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VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

CONNIE CLAY,

Plaintiff,

v.

CASE NO.
CL24-929

CITY OF RICHMOND AND PETULA
BURKS,

Defendants.

VIDEOCONFERENCED

DEPOSITION UPON ORAL EXAMINATION

OF SHEILA D. WHITE,

TAKEN ON BEHALF OF THE PLAINTIFF

September 10, 2025

KATHLEEN BEARD ADAMS, CCR, RPR, CRR

Court Reporter

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Also Present: William J. Hudson, Electronic Notary
Public for the Commonwealth of
Virginia at Large

Catherine Jacquemin, Office
Administrator, Ogletree Deakins

Sam Sylvester, Law Clerk,
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1 thoughts.

2 And I'm going to go through some --
3 first, I'm going to do some background questions and
4 some instructions, and then we'll go through your
5 actual experience with the City of Richmond. Okay?

6 A. Yes.

7 Q. Okay. Because we're remote sometimes
8 it's difficult to tell where someone's ending and
9 where the next person is going to begin speaking.

10 A. Uh-huh.

11 Q. I'll endeavor on my end to give a break
12 in between and to give your counsel an opportunity
13 to object if necessary. And I ask that you endeavor
14 to do the same. Is that all right?

15 A. Yes.

16 Q. Okay. Could you please state your full
17 name for the record?

18 A. Sheila [REDACTED] White.

19 Q. Okay. Ms. White, how are you currently
20 employed?

21 A. I am employed full-time.

22 Q. Yes. How are you employed?

23 A. I work for an organization.

24 Q. Ms. White, when I said if you could give
25 a complete answer, what do you do for a living right

1 now? Who employs you?

2 A. (No response)

3 MS. ROBB: Ms. White. If you could just
4 answer the questions I ask.

5 MR. WADDELL: Sarah, I'm just going to
6 note for the record we do have a concern with
7 sharing her employer's information just based on the
8 history. I'm not going to instruct her how to
9 answer the question. If she doesn't want to provide
10 that that's her decision. I think she has answered
11 your question that she's full-time employed, but you
12 can ask her.

13 MS. ROBB: I've never had someone who
14 does not tell me where they work. I guess I don't
15 understand. Should we go off the record and discuss
16 it?

17 MR. WADDELL: We don't need to. I just
18 don't think she feels comfortable giving personal
19 information about her employer based on some of the
20 actions that Ms. Clay has taken. She's entitled to
21 privacy.

22 You can ask her what you want to ask her
23 and if she tells you that she's employed by a
24 company I think she's answered your question. I
25 don't know that she has to tell you where she's

1 employed.

2 BY MS. ROBB:

3 Q. All right. Ms. White, why are you --
4 why do you feel uncomfortable based on the actions
5 of my client saying where you work?

6 MR. WADDELL: And I'll say that's my
7 representation not hers.

8 MS. ROBB: I understand. I'm going to
9 give her a chance to explain that.

10 BY MS. ROBB:

11 Q. Ms. White?

12 A. I feel uncomfortable because your client
13 has been on my LinkedIn page stalking me.

14 Q. What do you mean by that, Ms. White?

15 A. Exactly what I said.

16 Q. No. What do you mean by the word
17 "stalking"?

18 A. I think that has a common definition.

19 Q. I don't think so. I'm asking what you
20 think it is.

21 A. Exactly what I said, she's been on my
22 LinkedIn page stalking me.

23 Q. When has she been on your LinkedIn page?

24 MR. WADDELL: If you remember you can
25 answer.

1 A. Yeah. I don't recall the exact date.

2 BY MS. ROBB:

3 Q. Okay. Well, stalking is something more
4 than just before.

5 A. Well, that's your definition.

6 Q. Okay. Well, how many times?

7 A. LinkedIn doesn't give me the number of
8 times someone's been on my page.

9 Q. So it could be one?

10 A. It could be one. It could be more.

11 Q. Were --

12 A. I just know that she's been on my page.
13 We have no other affiliations. There's no reason
14 for her to be on my page.

15 Q. Well, you're a witness in this case.

16 A. But I don't want to share my information
17 with her. It is not relevant to this suit. So can
18 we just move on?

19 Q. I've asked you where you work, and if
20 you're saying you're not going to answer then you're
21 saying you're not going to answer -- and is that
22 what you're saying?

23 A. I think I've been clear.

24 Q. Are you saying that you're refusing to
25 answer where you work?

1 A. I have shared that I work and that
2 should be sufficient.

3 Q. Okay. All right. Ms. White, where do
4 you live?

5 A. I think you know where I live. You sent
6 the subpoena to my address.

7 Q. I'm just simply asking -- like let's
8 just --

9 A. I'm not answering.

10 Q. No, you're not.

11 Ms. White, in which city do you
12 currently reside?

13 A. [REDACTED].

14 Q. Thank you. How long have you lived in
15 Virginia?

16 A. Nine years.

17 Q. Okay. Did you come to Virginia to work
18 for the City of Richmond?

19 A. No.

20 Q. Okay. Where did you work just prior?

21 A. I do not want to answer that question.

22 Q. All right. One moment, Ms. White.

23 What qualifications did you have to be

24 the finance director for the City of Richmond?

25 A. What does that have to do with it?

1 Q. Ms. White, we can't -- this is not going
2 to work every single question. I asked you where
3 you worked prior. Normally that's how you set up
4 why someone has their job. Now I'm asking your
5 qualifications that made you the finance director
6 for the City of Richmond.

7 A. I was the deputy director. I was hired
8 as the deputy director for the City of Richmond.
9 When the director left he recommended that I sit in
10 the interim seat. And based on my performance I
11 applied for the job and was given the opportunity.

12 Q. One minute while I get a document.

13 Ms. White, I only just learned you were
14 going to be remote last evening and I didn't
15 anticipate physically being here. That's just an
16 explanation for why it might take a second for me to
17 get documents loaded. One moment.

18 Ms. White, let me ask you this: When
19 you began at the City of Richmond or when you --
20 let's say this: When you became the director of the
21 finance department how many people worked under you?

22 A. I don't recall.

23 Q. You don't know how many people worked
24 for you as the director of the --

25 A. I don't recall.

1 Q. Can you please give me a ballpark
2 answer?

3 A. Could you repeat the question?

4 Q. Ms. White, how many people worked under
5 you when you were the director of the finance
6 department for the City of Richmond?

7 A. Ballpark? Are you talking funded? Can
8 you be clear?

9 Q. Well, a finance department is a numbers
10 situation, so if you want to split it up and say
11 this many worked here and this many worked in this
12 department, because I know it was a big department,
13 you can answer however you see fit. I'm just trying
14 to figure out how many people did you -- were you
15 responsible for under your portfolio I believe is
16 the word.

17 A. I don't remember exactly, but ballpark
18 there were probably north of 140 positions. There
19 were a number of vacancies, so there might have
20 actually been filled at any given time around a
21 hundred, but I'm not sure.

22 Q. I have a question just because I'm being
23 curious. What happens -- if you have an unfunded
24 position what happens with the funding for that
25 position?

1 MR. WADDELL: I'm going to object for
2 the record. She is here in her personal capacity.
3 She's not a representative of the City.

4 MS. ROBB: I know.

5 MR. WADDELL: If you know the answer you
6 can answer. If you don't know then you don't know.

7 A. Yeah.

8 BY MR. WADDELL:

9 Q. You're the director -- you were the
10 director of finance and you don't know what happens
11 to that money?

12 A. I don't understand the question.

13 Q. Okay. Well, if you have unfunded
14 positions aren't they technically -- or unfilled
15 positions, excuse me, aren't they technically
16 funded?

17 A. That is correct.

18 Q. Where is -- where does that funding sit?
19 I'm not trying to -- I'm not trying to catch you.
20 I'm just interested in the answer to the question
21 for purposes of this lawsuit. It's a question
22 that's been in my head.

23 MR. WADDELL: I'm going to object to the
24 form. If you know the answer or understand the
25 question you can answer. If you don't you don't.

1 A. I'm not following the question, and so I
2 can't answer it.

3 BY MS. ROBB:

4 Q. All right. Ms. White, how many -- did
5 you have directors under you? What was the level
6 under you?

7 A. The next level under me could have been
8 a deputy or an administrative assistant.

9 Q. So -- well, administrative assistant
10 would report to you on an administrative basis. I'm
11 taking from your answer that the level just under
12 you in the hierarchy was a -- is a deputy?

13 A. Deputy director. Chief of risk
14 management. So...

15 Q. So is that two people who were under you
16 in the hierarchy, just under?

17 A. Just under -- no. There were more than
18 two people who reported directly to me.

19 Q. Okay. How many people were on the next
20 layer under you, under director of finance?

21 A. So let me just go through it. And that
22 changed over time, so just let me -- bear with me
23 for one second.

24 Q. All right.

25 A. The administrative assistant, and the

1 had a person who did policy, a person who did
2 analytics, there was also two deputies, and the risk
3 management, and then also debt.

4 Q. And what is that last one?

5 A. Debt and investments.

6 Q. Oh, debt. Sorry. I didn't understand
7 the word that you had said. Okay. I understand
8 now.

9 All right. And so what were your duties
10 as director of a hundred-some people and before
11 facing director for the City what was a day-to-day
12 like for you?

13 A. No day was the same.

14 Q. Okay.

15 A. So it would vary.

16 My chief responsibility was to
17 administer the finances for the City, and so all the
18 things that that entails, and there are a lot of
19 them.

20 Q. I assume. What were the main things
21 that it entailed? I don't need all the
22 nitty-gritty. I just want to know generally what
23 was it that you did.

24 A. So policy, assisted with policy,
25 carrying out whatever the directives were for the

1 council or mayor as relates to any of the financial
2 policies. Reporting to all of the various areas,
3 whether those are federal, local or state. Ensuring
4 that we met our obligations as it related to our
5 audits and our financial obligations as it relates
6 to paying vendors, administering contracts. All of
7 those things.

8 Q. Okay. One moment. Sorry. I am having
9 trouble getting a document to load, and I apologize
10 for that.

11 All right. What kind of training did
12 you receive when you onboarded at the City of
13 Richmond that you remember? What was the
14 orientation like is the question I'll ask.

15 A. I onboarded in the middle of COVID.

16 Q. Oh, gosh.

17 A. So -- yeah. So orien -- there was not
18 orientation because, obviously, no one was doing
19 orientation at that time. And the director was
20 there, but the person who had vacated the position
21 before me had left. And so onboarding consisted of
22 meeting the various directors and just starting to
23 read the code, the ordinances and just relevant
24 documents.

25 Q. Okay. And were you familiar with the

1 A. Not all positions had job descriptions.
2 So some did, some didn't.

3 Q. One moment.

4 Do you remember when the last training
5 for FOIA was that you attended?

6 A. I don't recall.

7 Q. Do you remember who presented?

8 A. I don't recall.

9 Q. What does FOIA require of a director of
10 a department at the City of Richmond?

11 A. I think it depends on your position. My
12 requirements are a lot different from someone
13 else's, so I have specific rules that I have to
14 follow.

15 Q. How many days does FOIA require for a
16 turnaround time when you'd receive a FOIA?

17 A. I don't recall the specifics.

18 Q. Okay. Was it quick?

19 MR. WADDELL: Object to form. You can
20 answer if you know.

21 THE DEPONENT: I don't -- I don't know
22 what she means by quick.

23 BY MS. ROBB:

24 Q. Well, I will move on.

25 What are the extra rules that you said

