was doing work, Mr. Rubenstein was doing work for Iviewit?

A. I'm not aware -- other than referring Iviewit to Meltzer, Rubenstein never did any work for Iviewit.

Q. Okay. So Rubenstein's sole role, from what you understand, is he referred Iviewit to the Meltzer Law Firm in New York?

A. Yes.

Q. Was he ever part of an advisory board member or was he an advisory board member to Iviewit? And we're talking about Mr. Rubenstein.

A. I have never used him as an advisory board member?

Q. Are you aware of whether or not he ever attended any board meetings with the directors of Iviewit?

A. He never attended a board meeting. I've never met the man.

Q. In regard to meetings with Proskauer Rose, did you have any meetings with Proskauer Rose concerning their retainer by Iviewit?

A. Only in the final weeks of Iviewit's presence in Boca Raton.
engagement agreement refers to the parent company of Iviewit.

Q. Well, let's go to my next question on this whole thing, and that is, with regard to, with regard to the approval by the board of directors, we've talked prior about the board of directors and Ken Rubenstein, was Ken Rubenstein -- you've previously stated that he didn't have any role with regard to the company, no active role?

A. That's correct.

Q. And I hate to bounce back and forth to you about this, he was never, like, an advisor or consultant or anything like that; he was just someone who was Proskauer Rose's person who did work on IP?

A. Yeah, I can't speak to the discussions that may have taken place between Mr. Wheeler and Mr. Rubenstein, but --

Q. I'm not asking you to. I'm just saying from what you know because obviously this deposition testimony is given on your own personal knowledge.

A. Yes. He played no active role in the company other than having directed the
company to work with Meltzer and this gentleman Rolf as the patent attorney.

Q. And that was his totality of his role from what you know?

A. Yes.

Now, let me parenthetically add, that I do understand and know that it was Eliot's desire to see him involved in an advisory role.

Q. Okay.

A. But that was never, that was never consummated.

Q. Okay. Did you ever want him to act in an advisory role?

A. I did not take any position on that.

Q. Okay. Did you ever represent that he should be in an advisory role?

A. No.

Q. Okay. So you really didn't have any opinion on what Mr. Rubenstein should or should not be doing with Iviewit?

A. Right.

Q. Okay. Did you have any discussions or correspondence at all with Rubenstein and Raymond Joao, I think it is? Is that how you pronounce it, J-O-A-O?