

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

<p>OTIS L. STORY, SR.,</p> <p>Plaintiff,</p> <p>vs.</p> <p>PAMELA STEPHENSON and THE FULTON-DEKALB HOSPITAL AUTHORITY,</p> <p>Defendants.</p>	<p>CIVIL ACTION</p> <p>FILE NO. 2008-CV-150333</p>
---	--

DEPOSITION OF
DANIEL COPELAND

Tuesday, May 13, 2008

2:00 p.m.

Suite 2000 One Atlantic Center
1201 West Peachtree Street
Atlanta, Georgia

Renda Cornick, RPR, CCR-B-909



JPA REPORTING, LLC

CERTIFIED COURT REPORTERS

404-853-1811 1-888-947-2963

1 Q. Have you discussed this litigation with
2 Mr. Brown?

3 A. No, sir.

4 Q. Now, when did you first meet Mr. Story?

5 A. I can't recall the date, but the first
6 time we met was at church one Sunday.

7 Q. Okay.

8 A. I am a member of Cascade United Methodist
9 Church and also member of, attend another church
10 called Impact. I seen him at Cascade, first time I
11 shook his hand, he was at Impact Church one Sunday.

12 Q. When was the first time you can recall
13 where you had a conversation or talked with Mr. Story?

14 A. I can recall the date at the church, we
15 had a conversation and I can recall the next time we
16 had a conversation was we talked on the phone the
17 following day about his problem. Then I think the
18 next couple of days we had a conversation, but I
19 invited him out to a golf tournament.

20 I said, I am really busy, why don't you
21 come and play 18 holes of golf with us. I invited him
22 like that. That's how he came along with us.

23 Q. The conversation, try to walk through
24 them, at church was that general pleasantries or was
25 there something in that conversation that related to

1 Mr. Story's termination from Grady or any
2 conversations he had with regard to Ms. Stephenson's
3 role with that?

4 A. No. It was just hi, how are you.

5 Q. Pleasantries?

6 A. Yes.

7 Q. You said you had a phone call the next
8 day. Did you call him?

9 A. I think he called me. I didn't have his
10 number.

11 Q. Why was he calling you?

12 A. I don't know. He just called me
13 because -- he called me regarding a conversation we
14 had there in church and asked me how -- I said there
15 is a way I might be able to help him as a lobbyist.
16 We discussed that.

17 Q. You mentioned you might be able to help
18 him in reference to the dispute he had with Grady and
19 Ms. Stephenson?

20 A. No. It was with the board. I said, why
21 don't you put this fire out. You ever think about
22 just putting the fire out; since you have been
23 terminated, you ever think about putting the fire out,
24 leaving in good standards. I said, we would be
25 willing to go to the board and ask the members of the

1 you the rest of the year, would you be willing to do
2 that. That's how this came up.

3 Q. Would this have been written shortly after
4 you and Mr. Story spoke at the Cascade church when you
5 mentioned you might be able to help him?

6 A. No. I think it was written probably
7 about, I don't know, a week later, two weeks later.

8 Q. So maybe you all spoke first of May, this
9 came out May 14th, something in that timeline?

10 A. I think we met twice.

11 Q. During the May 1 to May 14 period?

12 A. Yes. We met twice.

13 Q. You are counting Cascade church meet --

14 A. No, Starbucks and Cascade.

15 Q. Those are the two meetings?

16 A. Yes, outside the church.

17 Q. Then your fee would be 20 percent of the
18 severance money paid.

19 A. Yes. He agreed.

20 Q. So it was your understanding that at this
21 point in time Mr. Story was deciding whether to just
22 go with sort of a local effort through you to settle
23 it or to hire an attorney.

24 A. To my knowledge, he didn't want to hire
25 attorneys; he wanted to get the board members to offer

1 him something. That was what the deal was, lobby the
2 board members and ask the board members.

3 Q. Do you recall that you placed phone calls
4 to Mr. Richard Sinkfield who was representing the
5 authority at the time to discuss this as well as
6 placing a call to me to discuss the feasibility to get
7 involved?

8 A. I never made a phone call to you. I made
9 a phone call to you once, it was after he hired you.
10 I said there was a possible chance that he didn't have
11 to have an attorney.

12 Q. Right.

13 A. You said no, stated the reason why. And I
14 have a copy of the ethics board saying it is okay to
15 lobby local board members.

16 Q. You have a copy of what?

17 A. I have a copy from the state ethics
18 committee saying it was okay, advised the opinion, it
19 was okay to lobby the board members for this matter.
20 He hired you, we dropped out. All this took place
21 after the golf tournament, when he found out. There
22 is another part of the opinion.

23 Q. Okay. You are saying -- you said a lot of
24 things. I have to get it straight. Maybe at a break
25 we can look at your documents so she can make one set

1 of copies rather than going back and forth. Let's
2 finish this first. When you wrote this May 14th
3 proposal, this is before the golf tournament?

4 A. No. After the golf tournament.

5 Q. After the golf tournament?

6 A. To my knowledge.

7 Q. And at either the Cascade church meeting
8 or the Starbucks meeting you talked about, did
9 Mr. Story then explain to you what his allegations
10 were?

11 A. No, he didn't. He just said to me he just
12 wanted a severance package, get paid, move on. He was
13 looking places for other jobs. That was my
14 understanding from Mr. Story.

15 Q. Were you aware of ongoing publicity during
16 this period of time about Mr. Story's allegations that
17 were set forth in his lawsuit that was in the
18 newspaper?

19 A. That happened after all of this.

20 Q. Are you sure?

21 A. I am quite sure. There was one thing with
22 the termination, we had a conversation at Starbucks
23 regarding the termination. It was more of a
24 conversation between African-Americans in the sense
25 of, Otis, we don't need this in the community, some of

1 the leaders don't think it is a nice thing you guys
2 are fighting, Grady is a large hospital; that's where
3 the conversation came up at. Even Otis is aware of
4 that. We discussed that day that there was other
5 people in the community that was not satisfied with
6 the fighting.

7 Q. When you made your proposal, then I take
8 it you were at least of the impression that there was
9 not a lawyer hired nor was there a lawsuit filed?

10 A. I was informed there wasn't. Otis
11 informed me. That's where we came up with the idea, I
12 said why don't you try to settle.

13 Q. As someone who works in government
14 lobbies, I take it you would be a reader of local
15 newspapers and watch TV?

16 A. Yes.

17 Q. Now, did you talk with Ms. Stephenson, did
18 she encourage you to attend this deposition?

19 A. Not to my knowledge, no, she didn't. We
20 had a conversation.

21 Q. Tell me about the conversation.

22 A. We just said hi to each other, there was a
23 Democratic party had last night. As a lobbyist, I run
24 into Pam quite often. It was hi, how are you, how you
25 doing, stuff like that. I was aware of this, I did

1 Q. Is the golf tournament the only time you
2 heard Mr. Story say anything that you believe to be
3 defamatory or critical of Ms. Stephenson?

4 A. No. He said it during Starbucks, the
5 meetings at Starbucks.

6 Q. Was that in relationship to what he
7 contended she did or the board did in terminating him?

8 A. He pointed a finger at Ms. Stephenson.

9 Q. What did he say?

10 A. He said she was out to get him, she was
11 totally unprofessional, that the day of the golf
12 tournament -- most of the stuff I can recall was the
13 day of the golf tournament.

14 Q. Tell me what you recall him saying about
15 Ms. Stephenson.

16 A. There was an autocratic statements. You
17 know it was really -- two ladies in the room, you know
18 that bitch ain't -- that kind of bitch tried to
19 destroy me, that bitch tried to destroy me, and stuff
20 like that.

21 Q. Tell me everything you can recall.

22 A. I just remember him saying, that bitch
23 tried to destroy me.

24 Q. Destroy me meaning Mr. Story?

25 A. Yeah, Mr. Story.

1 And trying to think what else he said that
2 day. She was no good.

3 Q. Okay.

4 A. She was no good. I mean, that's all I can
5 remember right now. It went on at least nine or 12
6 holes. It got worse by the 17th hole.

7 Q. Just repeating the same things?

8 A. Yeah, some of the same things.

9 Q. Is that all you can recall, she tried to
10 destroy him, she was no good?

11 A. She took his dinner away from him the
12 night they fired him.

13 Q. Took his dinner away?

14 A. They fired him and took his dinner away.

15 Q. Could it have been they fired him at
16 dinner?

17 A. Fired at dinner. He didn't get to eat the
18 food, that B wouldn't let me eat my own food. That
19 lowdown B wouldn't let me eat the food. I was like,
20 Otis, hold it down.

21 I can't remember the fourth guy playing
22 golf with us. I was more embarrassed he came out and
23 said those things there.

24 Like I said again, Mr. Parks, there was
25 alcohol there, there was cocktails about every two

1 honest, up front, as a hard worker.

2 MR. PARKS: That's all I have got. Thank
3 you, Mr. Copeland.

4 MR. JOHNSON: Take a break.

5 (Recess from 3:16 p.m. to 3:29 p.m.)

6 MR. PARKS: I have one more question. I
7 can do it after yours or before it.

8 MR. JOHNSON: (Indicating).

9 Q. (By Mr. Parks) Mr. Copeland, I realize
10 you said you couldn't recall time or place but in any
11 conversations you had with Ms. Stephenson after the
12 golf tournament, did you ever tell her you were there
13 representing Mr. Story in an attempt to settle the
14 dispute?

15 A. Never. Not to my knowledge, never.

16 EXAMINATION

17 BY MR. JOHNSON:

18 Q. Mr. Copeland, I am Charles Johnson. We
19 have spoken before. I represent Ms. Stephenson. I
20 have one or two questions for you.

21 In any of your conversations with
22 Mr. Story do you recall whether in any of those
23 conversations he indicated that he thought that Ms.
24 Stephenson wanted to sleep with him?

25 A. As I recall on the golf course, that came

1 up in some kind of way but it wasn't -- maybe had a
2 crush on him, Ms. Stephenson had a crush on him. I
3 think it came up in the conversation. I remember the
4 conversation on the golf course.

5 Q. So Mr. Story indicated that he thought Ms.
6 Stephenson was interested in him in something other
7 than a professional way.

8 A. Yeah, something like that. It came up in
9 a conversation. I am trying to think back. It is a
10 long time. I am not for sure, if he wanted to sleep
11 with her. I know she didn't want to sleep with him.
12 I just knew that. It would have to have been if he
13 had a chance he could have or something like that. He
14 never came out and said she wanted to sleep with him
15 to me, never.

16 Q. But the subject came up?

17 A. It came up that somebody had a crush on
18 somebody. He had a crush on her or something like
19 that. I do remember that. I can recall that
20 conversation. And there again, Mr. Johnson, he was
21 drinking that day and he was just -- he was talking.

22 Q. Just want to make sure. Your impression
23 from what he said was he thought somebody was
24 interested in somebody.

25 A. Yeah.

1 Q. And I am trying to understand from what
2 you understood him to say, who did he think was
3 interested in whom.

4 A. I don't know. But I know he said
5 something about he could get after her if he wanted
6 to. I remember him saying stuff like that. I
7 remember him saying that day out in the conversation,
8 I could F the B if I wanted to, something like that.

9 I was like, man, Pam, isn't she married,
10 Pam, Pam is married. That was it. I didn't pay any
11 attention to the conversation. I didn't pursue it. I
12 didn't (indicating). I thought he was blowing off
13 steam.

14 MR. JOHNSON: I don't have any other
15 questions.

16 RE-EXAMINATION

17 BY MR. PARKS:

18 Q. Mr. Copeland, you never told that to Ms.
19 Stephenson, did you?

20 A. I think I was so embarrassed --

21 Q. Answer the question. You never told that
22 to her, did you?

23 A. I don't know if I might have told someone
24 else. I can't recall. But I don't think I
25 personally --

1 Q. Did you tell anyone?

2 A. I did tell some people.

3 Q. Who?

4 A. I just recall the name. There again, I
5 mentioned earlier, Oliver Brown and I did have a
6 discussion, I remember that. I think I might have
7 bounced it off of Oliver. I am not for sure. I don't
8 know for sure. But that conversation did -- I think I
9 was so shocked, I was just shocked.

10 Q. Why didn't you remember that when I asked
11 you to tell me everything about what was said?

12 A. You know, I am sitting here now, you asked
13 me a question earlier --

14 Q. Just answer that question.

15 A. Because it didn't pop up to me. It
16 didn't -- it is coming back to me now. This happened
17 a long time ago, Mr. Parks.

18 Q. You forgot?

19 A. Did I forget that part, no. There is
20 something else I forgot. I forgot during the golf
21 tournament, he is talking about, when he was playing
22 golf, drinking, you know, I remember him saying I will
23 destroy that bitch, I am going to destroy all of them.

24 I remember a conversation when he hired
25 you I didn't bring up. He said to me one time, he

1 said, I remember the conversation, Dan, I am hiring
2 this guy named Lee Parks, I am paying \$30,000, we are
3 going to sue all the MF down there, I am going to
4 destroy this town. I didn't bring that up. It is
5 coming back to me now.

6 Q. Did you tell that to Ms. Stephenson?

7 A. I might have told Oliver that.

8 Q. I asked Ms. Stephenson because I have her
9 deposition, she doesn't recall any of that.

10 A. I can't recall telling her. I can't. I
11 don't remember having that -- I was so embarrassed. I
12 was so embarrassed of the behavior that day. I could
13 have told Oliver Brown in a conversation. I am not
14 for sure.

15 MR. PARKS: Thank you.

16 MR. JOHNSON: Thank you.

17 (Deposition concluded at 3:35 p.m.)

18 (Pursuant to Rule 30(e) of the Federal
19 Rules of Civil Procedure and/or O.C.G.A.

20 9-11-30(e), signature of the witness has been
21 reserved.)
22
23
24
25