was on there.  
12 **Q. Okay.**  
13 A. I think they asked about it and I just  
14 sent it to them or something.  
15 (Plaintiff's Exhibit 120 was previously  
16 marked.)  
17 **Q. (By Mr. Buckley) Okay. I'm going to show**  
18 **you what is marked as Exhibit 120 --**  
19 A. Okay.  
20 **Q. -- and just ask you to identify the**  
21 **document. And I'll note that the email is attached to**  
22 **that, but you tell me whether it was attached to your**  
23 **statement when you signed it.**  
24 A. No, not that I remember.  
25 **Q. Okay.**

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1 A. No, this was a screen shot that I sent  
2 him. But, no, I signed it and this was just the last  
3 piece.  
4 **Q. Did you send -- so you sent to**  
5 **Mr. Buechner a screen shot of the email between you**  
6 **and Gerald that --**  
7 A. Uh-huh.  
8 **Q. -- we already talked about?**  
9 A. Yeah. Yes.  
10 **Q. Okay. So let's go ahead and mark the**  
11 **whole document -- by the way, on the last page of the**  
12 **declaration, that is your signature, correct?**  
13 A. Yes, sir.  
14 **Q. So I was wondering, Mr. Holland, if you**  
15 **never met Mr. Buechner, you know, did you -- did you**  
16 **print a copy and sign it and then email it back to**  
17 **Mr. Buechner, or how did he get a signed copy of this**  
18 **declaration?**  
19 A. Printed it, signed it, scanned it, and  
20 emailed it back.  
21 **Q. Okay. Great.**  
22 A. I think that's how that went.  
23 **Q. All right. Good.**  
24 A. I have a printer/scanner at home because I  
25 work from home.



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1 **Q. Okay. So just my understanding,**  
 2 **Exhibit 120 is a true and correct copy of your**  
 3 **declaration that you gave to Mr. Buechner in this**  
 4 **case?**  
 5 A. Yeah. Can I have my copy and I'll tell  
 6 you?  
 7 **Q. Sure. You want to compare it to that**  
 8 **copy, that's fine.**  
 9 A. Well, I just want to make sure the date is  
 10 the same. Yeah, because this is what I printed. So  
 11 if the email would have been on there, it would have  
 12 printed with this --  
 13 **Q. Okay.**  
 14 A. -- I mean, per se. So it's 11/1/2021.  
 15 Yeah, they should be the same.  
 16 **Q. Okay. Well, just look because for**  
 17 **evidentiary purposes, we need to establish if that is**  
 18 **a true and correct copy of your declaration?**  
 19 A. Yes, it is.  
 20 **Q. Okay. And the email is a true and correct**  
 21 **copy of the email that you sent to Gerald on April 22,**  
 22 **2019, correct?**  
 23 A. Yes.  
 24 **Q. All right. Thank you. So I think the**  
 25 **thing in this deposition that I want to establish is**

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1 **the things that you don't know.**  
 2 A. Okay.  
 3 **Q. Okay. You weren't in conversations with**  
 4 **Mr. Teske at the time that he made the decision to**  
 5 **fire Gerald and you don't --**  
 6 A. No.  
 7 **Q. -- know of your own personal knowledge**  
 8 **what his motives were?**  
 9 A. No.  
 10 **Q. All right. And, in fact, from the time**  
 11 **that you and Gerald broke off your relationship, you**  
 12 **have no personal knowledge whatsoever of anything that**  
 13 **Gerald was doing in terms of his job working for**  
 14 **Clayton County, in terms of what he was doing for**  
 15 **friends of Clayton County CASA, or what he was doing**  
 16 **in his personal life, correct?**  
 17 A. No.  
 18 **Q. Okay. And in your declaration, you, you**  
 19 **make some assumptions about what Gerald was doing when**  
 20 **he was at Frogs, but you have no personal knowledge of**  
 21 **what he was doing at Frogs, correct?**  
 22 A. No. That would be anybody at Frogs.  
 23 **Q. Okay. Say that again. It would be --**  
 24 A. That would be anybody that was at Frogs  
 25 when he was there and --

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1 **Q. When you say they would know perhaps but**  
 2 **you --**  
 3 A. They would know. I don't know.  
 4 **Q. Because you weren't there?**  
 5 A. No. I mean, I know what happened later  
 6 so.  
 7 **MR. BUCKLEY:** Okay. Good enough. All  
 8 right. That's all the questions I have.  
 9 **MR. BUECHNER:** I don't think I have  
 10 anything.  
 11 **MR. BUCKLEY:** All right. Good. Sir,  
 12 thank you for your time.  
 13 **THE VIDEOGRAPHER:** Going off video record  
 14 at 1:52 p.m.  
 15 (Deposition concluded at 1:52 p.m.)  
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1 C E R T I F I C A T E  
 2  
 3 STATE OF GEORGIA:  
 4 FULTON COUNTY:  
 5  
 6 I hereby certify that the foregoing  
 7 transcript was taken down, as stated in the caption,  
 8 and the questions and answers thereto were reduced to  
 9 the written page under my direction; that the  
 10 foregoing pages 1 through 51 represent a true and  
 11 correct transcript of the evidence given. I further  
 12 certify that I am not of kin or counsel to the parties  
 13 in the case; am not in the regular employ of counsel  
 14 for any of said parties; nor am I anyway interested  
 15 in the result of said case. The witness did not  
 16 reserve the right to read and sign the transcript.  
 17 This, 7th day of February, 2022.  
 18  
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 21 \_\_\_\_\_  
 22 TAMMY G. MOZLEY, CCR-B-1032  
 23  
 24  
 25

1 DISCLOSURE

2 STATE OF GEORGIA:  
3 COUNTY OF DEKALB:

4 Deposition of Paul G. Holland

5 Pursuant to Article 10.B of the Rules and Regulations  
6 of the Board of Court Reporting of the Judicial  
7 Council of Georgia, I make the following disclosure:

8 I am a Georgia Certified Court Reporter. I am here as  
9 a representative of Regency-Brentano, Inc.

10 I am not disqualified for a relationship of interest  
11 under the provisions of O.C.G.A. §9-11-28 ©.

12 Regency-Brentano, Inc., was contacted by the offices  
13 of Buckley Beal, LLP to provide court reporting  
14 services for this deposition.

15 Regency-Brentano, Inc., will not be taking this  
16 deposition under any contract that is prohibited by  
17 O.C.G.A. §15-14-37 (a) and (b).

18 Regency-Brentano, Inc., has no exclusive contract to  
19 provide reporting services with any party to the case,  
20 any counsel in the case, or any reporter or reporting  
21 agency from whom a referral might have been made to  
22 cover this deposition.

23 Regency-Brentano, Inc., will charge its usual and  
24 customary rates to all parties in the case, and a  
25 financial discount will not be given to any party to  
26 this litigation.

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**EXHIBIT 43**  
**to**  
**Deposition of Paul Holland**  
**(Filed under Seal)**



IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

GERALD LYNN BOSTOCK, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 CLAYTON COUNTY, )  
 )  
 Defendant. )

CIVIL ACTION  
NO: 1:16-cv-01460-ELR-WEJ



DECLARATION OF PAUL HOLLAND

1.

My name is Paul Holland. I have personal knowledge of the facts set forth in this Declaration and know them to be true and correct. I am over the age of eighteen years old, am suffering no disabilities, and am competent to execute this Declaration.

2.

I am a gay male. I met Gerald Bostock in 2007, and we began dating shortly thereafter. Mr. Bostock and I broke up sometime in April 2012.

3.

During the time that Mr. Bostock was my partner, I lived in a townhouse located in Midtown Atlanta. In 2008 or 2009, Mr. Bostock moved in with me and lived with me at my Midtown Atlanta townhouse. At the time, Mr. Bostock and I

agreed that living together at my townhouse in the Midtown Atlanta area would be a workable living arrangement because it was roughly halfway between my job in Kennesaw and his job in Clayton County. When Mr. Bostock moved in with me, he would go to a house he owned in Jonesboro (in Clayton County) on occasion to tend to matters there, but he primarily lived with me at my townhouse in Midtown Atlanta.

4.

During the time that Mr. Bostock was my partner, I attended a number of events related to the Clayton County Court Appointed Special Advocate (CASA) program, including three Duck Derby events, a Christmas parade and an event for Christmas toys for children. During these and other events, I met a number of Mr. Bostock's co-workers who worked with him at the Clayton County Juvenile Court, and Mr. Bostock introduced me to them. I also met Chief Judge Steve Teske, and Mr. Bostock introduced me to Judge Teske. I also went to Mr. Bostock's office on a few occasions, and Mr. Bostock introduced me to additional co-workers during these office visits.

5.

Judge Teske and the co-workers of Mr. Bostock I met were very friendly and welcoming toward me as Mr. Bostock's partner. Mr. Bostock and I attended Judge Teske's daughter's wedding.

6.

When Mr. Bostock and I were partners, he would often tell me that he was happy that he could be himself at the Clayton County Juvenile Court and be open there about the fact that he was gay.

7.

When Mr. Bostock planned to go to a dinner that he said related in some way to the CASA program, he would let me know in advance, and he would sometimes (but not always) invite me to attend.

8.

I considered F.R.O.G.S. to be a gay restaurant and bar until it closed in December 2020. F.R.O.G.S. had a predominantly gay clientele and advertised in various local gay periodicals. F.R.O.G.S. was located approximately four blocks from my townhouse.

9.

I considered Cowtippers to be a gay restaurant and bar until it closed in December 2018. Cowtippers had a predominantly gay clientele and advertised in various local gay periodicals.

10.

“Gayborhood” was a marketing term commonly used in advertising directed toward the gay community before, during and after 2013. This term referred to Midtown Atlanta and the fact that it was a gay-friendly area where many gay people lived and where many businesses that catered to a predominately gay clientele operated.

11.

Sometime in April 2012, Mr. Bostock told me he was going to a CASA-related event that evening. However, Mr. Bostock did not return home until extremely late, sometime around 2:00am. I was upset about this because I had been trying to call Mr. Bostock that night, and he did answer his cell phone or return my calls.

12.

The next morning, while Mr. Bostock was still asleep, I went through Mr. Bostock’s wallet and found several receipts from F.R.O.G.S. reflecting that Mr.

Bostock had been going there on Friday afternoons when I thought he was still at work. I confronted Mr. Bostock about this, and he claimed that he was meeting “clients” there. I asked Mr. Bostock why he never mentioned to me these visits to F.R.O.G.S, why he did not stop by the townhouse to freshen up before going there, and why he did not ask me if I wanted to go, since it was so close to my townhouse. Mr. Bostock responded that he was just going to “relax” there (at F.R.O.G.S.) for awhile before coming home. I did not believe Mr. Bostock and consequently, Mr. Bostock and I broke up.

13.

A few weeks after Mr. Bostock and I had broken up, Mr. Bostock came to my townhouse to discuss who should use two very expensive tickets I had given to Mr. Bostock for a country music concert. I told Mr. Bostock that, since the tickets were a gift to him, he should use them, and that I did not want to go to the concert with him. Mr. Bostock then told me that he would use the tickets and take Yhon Sanchez to the concert, and that he had been going out with Mr. Sanchez.

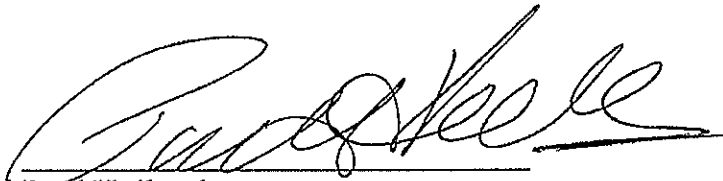
14.

Shortly after this conversation with Mr. Bostock, I learned that Mr. Sanchez was a manager at F.R.O.G.S. at the time. Accordingly, I concluded that Mr. Bostock



had been going to F.R.O.G.S. on Friday afternoons to socialize with and/or flirt with Mr. Sanchez.

Pursuant to 28 U.S.C. § 1746, by my signature below, I declare, under penalty of perjury, that the foregoing is true and correct. Executed on 11/1/2021, 2021.

  
\_\_\_\_\_  
Paul Holland

**From:** Paul G.  
**Sent:** Monday, April 22, 2019 7:55 PM  
**To:** Gerald Bostock <gerbos11@yahoo.com>  
**Subject:** hey from Paul

Hey Gerald! I was watching the news and saw a story about you and a lawsuit going to the Supreme Court about sexual orientation protection under the sex status of the civil rights act. I applaud the pursuit of non discrimination and including sexual orientation under that status. However, as I read it stated you sued stating you were fired because you were gay and they found out you joined a gay softball league. During our time together I met most of your co-workers, boss, and some board members and they all knew you were gay and were very supportive I thought. I just wanted to reach out to see why you thought you got fired for that reason when that is not what I perceived at all. I'm just curious as to what happened and made you feel that was the case. With a national story, I want to make sure I'm up to speed on everything to be best prepared as I'm already getting text and phone calls from friends.

Thanks! Hope you are doing well..

Paul

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