

IN THE U.S. DISTRICT COURT FOR THE DISTRICT OF MARYLAND

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NATALIA TCHESKIDOVA	:
	:
Plaintiff,	:
	:
v.	: Case No. 1:07-CV-00091-AMD
	:
ITT FEDERAL SERVICES	:
	:
Defendant.	:
-----X	:

Wednesday, December 12, 2007

Bethesda Maryland

Deposition of

EDWIN SHOCKNEY (via telephone)

defendant, called for examination by counsel for plaintiff, pursuant to notice, at the offices of Lippman, Semsker & Salb, 7979 Old Georgetown Road, Suite 510, Bethesda, Maryland 20814, beginning at 12:33 p.m., before Donna J. Escobar, a notary public of the State of Maryland, when were present on behalf of the respective parties:



For the Plaintiff:

GWEN D'SOUSA, ESQ.
MICAH SALB, ESQ.
LIPPMAN, SEMSKER & SALB
7979 Old Georgetown Road, Suite 510
Bethesda, Maryland 20814

For the Defendant:

STEPHEN ROBINSON, ESQ.
McGUIRE WOODS, LLP
7 St. Paul Street, Suite 1000
Baltimore, Maryland 21202-1671

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C O N T E N T S

WITNESS:	EXAMINATION BY COUNSEL FOR PLAINTIFF:
Edwin Shockney	3

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E X H I B I T S

EXHIBIT NO.	MARKED FOR IDENTIFICATION
Deposition Exhibit No. 1	19
Deposition Exhibit No. 2	21

1 P R O C E E D I N G S

2 WHEREUPON,

3 EDWIN SHOCKNEY

4 having been called for examination by counsel for plaintiff,
5 and having been first duly sworn by the notary, was examined
6 and testified as follows:

7 EXAMINATION BY COUNSEL FOR PLAINTIFF:

8 BY MS. D'SOUSA:

9 Q Can you please state your name?

10 A Edwin, E-D-W-I-N, Allen, A-L-L-E-N, Shockney,
11 S-H-O-C-K-N-E-Y.

12 Q Dr. Shockney, what is your address?

13 A My address is 1115 Elkton, E-L-K-T-O-N, Drive, Suite
14 107, Colorado Spring, Colorado 80907.

15 Q What is your current occupation?

16 A I'm a CEO of Shockney and Associates, Inc.

17 Q What is Shockney and -- what services does Shockney
18 and Associates perform?

19 A It is a behavioral health private practice and
20 consulting group.

21 Q What is your education?

22 A Undergraduate education was done at Ball State
23 University, Indiana University, State University of New York,
24 Crossroads College. Masters level was done at Crossroads
25 College of Divinity. Graduate school was done at, the Ph.D.

1 at Borean College and graduate school.

2 I hold a B.A. in humanities, pre-medicine, an M.A.
3 in counseling psychology, a Ph.D. in counseling psychology
4 with political emphasis. I am board certified as a pain
5 management trauma specialist. I'm licensed by the State of
6 Colorado. I'm stipulated as an expert witness in State,
7 Federal, and Military Courts.

8 MR. ROBINSON: Are you still there?

9 BY MS. D'SOUSA:

10 Q What's the number of employees in your company?

11 A Seven, but we also have the consultants which could
12 comprise as high as 10 additional consultants.

13 Q Are you presently retained by ITT Services, Inc.,
14 ITT Federal Services?

15 MR. ROBINSON: Objection to the form of the
16 question. He can answer it.

17 THE WITNESS: I'm not retained. They order work
18 through us, but we do not have a contract with them.

19 BY MS. D'SOUSA:

20 Q How long have you done contract work for ITT?

21 A I don't have a contract with ITT, but we've been
22 doing work for them since the year 2000, to my recollection.

23 Q Are you paid for the work you perform?

24 A Yes.

25 MR. ROBINSON: Objection to form but you can answer

1 Q Are you familiar with Natalia Tcheskidova?

2 A I'm familiar with the name.

3 Q All right. What do you know of Natalia Tcheskidova?

4 A I don't understand the question.

5 Q You are familiar with the name of Natalia
6 Tcheskidova?

7 A I have never met this lady. I am familiar with her
8 and data relating to her.

9 Q How --

10 A I'm sorry?

11 Q How did you become familiar with Natalia Tcheskidova
12 although you never met her?

13 A I was contacted by the ITT group and asked to
14 consult on a situation with Ms. Tcheskidova.

15 Q And what did they ask, what type of information were
16 they asking you to -- what type of service were they asking
17 you to perform?

18 A They asked our group to review communication with
19 Ms. Tcheskidova.

20 Q When you say your group, who did this group
21 comprise?

22 A It comprised, it is comprised or was in 2005 of a
23 psychiatrist, a board certified psychiatrist, a licensed
24 vocational consultant. We also had within that group a
25 clinical neuro-psychologist and I believe one other behavioral

1 MS. D'SOUSA: What's the basis of the objection in
2 the form?

3 MR. ROBINSON: That the word complaint is awfully
4 ambiguous and I just want to protect the record.

5 MS. D'SOUSA: Okay.

6 MR. ROBINSON: I think Rule 30 allows me to do that
7 pretty clearly.

8 BY MS. D'SOUSA:

9 Q Okay. I'm going to keep the question as it was.
10 Were you aware of any written complaints by Natalia
11 Tcheskidova?

12 A I did not view any written complaints by Natalia
13 Tcheskidova.

14 Q Did you review any documentation directed to Angela
15 Carrigan from Natalia Tcheskidova?

16 A I don't recall any communication with Angela
17 Carrigan and Ms. Tcheskidova.

18 Q Did you review any communication between Natalia
19 Tcheskidova and Elida Lake?

20 A I only reviewed the communication, the email
21 communication, the compilation of email communication.

22 Q Did you, I don't believe you answered the question.
23 The question was, did you review any email correspondence
24 between Elida Lake and Natalia Tcheskidova?

25 A If Elida Lake was one of the communicants inside

1 Q Okay. Reviewing your, you have in front of you an
2 email dated August 3rd, 2005. Based on that email, when did
3 you speak with Ms. Tcheskidova?

4 A Earlier that morning.

5 Q Was she confrontational with you?

6 MR. ROBINSON: Objection to form. He can answer it.

7 THE WITNESS: No.

8 BY MS. D'SOUSA:

9 Q Did she discuss with you as to what her perceived
10 problems were with ITT?

11 A Yes.

12 Q What did she state were her perceived problems?

13 A According to my note, because I have to go off the
14 note, illegal activities, physical harm, threats, perception
15 of being deceived by ITT.

16 Q Did she mention to you anything about not receiving
17 a bonus from ITT?

18 A I don't recall any conversation about any bonus or
19 any financial aspects at all.

20 Q Did she mention to you anything about complaints of
21 coworkers about illegal activity?

22 A I have no recollection of anything of that nature.

23 Q Did you ask her for, to provide any basis of the
24 statements that she was making?

25 A No, ma'am.

1 Q Why didn't you?

2 A That was not my job. My job was to create rapport
3 and then make a recommendation as to how Ms. Tcheskidova
4 could be better evaluated, and to examine the situation from a
5 mental/emotional health perspective by either a member of my
6 team or another provider.

7 Q What did you identify as Ms. Tcheskidova's symptoms?

8 A Well, symptoms are not identified by a practitioner.
9 Symptoms are reported by an individual. Sometimes the term is
10 used loosely, but concerns would be a better description of
11 what was identified.

12 Q What did you identify as the concerns?

13 A There seemed to be a lot of what we would term
14 loosely paranoia or speculative thinking, possibly hyper-
15 vigilance, some persecution and just a pattern of rambling
16 accusational verbiage that sometimes can be interpreted as
17 falling into the category of abnormal mental/emotional
18 function.

19 Q Based on your interview, did you determine that she
20 was paranoid?

21 MR. ROBINSON: Objection to form. You can answer it.

22 THE WITNESS: First of all, I didn't conduct a
23 clinical interview, and I didn't determine she was paranoid.

24 BY MS. D'SOUSA:

25 Q What was the conclusion you reached?

1 A I have no knowledge of it other than a comment made
2 that she had a history of being a good worker for ITT.

3 Q And how did you receive that information?

4 A I don't recall. It must have been in the
5 communication, the long communication. I'm speculating on
6 that. I don't remember how I was advised of that.

7 Q Were you aware that Ms. Tcheskidova was on vacation
8 in August 2005?

9 A I have no knowledge about Ms. Tcheskidova's vacation
10 schedule.

11 Q Were you aware that Dr. Sher was recommended to call
12 Ms. Tcheskidova?

13 A I am aware that Dr. Sher's, Dr. Sher was recommended
14 by me to ITT as a potential candidate to interview and assess
15 Ms. Tcheskidova. What happened past that point, I have no
16 knowledge.

17 Q Do you know if Dr. Sher attempted to contact
18 Ms. Tcheskidova?

19 A I'd have to defer that to ITT. I don't recall
20 anything past the fact that Dr. Sher was recommended to visit
21 with Ms. Tcheskidova.

22 Q Were you aware of any complaint by Ms. Tcheskidova
23 that one of her coworkers called her a bitch?

24 A As I sit here in recollection, I don't recall ever
25 hearing that.