

NO. 2005-PC-0843

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IN THE GUARDIANSHIP OF ) IN THE PROBATE COURT  
)  
LILLIAN GLASSER ) NUMBER ONE OF  
)  
AN INCAPACITATED PERSON ) BEXAR COUNTY, TEXAS

ORAL AND VIDEOTAPED DEPOSITION OF  
GILBERT MATHEWS  
NOVEMBER 18, 2005

**The Source of the Downpayment for the factory purchased from Campbell Soup Company was not disclosed. Gilbert Mathews, President of Lucifer Lighting, refused to disclose the source. Shortly after this purchase, Lillian Glasser lost control of her assets due to betrayal and breach of fiduciary duty by Goldman Sachs. There has never been a forensic accounting due to the effectiveness of the coverup on behalf of Goldman Sachs (annotated emphasis).**

1           A P P E A R A N C E S  
2 APPEARING FOR MARK GLASSER:  
3       Ms. R. Jo Reser  
4       DAVIDSON & TROILO, P.C.  
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6       7550 IH-10 West, Suite 800  
7       San Antonio, Texas 78229  
8       (210) 349-6484

9 APPEARING FOR SUZANNE MATHEWS:  
10       Mr. Les J. Strieber, III  
11       DAVIS, CEDILLO & MENDOZA, INC.  
12       McCombs Plaza, Suite 500  
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14       San Antonio, Texas 78212  
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16 APPEARING AS GUARDIAN AD LITEM FOR LILLIAN GLASSER:  
17       Mr. Stephen Jody Helman  
18       OSBORNE & HELMAN, L.L.P.  
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20       Austin, Texas 78701  
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22 APPEARING FOR LILLIAN GLASSER:  
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24       LOPEZ-SCOTT, P.C.  
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       Ms. Karen Ellert Pena  
       Attorney at Law  
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       San Antonio, Texas 78230  
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ALSO PRESENT:  
       Mr. Louis Soucie, Videographer  
       Mr. Mark Glasser  
       Ms. Suzanne Mathews

1           O R A L   A N D   V I D E O T A P E D   D E P O S I T I O N   o f  
2 GILBERT MATHEWS, produced as a witness at the instance  
3 of the Mark Glasser, and duly sworn, was taken in the  
4 above-styled and numbered cause on the 18th day of  
5 November 2005, from 10:06 a.m. to 5:01 p.m., before  
6 Cindy Cummings, CSR in and for the State of Texas,  
7 reported by machine shorthand, at the offices of Davis,  
8 Cedillo & Mendoza, Inc., McCombs Plaza, Suite 500, 755  
9 East Mulberry Avenue, in the City of San Antonio, County  
10 of Bexar, State of Texas, pursuant to the Texas Rules of  
11 Civil Procedure and the provisions stated on the record.  
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1 Q. It's not?  
 2 A. No.  
 3 Q. Oh, I'm sorry. I think you're right. I gave  
 4 you the wrong exhibit.  
 5 A. I would like to show it to Mr. Strieber.  
 6 Q. Sure. Is your house valued at over a million  
 7 dollars on the tax rolls of Bexar County?  
 8 A. Yes.  
 9 Q. And in addition, it -- during your wife's  
 10 deposition she stated that your net worth is  
 11 approximately \$5 million above net debt; is that  
 12 correct?  
 13 A. She said it was north of \$5 million.  
 14 Q. Is that correct?  
 15 A. Yes.  
 16 Q. And did you inherit any of that money from  
 17 your family?  
 18 A. No.  
 19 Q. You came from a family, I understand, that was  
 20 well off, but not rich like the Glassers; correct?  
 21 MR. STRIEBER: Objection. Form.  
 22 A. I'm not going to speak about the wealth of my  
 23 family.  
 24 Q. Well, you didn't inherit any money from them  
 25 to date; is that correct?

1 MR. STRIEBER: Asked and answered.  
 2 A. Well, by inherit, do you mean by bequest by  
 3 will?  
 4 Q. Yes.  
 5 A. I don't believe so. It's possible my father  
 6 left on his death a specific bequest to me. I don't  
 7 recall what his will said. He died eight years ago.  
 8 But with the exception of that, and I don't recall that  
 9 he did, I -- I've not received any bequests from my  
 10 family under a will.  
 11 Q. Okay. And you purchased a -- a building from  
 12 Campbell's Soup recently, did you, a factory?  
 13 A. I didn't purchase anything.  
 14 Q. Who purchased it? Did one of your  
 15 corporations purchase it?  
 16 A. A limited liability company purchased the  
 17 property which I'll refer to as the Campbell's Soup  
 18 property.  
 19 Q. Is that where you're moving your business to,  
 20 Lucifer Lighting?  
 21 A. Yes.  
 22 Q. And who provided the down payment for you to  
 23 purchase that property?  
 24 A. Do I have to answer this?  
 25 MR. STRIEBER: Let's go off the record.

1 Q. Let me ask, did it come from Lillian or  
 2 Benjamin Glasser?  
 3 A. Of course not.  
 4 Q. All right. Now, in February of 2002 when  
 5 Benjamin Glasser died, his will, we've been through  
 6 this, indicated a pretty equal distribution if his  
 7 children -- if his wife predeceased him between Suzanne  
 8 and Mark. That was in February.  
 9 In October of 2002, is it true that  
 10 Lillian executed a new will called the -- a will drafted  
 11 by the law firm in New York City of Paul Weiss?  
 12 MR. STRIEBER: Objection. Form.  
 13 A. I don't have any knowledge of any actions that  
 14 Lillian took with Paul Weiss Attorneys other than what  
 15 was produced in the litigation from Joseph Purcell's  
 16 files.  
 17 Q. And you recently this week had Jack Paul Leon,  
 18 who was apparently given custody of some wills by  
 19 Suzanne, furnish those to be seen by this Judge Spencer  
 20 in camera in this matter?  
 21 MR. STRIEBER: Objection. Form.  
 22 A. I -- I did not have any role or any  
 23 participation in what you asked.  
 24 Q. Well, you were here when your wife testified  
 25 that -- that Jack Paul Leon had possession of wills of

1 Lillian Glasser; correct?  
 2 A. Yes.  
 3 Q. And they have now been produced to Judge  
 4 Spencer, haven't they?  
 5 A. Yes.  
 6 Q. Is the Paul Weiss --  
 7 A. Let me say, I don't know what has been done.  
 8 I don't have the records.  
 9 MR. STRIEBER: For the record, I'll just  
 10 state that I obtained copies through Sharon Gardner's  
 11 office who had obtained copies previous to that for the  
 12 purpose of making summaries.  
 13 MS. RESER: Okay.  
 14 MR. STRIEBER: So we've produced copies  
 15 from Sharon Gardner's office together with the summary  
 16 that we had made in the mediation between your client  
 17 and our -- my client --  
 18 MS. RESER: And this would be of two --  
 19 MR. STRIEBER: -- and submitted it to the  
 20 court.  
 21 MS. RESER: And this is two different  
 22 wills; correct?  
 23 MR. STRIEBER: Yes. My cover letter said  
 24 the two wills, plus the summaries have already been  
 25 provided to the court pursuant to the court order.