

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

THE SATANIC TEMPLE, INC.

PLAINTIFF

V.

CASE NO. 5:22-CV-5033-TLB

**LAMAR ADVANTAGE GP COMPANY, LLC,
LAMAR ADVANTAGE HOLDING COMPANY, and
LAMAR ADVERTISING COMPANY**

DEFENDANTS

**EXHIBIT 2 TO
DEFENDANTS' RESPONSE TO THE SATANIC TEMPLE, INC.'S
MOTION IN LIMINE TO EXCLUDE EXPERT TESTIMONY**

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION

THE SATANIC TEMPLE, INC.,

Plaintiff,

v.

LAMAR MEDIA COMPANY, LAMAR

ADVANTAGE GP COMPANY, LLC, and

LAMAR ADVANTAGE HOLDING COMPANY,

Defendants.

Case No.

5:22-CV-5033-

TLB

VIDEOTAPED DEPOSITION OF

CORPORATE REPRESENTATIVE FOR THE SATANIC TEMPLE, INC.

LUCIEN GREAVES, (PSEUDONYM)

DATE: Friday, February 3, 2023

TIME: 10:29 a.m.

LOCATION: The Satanic Temple

64 Bridge Street

Salem, MA 01970

REPORTED BY: Robert Lombardi, Notary Public

JOB NO.: 5694152

EXHIBIT
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1 WHEREUPON,
2 LUCIEN GREAVES, (PSEUDONYM),
3 called as a witness, and having been first duly sworn
4 to tell the truth, the whole truth, and nothing but
5 the truth, was examined and testified as follows:

6 THE REPORTER: You may proceed today,
7 counsel.

8 EXAMINATION

9 BY MS. KEITH-BOLDEN:

10 Q Good morning, Mr. Greaves. As you just
11 heard, my name is Sarah Keith-Bolden, and I'm here on
12 behalf of Lamar Advantage GP Company and Lamar
13 Advantage Holding Company. Could you state your name
14 for the record?

15 A Could you be more specific?

16 Q Well, what name are you going to provide for
17 us today?

18 A Lucien Greaves. L-U-C-I-E-N G-R-E-A-V-E-S.

19 THE VIDEOGRAPHER: Excuse me.
20 Videographer here. Lucien, could you pull your mic up
21 a little higher, please?

22 THE WITNESS: Oh, I'm sorry.

23 THE VIDEOGRAPHER: Great.

24 THE WITNESS: Was it difficult to hear
25 me?

1 THE VIDEOGRAPHER: No, I could hear
2 you. I just -- well, you can put --

3 THE WITNESS: I -- I didn't know if it
4 was on her end.

5 THE VIDEOGRAPHER: Okay. No, that's
6 fine.

7 THE WITNESS: There. Okay.

8 THE VIDEOGRAPHER: Okay. That's good.

9 BY MS. KEITH-BOLDEN:

10 Q And is that your legal name?

11 A It is not.

12 Q What is your legal name?

13 MR. KEZHAYA: Object to associational
14 privilege.

15 And also, don't answer that.

16 THE WITNESS: Okay.

17 BY MS. KEITH-BOLDEN:

18 Q So the name Lucien Greaves; what do you use
19 that name for?

20 A As a pseudonym.

21 Q And do you use that pseudonym when you're
22 doing work for The Satanic Temple?

23 A I do.

24 Q Have you ever been deposed before?

25 A I have.