

Memorandum

To: File
From: W. Charles Perry
Date: December 1, 1999
Page: 1 of 2
Project: California vs. Dosanjh & Nekrawesh
Re: Anita Nekrawesh 2/12/97 Deposition Transcript (“Statement Under Oath”)

Page	Summary
22	Work hours at business M-F 7A – 6P.
23	Sonny opened business in AM. Alarm was by front door on Horner Street.
25	10 minutes to travel from home (34500 Fremont Boulevard, Apt. 101, Fremont, CA 94555) to business (3961 Horner Street, Union City, CA) via driving a 1994 Honda Civic EX. [NOTE: 4 MILES PER MAP BLAST ~ 2 FREEWAY & 2 SURFACE STREETS]
26	Employee parking lot in back of building.
29	Alleyway behind LOI accessed from Vallejo Street provided access to parking.
37	DOI 6/3/97 – Sunday
38	Arrived at LOI ~9:00 PM.
41	Went to LOI to meet Sonny – personal meeting.
42	Were planning on going to another location – going on a date. AN does not recall if drove from home or somewhere else.
43	Parked in front of building on Horner street. SD standing by door on Vallejo street. SD was doing “something with the light.”
45	Could see SD because drove down Horner toward Vallejo.
46	SD was fixing light by side door. AN could see this as she walked toward SD.
47	SD was not replacing bulb, he was “touching the lamp, but it was halfway open, I think.”
48	No one was in vicinity except SD and AN.
49	SD was assembling lamp – he did not have a screwdriver or any other tool.
49	AN & SD were going to go to a movie. AN wanted to go, SD wanted to fix lamp, AN decided to use restroom inside building.
50	AN used personal key to open door (it was closed & locked). “I opened the screen, then the door, and I ent inside, and I saw the fire.” Door is a single door
51	Door only has knob-lock – it does not have dead-bolt.
54	AN walks straight ahead toward bathroom door on far side of back room (NW corner of building), goes 1-2 steps not certain), “Well, I opened the door and I saw the fire and I closed the door back.” Fire was coming from double door.
57	Sees fire on floor.
58	Flames were coming up from floor like flames from a log in a fireplace.
59	Flames were knee height - ~2.5 ft above floor level. “I just saw the fire ad closed the door and walked out, I didn’t mean walk, run.”
60	Evening was hot.
61	Door knob felt normal – hot hot – did not burn hand. Room temperature felt normal when AN walked inside.
64	AN turned around, closed the door, grabbed Sony, and ran.
65	AN grabbed Sonny’s back and screamed fire. AN did not smell gasoline or anything unusual.
68	AN was at LOI only long enough to park, walk down sidewalk, speak to SD, unlock door, etc. No other delays. SD & AN ran down Vallejo away from Horner.
69	AN & SD ran down alley behind building toward Union City Blvd (next street parallel to Vallejo Street to west).
71	Entered United Food & Liquor, “We were screaming call the police.” “Sonny called the cops.” SD ran inside. AN ran outside.
72	Watches building burning from store while SD made call.
73	Building was popping – “like noise, fire.” Popping was from PG&E poles.
74	Can see car on fire.
75	AN wanted to move car. But “these people” would not allow her to do so because of risk.
95	AN did not see any smoke inside building when she went inside to use toilet. As AN ran up street, she heard the popping of windows (on Vallejo Street? see exhibit for “X1 mark).
97	Heard breaking of window – “it made a lot of noise.” The sound of shattering glass. Did not see glass shoot from

Memorandum

To: File
From: W. Charles Perry
Date: December 1, 1999
Page: 2 of 2
Project: California vs. Dosanjh & Nekrawesh
Re: Anita Nekrawesh 2/12/97 Deposition Transcript ("Statement Under Oath")

	window.
98	Did not hear an explosion. Does not recall a whoosh sound while in building.
99	Heard fire sound when inside building.