

1 Q. So you don't have any information about how  
2 it was disseminated?

3 A. No, ma'am. I don't even have information if  
4 it was ever finalized and put out.

5 MS. LAPORTE: Sorry. We might trouble you  
6 with one more document here.

7 (Pause in proceedings.)

8 MS. LAPORTE: I think that's the last  
9 remaining thing that we can ask. So we can take a  
10 break until the last document that we're preparing as  
11 an exhibit comes in.

12 (A discussion was held off the record.)

13 (Deposition Exhibit 40 was marked for  
14 identification.)

15 BY MS. LAPORTE:

16 Q. All right, Ms. Soper. Exhibit 40 is a  
17 document that is actually very hard to read the Bates  
18 numbers on because it's gotten cut off. So I'll  
19 identify it by -- or ask you to identify it, actually.  
20 Can you tell what this document is, Exhibit 40?

21 A. Yes, ma'am. It's an E-mail from  
22 Major McWhorter to several individuals asking for --  
23 to provide some of the response to the requested  
24 answers.

25 Q. Okay. And so if you look at -- it's an

1 E-mail chain; right?

2 A. Right. Right.

3 Q. And so if you read it from the back, this  
4 person, Atanasoff, Kate Atanasoff --

5 A. Yes, ma'am.

6 Q. -- is requesting some assistance in answering  
7 the questions --

8 A. Correct.

9 Q. -- attached questions on transgender policy  
10 for public affairs guidance as it pertains to  
11 Air Force recruiting. Do you see that?

12 A. Yes, ma'am.

13 Q. And those questions are the ones that we  
14 looked at in Exhibit 39; correct?

15 A. Uh-huh.

16 Q. So you got involved, and in the second  
17 message on the first page of the exhibit indicated  
18 that you wanted to request some inputs from various  
19 people on the attached questions from the recruiters  
20 regarding transgender accessions. Do you see that?

21 A. Yes.

22 Q. And you said you would compile the responses  
23 and send them in and "cc" everybody; right?

24 A. Yes.

25 Q. So did you actually end up receiving

1 responses from people?

2 A. Yes, ma'am.

3 Q. And did you compile them?

4 A. Yes, ma'am.

5 Q. And send them in?

6 A. Yes, ma'am.

7 Q. Okay. So -- all right. So somewhere there's  
8 a document that contains not only these questions but  
9 also the answers?

10 A. Correct.

11 Q. And they're answers you helped to compile?

12 A. Correct.

13 MS. LAPORTE: Okay. I think that that's all  
14 the questions we have.

15 MR. PARKER: We have nothing on redirect.

16 MS. LAPORTE: Okay.

17 Read and sign.

18 (Witness excused.)

19 (Deposition concluded at 4:57 p.m.)  
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C E R T I F I C A T E

I do hereby certify that the aforesaid testimony was taken before me, pursuant to notice, at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth, and nothing but the truth; that the testimony of said deponent was correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the deposition is a true and correct record of the testimony given by the witness; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.



Nancy J. Martin, RMR, CSR

Dated: February 5, 2018

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying shorthand reporter.)