

App. 46

1 NORTH CAROLINA) IN THE GENERAL COURT OF JUSTICE
) SUPERIOR COURT DIVISION
 2 FORSYTH COUNTY) File No.:96 CVS 1409

3 PHILIP A. R. STATON,
 Plaintiff,

4 vs.

5 JERRI RUSSELL BRAME; JERRI RUSSELL
 6 BRAME d/b/a "T&J VENTURES," "S&B
 INVESTMENTS," and "JRB INVESTMENTS,
 7 INC."; JRB INVESTMENTS, INC.; THOMAS
 BRAME, GLOBAL SPORT MANAGEMENT CO.,
 8 GLOBAL LAND MANAGEMENT, INC., and
 T&J VENTURES, INC.,
 9 Defendants,

10 vs.

11 INGEBORG STATON and
 MERCEDES MESA DE STATON,
 12 Intervenor,

13 vs.

14 PHILIP A. R. STATON and GAYLE
 RUSSELL STATON,
 15 Defendants and Third-Party
 Plaintiffs,

16 vs.

17 DARRELL WILSON,
 18 Third-Party Defendant.

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 (Caption continues ...)

20 **DEPOSITION OF JERRI RUSSELL BRAME,**
 21 **(Volume II, Pages 265 - 492)**

22 Winston-Salem, North Carolina
 Thursday, January 9, 1997

23
 24 Reported in Stenotype by
 Linda N. Russell, CSR, RPR
 25 Transcript produced by computer-aided transcription

CERTIFIED COPY

1 Q. To your knowledge, were those the first
2 accounts at Centura that involved any member of the
3 PIM Group?

4 A. I believe so, yes, sir.

5 Q. All right. And who were the signatories on
6 those accounts, if you know?

7 A. I don't recall specifically right now. I do
8 know that Tom had signature authority on some -- on
9 those individual accounts. I did also. And I
10 believe that Philip did at some point in time. But
11 I'm not sure -- those signature cards changed on
12 those accounts at different times. And in the
13 beginning, I believe that Tom and I initially had
14 signature authority on those accounts, and then
15 Philip was added to them, as was Inge on some
16 accounts.

17 Q. What were those accounts used for? In 1993.

18 A. In 1993? The individual accounts in Philip's
19 name, Inge's name and Mercedes' name were used to
20 generally pay bills and expenses for them.

21 Q. Did the accounts -- excuse me, did the
22 accounts at Triad still exist?

23 A. They -- I think, existed for a period of
24 time, and then Tom instructed me to close some of
25 those accounts out. Specifically, he closed Inge's

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BRAME d/b/a "T&J VENTURES," "S&B
INVESTMENTS," and "JRB INVESTMENTS,
INC."; JRB INVESTMENTS, INC.; THOMAS
BRAME, GLOBAL SPORT MANAGEMENT CO.,
GLOBAL LAND MANAGEMENT, INC., and
T&J VENTURES, INC.,
Defendants,

vs.

INGEBORG STATON and
MERCEDES MESA DE STATON,
Intervenors,

vs.

PHILIP A. R. STATON and GAYLE
RUSSELL STATON,
Defendants and Third-Party
Plaintiffs,

vs.

DARRELL WILSON,
Third-Party Defendant.

(Caption continues ...)

CONTINUED DEPOSITION OF
JERRI RUSSELL BRAME
(Volume V, Pages 764 - 1007)

High Point, North Carolina
Thursday, November 19, 1998

Reported in Stenotype by
Linda N. Russell, CSR, RPR
Transcript produced by computer-aided transcription

App. 49

1 MR. HOPPE: Yes. That's the
2 signature card. This is --

3 THE COURT: Okay. If you don't
4 need me any longer, I'll go back to my office and
5 do some work.

6 MR. HOPPE: Thank you, Judge.

7 THE WITNESS: Thanks, Judge.

8 MR. HARWELL: Thank you very much,
9 Judge.

10 THE WITNESS: Would this be a good
11 time to take a short break?

12 MR. HOPPE: Yes.

13 THE WITNESS: Couple of minutes?

14 (RECESS TAKEN FROM 11:35 A.M. TO 11:44 A.M.)

15 BY MR. HOPPE:

16 Q. Ms. Russell, I'd like you to take a look at
17 Exhibit 500.

18 MR. HARWELL: Wait a minute.

19 Everybody's not here.

20 (DISCUSSION OFF THE RECORD)

21 BY MR. HOPPE:

22 Q. Ms. Russell, would you take a look at Exhibit
23 500 and identify that for me, please.

24 A. It is a copy of a form that the heading name
25 says PIM Group Clearing Account, Post Office

App. 50

1 Box 11375, Winston-Salem, North Carolina 27116.

2 Q. Does that appear to be a signature card that
3 you signed on or about June 28th of 1993?

4 A. No, sir.

5 Q. Is that your signature that appears as a
6 depositor under the second -- next to that X?

7 A. That appears to be my signature on the second
8 signature of depositor line, yes.

9 Q. Do you see the date, about halfway down the
10 page there?

11 A. It says "Date Opened: 6/28/93." There's
12 nothing on here to indicate when my signature was
13 put on here.

14 Q. When do you believe you signed that document?

15 A. I have no idea.

16 Q. Do you have any reason to believe you did not
17 sign that document on or about June 28th of 1993?

18 A. I'm sorry, I didn't understand that. You put
19 the date in that and that confuses me, because I
20 don't relate it --

21 Q. Do you have any reason to believe you didn't
22 sign that signature card on or about June 28th of
23 1993?

24 A. I'm saying I don't know. This appears to be
25 my signature on this card. The date you're