

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
3:75-CR-26-3  
5:06-CV-24-F

\_\_\_\_\_  
UNITED STATES OF AMERICA )  
 )  
v. )  
 )  
JEFFREY R. MacDONALD )  
Defendant )  
\_\_\_\_\_ )

**AFFIDAVIT OF COUNSEL REGARDING DEPOSITIONS**

NOW COMES defendant, Jeffrey R. MacDonald, by and through his undersigned counsel, and provides the following list of people he would depose pursuant to this Court's order of 8 June 2012:

George M. Anderson  
James L. Blackburn  
Jack B. Crawley, Jr.  
Janice S. Glisson  
Cecil Goins  
Dennis C. Meehan  
Brian M. Murtagh  
Wade M. Smith  
Lee W. Tart

As this Court is aware, Mr. MacDonald is indigent and has been accorded status under the Criminal Justice Act. Although he has waived his right to court-appointed counsel and has been and will be represented by the undersigned for the purposes of the evidentiary hearing, Mr. MacDonald remains indigent for the purposes of necessary litigation expenses.

He will be seeking authorization for funds under the CJA to conduct these depositions, and defend any depositions noticed by the government, to include necessary expenses for court reporters, subpoenas, travel, and the like excluding attorney fees.

WHEREFORE, Jeffrey R. MacDonald respectfully requests this Court allow him to take the depositions of the named individuals pursuant to a schedule to be agreed upon by the parties.

This the 27<sup>th</sup> day of June, 2012.

**RUDOLF WIDENHOUSE & FIALKO**

/s/ M. Gordon Widenhouse, Jr.

N.C. State Bar #10107

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Attorney for Jeffrey R. MacDonald

**CERTIFICATE OF SERVICE**

I hereby certify that on 27 June 2012, I electronically filed the foregoing Affidavit of Counsel Regarding Depositions with the Clerk of Court using the CM/ECF system which will send notification of such filing to counsel of record in this matter.

**RUDOLF WIDENHOUSE & FIALKO**

/s/ M. Gordon Widenhouse, Jr.

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