

CITATION 7 CONTINUED

At approximately 2:15 P.M. 4-22-99 Dan Briggs meets with Peter Waldau and Bob Layer who is being sued over the easement. Again the gate damage is discussed.

D.B. - I know I asked somebody and it was one of our guys.

P.W. - You said it was done by David or Kelsey.

D.B. - One of our guys I said.

I have to be careful - I don't want to be in court.

Dan Briggs encourages dialog with Tom McCloskey to seek resolution:

D.B. - So sometimes when you get those people and they really feel that you're really not trying to get money from them just because they've got money, and you're really not trying to get nothing for nothing. Sometimes I've seen these people be human. And it's really easy over the phone not to be.

..Or to have another young guy go "Tom I'll take care of that for ya." "Hey Dan go ahead and knock down that G---" (Briggs cuts off sharply) Or you know or whatever. I'm making these things up. You know what I'm saying... You get them in person and magic happens, it does. So let me ask him [Tom McCloskey] these questions.

Dan Briggs discusses gating and posting of traditional public trails on Molooa Bay Ranch:

D.B. - It's real easy for these people [Briggs' employers] I noticed to say "O.K. God damn it. Forget it. Anybody down there is trespassing." That's what I noticed and that's not going to work.

Bob Layer - That's not good. That's fire.

D.B. - That's fire. That's not good we don't need that here. Maybe that's the way it's done in the Big City.

As Witness
Bob Layer