

# Exhibit 41

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

-----  
ANDREW COLBORN,  
Plaintiff, CIVIL ACTION NO. 19-CV-0484  
-vs-  
NETFLIX, INC., ET AL, \*\*\*CONFIDENTIAL\*\*\*  
Defendants.  
-----

DEPOSITION OF: BRENDA SCHULER  
DATE: May 20, 2022  
TIME: 8:39 a.m. to 4:57 p.m.  
LOCATION: Godfrey & Kahn, S.C.  
833 East Michigan Street  
Suite 1800  
Milwaukee, Wisconsin 53202  
REPORTED BY: Janet D. Larsen, RPR

1 set that exhibit to the side.

2 A. Okay. Okay.

3 Q. So Exhibit [10](#) again begins with Colborn Texts  
4 4664.

5 A. All right.

6 Q. We talked about this before. This is the email  
7 where you asked Mr. Colborn to send you a bunch of  
8 stuff from Manitowoc County before he retires.

9 Do you see that?

10 A. I do, yes. M-hm.

11 Q. And then he says, I will send you what I have. In  
12 the second text from you, you say, Thank you.  
13 I'll take them all. This director is amazing,  
14 Andy. Honestly. I'm so excited that I made the  
15 decision to follow through. He trusts us.  
16 Appreciates us. He's a great guy. Very pro LE  
17 and just fair in general.

18 Do you see that?

19 A. Yes.

20 Q. And are you talking about Mr. Rech here?

21 A. Yes.

22 Q. And you say, very pro LE. Do you mean very pro  
23 law enforcement?

24 A. Yes.

25 Q. If you could flip to the third page. Bates No.

1 A. Right.

2 Q. And he says to you, How did it look? Pro Avery?  
3 You say, I didn't watch the video yet but thanks  
4 for sending it.

5 He says both of those things to you.

6 A. Yes.

7 Q. And then you say, Lol. Not pro Avery. It's just  
8 a teaser for now for the public and objective,  
9 question mark. No worries. It'll lean towards  
10 gaf soon enough. And he says, Okay. Lol. And  
11 includes some emojis.

12 Do you see that?

13 A. I do.

14 Q. And are you talking about the teaser here for  
15 Convicting a Murderer?

16 A. Yes.

17 Q. That was just released to the public or was about  
18 to be?

19 A. Yes, yes. Hold on. Yes. It was -- When did  
20 Making a Murderer 2 come out? It was just right  
21 around that time. It was right around the time  
22 that Making a Murderer 2 came out. That's -- So,  
23 yes, it was public.

24 Q. Okay. And in your green text here, it says the  
25 teaser is -- I guess I'm not totally following the

1 punctuation, but I think you're saying that the  
2 teaser is fairly objective; is that right?

3 A. Yes.

4 Q. And then you say, No worries. It'll lean towards  
5 gaf soon enough; correct?

6 A. GAF, yes.

7 Q. And GAF means guilty as fuck?

8 A. Yep.

9 Q. So the actual documentary is going to be very anti  
10 Steven Avery; is that fair?

11 A. Yes.

12 MR. KURTZ: Objection. Argumentative.  
13 Vague and ambiguous.

14 Q. You can answer.

15 A. Oh, I didn't know about that one.

16 It will, it will give the full  
17 information that will show that Steven Avery is  
18 guilty, yes.

19 Q. And it will I think you used the word vindicate a  
20 little bit ago, it will vindicate Mr. Colborn; is  
21 that correct?

22 A. I don't know if I used that word, but I --

23 Q. I think you said he felt vindicated by the  
24 verdict.

25 A. I was going to say I don't think I said that this

1 would vindicate him, our film would. He was  
2 vindicated by the guilty verdict, yes, that's  
3 correct, yes, for that.

4 Q. Right?

5 A. Yes.

6 Q. And the film you're working on will show that  
7 Mr. Avery, as you put it, is g-a-f, and it will  
8 show you that Mr. Colborn was a good police  
9 officer; is that correct?

10 A. It will show that he's guilty after proving that,  
11 and it will give Andy's side of the story. Is  
12 that fair? That's the best way I can describe it.

13 (Exhibit [2032](#) marked for identification)

14 Q. Would you say Convicting a Murderer will humanize  
15 Mr. Colborn?

16 MR. KURTZ: Same objections.

17 A. Yes.

18 Q. You can answer.

19 A. Yes.

20 Q. So you've just been handed Exhibit [2032](#). These  
21 are more texts between you and Mr. Colborn;  
22 correct?

23 A. Yes.

24 Q. And these begin at Bates No. 4150, in the bottom  
25 right-hand corner. Do you see that?

1 STATE OF WISCONSIN)  
2 MILWAUKEE COUNTY )

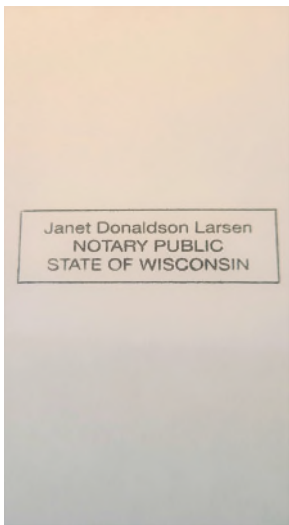
3 I, JANET D. LARSEN, a Notary Public in  
4 and for the State of Wisconsin, do hereby certify that  
5 the deposition of BRENDA SCHULER was taken before me  
6 under and pursuant to the Federal Rules of Civil  
7 Procedure on the 20th day of May, 2022.

8 That before said witness testified,  
9 she was first duly sworn by me to testify the truth.

10 That I am not a relative or employee or  
11 attorney or counsel of any of the parties, or a  
12 relative or employee of such attorney or counsel, or  
13 financially interested directly or indirectly in this  
14 action.

15 That the foregoing pages are a true and  
16 correct transcription of my original shorthand notes  
17 taken at said time and place.

18  
19  
20  
21  
22  
23  
24  
25



Dated this 24th day of May, 2022  
at Milwaukee, Wisconsin.

*Janet Donaldson Larsen*  
\_\_\_\_\_  
JANET DONALDSON LARSEN  
REGISTERED PROFESSIONAL REPORTER  
NOTARY PUBLIC, STATE OF WISCONSIN  
MY COMMISSION EXPIRES 1-22-26