

1 Thereupon,

2

3 having been first duly sworn or affirmed, was

4 examined and testified as follows:

5

DIRECT EXAMINATION

6 BY MR. BOBER:

7 Q Good morning, Mr. .

8 A Good morning.

9 Q So we are here for the continuation of your
10 deposition.

11 A Thank you, very much.

12 Q Since it's been a little while since I saw you
13 last, I just want to remind you^{of} some of the ground rules
14 for today.

15 If at any point I ask you a question and it's
16 not completely clear to you, or if you don't understand
17 the question, just tell me right away, and I'll try to
18 make it more clear for you, if I can.

19 A Okay, thank you.

20 Q Also, if you don't know the answer to the
21 question, just tell me you don't know. In other words,
22 please don't guess.

23 A Okay.

24 Q And if you're not sure of your answer, would
25 you also let me know that?

1 A Okay.

2 Q If at any point you feel like you need to stop
3 for the restroom, a glass of water, coffee, whatever,
4 you let me know, and I'll be glad to give you as much
5 time as you need? ^{no ?}

6 A Thank you, very much.

7 Q You're welcome. I understand, I remember you ^{add --}
8 speak a little bit of English, but obviously we have a ^{an}
9 interpreter here who is here to translate. So before
10 you answer any of my questions, even if you understand a
11 little bit in English, please wait for the interpreter
12 to finish her translation so we can make sure that you
13 fully understand the question. Okay?

14 A I understand.

15 Q Thanks. All right. Since the time I saw you
16 last, and that was in July of 2014, have you been
17 working since that time?

18 A I am presently retired.

19 Q When did you retire?

20 A This year.

21 Q What month of this year; ^{add ,} if you know?

22 A I started the paperwork sometime last year.
23 And I think I was retired either in January or February,
24 more or less.

25 Q I know you told me your birth date the last

1 time. How old are you now, sir?

2 A Seventy years old.

3 Q This may sound like a silly question, why did ^{add : cap}
4 you retire?

5 A Legally, the law allowed me to retire at 65,
6 but I didn't have accumulated time, enough sufficient
7 accumulated time in order for me to retire.

8 Q In this country?

9 A And also I wanted to acquire a little bit more
10 benefits because I was going to get very little.

11 Q So that's why you continued to work until 70
12 instead of retiring at 65?

13 A Right, exactly, because of that, and to
14 complete ten years of work.

15 Q Here in the United States?

16 A Yes.

17 Q I understand some people ^{add ,} after they retire ^{add ,}
18 still continue working. I understand that you retired
19 in January or February of 2015, did you have any ^{add . cap}
20 employment since then?

21 A I work. Not at a particular place, but if
22 ^{plural} someone need some carpentry work, something that is not
23 too complicated, I do that for them.

24 Q And how often -- strike that.

25 Since you retired, how often are you doing

1 **carpentry work, more**
1 carpentry, work more or less?

2 A Very little.

3 Q How much do you mean by that?

4 A If I could have, I would have said exactly the
5 amount. I said a little. I can't really tell.

6 Q What I mean is, people may mean different
7 things when they say, "very little". What do you mean
8 by very little, approximately?

9 A It's not often, it's not --

10 Q Once a week, once a month?

11 A One day, **add . cap** a day, on a certain day I get a **add ,**
12 job **add ;** and I work for two or three days, I might earn 80 or
13 100.

14 Q How often does that happen, since you retired?

15 A Two or three occasions.

16 Q And when you work on those occasions, you do
17 carpentry work?

18 A As long as it's a simple task, or a simple
19 job.

20 Q Like what?

21 A Installing baseboard -- not baseboard.

22 Q Chair rail?

23 A Chair railing.

24 Q Are you receiving Medicare benefits or
25 **Medicaid benefits presently, or Medicaid?**