

CROSS/MR. BREITBART/DR. SCHIFFMAN

1 Q Hadn't you taken a very active part in keeping
2 Professor Golb from being a --

3 A No, that's a lie. I was only present twice a month.

4 THE COURT: Sorry, Professor, he hasn't finished
5 the question.

6 THE WITNESS: I'm sorry.

7 Q Did you take any actions with regard to Professor Golb
8 not being invited to any exhibit?

9 A Absolutely not. I have never been involved in any
10 decision of who would be lecturing at any exhibit except, right,
11 or ever an exhibit. The only time I was present at any
12 discussion at all in my entire life about Norman Golb giving a
13 lecture was the 1950 scrolls conferences in Israel where I
14 advocated for him where he was invited.

15 Q 1950?

16 A I'm sorry, the 50th anniversary in 1997. I'm getting
17 lost here. '47 and '97, the 50th anniversary and in 2007 I
18 advocated for him again and I lost. This is a total lie.

19 Q So you've maintained a very pleasant relationship?

20 A I haven't seen the man since the presentation that he
21 made at the 50th anniversary of the scroll which was in 1997. I
22 didn't maintain, I simply said I never had an unpleasant
23 experience and I never had plain and simple.

24 Q As a result of your communication with Mr. Bandler, you
25 indicated in words or substance that you had a problem; is that

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1 right?

2 A Correct.

3 Q And as a result of that Mr. Bandler took certain
4 action?

5 A You're asking me to judge why Mr. Bandler did what he
6 did?

7 Q No, I'm asking you if whether or not if you know as a
8 result of your conversation with Mr. Bandler whether he took
9 certain actions?

10 A I know there was an investigation that took place but
11 that is also hearsay.

12 Q Were you the subject of that investigation, did anyone
13 look into it?

14 A I have no idea.

15 Q Did anyone ask you any questions about what your role
16 was?

17 A Yes, of course.

18 Q Who?

19 A Mr. Bandler.

20 Q So Mr. Bandler asked you what you did or what you
21 didn't do?

22 A I'm not sure I understand this question.

23 Q Well, did Mr. Bandler --

24 A I'm not a suspect here, I'm not under trial. What are
25 you asking me? I don't even understand this.

Sheila Wesley
Senior Court Reporter

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1 Q Did you become part of the district attorney's team?

2 A Of course not.

3 Q In prosecuting this case?

4 A Prosecutor's team? I'm just some scholar, how can I
5 become part of his team? What am I?

6 Q Well, did you learn that there was a search warrant
7 executed in this case?

8 A I learned that at the day in which it happened. I was
9 called and informed an arrest had been made and that also there
10 would be some news conferences after it happened I was informed.

11 Q Did there come a time when you were asked to help write
12 the search warrant?

13 A I was asked to help write a description of the Dead Sea
14 Scrolls. I have no idea if that was a search warrant or not.

15 MR. BREITBART: May we have these documents marked
16 for identification, your Honor?

17 Am I letters or numbers, your Honor?

18 THE COURT: You are the defense attorney, right,
19 so your letters.

20 MR. BANDLER: Can I identify them for the record?

21 COURT CLERK: So it's Defendant's A for
22 identification.

23 MR. BREITBART: A and sub 1, yes.

24 May the record reflect I'm handing the witness two
25 pieces of paper.

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1 Q Do you recognize those documents?

2 A I only recognize some of the verbiage in item number
3 seven through eleven. I've never seen this document before as a
4 whole document.

5 Q Did you have any role in writing those documents?

6 A I had a role in correcting the material between numbers
7 seven and eleven after a draft was created from Wikipedia and I
8 was asked if I could go over that draft and make any suggestions
9 and I made some suggestions and those suggestions I assume are
10 reflected but I don't have the paper to actually see.

11 Q And did there come a time when you learned that those
12 documents were part of the search warrant in this case?

13 A No, actually this is the first time I heard that they
14 were part of the search warrant. I know that they needed some
15 description of the Dead Sea Scrolls for something, the DA's
16 office, but I'm not a lawyer, what do I know.

17 Q So you did work on and you did participate in the
18 writing of those two documents?

19 A As I said, items number seven through eleven were
20 corrected and revised apparently in accord with some of my
21 suggestions.

22 MR. BREITBART: I would offer those documents at
23 this time, your Honor.

24 THE COURT: We'll hold onto them because I still
25 fail to see the relevance. Shall we move on, please.

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Senior Court Reporter

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1 MR. BANDLER: Your Honor, I don't object. I think
2 having them in evidence --

3 THE COURT: We'll wait until the jury takes a
4 break but we should go a little bit longer.

5 Q As a result of the activities that you described, the
6 blogging, the e-mails and the like, did you suffer any economic
7 loss?

8 A I can't know that.

9 Q Were you asked that question in the Grand Jury?

10 A I think I said no because I have no demonstrative --

11 Q The first question was, were you asked that question in
12 the Grand Jury, sir?

13 A I think I've --

14 THE COURT: Sir, I think I've already told you
15 stop yelling at the witness. If you need the witness
16 directed --

17 MR. BREITBART: Judge, I wasn't yelling.

18 THE COURT: I misapprehended. I apologize. If
19 you need the witness directed, ask me.

20 A I think I said I suffered no loss.

21 Q Would you repeat that?

22 A I believe I said to the Grand Jury that I suffered no
23 loss and that was before I did my 2009 income tax.

24 Q Would it be fair to say that you swore in the Grand
25 Jury that you don't know of an economic loss?

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1 A Yes, that's correct. I do not know of an economic
2 loss, that's correct. That's what I said to you here.

3 Q I'm sorry?

4 A That's what I meant when I said when you asked me the
5 first question and I said I don't know that I have any loss
6 whatever. It's correct.

7 Q Did there come a time, sir, when you were asked
8 questions about when you felt that you should proffer to the
9 jury the fact that you have a life contract?

10 A You lost me a little bit.

11 Q Did there come a time where you felt you needed to
12 proffer to the Grand Jury that you have a life contract at the
13 university?

14 A I just don't remember, it's possible. I mean I do have
15 tenure at the university which is essentially a life contract
16 because we have no retirement age unlike everyone else.

17 Q Well, did you indicate, sir, that you just wanted to
18 point out and this is page 58 line 20.

19 THE COURT: I'm sorry, sir, there is no foundation
20 for asking about a prior inconsistent statement.

21 MR. BREITBART: This is to refresh his
22 recollection, your Honor.

23 THE COURT: Excuse me, sir, you haven't asked a
24 question.

25 Q Did you -

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1 THE COURT: Ask a question before you refer to
2 prior testimony which is hearsay.

3 Q Did you indicate to the Grand Jury, sir, that you have
4 a life contract at the university?

5 A I don't remember, I could of.

6 Q Did you indicate, sir, that if you were found guilty of
7 this offense, you'll be gone tomorrow?

8 A Yes.

9 Q Now, when you were testifying to the Grand Jury, did
10 you indicate, sir, that you would not be gone because of the
11 blogs but you would have been gone because you were found guilty
12 of the impropriety of plagiarism?

13 A Of course.

14 Q Were there benefits that you received as a result of
15 this series of disagreements that you had?

16 A When you say "series of disagreement" you're referring
17 to the present affair or the ongoing debate about the scrolls?

18 Q I'm talking about the subject matter about which we're
19 here today.

20 A Absolutely not. A benefit? I got a benefit? Good
21 luck. We should all have benefits like that.

22 Q Well, were you asked this question and did you give
23 this answer in the Grand Jury from page 59 line 9:

24 "QUESTION: The Grand Juror is inquiring if you know of
25 any financial consequences to Norman Golb's son due to the

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1 differences.

2 "ANSWER: I can't believe there would be any because
3 the normal disagreements about the Dead Sea Scrolls make you
4 money rather than losing you money."

5 A The disagreements regarding what the scrolls mean,
6 that's why I asked you when you began the question I asked you
7 do you mean the present affair or the overall debate on the
8 scrolls.

9 The debate on the scrolls is profitable for those who
10 participate in it because people are interested in it, they want
11 to hear lectures and they want to hear this ongoing intellectual
12 debate which should be. And this debate over here is a totally
13 non profitable activity. The lawyers may make money but I'm not
14 getting anything.

15 Q Were there disagreements that you had as a result of
16 these blogs and the like?

17 A I do not believe so.

18 Q Well, did there come a time where you felt it necessary
19 to call Mr. Bandler?

20 A Of course there came a time it was necessary to call
21 Mr. Bandler.

22 Q And were you asked any other questions about any of the
23 other normal consequences when you were in the Grand Jury except
24 about this case?

25 THE COURT: I'm sorry, I don't understand.

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1 A I don't even understand it.

2 THE COURT: Woe, woe, wait for me, please. Thank
3 you.

4 I don't understand what normal consequences are,
5 sir, so could you rephrase the question so we can all
6 understand it.

7 Q Let me ask the question again, sir, a grand juror is
8 inquiring if you know of any financial consequences to Norman
9 Golb's son due to the differences and you answered --

10 A The financial consequences. Could you read it again,
11 please?

12 Q A grand juror is reputed to have asked you, if you know
13 of any financial consequences to Norman Golb's son due to the
14 differences and you answered I can't believe there would be any
15 and now we're talking about the previous question, because the
16 normal disagreements about the Dead Sea Scrolls make you money
17 rather than losing you money.

18 A Would you like me to explain?

19 Q Yes?

20 A Okay.

21 Q I'll take my chances.

22 A I just assumed that Norman Golb's son had nothing to do
23 with the Dead Sea Scroll except for the fact they're going to
24 inherit whatever fortune exist.

25 Q I couldn't hear it.

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1 A The Golb's sons as far as I knew had nothing to do with
2 the Dead Sea Scrolls. The only money would be Norman's income.
3 We presume that Professor Golb like everyone else in the field
4 gets paid for lectures ran. Eventually the only consequence
5 they'll get a bigger inheritance because of the Dead Sea Scrolls
6 fight going on that they had no down side to the legitimate
7 academic controversy which contrary to the lies which were
8 related before I've always supported.

9 Q Would it be fair to say, sir, that the Dead Sea Scrolls
10 are big money situation?

11 A I don't call it big money.

12 Q Well, would you call \$50 million big money?

13 A You mean the actual value of the scrolls?

14 Q No, they're worth much more, right?

15 A Well, it depends whether you tried to sell them or you
16 don't wish to sell them. Well, let's see, yes.

17 Q What about the exhibits, for example?

18 A Yes, they make a lot of money big money but not fifty
19 million.

20 Q Well, would it be fair to say that you charge or that
21 people are charged \$25 a head to get into the scroll exhibits?

22 A I don't know what it charges to go, I always get in as
23 a courtesy. I have no idea what the cost is to go in.

24 Q You have no idea?

25 A No.

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1 Q Were you at the scroll exhibit in Milwaukee in 2010?

2 A Yes, I was.

3 Q Did you speak there?

4 A Yes, but I didn't pay to go in.

5 Q Do you know what the people who went there paid?

6 A No, that's what I just said before, why are you asking
7 me that? I just told you I don't know.

8 Q To make a point.

9 THE COURT: Mr. Breitbart, I have told you
10 repeatedly.

11 Q Did you know how many people attended the exhibit in
12 Milwaukee?

13 A No.

14 Q Are there ways of you finding that out?

15 A There could be, for example, I was told a profit to use
16 the --

17 Q I'm sorry?

18 A I was told the profit of the use of the exhibit but I
19 don't know anything about fifty million.

20 Q Did you know that 167,000 people attended that exhibit?

21 A No. I think that's wonderful, that's good news.

22 Q How about the Royal Ontario Museum, were you involved
23 in that one?

24 A I lectured there.

25 Q And you were paid for lecturing there?

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1 A Yes.

2 Q Do you know how many people attended the Royal Ontario
3 Museum?

4 A No, I have no idea.

5 Q Would the number 200,000 surprise you?

6 A It wouldn't, no.

7 Q How about the Raleigh Museum, did you do that one also?

8 A Yes, I was there. You're just proving that I got
9 underpaid. You're proving that we don't get paid money to give
10 lectures of the Dead Sea Scrolls.

11 Q Well, you've indicated in other places, sir, that there
12 are inherent benefits for being at the scroll exhibits, aren't
13 there?

14 A Of course.

15 Q What are the benefits that you get?

16 A Well, you get to present your ideas to an audience, you
17 get to see a nice exhibit, get a free trip to see a nice
18 exhibit, you get to present your ideas, and people know about
19 you and you may get invited to some other lectures in the area
20 and you might make a couple bucks here or there for doing it
21 which is an honest activity.

22 Q You describe that as notoriety; is that right?

23 A Well, you could, okay.

24 Q You have is what I'm saying?

25 A Okay, yes, I would, I think it's fine.

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1 Q Fame?

2 A It depends whether people think we're famous but that's
3 okay Dead Sea Scrolls scholars in a certain sense become public
4 figures.

5 Q Do you know how many people attend the Raleigh museum?

6 A No.

7 Q Would the number 50,000 surprise you?

8 A No.

9 Q How about the San Diego Museum in 2007, were you there?

10 A San Diego, yes.

11 Q That was at the San Diego Natural Museum?

12 A Right.

13 Q Is that the first one that was run by Risa Levitt Kohn?

14 A I believe it was, yes.

15 Q Did you have anything to do with Lisa Levitt Kohn
16 getting that job?

17 A No.

18 Q Do you know how many people attended that exhibit?

19 A No.

20 Q Would the number 450,000 surprise you?

21 A Not really, there was a lot of people there when I was
22 there.

23 Q How about the Kansas City exhibit, did you attend that
24 one?

25 A Yes.

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1 Q Did you speak there?

2 A I spoke there. My wife broke her leg there and had an
3 operation in Kansas City but yes, I was there.

4 Q Did that have something to do with the scrolls?

5 A I don't know, you'll have to answer that.

6 THE COURT: You mean her breaking her leg?

7 THE WITNESS: Yes, he'll have to answer whether it
8 was the Dead Sea Scrolls.

9 THE COURT: You know what, I'm going to take a
10 break because I don't know what the relevance of all of this
11 is.

12 THE WITNESS: I can't tell if I'm testifying or if
13 he's testifying.

14 THE COURT: Professor Schiffman, I apologize.
15 Jurors, have a nice little break. See you in fifteen
16 minutes, make it twenty.

17 (The jury exited the courtroom and the
18 following occurred:)

19 (Witness exit.)

20 THE COURT: Yes, 25 words or less what's the
21 relevance of this?

22 MR. BREITBART: Your Honor, this is what I would
23 describe as cross-examination. I'm trying to use any prior
24 immoral, illegal, or vicious act perpetrated by this witness
25 to attack his credibility.

Sheila Wesley
Senior Court Reporter

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1 THE COURT: Well in that case I'm not quite which
2 immoral or vicious et cetera act you have asked him about,
3 but while we know Mr. Kuby's politics, excuse me, from his
4 notoriety, it is those who think making money is not immoral
5 or vicious acts. I am not amongst them so I don't
6 understand that.

7 MR. BREITBART: They provide him a motive.

8 THE COURT: Okay now that we have that established
9 that the man has made his living as he has admitted by being
10 a scholar of the Dead Sea Scrolls and now we will move on.

11 And what is the relevance of his providing
12 information to the district attorney which the district
13 attorney chose to use in his search warrant application?

14 MR. BREITBART: What is the significance?

15 THE COURT: Well, you've offered --

16 MR. BREITBART: I'll tell you my purpose is, this
17 man has never been investigated, no one has looked into his
18 activities, he came to the district attorney's office, he
19 went to NYU, no one ever explored whether or not he was in
20 fact a plagiarist and a misrepresenter in any of the violent
21 acts that a scholar can make.

22 THE COURT: I don't really care whether the People
23 have or have not investigated him in this regard. The
24 witness is not competent to so testify. Number one, he did
25 testify that he was involved in an investigation, I don't

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1 know the extent at NYU, I don't know if he has firsthand
2 information on it and I have now had enough of this. So if
3 we're not going to move onto relevant matters, we're going
4 to be done.

5 MR. BANDLER: And my concern with the reference,
6 defense counsel's reference to the search warrant and for
7 the record, we're talking about the search warrant of
8 January 12, 2009, pages four and five, the affidavit of
9 Investigator McKenna, Mr. Breitbart was trying to give the
10 jurors the impression that it was something nefarious when
11 in fact Investigator McKenna's affidavit clearly sources his
12 basis for knowledge and the purpose of that. So it's kind
13 of giving a misleading impression.

14 THE COURT: I don't know whether they have a
15 misleading impression or not being asked as a lawyer and a
16 Judge I know what the purpose of it was so but you like
17 knowing the purpose of this line of cross-examination so I
18 am not taking the documents into evidence and you may have a
19 break.

20 MR. KUBY: When should we return?

21 THE COURT: Ten minutes.

22 (Recess.)

23 (Continued on next page.)

24

25

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1 THE COURT: Get the witness.

2 THE COURT OFFICER: Witness entering.

3 (Whereupon, the witness entered the courtroom.)

4 THE COURT: Let's get the jury.

5 THE SERGEANT: Jury entering.

6 (Whereupon, the jury entered the courtroom.)

7 THE CLERK: Case on trial continues. All parties
8 are present. The jury is present and being seated, and the
9 witness is again reminded of his oath.

10 MR. BREIBART: May we have this marked for
11 identification, your Honor? Oh, I have the stickers. May I
12 proceed, Your Honor?

13 THE COURT: Yes.

14 CROSS EXAMINATION CONTINUED

15 BY MR. BREIBART:

16 Q. Would you take a look at what's been marked Defense
17 Exhibit B.

18 A. Yes.

19 Q. You recognize that?

20 A. Yeah.

21 Q. What do you recognize it to be?

22 A. It's an article that appeared in the supplement I guess
23 in the weekend supplement of Haaretz newspaper in Israel, in
24 which I know that in here is an interview by me of made -- done
25 by Avi Katzman.

1 Q. Who is Avi Katzman?

2 A. An Israeli journalist.

3 Q. Is he a prominent Israeli journalist?

4 A. Pretty prominent, yeah.

5 Q. Is it's a prominent newspaper?

6 A. It's the equivalent of the New York Times.

7 Q. Have you previously read that article?

8 A. Yes.

9 MR. BREIBART: I would offer it into evidence at
10 this time.

11 THE COURT: May I see that please? Move on
12 please, counsel. Move on.

13 Q. You testify --

14 THE COURT: That won't do me any good, will it ?
15 Go ahead.

16 Q. You indicated yesterday under oath, sir, that after Avi
17 Katzman?

18 THE COURT: I am not taking this article into
19 evidence even if it were trans rated into English.

20 MR. BREIBART: May we know why, Judge?

21 THE COURT: First of all, I don't understand what
22 the article in a newspaper, how an article in a newspaper is
23 evidence of anything.

24 MR. BREIBART: I can't ask him questions about it
25 if he can't see it. And yesterday he made specific

1 testimony with regard to this.

2 THE COURT: You can he can look at it. I don't
3 know, you read me Hebrew?

4 THE WITNESS: Yes.

5 THE COURT: Silly question.

6 THE WITNESS: Thank you.

7 THE COURT: Ask him questions. Let's move on to
8 relevance because I am having difficulty with it still.

9 Q. You recall testifying yesterday about Avi Katzman?

10 A. Yes.

11 Q. You recall testifying with regard to claims that you
12 had never been accused by Katzman of plagiarism?

13 A. Yes.

14 Q. What is plagiarism, sir?

15 A. There are different definitions of plagiarism. As I
16 understand it, the legal definition of refers -- have to do with
17 the copying of verbiage of somebody, and it guards the
18 plagiarism is a violation of the right to creative expression in
19 which someone takes the words that somebody wrote, and repeats
20 them. In the university setting, plagiarism could be understood
21 more widely to include the stealing of people's ideas, but
22 that's different from the legal definition.

23 Q. Well, yesterday 10 F came into evidence in this case.
24 Do you recall that?

25 A. I don't know what's 10 F, no.

1 Q. 10 F was the evidentiary label for an article called
2 plagiarism and the dead sea scrolls NYU professor snitch --

3 A. I read that.

4 Q. In there, is there the NYU definitions of plagiarism?

5 A. I believe so, yes.

6 Q. Matter of fact, sir, doesn't it say whether intended or
7 not, plagiarism is academic fraud. You plagiarize when without
8 proper attribution you paraphrase or re-state someone else's
9 facts, analysis, and/or conclusions. Is that correct? Is that
10 what it says?

11 A. I believe so, yes.

12 Q. Do you want to see it?

13 THE COURT: I am sorry. Sir, the exhibit is in
14 evidence. It says what it says. I don't know whether
15 that's NYU's definition. Perhaps the witness can actually
16 offer some real testimony on that. Don't ask him to read
17 exhibits in evidence. Thank you.

18 Q. In 10 F, doesn't it indicate that's New York
19 University's --

20 A. It does indicate that.

21 THE COURT: I am sorry. Is that correct?

22 THE WITNESS: I am not sure what the question is.
23 I don't know.

24 THE COURT: The question is whether the
25 description of plagiarism --

1 THE WITNESS: I don't know the answer to that
2 question. I have to open up the NYU document and compare.

3 THE COURT: Fair enough. Sorry I asked.

4 MR. BREIBART: May I show him the document?

5 THE COURT: No. Sir, he doesn't know the answer
6 to your question.

7 THE WITNESS: I have no idea.

8 Q. Does it also indicate in the --

9 THE COURT: Counsel, please do not ask him what an
10 article indicates or what an exhibit in evidence indicates.
11 Ask him questions so that he can answer them. He doesn't
12 need to read the exhibit.

13 Q. Do you have an obligation to familiarize yourself with
14 the New York University faculty handbook?

15 A. No, there's no such obligation.

16 Q. Have you --

17 A. I have breezed through the handbook. Nobody reads it.
18 They don't even give it out. It's not even printed.

19 Q. It's not printed?

20 A. It's no longer printed. It's on internet.

21 Q. Is it a fact, sir, that every member of the university
22 is expected to conform to the highest standards of honesty and
23 integrity. Activities such as plagiarism and misrepresentation
24 are expressly prohibited. Plagiarism is the appropriation of
25 another's ideas, processes, results or words without giving

1 appropriate credit.

2 A. I agree with that statement, but I have no idea whether
3 that's the exact text the NYU document. I personally agree with
4 what you read. That doesn't mean anything.

5 Q. Now, you were asked certain questions by the district
6 attorney yesterday with regard to the Avi Katzman interview of
7 you?

8 A. Yes.

9 Q. Do you recall that?

10 A. I recall that I was asked, yes.

11 Q. And I believe you were asked whether or not when there
12 were articles or accusations that you had previously committed
13 plagiarism that were published in 1993, and you said that that's
14 not true?

15 A. I believe it's not true.

16 Q. Isn't that article in front of you?

17 A. No.

18 Q. That article is not in front of you?

19 A. No. Oh, article -- is this article in front of me?

20 Q. I said is there an article in front you?

21 A. Yeah, there's an article in front of me.

22 Q. Is that the article that was referred to by Mr. Bandler
23 when he asked you whether or not Avi Katzman accused you of
24 plagiarism?

25 A. I believe so.

1 Q. Is there a Hebrew word for plagiarism?

2 A. Well, the word they use is plagyar [phonetic].

3 Q. Is there a hebrew word for --

4 A. A plagyar is a plagiarist.

5 Q. In this particular case, sir, doesn't Avi Katzman's
6 article --

7 A. No.

8 Q. -- indicate in a question that Katzman asked you of, by
9 the way, do you have any notes or memorandum on the interview
10 you gave in 1993?

11 A. Of course not. Who in their right mind would take
12 notes in an interview I gave somebody other?

13 Q. In 1993 you were asked questions about Mr. Katzman, and
14 he wrote an article; is that correct?

15 A. Of course.

16 Q. Not what you said, sir, but is in fact in the article,
17 does Katzman say that he asked you, but you also in different
18 articles that you've published have not hesitated to appropriate
19 portions of Golb's theory?

20 A. I have to find the text here because this may take a
21 while for me to find. I see something is underlined here.

22 MR. BREIBART: May I approach the witness?

23 A. It's not discussing. What it says -- you have to give
24 me time to find it. To tell you the truth, I will not sit here
25 for five minutes where I re-read the whole article where I --