

WOOD - Cross (by Ms. Scanlan)

1 Q So for the transactions that you submitted for Red Pepper  
2 Pizzeria, for instance, there could be fraudulent transactions  
3 in there that the source of that is not this breach; right?  
4 There could be John Doe's credit card number, that somebody  
5 took his credit card and did a fraudulent transaction, that has  
6 nothing to do with that. You wouldn't know; right?

7 A Potentially, yes.

8 Q So what did you do to avoid having that sort of thing  
9 happen, where there's a fraudulent transaction that's being  
10 attributed here that really has nothing to do with this? What  
11 were the steps taken to avoid that?

12 A Well, I know a lot of the card brands, they can do their  
13 own analysis to see where the common point of compromise was.

14 Q Sure. But what did you do to avoid that? You gave them  
15 credit card numbers, asked for information, they gave you  
16 information back.

17 What did you do to make sure that that's the information  
18 that goes with this breach?

19 A I didn't specifically verify that.

20 Q You indicated that some of the card issuers sent you back  
21 individual account records; is that correct?

22 A Yes.

23 Q And some of them did not?

24 A Well, I believe they all did. I'd have to look back,  
25 again, at my records. But most of them provided individual

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1 transactional information for each card number.

2 Q Did you verify that those transactions were fraudulent,  
3 with the account holders?

4 A No, I did not.

5 Q And in terms of these -- all these financial institutions  
6 that are listed here, right, you indicated that some of this  
7 information regarding which institution it is you got all off  
8 these records that tell you what string of BIN numbers go with  
9 what financial institution; right?

10 A Correct.

11 Q Did you request records from all of these places to verify  
12 that you had the correct amounts for each of these financial  
13 institutions?

14 A Did I reach out to the individual banks to verify?

15 Q Correct.

16 A No.

17 Q Okay. So these -- just so I understand, so all of these  
18 financial institutions, these 3,715, you have not verified with  
19 them that this is the right amount for their loss; right?

20 A No. I'm going off what the card brands were reported from  
21 them.

22 Q But you didn't check with them to see if that's correct?

23 A No.

24 MS. SCANLAN: May I have one moment, Your Honor?

25 THE COURT: You may.