

15 detail in my head right now, no. No, I  
16 don't.

17 Q. So, you had no idea, no idea  
18 whatsoever?

19 A. Yes, I did, but not the  
20 detail of --

21 Q. I see.

22 MR. WACHTEL: Excuse me.

23 BY MR. ALTMAN:

24 Q. So, you had a general  
0014

1 understanding --

2 A. I'll wait. I'll wait.

3 Q. You had a general  
4 understanding that at some point in time  
5 the \$270 million plus notes were going to  
6 be finally due and payable, the end of  
7 the note, fully due and payable, but you  
8 just didn't know precisely when it was,  
9 right?

10 A. Exactly.

11 Q. And one of the things that  
12 some people around you were doing at the  
13 time were seeking to secure financing to  
14 replace that; isn't that right?

15 A. That's right.

16 Q. Because the notes were  
17 coming due, and once they were due, they  
18 have -- you have to pay them, right?

19 A. That's right.

20 Q. And you didn't have \$272  
21 million at the time, right?

22 MR. WACHTEL: Objection.

23 THE WITNESS: Well, I won't  
24 say that. I don't know.

0015  
1 BY MR. ALTMAN:

2 Q. Well, you had assets worth  
3 more than \$272 million, right?

4 A. Yes.

5 Q. Assets worth, in fact, much,  
6 much more than \$272 million, correct?

7 A. Of course, of course.

8 Q. But you just didn't have the  
9 cash with -- to pay back Bank of America  
10 or to Fortress the \$272 million, right?

11 A. It should have been there,  
12 but it wasn't.

13 Q. Separate and apart from your  
14 ownership interest in the MIJACK catalog,  
15 Neverland and your interest in Sony ATV,  
16 you think you should have had available  
17 cash of \$270 million?

18 A. Absolutely.

19 Q. From what source?

20 A. From my royalties, from the  
21 generation of my catalog, but there's a  
22 lot of rip-off artists.

23 Q. But you didn't have the  
24 money, as a matter of fact; isn't that

0016  
1 right?

2 A. Probably not.