

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF ILLINOIS

U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Docket No. 16-2222

Plaintiff,

vs.

Urbana, Illinois  
May 16 & 17, 2018

RENT-A-CENTER EAST, INC.,

Defendant.

JURY TRIAL TESTIMONY -- MICHAEL JAMES MORELAND, JR.

BEFORE THE HONORABLE ERIC I. LONG  
UNITED STATES MAGISTRATE JUDGE

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

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Proceedings recorded by mechanical stenography; transcript  
produced by computer.

1 (In open court; May 16, 2018; jury present.)

2 MICHAEL JAMES MORELAND, JR., sworn, 1:27 p.m.,

3 DIRECT EXAMINATION BY MR. MULAIRE:

4 Q Good afternoon, Mr. Moreland. Could you state  
5 your full name for the record?

6 A It's Michael James Moreland, Jr.

7 Q And -- thank you. And I'll just ask you: Try  
8 to keep your voice up.

9 A Okay.

10 Q Sir, where do you live?

11 A In Rantoul, Illinois.

12 Q And were you at one time employed by  
13 Rent-A-Center?

14 A Yes, sir.

15 Q And what, roughly, were your dates of  
16 employment there?

17 A From November of 2011 to July of 2012.

18 Q And what was your job at Rent-A-Center?

19 A I was a customer accounts representative.

20 Q Were you assigned to a particular store?

21 A The Rantoul store.

22 Q For the whole time that you worked there?

23 A Yes.

24 Q And let me make a better question. For the  
25 whole time you worked at Rent-A-Center, you were at the

1 Rantoul store?

2 A Yes.

3 Q Now, who was the store manager at the Rantoul  
4 store when you worked there?

5 A Russ Kasper.

6 Q And do you recall the district manager at the  
7 time you worked?

8 A His name was Dan.

9 Q Would that have been Roling?

10 A I can't remember the last name for sure.

11 Q Fair enough.

12 Why did your employment at Rent-A-Center end?

13 A I put in my notice because I took a position  
14 with another company.

15 Q So you left voluntarily?

16 A Yes, sir.

17 Q And do you remember about how much notice you  
18 gave with your resignation?

19 A I know it was at least two weeks.

20 Q Okay. And do you happen to remember the date  
21 of your last day of work at Rent-A-Center?

22 A Yes, sir. My last day was July 14th.

23 Q Okay. And could you explain for the jury: How  
24 do you happen to remember that particular date?

25 A Because the new position I took with the, my

1 new employer started on my birthday, which was July 15th.

2 Q Okay. Thank you.

3 Now, let me ask you a few questions about your  
4 time at Rent-A-Center. When you worked there, did you  
5 know an employee with the last name of Kerr?

6 A Yes, sir.

7 Q And at that time, what was that individual's  
8 first name?

9 A Jason.

10 Q And you're aware that she now goes by Megan?

11 A Yes, sir.

12 Q So that's the same person?

13 A Yes.

14 Q How was Ms. Kerr as an employee at that time,  
15 Jason Kerr?

16 A In my opinion, very reliable, honest,  
17 dependable.

18 Q Okay. And I take it you believed she was an  
19 honest person?

20 A Oh, yeah. Absolutely.

21 Q Now, back when you worked at Rent-A-Center, how  
22 many delivery vehicles were there at the Rantoul store?

23 A There were two.

24 Q And could you just briefly describe them?

25 A One was a cargo van. The other one was a box

1 truck.

2 Q And was using those two company vehicles for  
3 either personal or non-business use allowed?

4 A No.

5 Q Now, did you yourself ever use the truck for  
6 something other than Rent-A-Center business?

7 A Yes, sir.

8 Q And could you tell us about that?

9 A There was an instance where we went -- myself  
10 and another employee -- went to a Harley-Davidson  
11 dealership. We were doing a delivery. We stopped by the  
12 Harley dealership.

13 Q Now, just to be clear, was the delivery to the  
14 Harley-Davidson deal--

15 A No, sir.

16 Q So the trip to Harley-Davidson, that was just  
17 personal?

18 A Correct.

19 Q And who was the other employee who went with  
20 you?

21 A R.J. Harding.

22 Q Okay. And so the two of you went shopping at  
23 the Harley-Davidson store?

24 A Correct.

25 Q Okay. And do you remember when this happened?

1 What day?

2 A It was about a week before my final day with  
3 Rent-A-Center.

4 Q Okay. So it would have been about a week  
5 before July 14th then?

6 A Correct. It was on a Friday because it was  
7 payday.

8 Q Okay. And just to be clear, so this would have  
9 been in 2012?

10 A Yes, sir.

11 Q Okay. Now, do you know whether the company,  
12 Rent-A-Center, found out about your trip to the  
13 Harley-Davidson store?

14 A Oh, yes.

15 Q And how do you know that?

16 A R.J. was terminated when we got back to the  
17 store.

18 Q Okay. By who?

19 A It was over the phone. He told me it was the  
20 district manager.

21 Q Okay. So, now on the day that the company  
22 found out about the trip to the Harley-Davidson store,  
23 what about you? Were you allowed to continue working for  
24 the rest of the day?

25 A Yes, sir.

1 Q And for that matter, were you allowed to  
2 continue working for the next week?

3 A Right. Yes, I was.

4 Q And so all together, about how much longer did  
5 you continue at Rent-A-Center after the company found out  
6 that you had gone --

7 A It was just roughly a week, up until the 14th  
8 of July.

9 Q Okay. And so to be clear, did Rent-A-Center  
10 fire you for using the truck for personal reasons?

11 A No, sir.

12 Q Did you get suspended?

13 A No, sir.

14 Q Did you even get any kind of warning from  
15 Rent-A-Center about that?

16 A No, sir.

17 MR. MULAIRE: Thank you. No further questions.

18 THE COURT: Mr. Trusevich, cross.

19 MR. TRUSEVICH: Thank you, Your Honor. I  
20 appreciate it.

21 THE COURT: Yes.

22 CROSS-EXAMINATION BY MR. TRUSEVICH:

23 Q Good afternoon, Mr. Moreland. How are you?

24 A Doing good. How are you?

25 Q Good.

1           If your time records from Rent-A-Center show  
2 your last day of work was actually July 6, 2012, would  
3 you dispute that?

4           A     Absolutely.

5           Q     All right. And do you have any documents --  
6 did you produce any documents to the EEOC to show that  
7 your last day was actually the 14th and not the same day  
8 that Mr. Harding was fired on July 6th --

9           A     I do not.

10          Q     -- of 2012?

11          A     I'm sorry. No. I did not provide any  
12 documentation. No, sir.

13          Q     Do you have any?

14          A     I don't know.

15          Q     All right.

16          A     I mean, I may be able to, but --

17          Q     But would you agree with me: At Rent-A-Center,  
18 you have to clock in and clock out, right?

19          A     Correct.

20          Q     You were an hourly employee, correct?

21          A     Correct.

22          Q     There were time records that would show that,  
23 correct?

24          A     Absolutely.

25          Q     And whatever those time records show, they

1 show, correct?

2 A Right.

3 Q And isn't it true, sir, that you and Mr.  
4 Harding, on July 6th, Mr. Harding's last day, went to the  
5 Harley shop, correct?

6 A Yes, sir.

7 Q He was fired at, approximately around noon,  
8 right?

9 A I know he was fired. I'm not sure on the time.

10 Q And then you were allowed to work the rest of  
11 the day because that was your fourteenth day of your  
12 notification; isn't that true, sir?

13 A I know I worked that day. I don't know if that  
14 was the fourteenth day of my notification, though.

15 Q All right. And like I said, your time records,  
16 according to you to this jury, is there would be time  
17 records for at least another week is what you said,  
18 correct?

19 A Correct.

20 Q And HR would have those records, correct?

21 A Oh, absolutely.

22 Q And, in fact, you're familiar, sir, with the  
23 Rent-A-Center HR program, correct?

24 A I don't know what you mean by "familiar."

25 Q Sure. Let me ask you: If, if any coworker,

1 such as yourself, was having an issue of either  
2 harassment, discrimination, or retaliation, or any issue  
3 of work complaint, you would know -- at Rent-A-Center,  
4 you knew how to make a complaint, correct?

5 MR. MULAIRE: Objection, scope.

6 MR. TRUSEVICH: Your Honor, we have him listed,  
7 too, as a witness.

8 THE COURT: I'll give you -- Mr. Mulaire, I'll  
9 give you an opportunity to cross him on anything that  
10 goes beyond the scope.

11 WITNESS MORELAND: Okay. Could you repeat that  
12 for me?

13 MR. TRUSEVICH: Yes, sir. Absolutely.

14 WITNESS MORELAND: Okay.

15 BY MR. TRUSEVICH:

16 Q When you were working there, you knew how, if  
17 there was an issue of -- let's say you were having a  
18 problem at work, at Rent-A-Center, regarding harassment  
19 or discrimination or retaliation, you knew how to call or  
20 who to call, correct?

21 A I mean, I could have found it out easily.  
22 There was -- it was regularly available. Yes, sir.

23 Q And, in fact, you actually did call the  
24 Coworker Relations number, didn't you, sir?

25 A I don't know.

1 Q Let me refresh your recollection.

2 A I mean, maybe.

3 MR. TRUSEVICH: Your Honor, may I approach?

4 THE COURT: Yes.

5 (Brief pause in proceedings.)

6 MR. TRUSEVICH: Your Honor, may I approach?

7 THE COURT: Yes.

8 MR. TRUSEVICH: This is for you to review.

9 (Brief pause in proceedings.)

10 MR. TRUSEVICH: May I approach the witness?

11 THE COURT: Please do.

12 BY MR. TRUSEVICH:

13 Q Sir, let me hand you a document -- and please  
14 review that; take your time -- and see if that refreshes  
15 your recollection on whether you called the Coworker  
16 Relations hotline.

17 A Oh, --

18 MR. MULAIRE: Your Honor, I object to the use  
19 of this document. The EEOC has never seen the first  
20 three pages of this before. The last page, I believe, we  
21 have; but the first three pages, these weren't produced  
22 at any time.

23 THE COURT: Talk up here for just a second.

24 (Sidebar between the Court and counsel.)

25 THE COURT: Is this introduced just to refresh

1 recollection?

2 MR. TRUSEVICH: Absolutely.

3 THE COURT: Nothing to be used as evidence?

4 MR. TRUSEVICH: No.

5 Other than the last page. I am going to admit  
6 the last page. I think it may be already admitted.

7 THE COURT: Okay. Is that the one that you'd  
8 seen and did not have an objection to?

9 MR. MULAIRE: We've definitely seen the fourth  
10 page.

11 I'd just inquire what it's being admitted for.

12 MR. TRUSEVICH: Just to show that Mr. Moreland,  
13 when he was working there, Jason Kerr went through his  
14 Workplace Behavior Training and knew how to complain.

15 MR. MULAIRE: Okay. We don't have any  
16 objection to that.

17 THE COURT: Okay.

18 MR. MULAIRE: But may I have a moment to just  
19 read this to see what it is? I don't -- but I've really  
20 never seen this.

21 THE COURT: Okay. Is it okay if we go ahead  
22 with this witness?

23 MR. MULAIRE: I thought you were supposed to  
24 have given notice to opposing counsel with things put  
25 into use, but --

1 MR. TRUSEVICH: For the record, we have tried  
2 to call Mr. Moreland at least ten times. He refused to  
3 call me back at any time. So he's certainly cooperated  
4 with EEOC, so what's good for the goose is good for the  
5 gander.

6 MR. MULAIRE: I was referring to Rent-A-Center  
7 providing the document to EEOC. It's nothing from Mr.  
8 Moreland, but --

9 THE COURT: All right.

10 MR. MULAIRE: -- we can proceed, Your Honor.

11 (In open court; jury present.)

12 MR. TRUSEVICH: May I proceed?

13 THE COURT: Give Mr. Mulaire just one moment.

14 MR. TRUSEVICH: Okay.

15 MR. MULAIRE: I'm almost done. Thank you.

16 (Brief pause in proceedings.)

17 MR. MULAIRE: Thank you, Your Honor. I've had  
18 a chance to look at it.

19 THE COURT: All right.

20 Mr. Trusevich, you -- I believe you were  
21 refreshing recollection. You may proceed.

22 MR. TRUSEVICH: Thank you, Your Honor.

23 BY MR. TRUSEVICH:

24 Q Mr. Moreland, have you had a chance to review  
25 that document to refresh your recollection?

1 A Yes, sir.

2 Q All right. And I don't want you to get into  
3 the details, but I just want to ask you: Did you, in  
4 fact, call the Coworker Relations hotline regarding an  
5 employment issue?

6 A That is correct.

7 Q All right. And did that system work for you?

8 A Yes, it did.

9 Q Any retaliation after you used it?

10 A No.

11 MR. TRUSEVICH: May I approach?

12 THE COURT: Yes.

13 MR. TRUSEVICH: Mr. Moreland, if I could have  
14 that back, please.

15 Thank you, sir.

16 (Brief pause in proceedings.)

17 MR. TRUSEVICH: And, Your Honor, at this time,  
18 we're going to mark that last page. It is -- well,  
19 actually, it's already an exhibit. It's Defendant's  
20 Exhibit 25. We would offer 25 into evidence.

21 MS. QUINCY: It's in.

22 MR. TRUSEVICH: It's already in?

23 MS. QUINCY: I believe it's already in.

24 MR. TRUSEVICH: Oh. Well, then, I lost track  
25 of that one.

1 Well, then, Your Honor, permission to publish  
2 what's already been admitted into evidence as  
3 Rent-A-Center Exhibit 25, publish to the jury?

4 THE COURT: You may.

5 BY MR. TRUSEVICH:

6 Q And, sir, do you recall that -- you can also  
7 look on your screen, too, sir. Let me know if you can  
8 read that.

9 A It's a little blurry, but --

10 Q After you made a complaint, within one week,  
11 sir, isn't it true that the district manager -- by the  
12 way -- can you, can you pop up the -- no, not those --  
13 the DM at the bottom's name.

14 Sir, you said you couldn't remember Dan's last  
15 name. Do you remember that?

16 A Yeah. That --

17 Q Does this ring a bell?

18 A Yeah. That looks great. Yes, sir.

19 Q All right. Thank you, Mr. Moreland.

20 Dan Kober, correct?

21 A Correct.

22 Q So would you agree that within one week of  
23 making a complaint on January -- pop that date back up at  
24 the bottom, Harriet, please -- that on January 13, 2012,  
25 Dan Kober came and gave a Respect in the Workplace

1 seminar.

2 Do you recall that?

3 A I don't -- I'm not 100 percent sure. It sounds  
4 familiar. I think so.

5 Q Okay. Well, let's look at -- let's look at the  
6 document.

7 A Okay.

8 Q Pull up the topic at the very top, the name of  
9 it.

10 A Okay.

11 Q "RAC Workplace Behavior Training, Store  
12 Employee Listing Checklist." You see that?

13 A Yes, sir.

14 Q Blow up the names, please.

15 And on the left, sir, you'll see employee  
16 numbers and then employee names. Do you see that?

17 A Yes, sir.

18 Q Whose name is -- one, two, three -- four down  
19 at the bottom?

20 A That is mine.

21 Q That would be you, correct, sir?

22 A Yes, sir.

23 Q All right.

24 A Yep.

25 Q And does that refresh your recollection that

1 the --

2 A Yeah.

3 Q Let me finish.

4 Does this refresh your recollection that the  
5 DM, Dan Kober, came in within a week of your complaint  
6 and gave a workplace, Respect in the Workplace training?  
7 And Roger Harding was there; Russ Kasper was there; Jason  
8 Kerr was there; you were there; and Eleena Reeves.

9 And, in fact, do you see to the right there's  
10 initials?

11 A Yes, sir.

12 Q Next to your name, there's initials there,  
13 correct?

14 A Yes, sir.

15 Q All right. Does that refresh your  
16 recollection --

17 A It --

18 Q -- one way or the other?

19 A That does.

20 Q All right. And do you call -- do you recall,  
21 sir, at that training -- you can leave it up -- at that  
22 training that Mr. Kober covered -- and just so we're  
23 clear, Jason Kerr was there, correct?

24 A Yes.

25 Q And Mr. Kober, your DM, covered respect in the

1 workplace, treating each other fairly, discrimination  
2 policy, harassment policy, reporting procedures.

3 Do you recall that he covered those?

4 A I don't remember in detail exactly what it was.

5 Q Anything like that?

6 A It was something very similar to that. Yes.

7 Q Fair enough, Mr. Moreland.

8 And I know it has been -- what's the date at  
9 the bottom? 2012, right?

10 A Right.

11 Q That's a long time. Trust me, I totally  
12 understand that.

13 And, sir, if -- if, in fact, your time  
14 sheets -- and we'll get them -- your time sheets show  
15 that you were actually fired on July 6th, the same day as  
16 Roger Harding -- you would agree the time sheets are the  
17 time sheets; would you agree with that?

18 A Absolutely not. I was not fired from  
19 Rent-A-Center.

20 Q And if it was the same day and the DM -- if  
21 that was going to be your last day and the DM allowed you  
22 to work the remainder of the afternoon -- and fired  
23 Harding -- not to leave the store understaffed, would you  
24 fault him for that?

25 A I'm sorry. Can you repeat that --

1 Q Sure.

2 A -- for me?

3 Q You don't know if the DM, if it was your last  
4 day, July 6, 2012 -- you with me? --

5 A I'm with you.

6 Q -- and it was Harding's last day; and since you  
7 had given a two-week notice and it was your fourteenth  
8 day, if the DM decided "I'm going to let Harding go at  
9 noon" but let you work the rest of the day, you don't  
10 know if he did that because he didn't want to leave the  
11 store short-staffed or anything; you don't know what the  
12 DM was thinking, right?

13 A I have no idea what the DM would have been  
14 thinking at that point. No, sir.

15 MR. TRUSEVICH: Mr. Moreland, you've been  
16 wonderful. Thank you.

17 Pass the witness.

18 MR. MULAIRE: I have a little bit of redirect,  
19 Your Honor.

20 THE COURT: Redirect or cross on the issue --

21 MR. MULAIRE: It will be a major redirect.

22 THE COURT: Okay.

23 REDIRECT EXAMINATION BY MR. MULAIRE:

24 Q Mr. Moreland, just briefly, is there any doubt  
25 in your mind that you worked about a week after Mr.

1 Harding was fired at Rent-A-Center?

2 A No doubt at all.

3 Q And is there any doubt in your mind that you  
4 worked up to within a day of your birthday at  
5 Rent-A-Center?

6 A No doubt at all.

7 Q Is there any chance you have your own birthday  
8 wrong?

9 A No, sir.

10 Q Okay. So if there was some sort of time sheet  
11 or other piece of paper that said that you stopped  
12 working on the same day that Mr. Harding was fired, would  
13 that record be right or wrong?

14 A That would be wrong.

15 MR. MULAIRE: Thank you. No further questions.

16 MR. TRUSEVICH: Nothing further.

17 THE COURT: All right. Mr. Moreland, thank you  
18 for your time.

19 Is he under subpoena? Mr. Mulaire, is Mr.  
20 Moreland under subpoena or voluntary?

21 MR. MULAIRE: He is, but there's no reason not  
22 to release him.

23 THE COURT: Can he be released?

24 MR. TRUSEVICH: I agree.

25 THE COURT: All right. You're released from

1 your subpoena.

2 WITNESS MORELAND: Okay.

3 THE COURT: Have a safe trip home.

4 WITNESS MORELAND: Thank you.

5 (Witness Moreland excused, 1:45 p.m.)

6 \* \* \* \* \*

7 (In open court; May 17, 2018; jury present.)

8 MICHAEL JAMES MORELAND, JR., sworn, 10:08 a.m.,

9 DIRECT EXAMINATION BY MS. QUINCY:

10 Q Good morning, Mr. Moreland.

11 A Good morning.

12 Q You were here yesterday --

13 A Yes, ma'am.

14 Q -- and gave some testimony regarding your  
15 employment at Rent-A-Center, --

16 A Yes, ma'am.

17 Q -- correct?

18 I just want to ask you some questions --

19 A Yes, ma'am.

20 Q -- about that.

21 Are you certain as you sit here today of the  
22 dates of your employment at Rent-A-Center?

23 A Yes, I am.

24 MS. QUINCY: Could the -- is the witness -- is  
25 the exhibit book with the witness?

1 MR. TRUSEVICH: Your Honor, may I approach?

2 Mr. Moreland, here you go.

3 BY MS. QUINCY:

4 Q Mr. Moreland, before you look to that, when you  
5 swear to something under oath, --

6 A Right.

7 Q -- you take that seriously, don't you?

8 A Yes, ma'am.

9 Q And you absolutely want to make sure that it's  
10 correct?

11 A Yes, ma'am.

12 Q Could you turn to page -- or Exhibit Number 77,  
13 please.

14 A Where is that at? Oh --

15 Q It's there.

16 (Brief pause in proceedings.)

17 THE COURT: Ms. Quincy, let's stick to the  
18 scope of what we discussed earlier, though. Okay?

19 BY MS. QUINCY:

20 Q Did you talk to another witness in this case  
21 today or last night about some of the testimony you gave  
22 here yesterday?

23 A Yesterday afternoon.

24 Q And that witness would be R.J. Harding?

25 A Yes, ma'am.

1 Q Did you text him -- you texted him at 6:13 p.m.  
2 and said, "They kept trying to say they fire me." Is  
3 that right?

4 A That was one of the messages. Yes.

5 Q And he responded to you, "They didn't fire you.  
6 They fired me. It was your last day."

7 Is that correct?

8 A That is correct.

9 Q And you responded by saying, "I know"?

10 A Yes. And the "I know" --

11 Q Sir, you responded to Mr. Harding saying it was  
12 your last day, the day he was fired, by saying, "I know"?

13 A That was not in response to that text message.  
14 No, ma'am.

15 MS. QUINCY: Your Honor, may I approach the  
16 witness?

17 THE COURT: Yes.

18 BY MS. QUINCY:

19 Q Did you review what's in front of you?

20 A Oh, yes, ma'am.

21 Q Do you recognize this as the text exchange you  
22 had with R.J. Harding?

23 A Absolutely.

24 MS. QUINCY: Move the admission of what I think  
25 we need to mark as Defendant's Exhibit 83.

1 (Brief pause in proceedings.)

2 THE COURT: Is this being offered under Rule  
3 613?

4 MS. QUINCY: Yes, Your Honor.

5 MR. MULAIRE: Your Honor, we would request, for  
6 completeness, the second page and five other pages that I  
7 handed Ms. Quincy a moment ago be included in the  
8 exhibits.

9 THE COURT: I haven't seen the other five  
10 pages.

11 MR. MULAIRE: I can hand them to you.

12 THE COURT: What we can do, Mr. Mulaire, is  
13 allow Ms. Quincy to proceed on the one page; and then you  
14 can tender the others --

15 MR. MULAIRE: Okay. Thank you.

16 THE COURT: -- in your examination.

17 So, we'll allow the text message exchange,  
18 Defense Exhibit 83.

19 Ladies and gentlemen, I want to give you a  
20 brief instruction, though, so that you understand why  
21 this is coming in. You're about to hear evidence that  
22 before -- or in this case, during the trial, a witness  
23 may have made a statement that may be inconsistent with  
24 his or her testimony here in court. You may consider  
25 this evidence only to help you decide how believable the

1 witness's testimony is and what weight to give his  
2 testimony here in Court.

3 All right, Ms. Quincy, Defense 83 is admitted  
4 for the limited purpose.

5 MS. QUINCY: Can I get the ELMO? Sorry. We're  
6 going to have to use some old school.

7 BY MS. QUINCY:

8 Q Okay. Again, you wrote to Mr. Harding saying,  
9 "They kept trying to say they fire me," correct?

10 A Yes, ma'am.

11 Q He says, "They didn't fire you. They fired me.  
12 It was your last day." Correct?

13 A Yes, ma'am.

14 Q And your response is, "I know. I called them  
15 liars." Correct?

16 A Yes, ma'am.

17 Q There's nowhere in here where it says that  
18 wasn't your last day, correct?

19 A No. I mean, I wasn't --

20 Q Sir, --

21 A I don't believe so.

22 Q Yeah. There's nothing where you said to Mr.  
23 Harding, "It wasn't my last day," right?

24 A That is correct.

25 Q And, in fact, you responded by saying, "I

1 know," right?

2 A I responded to that. Yes, ma'am.

3 Q Did you have any chance to review records that  
4 may show when your last day actually was?

5 A I have not seen any, like, official records.  
6 No, ma'am.

7 Q You had some confusion before about even what  
8 year --

9 A Yeah. I was off on the year. You're correct.

10 Q Right. You had originally thought it was 2013,  
11 right?

12 A Right.

13 Q And you actually reached out to Mr. Harding at  
14 one point and said, "Hey, when was it that we got fired?"  
15 Right? "When did we leave Rent-A-Center?"

16 A Right.

17 Q And Mr. Harding told you. And you reached out  
18 to Mr. Harding because you guys' last day was the same  
19 day, right?

20 A That's not why I reached out to him.

21 Q But it was, wasn't it? The last day you  
22 worked --

23 A No.

24 Q -- was the same last day that Mr. Harding  
25 worked?

1 A No.

2 Q Okay. There's nothing in the text between you  
3 and Mr. Harding right there where you challenge what he  
4 said -- "They didn't fire you. They fired me. It was  
5 your last day" -- right?

6 A You're correct. I did not challenge him.

7 Q And the next bubble says, "I know," right?

8 A That is what it says.

9 MS. QUINCY: That's all, Your Honor.

10 THE COURT: All right. Mr. Mulaire, on that  
11 limited scope.

12 MR. MULAIRE: Yes, Your Honor.

13 (Brief pause in proceedings.)

14 CROSS-EXAMINATION BY MR. MULAIRE:

15 Q Good morning, Mr. Moreland.

16 A Good morning.

17 Q Did you have any earlier communications in the  
18 day yesterday with Mr. Harding, earlier than what that  
19 exhibit shows?

20 A Yes, sir.

21 MR. MULAIRE: Your Honor, I apologize. Our  
22 printer ran out of ink, so I was only able to print the  
23 three copies. Is there any chance I can give the witness  
24 our copy?

25 May I approach the witness? And I guess we'll

1 mark this Plaintiff's 13.

2 THE COURT: Yeah.

3 (Brief pause in proceedings.)

4 BY MR. MULHAIRE:

5 Q Mr. Moreland, could you take a moment and  
6 review the five pages that I just handed you, marked  
7 Plaintiff's 13, and let me know when you've had a chance  
8 to do so.

9 A Yeah. I've reviewed this.

10 Q And are these additional messages to and from  
11 Mr. Harding yesterday?

12 A Yes, sir.

13 Q Without telling us what the messages say, could  
14 you tell us when the earliest one was?

15 A 2:19 p.m.

16 Q And -- let's see here -- and can you tell --  
17 the last page of this exhibit, the messages on there, can  
18 you tell whether those come before or after the page that  
19 you were just shown by Ms. Quincy?

20 And if you need to see the other exhibit again,  
21 I can just show you that.

22 A I have that here.

23 So, like, this one, like, is in the middle of  
24 this whole conversation --

25 Q Okay. And just for the record, you were

1 referring to the defendant's exhibit being in the middle  
2 of the discussion represented by the plaintiff's  
3 exhibit; --

4 A Yes, sir.

5 Q -- is that correct? Okay.

6 MR. MULAIRE: Your Honor, at this time, I would  
7 move Plaintiff's 13 into evidence.

8 MS. QUINCY: Objection, Your Honor, beyond the  
9 scope and 403.

10 THE COURT: Overruled. I'm going to allow it  
11 under Rule 106 to put it into context.

12 MR. MULAIRE: May I publish it to the jury,  
13 Your Honor?

14 THE COURT: You may.

15 MR. MULAIRE: Could I have the ELMO?

16 COURTROOM DEPUTY: It should be on.

17 BY MR. MULAIRE:

18 Q Mr. Moreland, I want to give you an opportunity  
19 to just explain this discussion to the jury so they have  
20 a complete picture of your communications with Mr.  
21 Harding.

22 First of all, could you clarify for us: The  
23 blue boxes here -- and I'll confess; they're going to get  
24 a little bit pink at times, a toner issue.

25 The blue boxes, does that represent things you

1 said or things Mr. Harding said?

2 A Those are things I said.

3 Q Okay. It's the reverse of the previous exhibit  
4 because you provided these to me?

5 A Yes, sir.

6 Q Okay. And then the things that are either in  
7 very light boxes or look like they don't have boxes  
8 around them, that's Mr. Harding?

9 A Yes, sir.

10 Q Okay. So who reached out to who yesterday?

11 A I did, --

12 Q Okay.

13 A -- the first message at 2:19.

14 Q And what was the first thing you said to Mr.  
15 Harding?

16 A "Dude."

17 Q And what was after that?

18 A "Before I say anything, do you have to testify?  
19 I can't talk to you about it if you haven't yet."

20 Q And so you understood that if Mr. Harding was  
21 going to be appearing as a witness that you weren't to  
22 talk to him, --

23 A Oh, absolutely.

24 Q -- correct? All right.

25 A Absolutely.

1 Q And then could you read for us the remaining  
2 messages on that page?

3 A Mr. Harding responded, "I haven't yet. I'm" --  
4 abbreviation for "supposed to tomorrow."

5 I responded, "Oh, okay. Well, I can't say  
6 anything about it then. I wouldn't want to -- or I  
7 wouldn't want to say anything -- wouldn't want anything I  
8 say to affect your testimony."

9 And then he responded, "Nothing's going to  
10 affect" --

11 Q There's a four-letter word?

12 A Right.

13 And then I said "LOL."

14 Q Were you attempting to influence Mr. Harding's  
15 testimony in any way?

16 A Oh, absolutely not.

17 Q Okay. Can you go on to the second page of the  
18 exhibit?

19 A Sure.

20 Q And now, just to move things along, am I right,  
21 the first couple of messages are just a duplicate of what  
22 was on the previous page?

23 A Yes, sir.

24 Q And so am I right that the next new message is  
25 towards the bottom of the page?

1 A That is correct.

2 Q Could you tell us which one is next?

3 A The one that says, "I parked at county  
4 courthouse and paid. I found out you can park at the  
5 mall for free."

6 Q Why were you telling Mr. Harding that?

7 A It was -- I don't know, just --

8 Q Just trying to be helpful?

9 A Be nice. Save him a few bucks.

10 Q Thank you.

11 And he says, "Okay"?

12 A Yes.

13 Q Let's go to the next page, and could you --  
14 just read for us, just like you did the last time,  
15 letting us know who's saying what, what the messages are  
16 on this page.

17 A I responded -- well, he responded, "Okay."

18 Then I responded, "Have fun, Man."

19 And then he asked me, "Whose side did you  
20 testify on?"

21 And I responded, "I don't know." I mean, I did  
22 know, but I responded, "I don't know. Wasn't really on  
23 any side. I just told the truth. Whoever that helps  
24 doesn't matter to me."

25 He responded, "That's all I'm gonna do."

1           And then I kind of just changed the topic and  
2           said, "Hey, I got a personal question. You got a  
3           motorcycle?"

4           And he responded -- "What's that?" -- what I  
5           believe is in response to "I got a kind of personal  
6           question."

7           And then I responded "if you consider that  
8           personal."

9           And he goes, "No. I do not."

10          Q       Let's go on to the next page.

11          A       The next page, there's a partial picture of my  
12         bike, just -- and I said, "Oh, I thought you were asking  
13         what a motorcycle was. LOL."

14                 "If you ever get one, I'm pretty decent now.  
15         Third year. Can kinda say I'm a pro. LOL."

16                 And then those messages stopped.

17                 And at 5:39, I received a message where he  
18         said, "Just got a message they don't need me to testify."

19                 I responded, "Like at all?"

20                 He responded, "Nope. Don't need me at all."

21          Q       Okay. And now just to clarify, the part about  
22         the motorcycle, that had nothing to do with the trial?

23          A       Oh, no, not at all.

24          Q       Okay. Let's continue on to the next page. And  
25         could you just continue?

1           A     That message would say, "Second time I got  
2 summoned and didn't need me at all. Sweet."

3                     Then, "So what were you going to tell me?"

4           Q     And just for the record, who said those two  
5 things that you just read?

6           A     R.J.

7           Q     Okay. Please continue.

8           A     I responded at 6:13. "They kept trying to say  
9 they fired me."

10                    And then he said, "They didn't fire you. They  
11 fired me. It was your last day."

12                    I replied, "I know."

13                    The "I know" that I replied was intended for  
14 the message "they didn't fire me" -- "they didn't fire  
15 you; they fired me."

16                    Those were messages that were going back --  
17 just like a normal conversation; but -- you know, just  
18 like the previous one where I sent him, "Hey, is this a  
19 personal question?"

20           Q     Is there -- what app or messaging system were  
21 you using to do the --

22           A     This is Facebook Messenger.

23           Q     And that's like an instant messaging system?

24           A     Oh, yeah.

25           Q     So things come back, more or less --

1 A Split second.

2 Q -- in real time?

3 A Yes.

4 Q Could you just -- you did it just briefly now,  
5 but I want to make sure the jury understands. Could you  
6 explain the sequence of the four messages, the one that  
7 starts "they kept trying to say they fire me" and then  
8 the -- one, two, three -- four messages that come after  
9 that?

10 As you saw them, in what order do they come in?

11 A The first -- after -- well, first would be,  
12 "They kept saying they fire me."

13 The second message was, "They didn't fire you.  
14 They fired me."

15 I responded, "I know," in response to that  
16 message, so that would have been the third message in my  
17 intentions.

18 The next message was, "It was your last day."

19 "I called them liars."

20 It was also -- I mean, it was like, "I know. I  
21 called them liars." It wasn't, like, full sentence  
22 structure.

23 "I called them liars" was, I mean, at the same  
24 time as the "I know." Then "I called them liars."

25 THE COURT: Mr. Mulaire, before you go to the

1 last page, do not publish the last page. I want to talk  
2 about it.

3 MR. MULAIRE: Very well.

4 THE COURT: You may be able to redact the  
5 portion off of that that I'm concerned about, which you  
6 could probably tell from looking at it.

7 MR. MULAIRE: I have a guess, but I'm not  
8 completely sure.

9 THE COURT: All right. Do you want to talk  
10 quickly on a sidebar?

11 MR. MULAIRE: Sure.

12 (Sidebar between the Court and counsel.)

13 THE COURT: So, I mean, I think there's part of  
14 this that is simply so prejudicial that any probative  
15 value is going to be --

16 MR. MULAIRE: On this page?

17 MS. QUINCY: Last page.

18 THE COURT: This is the last page.

19 (Brief pause in proceedings.)

20 MS. QUINCY: [Indicating.]

21 THE COURT: Yeah. That's the part.

22 I don't know where I got this. This was with a  
23 separate --

24 MR. MULAIRE: So this was -- the display is a  
25 little different.

1 MS. QUINCY: Wait a minute. Why do you have  
2 something different than I have?

3 MR. MULAIRE: It has to do with me.

4 THE COURT: [Inaudible.]

5 MR. MULAIRE: Yeah. I mean, when you guys  
6 printed it out -- I squished it so the full picture would  
7 fit on a page. I think for you guys it was chopped up on  
8 different pages.

9 THE COURT: Keep your voice down.

10 MS. QUINCY: But mine isn't the same as what  
11 the Court's is.

12 But, anyway, this is what -- this I'm pointing  
13 to [inaudible] you weren't terminated. RAC was saying I  
14 was [inaudible].

15 That's [inaudible]. I don't know what's going  
16 on, but that annoyed me a tad.

17 So the bottom half of the last page, but we  
18 have the same thing.

19 MR. MULAIRE: Yeah, okay. And I've given the  
20 Court a copy of this, just -- the witness -- because I  
21 couldn't print the fourth copy.

22 MS. QUINCY: Okay.

23 THE COURT: Okay. So are you --

24 MR. MULAIRE: Yeah. I'm fine. I mean, it's  
25 okay with us.

1 THE COURT: You can just cut it off.

2 MR. MULAIRE: Don't show the jury.

3 MS. QUINCY: I'm going to --

4 THE COURT: I don't want this, though, from  
5 here down. Simply make it -- there's no probative value  
6 to that.

7 MR. MULAIRE: For now, I'll just fold it.

8 THE COURT: Okay.

9 MR. MULAIRE: Do I even need the last page?

10 THE COURT: Or do you just want to rip off the  
11 last page?

12 MS. QUINCY: I want this.

13 THE COURT: I assumed you wanted it.

14 MR. MULAIRE: That's fine.

15 THE COURT: So why don't we -- each of you tear  
16 that off and take the copy from him and tear that.

17 (Brief pause in proceedings.)

18 THE COURT: All right. Thank you both.

19 I'll let you get that cut up. Take your time,  
20 Ms. Quincy.

21 (In open court; jury present.)

22 BY MR. MULAIRE:

23 Q Mr. Moreland, just for completeness, then,  
24 could you move to the last now half page of the exhibit.

25 And just as you were before, could you

1 explain -- first of all, the blue -- these are blue  
2 bubbles, so that is something you said?

3 A Yeah. This is all mine.

4 Q So could you just read for the jury what you  
5 said?

6 A "They said kept saying" -- then in quotation  
7 marks -- 'when you were terminated' to me, referring to  
8 me. In all honesty, they should have fired me as well."

9 Q Okay. And is there anything untruthful in this  
10 exchange that you just described to the jury?

11 A No, sir.

12 Q With the understanding that the sequence of the  
13 "I know" is as you explained a moment ago?

14 A Right. Yeah. That was out of sequence. Yes,  
15 sir.

16 Q And to be clear, your understanding, as you  
17 continued with this exchange, was that Mr. Harding would  
18 not be testifying, and so that's why you proceeded to --

19 A I would not have talked to him if he was --

20 Q Sorry. Let me just finish the question.

21 A Sorry.

22 Q That was why you proceeded to discuss the case  
23 with him; you didn't believe he was going to be a witness  
24 anymore?

25 A Yes, sir.

1 Q And that was based on what he said?

2 A Exactly.

3 Q Would you have talked to him if you believed he  
4 was going to be testifying?

5 A No, sir.

6 Q Sir, the testimony that you gave yesterday, do  
7 you stand by it?

8 A Absolutely.

9 MR. MULAIRE: May I confer with my co-counsel?

10 THE COURT: Please.

11 (Brief pause in proceedings.)

12 MR. MULAIRE: Your Honor, I guess I could mark  
13 these as a plaintiff's exhibit, but I'd like to show the  
14 witness the records that were provided a little earlier  
15 today.

16 THE COURT: Which ones are those?

17 MR. MULAIRE: I'm sorry?

18 THE COURT: Which ones are those? Are those  
19 the business records?

20 MR. MULAIRE: The time -- yeah. The business  
21 records.

22 THE COURT: If you do, I'm going to let Ms.  
23 Quincy get into it.

24 MR. MULAIRE: I think it's fair to let the  
25 witness see them.

1 THE COURT: No objection then?

2 MS. QUINCY: No objection.

3 THE COURT: So you --

4 MR. MULAIRE: Should we mark these Plaintiff's  
5 exhibits?

6 THE COURT: No. Don't mark them. They're  
7 going to be marked as a defense exhibit, but we'll allow  
8 you to publish them with the understanding that they're  
9 going to be admitted.

10 MR. MULAIRE: Okay. Thank you, Your Honor.

11 I only have one copy. Is there a copy I can  
12 show to the witness?

13 COURTROOM DEPUTY: I can make one.

14 THE COURT: Mr. Mulaire, you can have our copy.

15 BY MR. MULAIRE:

16 Q Sir, could you take a look at the records that  
17 I just handed to you; and when you've had an opportunity  
18 to look through them, just let me know.

19 (Brief pause in proceedings.)

20 A I've reviewed them.

21 Q Okay. Starting with the two pages that --  
22 these two pages. They have "Work Date," "Location,"  
23 "Employee ID" in the first three columns?

24 A Yes, sir.

25 Q First of all, have you ever seen this before

1 today?

2 A No. I have not.

3 Q Now, you see that this indicated -- and may I  
4 publish it to the jury, Your Honor?

5 THE COURT: Yes. On the -- with the  
6 understanding it will be admitted.

7 What's this -- Ms. Quincy, just for the record,  
8 what's this going to be marked as?

9 MS. QUINCY: Your Honor, we will be marking  
10 this entire packet as Defendant's Exhibit 84.

11 THE COURT: Okay. Thank you.

12 (Brief pause in proceedings.)

13 BY MR. MULAIRE:

14 Q First of all, sir, do you happen to recall what  
15 your employee ID number was at Rent-A-Center?

16 A I don't remember what it was.

17 Q If you look at the third column, there's an  
18 employee number listed as 154108. Do you recall if  
19 that's yours?

20 A I don't remember it.

21 Q I take it that that is Defendant's implication  
22 that that is you.

23 With that understanding, do these pay records,  
24 which go up until July 6, 2012, does that reflect your  
25 last day of work at Rent-A-Center?

1 MS. QUINCY: Objection, Your Honor. It  
2 misstates the evidence.

3 THE COURT: Overruled.

4 WITNESS MORELAND: Okay. I'm sorry. Can you  
5 repeat that for me?

6 BY MR. MULAIRE:

7 Q This record appears to contain dates going up  
8 to July 6, 2012.

9 Well, first of all, you have it. Could you  
10 take a look at the, the work date. Do you see any dates  
11 after July 6, 2012?

12 A I do not. Not on this document, no, I do not,  
13 sir.

14 Q Does this doc-- is that correct? Is your last  
15 day at work July 6th?

16 A No. It was not.

17 Q You had additional dates of work after that --

18 A Right.

19 Q -- that are not reflected in this document?

20 A Correct.

21 MR. MULAIRE: These pages are all part of the  
22 same exhibit?

23 MS. QUINCY: Yeah.

24 MR. MULAIRE: Okay.

25

1 BY MR. MULHAIRE:

2 Q Sir, do you have any idea who created the  
3 two-page document you were just looking at?

4 A I mean, I see a name on there.

5 Q Okay. I'm not asking you to read the name.

6 A Okay.

7 Q I'm just saying: You, yourself, do you know  
8 who created that?

9 A No. I do not.

10 Q Do you know how it was created?

11 A No.

12 Q Do you know what system was used to create it?

13 A No.

14 Q Okay. Could you look at the page that has the  
15 little gray box on it.

16 Now, you see this, to, if you look down toward  
17 the bottom, there is a box that says "Termination." And  
18 it says "70612," it looks to me like intended to be a  
19 date.

20 Do you see that?

21 A Yes, sir.

22 Q Do you know who typed that information into  
23 that box?

24 A I do not.

25 Q Did you type it into that box?

1 A I did not.

2 Q Is that correct? Is that your termination  
3 date, July 6, 2012?

4 A I wasn't terminated.

5 Q Fair enough.

6 A No, sir.

7 Q Setting aside that word, --

8 A Okay.

9 Q -- was that the last day that you worked at  
10 Rent-A-Center, July 6th?

11 A No, sir.

12 Q And could you remind us: How is it that you  
13 recall what was your last date, even though it was so  
14 many years ago?

15 A Because I started my new position on my  
16 birthday, which was the following day. From -- my  
17 birthday's July 15th, so the 14th would have been the  
18 last day.

19 Q And, finally, if you could take a look at  
20 the -- looks like a pay stub. Do you have that page?

21 A Yes, sir.

22 Q If you look here up toward the top, what's the  
23 pay period that it indicates?

24 A That's just pay period, June 30, 2012, through  
25 July 6th of 2012.

1 Q And you recalled that yesterday, that July 6th  
2 was the end of the pay period?

3 A Right, yeah.

4 Q Now, is there anything about this document that  
5 changes your recollection that, in fact, your last day  
6 was July 6th and not a week later?

7 A No. No, sir.

8 Q Do you recall being paid for your final week at  
9 work?

10 A I do.

11 MR. MULAIRE: Your Honor, may I have a moment?

12 THE COURT: Uh-huh.

13 (Brief pause in proceedings.)

14 MR. MULAIRE: I will just note for the record  
15 there's some personal information on here, like Social  
16 Security numbers, that we need --

17 THE COURT: Let's redact it before it goes to  
18 the jury.

19 MR. MULAIRE: -- to redact as an exhibit.

20 THE COURT: Thank you. Thank you for noting  
21 that.

22 BY MR. MULAIRE:

23 Q So, just in conclusion, Mr. Moreland, is there  
24 anything about what we've discussed today that changes  
25 any of your testimony from yesterday?

1 A It is just concerning that it says July 6th.

2 Q Okay.

3 A But that doesn't change me. No, sir.

4 Q Okay. And I'm just asking you: In your mind,  
5 looking back on it, is there anything that was false  
6 about your testimony yesterday?

7 A No.

8 Q Do you believe the records that I just showed  
9 you are mistaken?

10 A I --

11 Q Well, let me --

12 A I don't know.

13 Q Let me withdraw that question.

14 Was July 6th your last day at work?

15 A No.

16 Q Or was it a week later?

17 A It was a week later.

18 MR. MULAIRE: Okay. Thank you. No other  
19 questions at this time.

20 THE COURT: Ms. Quincy.

21 REDIRECT EXAMINATION BY MS. QUINCY:

22 Q You had some trouble remembering when your last  
23 day was, right?

24 A I remembered my last day pretty fondly.

25 MS. QUINCY: Your Honor, may I approach?

1 THE COURT: Yes.

2 BY MS. QUINCY:

3 Q Sir, this was six years ago, right?

4 A Yes, ma'am.

5 Q And you've had a lot happen in your life in the  
6 intervening six years?

7 A Absolutely.

8 Q You reached out to Mr. Harding -- actually, a  
9 couple of weeks ago, it looks like -- because you didn't  
10 even remember what year --

11 A And --

12 Q -- you left Rent-A-Center, right?

13 A -- I was incorrect on that. Yes, ma'am. You  
14 are correct.

15 Q And you signed a declaration saying that you  
16 actually had left Rent-A-Center in 2013?

17 A That is correct.

18 Q It's really possible that dates six years  
19 ago -- it's hard to remember; would you agree with that?

20 A I would -- and can I add something, not  
21 necessarily pertaining to what I did with R.J.?

22 Sorry. This is a little personal. The reason  
23 I did have the dates mixed up -- the 12th and 13th -- is  
24 the 13th was a really rough year. I had a son that died,  
25 and the 13th was a blur. And it's been kind of, just

1 getting back to normal since then; you know, as normal as  
2 you can.

3 Q Right.

4 A So I think maybe that's why I was thinking  
5 2013. I, I admit it was just a really cruddy year.

6 Q And I'm really sorry for your loss, and I know  
7 you have gone through a lot of things.

8 A Yeah.

9 Q I only want to direct your attention to two  
10 documents --

11 A Yes, ma'am.

12 Q -- that counsel showed you. And I will  
13 represent -- and you will hear from -- you won't hear,  
14 but everyone else will hear from another witness that  
15 Rent-A-Center records all indicate your last day was the  
16 same last day as R.J. Harding.

17 If you would look at the check that's in front  
18 of you, the one with the gray box -- Your Honor,  
19 permission to publish?

20 Sir, this is the only one you would have  
21 seen -- you didn't have access to HR records?

22 A No. I did not.

23 Q And you certainly don't right now?

24 A No.

25 Q This is the only one you would have seen.

1 Rent-A-Center's records indicate this is the last check  
2 you received from Rent-A-Center.

3 It's dated July 10th because that would have  
4 been the check after the 6th when you worked. That  
5 doesn't trigger your memory at all?

6 A I remember the check being higher than normal.

7 Q Was this higher than normal, 859.07?

8 A It was. And I actually did go to the store  
9 when I got this check, which --

10 Q Could this --

11 A Maybe I was wrong on my days. I'm sorry. It  
12 was not intentional.

13 Q Could it have been that this was your last  
14 check, and you got paid out your vacation --

15 A No.

16 Q Sir, it's fine.

17 A I specifically remember that. That's why I  
18 went back and, like, "Whoa, this check is too high. Can  
19 somebody give me an explanation?" And then I got told by  
20 an employee there that there was earned vacation time  
21 that was accrued that got paid.

22 Q And does that help your memory that your last  
23 day working was actually July 6th?

24 A [No response.]

25 Q And, sir, if you don't remember, it's fine just

1 to say that.

2 A I mean, I know I started my new position on my  
3 birthday. And I know I wouldn't have went a week without  
4 employment. I know that for sure. But it's got me  
5 confused.

6 Q Yeah. And maybe because your check was a  
7 little higher and you were surprised by that; you could  
8 not start or something -- I don't know, but --

9 A Maybe I don't --

10 Q -- it's a little foggy?

11 A It's got me confused.

12 Q It was --

13 A Not intentional. I just want to put that out  
14 there.

15 Q Yeah.

16 A I would never lie. Okay?

17 Q And it was six years ago?

18 A Right.

19 Q And there have been a lot of things that  
20 happened in your personal life between then and now?

21 A Yes, ma'am.

22 MS. QUINCY: Your Honor, we don't have any  
23 other questions for this witness.

24 Thank you very much for coming back, Mr.  
25 Moreland.

1 THE COURT: Mr. Mulaire, anything further?

2 MR. MULAIRE: Just one follow-up, Your Honor.

3 THE COURT: All right. Keep it within Ms.

4 Quincy's scope.

5 RE CROSS-EXAMINATION BY MR. MULAIRE:

6 Q Sir, is your best recollection you worked at

7 Rent-A-Center up until the day or so before your

8 birthday?

9 A I thought so.

10 MR. MULAIRE: Thank you. No further questions.

11 THE COURT: You may step down. You may step

12 down.

13 WITNESS MORELAND: Papers?

14 THE COURT: Just leave it all there.

15 WITNESS MORELAND: This one is evidence.

16 THE COURT: Yeah. Just leave it all there.

17 WITNESS MORELAND: Thank you.

18 THE COURT: Thank you for coming back.

19 WITNESS MORELAND: I just -- I apologize.

20 THE COURT: No, you can't.

21 WITNESS MORELAND: I did not mean to cause

22 any --

23 THE COURT: You can't, you can't -- but thank

24 you. It's okay.

25 (Witness Moreland excused, 10:45 a.m.)

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REPORTER'S CERTIFICATE

I, LISA KNIGHT COSIMINI, RMR-CRR, hereby certify that the foregoing is a correct transcript from the record of proceedings in the above-entitled matter.

Dated this 31st day of May, 2018.

s/Lisa Knight Cosimini

Lisa Knight Cosimini, RMR-CRR  
Illinois License # 084-002998