

Nicholas [Name]

March 31, 2026

Page: line	Summary	Subject
Examination by Mr. [Attorney]:		
3:23-8:7	Mr. [Name] had never had his deposition taken before. He was not under the influence of alcohol or medication that could affect his testimony. He prepared for the deposition by speaking with Attorney [Attorney Name] by phone for approximately 30 minutes the day before.	Deposition preparation
8:16-10:23	Mr. [Name] did not review any documents in preparation other than the written statement he had sent to his boss, Rhoda [Manager], via email, which he reviewed during the phone call with Attorney [Name]. He was aware that [Colleague Name] also provided a written statement but never reviewed it and never discussed it with Mr. [Colleague]. No one other than his attorneys had spoken to him about his own statement.	Statements and documents reviewed
11:2-12:23	Mr. [Name] attended a private school called [School Name] in [City, State], graduating in June 2003. He had no further education beyond a high school diploma. He began working at the [Hotel Name] in [City] at the end of January 2024 and was hired by Maii [Supervisor] for the position of driver/houseman.	Education and employment history
12:24-14:18	The driver role involved picking up guests from the airport, and the houseman role involved various hotel tasks such as emptying garbage, checking bathrooms, ensuring the fitness center was stocked, and keeping common areas clean. When first hired, Mr. [Name] worked part-time on Friday evenings, Saturday evenings, and Sunday late afternoons around 3:00 or 4:00 p.m.	Job duties and initial schedule
14:19-17:16	Mr. [Name] did not report to anyone directly; he would clock in, retrieve the van key and his badge, check the van mileage, complete the vehicle checklist, and proceed through a typed checklist of tasks. There were separate checklists for the AM and PM shifts. All employee schedules, including driver names and hours, were posted on the wall. He was hired as a part-time employee.	Daily work routine
17:17-20:15	Mr. [Name] completed various training modules through the the hotel management platform platform, abbreviated the platform. There were several modules, and each required passing a quiz upon completion. Training topics included sexual harassment, front desk safety, human trafficking, and other subjects. All [Hotel Name] employees were required to complete the same training modules.	Marriott training modules
20:16-23:22	Mr. [Name] could not recall a specific module on safety but believed one existed. He still had access to the training modules. Beyond the the platform modules, his training consisted of a hotel tour and being observed during airport pickups. His current hours were 5:00 p.m. to 11:30 p.m. on Saturdays and Sundays, and he was sometimes called in during the week if another	Additional training and current hours

	driver did not show up. Busier weekends could require an earlier start at 3:00 or 3:15 p.m.	
23:23-26:20	Mr. [Name]'s supervisors were front desk supervisor Edward [Supervisor], assistant general manager Maii [Supervisor], and general manager Rhoda [Manager]. His job duties had not changed since January 2024. On May 22, 2025, the date of the incident, he clocked out at 11:35 p.m. He could not recall his exact start time but estimated it was between 5:00 p.m. and 6:30 p.m. May 22 was a Thursday.	Supervisors and incident day schedule
26:21-28:7	Mr. [Name] clocked in and performed his normal tasks that day. He had no specific recollection of events that day apart from his involvement in the incident. His only record was the written statement he had in front of him, and he had no other recollection beyond what was in that paper. Exhibit 1, Mr. [Name]'s written statement regarding the May 22 incident, was marked for identification.	Recollection of incident day and Exhibit 1 marked
28:8-30:13	The statement was titled "May 22 incident," authored by Mr. [Name] from his personal email [EMAIL REDACTED], dated May 29, 2025, at 5:08, and sent to general manager Rhoda [Manager]. The document was a true and correct copy of the email he sent on that date.	Exhibit 1 identification
30:14-32:4	Mr. [Name] did not recall having a conversation with Ms. [Manager] before preparing the statement. She instructed him in person on Thursday, May 29, right after he clocked in, to write a statement of what happened and email it to her. She provided no other information beyond requesting the statement. Everything in the statement was true and correct, with no additional conversations unaccounted for.	Statement preparation circumstances
32:5-34:24	At 11:10 p.m. on May 22, Mr. [Name] was about to leave when he saw a fire truck arrive with sirens. He went outside and the firefighters already knew they were going to room 124. He directed them to the 100 hallway, instructing them to make a right at the exit sign. He did not accompany them to the room. A few minutes later, an ambulance arrived and he provided the same directions, again not going to the room himself. He had no conversations with the firefighters or paramedics beyond giving directions.	Emergency responder arrival
35:1-37:12	Mr. [Name] had no conversations with anyone at the hotel after directing the firefighters and paramedics. The hotel staff were all surprised because no 911 call had come through the front desk. Typically, 911 calls would route through the front desk, so they assumed the guest used a cell phone. Two police officers then arrived, and Mr. [Name] directed them in the same manner as the others. He had no conversations with the police officers.	No front desk 911 call received
37:24-40:15	At the time of the incident, either [Colleague Name] or night auditor [Night Auditor] was at the front desk. Mr. [Name] was standing by the front desk when emergency responders arrived. Security officer [Security Officer]'s shift was from 11:00 p.m. to 7:00 a.m., and Mr. [Name] believed [Security Officer] had already clocked in. He saw [Security Officer] clock in but did not know [Security Officer]'s exact location in the hotel during the incident.	Front desk and security personnel

40:16-43:25	Making an incident report was part of hotel policy for the security officer. [Security Officer] went down to room 124 after the firefighters arrived to make a report. Mr. [Name] called [Security Officer] from his car after clocking out, and [Security Officer] told him the guest was complaining of chest pain and had high blood pressure. Mr. [Name] did not know how [Security Officer] obtained that information but speculated [Security Officer] may have learned it from being at the room or from conversations with firefighters or paramedics. Mr. [Name] expressed sympathy, then hung up and went home.	[Security Officer]'s report and phone call
44:1-44:2	Exhibit 2, [Colleague Name]'s written statement, was marked for identification.	Exhibit 2 marked
44:3-47:13	Mr. [Name] reviewed [Colleague Name]'s statement, which described Mr. [Name] going outside to ask the firemen what happened and a fireman telling him a 911 call originated from room 124 for severe chest pain. Mr. [Name] did not recall a firefighter telling him about chest pain or the 911 call origin. He stated there was no stopping to have a conversation, he was simply directing them to the hallway. He confirmed that if a firefighter had told him about severe chest pain, he would have remembered and included it in his own statement.	[Colleague] statement discrepancies
47:14-49:24	Mr. [Name] confirmed he pointed the emergency responders down the hallway but denied going with the firemen to open room 124 with his key, and stated that detail in Mr. [Colleague]'s statement was not accurate. He was not aware of Anthony going to the back office to inform [Security Officer]. He confirmed directing the ambulance and police to the hallway, returning to the front desk, and then gathering his personal belongings before heading outside. Kenneth was the night auditor and [Security Officer] was the security guard on duty.	[Colleague] statement review continued
49:25-53:15	Mr. [Name] was never told the details of what happened to the guest apart from the chest pain and high blood pressure information from [Security Officer]. He was not told about a heart attack or burns from scalding water. He first learned about the hot water from a news article and was shocked because it differed from what he understood had happened. [Colleague Name] later told him news crews had come to the hotel asking questions during days when Mr. [Name] was not working, as he did not work Monday through Friday. He never went back to ask coworkers about the hot water allegations.	Knowledge of the guest's death
53:16-55:24	A break was taken at 11:31 a.m., and the deposition resumed at 11:37 a.m. Attorney [Attorney] had no further questions. Attorney [Name] confirmed he would produce Mr. [Colleague] and Mr. [Name] for trial without subpoena. Attorney [Name] had no questions.	Deposition conclusion

END OF DEPOSITION