

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA

3 ATLANTA DIVISION

4 JEFFREY MICHAEL SELMAN,

5 Plaintiff,

6 vs. CASE NO. 1:02-CV-2325-CC

7 COBB COUNTY SCHOOL DISTRICT,

8 COBB COUNTY BOARD OF EDUCATION,

9 JOE REDDEN, Superintendent,

10 Defendants.

11 - - -

12 Deposition of JEFFREY MICHAEL SELMAN,

13 Taken by the Defendants,

14 Before Robin A. Elawady,

15 Certified Court Reporter

16 At the Law Offices of

17 The Manely Firm

18 Marietta, Georgia

19 On July 8, 2003, at 1:00 p.m.

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1 July 8, 2003

2 1:00 p.m.

3 (Whereupon, the reporter provided a
4 written disclosure to all counsel pursuant
5 to OCGA 9-11-28.)

6 MR. GUNN: Mr. Selman, I'm Linwood
7 Gunn. We've met before. I'm going to take your
8 deposition. You've been present for other
9 depositions, so you kind of know what to expect
10 here.

11 THE WITNESS: That's correct.

12 MR. GUNN: If I ask you anything and
13 you don't understand it, please ask me to
14 clarify, and I'll do my best to ask a better
15 question. Sometimes I don't ask a good one.

16 THE WITNESS: Thank you.

17 MR. GUNN: You've seen in other
18 depositions how sometimes you'll anticipate what
19 I'm going to ask before I complete the question,
20 and if you start answering before I stop talking
21 she'll have a difficult time getting everything
22 down. So try to remember that.

23 THE WITNESS: Okay.

24 - - -

25 - - -

1 JEFFREY MICHAEL SELMAN,

2 being first duly sworn, was examined and

3 testified as follows:

4 CROSS-EXAMINATION

5 BY MR. GUNN:

6 Q. Would you just state your name for
7 the record.

8 A. It is Jeffrey Michael Selman.

9 MR. GUNN: And I would propose our
10 usual stipulations we had in the other
11 depositions.

12 MR. MANELY: That will be fine. And
13 we'll read and sign --

14 MR. GUNN: Okay.

15 (Whereupon it was agreed among counsel
16 that the deposition would be taken
17 pursuant to the Federal Rules of Civil
18 Procedure for purposes of discovery and
19 all other purposes allowable under the
20 Federal Rules of Civil Procedure, with all
21 formalities waived and all objections
22 except those going to the responsiveness
23 of the answer and the form of the question
24 reserved until further use of the
25 deposition.)

1 Q. Where do you live Mr. Selman?

2 A. In Marietta. Do you want the
3 address?

4 Q. Yes.

5 A. 2156 Heritage Trace Drive in
6 Marietta, Georgia 30062.

7 Q. And do you have family here?

8 A. Yes.

9 Q. And what is your wife's name?

10 A. Margaret.

11 Q. And how many children?

12 A. One.

13 Q. Is it a son?

14 A. Son.

15 Q. What's his name?

16 THE WITNESS: Can we go off the
17 record a second?

18 MR. GUNN: Yes.

19 (Whereupon off-the-record discussions
20 ensued.)

21 Q. And his name is William?

22 A. Yes, his name is William.

23 Q. And how old is he?

24 A. He's a nine-year-old.

25 Q. So what grade was he in last year?

1 A. Third.

2 Q. He will be in fourth grade next
3 year?

4 A. That's correct.

5 Q. And what science class or classes
6 did he have last year?

7 A. He's in elementary school. Kind of
8 when the teacher broaches the subject is when
9 they have it during the day. I don't know the
10 scheduling during the day though.

11 Q. But it is not defined other than as
12 science?

13 A. That's correct, as far as I know.

14 Q. Is it your understanding that he has
15 a science textbook?

16 A. Yes.

17 Q. Have you reviewed it?

18 A. Yes.

19 Q. Does it have anything in there about
20 evolution?

21 A. The term "evolution" doesn't show
22 up, but when it speaks of things that might
23 relate to evolution it references things like
24 over time.

25 Q. So only in the most general sense?

1 A. That's correct, from my understanding.

2 Q. The statement that we are here
3 about, is that statement in the front of your
4 son's book from last year?

5 A. It is not in elementary school
6 textbooks, no.

7 Q. Have you ever seen a textbook that
8 had that statement in it?

9 A. The actual textbooks, no.

10 Q. Do you have any understanding about
11 when he moves to fourth grade is it going to be
12 a similar situation that he'll have general
13 science curriculum?

14 A. That's my understanding of it, yes.

15 Q. Does your son have any understanding
16 about what this case is about? Or have you had
17 any discussion with him about what you think
18 about the origin of life?

19 A. I can talk to the fact that we've
20 talked about it, and he exhibits some
21 understanding of it. To the exact extent of his
22 understanding, you'll have to ask him.

23 Q. Well, what have you discussed with
24 him in general terms?

25 A. Basically we've talked about science

1 in the house. We've talked about evolutionary
2 theory, how it works, the facts about it, why we
3 believe it is fact and why it is fact, why
4 religion is different than science fact, and how
5 the two don't have to be mutually exclusive.
6 They are just different realms of understanding.

7 Q. But you haven't discussed with him
8 the purpose of this litigation or the statement?

9 A. I don't remember whether I mentioned
10 the statement exactly and quoted it to him or
11 reading it from papers, but he understands the
12 basic underlying tenet of this whole thing is
13 separation of church and state, how government
14 shouldn't impose anybody's belief on anybody in
15 the country. The government has got to be
16 religion neutral.

17 Q. How long have you lived in Cobb
18 County.

19 A. Nine-and-a-half years.

20 Q. And where did you reside prior to
21 that?

22 A. It was in Fulton County down near
23 Abernathy.

24 Q. And then you at some point moved to
25 this area from New York State?

1 A. Prior to the Abernathy address, yes.

2 Q. And that was --

3 A. Although I'd been here several times
4 for assignments. I'm a consultant, a
5 programming consultant.

6 Q. And we were talking a little bit
7 before the deposition. Your employment at some
8 point was as a consultant with Lucent; is that
9 correct?

10 A. Yes.

11 Q. And tell me about just in general
12 terms your employment history since you've been
13 in Georgia.

14 A. I first came to Georgia as a
15 consultant from a firm in New York. I went
16 through an assignment with Delta Airlines.
17 Finished that up, went into the office of the
18 consultant firm and became recruiting manager of
19 that division. Put myself back out into the
20 field for Y2K situation at Lucent, and stayed at
21 Lucent for a little over five years.

22 Q. Until what time?

23 A. Until January of 2003.

24 Q. And what do you do now?

25 A. I'm looking for a COBOL job.

1 Q. When you say you are a consultant,
2 is there a particular area that you consult in,
3 expertise?

4 A. It is mainframe programming. Mostly
5 COBOL. A little bit of web developing, but
6 mostly COBOL.

7 Q. And what is your educational
8 background?

9 A. I have a bachelor's in history and a
10 minor in psychology. I've got about 90 credits
11 above my -- give or take five or six -- above my
12 bachelor's with no main direction in anything.
13 It was mostly just to sustain my teaching
14 license in New York City that I took these
15 courses.

16 Q. You taught in New York City?

17 A. Yes.

18 Q. How many years?

19 A. Approximately ten.

20 Q. Are you a member of any religious
21 group?

22 A. I'm Jewish.

23 Q. What synagogue do you attend?

24 A. You don't have to attend a temple, a
25 church or anything to be of a religious faith.

1 I'm Jewish.

2 Q. So you don't attend a temple or any
3 type of --

4 A. Occasionally I may attend a temple
5 with friends for specific holidays or we might
6 be invited by them to attend their temple. So
7 I've been to several in the area.

8 Q. You don't have one you consider your
9 own?

10 A. No.

11 Q. Have you ever filed any other
12 lawsuits before?

13 A. Maybe 30 years ago when somebody
14 stiffed me for some money on a job I had done
15 for them.

16 Q. Was that in New York?

17 A. Yes.

18 Q. How about other than that?

19 A. No. Not to my recollection.

20 Q. Have you been on the other side of
21 any litigation? A party or witness in any other
22 litigation?

23 A. Not that I remember, no.

24 Q. There were some articles in the
25 paper about your objections to the Cobb County

1 commission meetings and some of their practices
2 there. Are you planning on suing the county at
3 this point?

4 A. That's entirely up to them.

5 Q. So in other words, if they persist
6 in their practices it's possible you will file
7 suit against them?

8 A. I don't know at this point.

9 Q. How did you first become aware of
10 the issues involved in this litigation? And by
11 that I mean the textbook adoption and the
12 subsequent decision by the board to put the
13 stickers in the science textbooks.

14 A. I had seen an article in the
15 newspaper.

16 Q. At what point was that? What was
17 the article about?

18 A. It was specifically about the
19 inclusion of this disclaimer against evolution
20 being put in the science textbooks of secondary
21 schools in Cobb.

22 Q. And from that point, how did you
23 become a plaintiff in this case?

24 A. I evaluated what this really meant
25 to not just my own presence and my son's

1 presence here --

2 MR. MANELY: Before you venture down
3 this path, I may have just misheard you. What I
4 understood you to mean is physically from step
5 one to step two, how did you go from reading the
6 paper to signing on as a plaintiff.

7 Q. I guess a better way to ask my
8 question would be from that point, what did you
9 do that resulted in you -- who did you contact?
10 How did you get to be a plaintiff in this case?

11 A. I called up the ACLU and asked if
12 they were considering doing something about
13 this, behind the scenes, in front of the scenes,
14 but are they going to do something about it,
15 because I saw it as something that shouldn't be
16 there.

17 Q. And that resulted in you contacting
18 Mr. Manely at some point?

19 A. Yes.

20 Q. Or being put into contact with him?

21 A. Yes.

22 Q. Were you a member of the ACLU at
23 that point?

24 A. No.

25 Q. Are you a member of the ACLU now?

1 A. I don't know, to be honest with you.
2 I've sent them money periodically through my
3 entire life. I don't know if that was
4 membership or not.

5 Q. So you had sent them money prior to
6 that?

7 A. Yes.

8 Q. But you didn't think you were a
9 member at that point?

10 A. I get literature periodically, but I
11 don't remember signing anything saying I was a
12 member.

13 Q. You're aware that there was an
14 amended Complaint, a motion to amend the
15 Complaint. Do you know the other plaintiffs
16 that were --

17 A. Can you be more specific as to what
18 motion. There have been a lot of things
19 happening lately, and I want to know exactly
20 what you mean.

21 Q. Do you know anyone who has attempted
22 to join in this litigation as a plaintiff?

23 A. Yes.

24 Q. Who are they?

25 A. You want specific names?

1 Q. Yes.

2 A. Okay. I don't know all the names.
3 I just know some of them.

4 Q. Okay.

5 A. Deborah Power, Kathy Chapman, I
6 think a gentleman named Jeff Silver. I'm not
7 really sure of the rest of the people. I know
8 several other people have been approached about
9 coming on, but I haven't necessarily dealt with
10 them personally.

11 Q. How do you know those three folks?

12 A. I met them at board meetings.

13 Q. At Cobb County Board of Education
14 meetings?

15 A. Cobb County Board of Education
16 meetings when they were there protesting.

17 Q. Why did you bring this lawsuit?

18 MR. MANELY: There is the question
19 you started answering earlier.

20 A. I'm a strong adherent to the concept
21 of separation of church and state, and when I
22 saw the sticker, which is the kind of thing that
23 if you've been around this country several times
24 that people try to reintroduce religious beliefs
25 of creation into science classes. I saw this as

1 another attempt at religious intrusion by a
2 government body into an area that it doesn't
3 belong in. When you are teaching a subject, you
4 should teach that subject.

5 There is no controversy that
6 evolution is a fact among the vast majority of
7 scientists on this planet. When you start
8 introducing things like intelligent design and
9 creation science, it implies something
10 supernatural, something above the natural
11 sciences, and that's religion. To interject
12 that into a science class is just outside the
13 box of what science teaches. I wouldn't teach
14 French in a Russian class. Kids are there to
15 learn Russian. There is nothing wrong with
16 French, but they are not there to learn French.
17 They are there to learn Russian.

18 So if you come to a science class
19 expecting to learn science, you should be taught
20 what the scientists know at that time. Okay.
21 It changes constantly. It is self-evaluating.
22 Science brings in new data always. It gets up
23 for peer review. If the vast majority of the
24 people think it is bogus, they throw it out.
25 There has been a few things along the way,

1 especially in evolution -- well, not especially,
2 but in evolution that have been hoaxes. It gets
3 evaluated, it gets thrown out, and the truth
4 comes forward and it becomes a fact.

5 The theory of evolution is a
6 scientific process that people keep evaluating.
7 So there are no alternate scientific theories
8 for it. When you bring in something like
9 intelligent design or creation science, that
10 steps outside the evaluation process because you
11 can't test that. The existence of a
12 supernatural deity running the show is not
13 testable in a science environment. It steps
14 outside the scientific method.

15 So when the sticker came up and it
16 picked on evolution, it just smacked of
17 everything that seemed to be of a religious
18 intrusion into a place that it didn't belong.
19 If they want to have, you know, a history class
20 about it, you know, and discuss it, about it,
21 fine, but to teach it as an alternative to a
22 theory in science, no.

23 Q. So your concern was that that
24 sticker would result in something being taught
25 in the classroom that you didn't feel was

1 appropriate for the science classroom?

2 A. That's correct. As an intrusion
3 also of religion into that classroom.

4 Q. In New York City, what was your
5 license to teach?

6 A. I had two licenses. I had a high
7 school history license, and I had what they call
8 a common branches, which allowed me to teach
9 elementary school. And under the high school
10 license I basically could teach any grade under
11 that. So it could be 12th grade high school
12 history all the way down to kindergarten.

13 Q. So in high school you taught
14 history. And then did you ever teach in
15 elementary school?

16 A. Yes, I did.

17 Q. And would you have taught general
18 curriculum in elementary school, including
19 science?

20 A. Correct.

21 Q. You talked a little bit about the
22 process of science and how you go about
23 evaluating facts. Do you agree that part of the
24 development of science is questioning beliefs
25 and questioning facts? Questioning whether

1 facts are --

2 A. Questioning data.

3 Q. Right. Right?

4 A. (Nods head affirmatively.)

5 Q. Why do you believe that the board
6 decided to put this statement in the science
7 textbooks?

8 A. I think there is some religious
9 motivation behind it by some of the board
10 members and probably by some of the constituents
11 pushing them further to do it. To pick on
12 evolution is -- to me is an obvious religious
13 intrusion, because they didn't pick on any other
14 theory in science.

15 Q. Are there other science theories you
16 are aware of that raise this type of emotion and
17 strong feelings --

18 A. No. That's my point.

19 Q. Okay.

20 MR. MANELY: I presume your question
21 to mean currently. You know, obviously
22 Copernican theory of rotation of planets used to
23 get people beheaded on a regular basis when they
24 disagreed with the church.

25 MR. GUNN: Yes. We are talking

1 about today.

2 MR. MANELY: Okay.

3 Q. So your thought was that because it
4 engendered such strong feelings it must
5 necessarily be a religious motivation for --

6 A. Not because it generated strong
7 feelings, just because of the topic it was
8 picking on. It was picking on evolution, which
9 some people feel is contrary to creationism.

10 Q. What do you base your statement on
11 when you said you thought it was motivated by
12 religious belief?

13 A. It's been my experience that the
14 secular community in the world, in America,
15 wherever on this planet, they don't question
16 evolution. Scientists don't question evolution.
17 I don't want to hear about the 162 people in
18 this country who claim to be scientists
19 questioning it. There are 20,000-something
20 scientists that accept it, which puts them into
21 a .007 or something like that percentage of
22 people that say evolution is not a fact.

23 If the statement had said, "Approach
24 all science with an open mind and critically" --
25 "critical thought," that doesn't pick on any

1 particular science theory, principle, law. To
2 isolate evolution with a history in this
3 country, okay, of fighting evolution and the
4 creation, of saying, oh, there is no evolution,
5 you know, Darwin is a nut, it pinpoints
6 religion.

7 The only group -- well, it's not a
8 group, but it's -- the fundamentalist religious
9 people in this country want creation taught,
10 okay. Evolution has nothing to do with
11 creation. It's a science. So if you pick on
12 just evolution, the only people picking on this
13 are fundamentalist religious people. It is a
14 religious issue for them.

15 Q. So your belief is that any scientist
16 that questions any aspect of evolution must
17 necessarily have a religious belief?

18 A. That's not what I'm saying.

19 Q. Well, I understood you to say that
20 the only people that questioned --

21 A. You said aspect of evolution. Any
22 scientist that questions an aspect of evolution.

23 Q. Okay.

24 A. Scientists will debate new data
25 coming in and say, well, this might point to

1 this thing, this aspect of evolution, as not
2 being completely the way we thought it was.
3 Let's reevaluate. But none of them throw the
4 entire theory out. They accept it. The
5 questions come in, how did it happen, not that
6 it happened. The fact that it happened is a
7 fact.

8 Q. Now, you agree with me that
9 evolution is a term that really refers to two
10 different things; right?

11 A. What do you mean by that?

12 MR. MANELY: Which are?

13 A. Your turn to answer.

14 Q. Evolution stands for Darwin's
15 theory, and there are two large categories, I
16 guess. There is micro and macro evolution.

17 A. That's nonsense. Plain and simple.
18 There is evolution. This concept of micro and
19 macro evolution has been brought about by people
20 like in the intelligent design groups.

21 Q. Okay.

22 A. There is evidence of --

23 Q. Okay.

24 A. You want me to answer it, or do you
25 want to interrupt me? There is evidence, okay,

1 of what they call micro evolution that they have
2 to accept because it is there. They can see it
3 themselves.

4 Q. All right.

5 A. They deny that it could be then
6 extrapolated back into our late past, okay, for
7 millions and millions of years. They deny that
8 macro aspect of it. They are wrong. There is
9 only one evolution.

10 Q. Okay.

11 A. It happened. How it happened,
12 again, that's the thing where debate within the
13 scientific community takes place because new
14 evidence comes in constantly. To say evolution
15 is Darwinian -- he may have started it at one
16 point, but evolution has far exceeded anything
17 that Darwin had anticipated, because he didn't
18 have the data we have today and the tools we
19 have today.

20 Q. So in your mind evolution is one
21 word, and anyone that says that it means
22 anything other than one concept, you don't
23 believe that?

24 MR. MANELY: I have to object to
25 that because it is very vague. I know where you

1 are going, but your black-and-white language you
2 are using is pretty vague.

3 A. Restate.

4 Q. You were using the terms "macro" and
5 "micro evolution" that you told me you don't
6 agree that there is a concept?

7 A. I'm not using them --

8 MR. MANELY: Hang on. Remember
9 she's taking down words. So let Linwood finish
10 his sentence, otherwise she's going to get
11 really finger tight.

12 A. I'm sorry. I don't mean to be
13 argumentative.

14 Q. So your understanding of science is
15 that natural selection and the theory that all
16 organisms derived from one organism is all a
17 single theory, and there is no way to dispute
18 any part of that overall theory?

19 A. I think that you are lumping
20 something together that shouldn't be put
21 together.

22 Q. How would you separate it?

23 A. Evolution is a process. As that
24 process progressed from the day it began -- how
25 it began, I don't care. I don't know. The fact

1 that it is going on, okay, how it happened at
2 any given point when new data shows up to show
3 links between this and that and the other thing,
4 that's what we debate in science. Not that it
5 happened. We know it happened. We don't know
6 how it happened completely, although we are
7 finding out.

8 Q. What happened? You keep saying it
9 happened. What happened?

10 A. Evolution happened. How life --

11 Q. What is evolution?

12 A. Evolution is a process. It's a
13 scientific theory, which in science a theory is
14 not a hypothesis. Colloquially when we talk
15 about a theory it means something else. So in
16 science we talk about a theory. It is a group
17 of facts that come together to show a process
18 that happened. So evolution is a process of how
19 life on this planet changes, period.

20 Q. And do you see any distinction with
21 one species developing into another species and
22 change in the sense of one species evolving and
23 changing its characteristics?

24 A. Restate that.

25 Q. You said that I was lumping

1 everything together, and then I didn't
2 understand what distinction you were trying to
3 draw between -- are you trying to draw a
4 distinction between what happened and how it
5 happened? Is that what your distinction is?

6 A. My distinction is that evolution is
7 a process that we can see happening through the
8 fossil evidence, through a lot of different
9 things that happened, okay. At each change in
10 evolution, when we have new data coming in, the
11 debate comes up, what does that data mean? How
12 does it relate to things that happened before?
13 What is the evidence of how this piece of
14 evidence relates to that other piece of
15 evidence, okay. That's the difference of the
16 two.

17 You have this umbrella issue of --
18 not issue of fact, but evolution that says life
19 on this planet started way back here and changed
20 over a long, long, long, long time, millions of
21 years, to exist into the way we see things
22 today. How different life forms have branched
23 off, became other life forms, and related to
24 each other.

25 The process at each individual

1 section of that process, how did it happen at
2 that point? How does the new piece of fossil
3 evidence that we've just discovered, how does it
4 fit into the big picture? That's where the
5 debate comes. Then consensus happens, and it
6 gets added into the bigger picture of evolution.
7 If further evidence comes down the road that
8 might contradict something there, it might lead
9 it into another direction.

10 The vast majority of sciences will
11 bang it around as much as they possibly can.
12 And they do. It's not a simple, oh, everybody
13 get together and agree with this. They have a
14 lot of discussion and evaluation of the data.
15 When they finally come to a consensus it gets
16 brought into the general theory of evolution,
17 and it gets taught that way because that's what
18 we know up to that point.

19 Q. And you have no problem with
20 evaluation of data in the classroom?

21 A. That depends on what classroom.

22 Q. In a science classroom, if you've
23 got --

24 A. A science classroom in a public
25 school, okay, is -- while things should be

1 evaluated and calculated, the subject that has
2 been already established by the scientific
3 community should be taught first. The children
4 have to be taught the process of science to see
5 how the scientists came to those data that they
6 are now being taught in the classroom, okay.
7 Discussion of the evaluation of how the
8 scientists came to that is absolutely
9 appropriate.

10 To do absolute research in an
11 elementary school in, a secondary school with
12 new fossils coming in, they are not prepared to
13 do that. That kind of thing is saved for
14 colleges, research areas, whatever.

15 So the subject should be taught in
16 the science classroom and should be examined.
17 But if you are implying that they should be
18 doing research there, if that's what I sense --
19 if that's what your question sounded like, no.

20 Q. Now, you keep mentioning the
21 evaluation of data, and I just want to confirm
22 that you are telling me that you think what
23 should be taught is what is the consensus first,
24 and then as a secondary matter --

25 A. And how it --

1 MR. MANELY: Hang on.

2 Q. -- as a secondary matter, then we
3 can talk about how the scientists got to that
4 point and some of the evaluation of data that
5 maybe is currently going on?

6 A. First you have to teach the subject.

7 Q. So you would have no issue with an
8 evaluation of data, say, in a high school
9 science class where they are talking about
10 evolution if they talk about the theories and
11 the evolution of life. If they talk about some
12 of the current controversies on a factual level,
13 you would have no problem with that; right?

14 A. What do you mean by controversies?

15 Q. Well, you've talked about how there
16 is new evidence coming in all the time, there is
17 new facts coming in, new data, and that
18 scientists evaluate that. You wouldn't have a
19 problem with that being introduced in the
20 classroom, their evaluations of what was going
21 on?

22 A. As long as it is coming in from the
23 scientific environment, no.

24 Q. Which would mean basing it on facts
25 and evaluating those facts and testing those

1 facts against facts that you've seen in other
2 areas and whether they fit together?

3 A. I'd accept that.

4 Q. You'd agree with me that this
5 discussion that occurred at the school board
6 level and that has occurred in the media about
7 this statement and about evolution, about
8 scientific views of evolution, it's been pretty
9 controversial?

10 A. Has nothing to do with science.

11 Q. That wasn't my question. This has
12 generated a lot of media attention. The
13 statement and whether the statement is accurate,
14 whether evolution is true and testable, that
15 type of debate has occurred in relation to the
16 placement of the sticker in the books.

17 A. The controversy is outside the
18 scientific community. It has nothing to do with
19 science. The controversy you are speaking of is
20 a social-religious controversy. It has nothing
21 to do with science.

22 MR. MANELY: If I understood
23 Linwood's question correctly though, it was do
24 you agree that the sticker has created a
25 controversy or there is a controversy about the

1 sticker.

2 Q. Yes. You want to define it as a
3 social controversy as opposed to a scientific
4 controversy, but you'd agree that there has been
5 a tremendous amount of controversy about that
6 topic?

7 A. Yes. I'll admit to that as long as
8 we make sure that we see where the controversy
9 is, and it's not controversy in the science
10 community about evolution.

11 Q. Huge amount of media coverage of
12 whether the sticker was appropriate, how people
13 felt about evolution, and how evolution should
14 be taught; right?

15 A. The controversy isn't how evolution
16 should be taught. The controversy is that there
17 are other alternative theories to evolution, and
18 there aren't any.

19 Q. Well, you are here today partly
20 because you disagree with the way the school
21 board thinks evolution should be taught; right?

22 A. From what I've read about what
23 they've said with the new regulations and their
24 guidelines and things, they seem to say now
25 evolution should be taught and taught in a

1 scientific mode.

2 Q. Right.

3 A. I don't have a problem with that. I
4 have a problem if alternate theories of
5 evolution are introduced, because the only
6 alternate theories of evolution aren't
7 scientific. And the board, from what I've seen,
8 hasn't said that they can come in.

9 Q. What I was trying to get to is: You
10 agree with me that there has been a lot of
11 controversy about the issue, and part of the
12 issue is how evolution should be taught; right?

13 A. I don't understand it as that.

14 Q. Okay.

15 A. It is not how it should be taught.
16 That's not the controversy.

17 MR. MANELY: Let me clarify
18 something also. Dr. Plenge may well have opened
19 the door for us to be concerned about how the
20 policy and the regs are going to be applied. So
21 that is still something that we are evaluating.
22 Remember when she was talking about if some
23 student wants to talk about intelligent design,
24 we need to talk about that, if she says we can
25 talk about that.

1 MR. GUNN: Well, I disagree --

2 MR. MANELY: That was fresh.

3 MR. GUNN: Okay. Well, I disagree
4 with that. I think that was a product of the
5 searching cross-examination that she was
6 undergoing. But I'm not asking him about --
7 well, maybe I should ask him. I'm not asking
8 him about what is taught in the classroom. I'm
9 asking him -- there has been a huge amount of --
10 actually in some of the newspaper articles,
11 there has been a huge amount of newspaper and TV
12 coverage of Cobb County School District's
13 sticker and this debate, is evolution
14 scientifically, completely valid? Is there any
15 realistic debate? Those things have been a big
16 controversy in this context in this litigation.
17 All right.

18 A. But your question to me was, is the
19 controversy about how evolution is taught. Even
20 from what you just said now, it is not a
21 controversy of how evolution is being taught or
22 will be taught. It is that they want to bring
23 in alternative theories.

24 Q. Okay.

25 A. So they'll teach evolution the

1 correct way, but then they will bring in
2 intelligent design to counter it.

3 Q. Okay.

4 A. And that's where the controversy
5 comes in, intelligent design/creation. Science
6 can't come into the science environment.

7 Q. We are not talking about teaching
8 evolution. I'm talking about teaching this type
9 of issue, whether you want to call it evolution
10 or you want to call it some other theory, that
11 the other theories are only relevant because we
12 are talking about evolution; right? That's what
13 I wanted you to understand my question to mean.
14 You are debating with me about whether evolution
15 should be -- the question is how it should be
16 taught. But that's what we are talking about.

17 A. I was just trying to respond to your
18 question the way I heard it.

19 Q. You know from attending meetings and
20 from the media coverage that there are some
21 people that are adamantly opposed to any
22 instruction on evolution?

23 A. Yes.

24 Q. And you know too that there are some
25 people that are adamantly opposed, like you, to

1 any other theory or any other type of theory
2 being introduced in the classroom; right?

3 A. I would like to rephrase your
4 question for you.

5 Q. Okay.

6 A. I'm not opposed to other people's
7 concepts being taught about in a classroom
8 setting that's appropriate to a comparative
9 religion, a history class, where it would come
10 up in context of what's happening, say, if they
11 are talking about modern history and what's
12 happening in the United States today. That's
13 fine. Having it brought into a science class
14 when it is out of context of the subject, yes,
15 I'm opposed to that.

16 Q. You can understand my questions to
17 mean science class. We are not talking about
18 music or history. We are talking about science
19 class.

20 So you are adamantly opposed and
21 many others are adamantly opposed to any other
22 theory being brought into the science classroom;
23 right?

24 A. That's correct.

25 Q. Why do you think this topic

1 engenders such strong opinions?

2 A. Throughout all of history theocracy
3 has brought its head up constantly where people
4 of a certain belief try to impose that belief on
5 the rest of the society they live in. It's been
6 very successful in several places, and it's been
7 very destructive. The United States is a
8 religion neutral country where you can practice
9 and believe anything you want to. You can pray
10 in a classroom as long as you don't bother
11 anybody else with it.

12 There is a movement in our country
13 now, and I'm not paranoid about this, where a
14 group of people want their religion taught to
15 everybody, and we all have to fall in line with
16 it. It makes no sense to me at all, but that's
17 what is happening. And they constantly raise
18 their heads trying to squeeze their religious
19 belief on the rest of us.

20 Q. You think that everyone that feels
21 differently than you is in that group that you
22 are describing?

23 A. No.

24 Q. My question to you is: Why does
25 this topic engender such strong feelings, not as

1 a historical matter, but today?

2 A. For me personally --

3 MR. MANELY: That's a good point.

4 Were you curious as to Mr. Selman's personal
5 feeling about why it engenders strong feelings
6 in himself or his feeling about why it engenders
7 strong feelings in the public at large?

8 MR. GUNN: The latter.

9 MR. MANELY: Okay --

10 Q. I'm asking you why you think this is
11 a hot topic.

12 A. Okay. Specifically in the science
13 arena, scientists are very precise. They
14 evaluate data that comes in. They discuss it.
15 They rip it apart. They analyze it. They argue
16 amongst themselves. And when they finally come
17 to an understanding that it's the truth, that's
18 what they go with, leaving the door always open
19 for new data coming in. They go with what they
20 have at the time for the best possible solution
21 that they have at that moment.

22 When you start bringing in things
23 that start ripping that down, you underpin our
24 entire society, which is based upon scientific
25 innovation. TV sets, computers, all this other

1 stuff. If you start questioning the science
2 behind that, and all of a sudden some religious
3 group comes, and maybe down the road, I don't
4 know, this is looking into the future, it could
5 undermine all that. Our way of life could be
6 totally destroyed. Our freedoms could be ripped
7 away because things are being controlled in the
8 wrong direction. So they fight to keep their
9 science precise so that that can't happen.

10 On the social side of it, we are
11 constantly going through an evolution in society
12 in this country to begin with. Not too long ago
13 we went through an evolution for civil rights.
14 One hundred years after the Civil War, blacks
15 were still not free in this country. People
16 couldn't believe what they wanted to in certain
17 ways. I mean, we are constantly vying for
18 position so that people can be free in this
19 country. To have one myopic group of religious
20 fanatics come forward and try to dominate our
21 society, we are going to get in its way, because
22 I don't want my freedoms taken and the people I
23 know don't want their freedoms taken away.

24 There is a whole issue with things
25 in this country now because of 9-11 and the

1 intrusion of religious --

2 Q. Let me kind of get you back on --

3 MR. MANELY: Let's take a break.

4 (Deposition in Recess, 1:43 p.m. to
5 1:51 p.m.)

6 Q. You were referring to this battle
7 between the scientists and the religious
8 fanatics before we broke. Can you see that
9 there may be people who are not religious
10 fanatics that have a different view of the
11 science of evolution than you do?

12 A. Can you put that in a better context
13 for me?

14 Q. In your mind, can you imagine that
15 there may be people who are not what you
16 consider religious fanatics who may disagree
17 with your view of the science of evolution?

18 A. It's been my experience from people
19 I've encountered before this issue and during
20 this issue that people of faith like myself who
21 know about evolution accept it. So I would have
22 to say no.

23 Q. Can you see how the instruction of
24 evolution could raise concerns to a parent or a
25 student even if they weren't a religious

1 fanatic?

2 A. Yes, with the caveat that they
3 should then opt out of taking that science
4 class. If the kid is taking science, that's
5 what he's got to be taught is science.

6 Q. And you know from sitting through
7 these depositions that state-mandated curriculum
8 requires that evolution be taught in our
9 classrooms; right?

10 A. Yes.

11 Q. Do you remember the verbiage of the
12 statement, or would you like me to read it to
13 you? I want to ask you some questions about it.

14 A. I know it. I can't quote it. So if
15 you would like to read it, by all means.

16 Q. That might make it easier, and I can
17 actually show you your Complaint, which you can
18 refer to here. Your Complaint says, "Defendant
19 now requires that all public school science
20 textbooks include a disclaimer which states,
21 'This textbook contains material on evolution.
22 Evolution is a theory not a fact regarding the
23 origin of living things. This material should
24 be approached with an open mind, studied
25 carefully and critically considered.'"

1 Tell me why you think that statement
2 constitutes a First Amendment violation.

3 A. First of all, it's fraudulent.
4 Evolution is a theory, not a fact. In science a
5 theory contains facts. So evolution is a fact.
6 It's contradictory. It's not true. Evolution
7 is a fact. So that's wrong, the very fact that
8 evolution is singled out here. In today's
9 modern America right now, the only societal
10 conflict outside of the science class is --
11 evolution is attacked by people that believe in
12 creation. So it's a religious thing. They
13 don't attack gravity. That's a theory. They
14 don't attack atomic theory. That's a theory.
15 It is fact. So picking on evolution is the only
16 place where I see a religious -- outside of
17 science there is a controversy because of
18 religion.

19 Q. Okay.

20 A. Does that answer your question?

21 Q. Yes. And I guess I wanted to ask
22 you: You think the only controversy is as a
23 religious basis, but you just agreed with my
24 statement that you could understand how a
25 student or a parent might have concerns about

1 instruction in evolution. How do you harmonize
2 those two statements?

3 A. That's easy on one level and hard on
4 another level. Because a person like myself who
5 has very strong spiritual faith, it's easy to
6 harmonize it. I mean, if I want my kid to learn
7 science, go to school and learn a topic that is
8 being taught there. If that's what they are
9 teaching, teach it. Let the kid learn it. When
10 I get him home, I'll teach him what we think is
11 another way it happened. It wouldn't be a
12 scientific way, but it's another way. Which is
13 how I deal with my kid. I teach him everything,
14 okay. But when he's doing science, he's got to
15 do science. When he's doing religion, he's got
16 to do religion. They are not self-exclusive.

17 When a person comes in from a
18 religious fanaticism that says, "I don't want my
19 kid taught this because it violates what I
20 believe," well, I understand that, but do you
21 want him to get an education that can get him a
22 job in the future that can, you know, give him a
23 way into a college? Yeah. Well, then he's got
24 to learn this, because the colleges are going to
25 test him on SATs, whatever, this is going to

1 come up. He's going to fail it.

2 You don't want him to learn that.

3 That's okay. You want him to learn it and tell
4 him it's a lie. That's okay too, but that's in
5 your house, not in science class.

6 If you don't want him to take it,
7 have him call in sick that day, and try not to
8 have him go past his number of days he's allowed
9 before he can't get promoted. That's your
10 option. There is a way out of it. They don't
11 have to impose their religious belief in some
12 place that it doesn't belong.

13 Q. You haven't reviewed the textbooks
14 that are at issue here; right?

15 A. I've seen excerpts here and there,
16 and I can't tell you the titles from which ones.
17 I've been inundated with so much, it starts to
18 muddle a little.

19 Q. You understand that the textbooks
20 that the statement is placed in all teach
21 evolution I think in the terms that you've
22 described it here, don't you?

23 A. That's my understanding. And
24 because that's there appropriately, why is there
25 a disclaimer there? It has got to have a

1 religious intent behind it.

2 Q. So you can only see a religious
3 intent to the disclaimer simply -- for two
4 reasons. One, because it singles out evolution;
5 and second reason, because you can't see any
6 other reason to have any debate about it?

7 A. That's correct.

8 Q. Would you agree with me that this
9 statement doesn't say anything about religion or
10 religious belief on its face?

11 A. It most certainly talks about
12 religion by the very fact that it isolates
13 evolution, because then that in itself is a
14 theory in science -- it is the only theory in
15 our modern world today that is being attacked by
16 religion. Secular groups will not question
17 this.

18 Q. So if we take a chapter of a
19 textbook that discusses evolution or the fact
20 that it just talks about evolution means that
21 it's religious?

22 A. Say that again.

23 Q. You just said that that is a
24 religious statement because it talks about
25 evolution --

1 A. It isolates evolution --

2 Q. -- only evolution?

3 A. It goes against evolution and only
4 evolution.

5 Q. Because it casts doubt on evolution
6 or because its topic is evolution?

7 A. It casts doubt on evolution.

8 Q. But you wouldn't --

9 MR. MANELY: I also heard him say,
10 and I understand where you are getting this
11 from, but also because it singles out evolution.

12 MR. GUNN: Okay.

13 MR. MANELY: So you are hearing him
14 correctly.

15 A. So it singles out evolution from
16 everything else in science.

17 Q. And your Complaint says that that's
18 a fundamentalist Christian expression. And if I
19 understand you correctly, that's your belief
20 because you don't understand any other
21 motivation that could possibly exist for that?

22 A. That's correct.

23 Q. If that statement said not what it
24 says there, but it just said evolution is a
25 topic in this textbook we urge you to critically

1 consider, you'd have the same belief that it was
2 religiously motivated; right?

3 A. Yeah. It shouldn't be isolated like
4 that.

5 Q. As you understand it, what's the
6 fundamentalist Christian viewpoint concerning
7 evolution?

8 A. It didn't happen. It's a younger
9 theory. The earth is 6,000 years old -- less
10 than --

11 MR. MANELY: 4,000.

12 THE WITNESS: 4,000?

13 MR. MANELY: 4,000 BC -- it is
14 6,000.

15 THE WITNESS: I just said that.

16 MR. MANELY: My error. My math.

17 Q. The fundamentalist Christian then
18 viewpoint would be not that evolution is a
19 theory, not a fact, but that it's not a fact?

20 A. That's my understanding.

21 Q. Would you agree with me that that
22 statement is somewhat different than that? I
23 mean, if you were trying to express what you
24 understand about the fundamentalist Christian
25 viewpoint, you wouldn't do it in that way, would

1 you?

2 A. Fundamentalist Christian viewpoint
3 says evolution didn't happen. It is not a fact.
4 So it says the same thing.

5 Q. Well, that doesn't say it's not --

6 A. It says it's not a fact.

7 Q. -- it didn't happen.

8 A. Evolution is a theory, not a fact.
9 It says it is not a fact. Fundamentalist
10 Christian say it is not a fact. It never
11 happened.

12 Q. I guess, fundamentalist Christians
13 would say not as that says, it's possible. They
14 would say it is impossible.

15 A. They wouldn't address it. They
16 would say it didn't happen.

17 MR. MANELY: You aren't suggesting
18 fundamentalist Christians are impossible of sin,
19 are you?

20 MR. GUNN: No.

21 Q. I'm just asking him, if you were a
22 fundamentalist Christian and you were trying to
23 say evolution is not a fact, and I'm not going
24 to believe it no matter what you say, you
25 wouldn't say it in those terms, would you?

1 A. Yes, I would.

2 Q. You stated earlier that the vast
3 majority of scientists believe evolution, so
4 there is some minority of scientists that don't?

5 A. I found out about that from some of
6 the people that were at different board meetings
7 when they came up and they spoke, and they were
8 claiming a list of 100 to 162 different, quote,
9 scientists. Some of them were engineers, some
10 of them were doctors, some of them were
11 chemists, very few of them, a few, were people
12 that I found out through the way that were
13 involved in anthropology and biological
14 sciences. But that -- I mean, that even made
15 the number, the ratio even smaller.

16 Q. It is a small minority?

17 A. Minuscule.

18 Q. I guess there was probably a
19 minuscule number of scientists who agreed with
20 evolution at one point in time.

21 A. I think that's an incorrect
22 statement.

23 Q. Okay.

24 A. Do you want an explanation of that?

25 Q. No. That's all right.

1 A. I didn't think you did. Because
2 I've got one.

3 Q. I'm going to show you what's
4 previously marked as Defendant's Exhibit 1 and
5 ask you if you've seen that before.

6 A. Yes.

7 Q. Do you believe that policy promotes
8 religion?

9 A. I think the wiggle room has been
10 reduced tremendously for it to come into a
11 science classroom.

12 Q. I'm asking you whether the text of
13 that policy, do you believe it promotes
14 religion?

15 A. I think it is acceptable.

16 Q. I was looking at some of the
17 newspaper articles, and there was some
18 indication, and I don't know if they quoted you
19 directly, that you had considered adding this
20 policy to this lawsuit at some point?

21 A. What you showed me was the
22 regulation that satisfied the policy -- that
23 supported the policy. So before those
24 regulations came out, yeah, there was some
25 concern.

1 Q. No, sir. I showed you the policy, I
2 believe.

3 A. No. You showed me --

4 Q. I showed you policy.

5 A. I think I read the regulation.

6 Q. Okay. Well --

7 A. Let me see both of them together so
8 I know what I'm talking about.

9 Q. I'm asking you about the policy,
10 which I believe is what I just showed you. The
11 one that's in your left hand. It says, "See
12 Regulation."

13 A. All right. The regulation is what I
14 find acceptable. The policy I found, there was
15 some wiggle room in there that they could
16 possibly start introducing some religious things
17 into it, and that's why we are questioning the
18 policy.

19 Q. That was what you said. And I asked
20 you based on the text of the policy.

21 A. Okay. Based upon the text of the
22 policy, okay, I think there is some wiggle room
23 that people could possibly wangle something they
24 called science into the classroom.

25 Q. I'm not asking you about what you

1 speculate might happen in the classroom. I'm
2 asking you whether that verbiage on that piece
3 of paper do you believe promotes religion.

4 A. It could allow the promotion of
5 religion.

6 Q. You can't answer my question just
7 based on the language itself?

8 MR. MANELY: But if the language
9 is --

10 A. The language is vague.

11 Q. Okay.

12 A. It is vague enough that I see in it
13 there is room for somebody to come in and teach
14 religion, calling it something else.

15 Q. But that language there standing by
16 itself, does it in your view promote religion?
17 Does it constitute an establishment of religion?
18 Does it encourage people to be religious?

19 A. It allows for that possibility, yes.

20 Q. Which part?

21 A. One of the things it says, "This
22 subject remains an area of intense interest,
23 research, and discussion among scholars." It
24 doesn't say among scientists. It says among
25 scholars. Biblical scholars could be in there.

1 Any number of different things can happen with
2 that.

3 And then it talks about "to ensure a
4 posture of neutrality toward religion."
5 Religion shouldn't be part of this. It is a
6 science class. The very mention of that says,
7 okay, it is there.

8 Q. So the mention of neutrality you
9 think raises questions?

10 A. One second. Okay. It says here
11 this policy -- I'm sorry. "It is the intent of
12 the Cobb County Board of Education that this
13 policy not be interpreted to restrict the
14 teaching of evolution." That's fine right
15 there. "To promote or require the teaching of
16 creationism; or to discriminate for or against a
17 particular set of religious beliefs, religion in
18 general, or non-religion." So it doesn't say to
19 keep religion out. It says it can come in, but
20 don't do anything bad against it or promote it,
21 but you can let it in. It doesn't belong in a
22 science class. It leaves the door open.

23 Q. I was asking you before, did you
24 consider adding the policy as a part of the
25 lawsuit?

1 A. Prior to the regulations coming out,
2 yes.

3 Q. And why didn't you do that?

4 A. I wanted to see what the regulation
5 was.

6 Q. And why was that?

7 A. Because I really don't want to sue.
8 I want this resolved in the appropriate way. I
9 want the sticker out of the book because it
10 doesn't belong there. It is one facet of the
11 separation of church and state in our country
12 that is being violated.

13 Q. But if you thought that the policy
14 promoted religion, and I think you said it did,
15 why wouldn't you add it to the lawsuit?

16 A. Because they said there was a
17 regulation coming up. In fact it says so right
18 at the top, "See Regulation." So until I saw
19 the regulation that clarified that further,
20 there is no sense jumping the gun.

21 Q. The regulation is what was marked as
22 Defendant's Exhibit 2.

23 A. Okay. What is your question?

24 Q. Do you believe that promotes
25 religion?

1 A. No.

2 Q. You think it's appropriate?

3 A. I would have written it differently,
4 but it's okay.

5 Q. Did you ever state to anyone that
6 you felt the policy was appropriate?

7 A. No.

8 Q. Did you ever hear your attorney
9 express the opinion that it was appropriate,
10 that it was an improvement that helped the
11 situation?

12 MR. MANELY: And those are separate
13 ideas.

14 Q. Did you ever hear your attorney
15 express something, again, to the satisfaction of
16 the policy?

17 A. No. In fact, I'm confused as to why
18 the policy and the regulation are even coming up
19 when I'm suing to get the sticker out of the
20 book, because whether or not the policy and
21 regulation does what I expect it to do, the
22 sticker is still wrong.

23 MR. MANELY: And again just so we
24 are clear, there is the issue that was raised by
25 Dr. Plenge, which supports Jeff's concern about

1 the policy as applied that the policy will be
2 used to permit the discussion of intelligent
3 design and creation science in the classroom.

4 MR. GUNN: Well, we disagree on that
5 point.

6 MR. MANELY: Well, along the lines
7 of similar transaction evidence, just so you
8 know -- do you want to go off the record for a
9 second?

10 (Whereupon off-the-record discussions
11 ensued.)

12 Q. When you were teaching, did any kid
13 ever raise an issue that you felt was
14 nonscientific when you were talking about
15 science?

16 A. In the ten years that I taught, and
17 I taught all sorts of subjects, obviously since
18 I spent a lot of time in elementary school, what
19 I taught wasn't challenged. Elementary school
20 children up in New York, while they have
21 religious training and upbringing, the issue
22 doesn't rise as much as it does in other places.
23 So I didn't encounter it as a teacher.

24 Q. And I'm not asking you about being
25 challenged. I'm just asking whether you ever

1 had, for instance, a question, well, that sounds
2 different than what my parents told me.

3 A. I can honestly say it never came up.

4 Q. Really?

5 A. Honestly.

6 MR. MANELY: Let me ask if you
7 include along that, because I need to hear your
8 question more broadly, a kid saying along the
9 intelligent design argument, what do you mean
10 the moon is made of a rock? It is actually made
11 of green cheese, isn't it? Would you include
12 that as part of bringing nonscientific views
13 into the --

14 MR. GUNN: No. I mean, I think
15 that's more of a factual thing. I was thinking
16 more in terms of, you know -- I think he
17 understood my question, just in terms of whether
18 there was anything more along the lines of
19 something religious coming in there in response
20 to something you were instructing.

21 MR. MANELY: Some religions may have
22 the point of view that the moon is made of green
23 cheese.

24 MR. GUNN: Could be, but I don't
25 know about that one.

1 THE WITNESS: It never came up.

2 Mr. GUNN: I think that's it.

3 MR. MANELY: Okay.

4 (Deposition was adjourned, 2:19 p.m.)

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1 Pursuant to OCGA 9-11-28, I hereby disclose that
2 Donovan Reporting, P.C., has been hired by the
3 deposing attorney to provide reporting services
4 for this deposition. There is no special fee
5 arrangement between Donovan Reporting, P.C., and
6 the parties and/or attorneys in this deposition
7 aside from our regular and customary fee
8 schedule; further, I have not entered into any
9 contractual arrangement other than for the
10 taking of this deposition, financial or
11 otherwise, with any person or entity in this
12 matter and am taking this deposition in full
13 compliance with OCGA 15-14-37. Fees are
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17 location of deposition, length of deposition,
18 expedited requirements, medical experts, video,
19 exhibits, waiting time, travel, realtime, etc.
20 A complete detailed fee schedule is available
21 upon request. This disclosure was provided to
22 all counsel at the commencement of the
23 deposition and is hereby incorporated into and
24 made a part of the transcript.

25

1 I, JEFFREY MICHAEL SELMAN Deponent, do hereby
2 certify that I have read the foregoing
3 deposition, and the same is a true and accurate
4 transcript of my testimony, except for the
5 changes listed below, if any.

6 PAGE/LINE/CHANGE

REASON

7 _____
8 _____
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18 If additional space is needed, please attach
19 separate sheet(s) and indicate number of
20 additional page(s) here: _____

21 _____
jeffrey MICHAEL SELMAN, Deponent

22 _____(Notary Public)

23 Date Notarized: _____

Donovan Reporting, P.C. FAX: 770-428-5801

24 237 Roswell Street, Marietta, GA 30060

Date of Deposition: July 8, 2003 CR: RAE

C E R T I F I C A T E

GEORGIA

COBB COUNTY

I hereby certify that the above and foregoing pages 1 through 60 are a true, complete, correct and exact transcript of my shorthand notes taken in the above-referenced matter;

That same constitutes a true, complete, correct and exact record of the above-referenced matter;

That same was transcribed through computer-assisted transcription;

That I am not of kin or counsel to any of the attorneys or parties, nor am I in the regular employ of any of the attorneys or parties;

This _____ day of _____, 2003.

Robin A. Elawady, CCR B-2224

Certified Court Reporter