



1 IN THE CIRCUIT COURT OF THE 15TH
2 JUDICIAL CIRCUIT IN AND FOR
3 PALM BEACH COUNTY, FLORIDA
4 CASE NO.: 2018-CA-002317

5
6 WALTER E. SAHM AND
7 PATRICIA SAHM,
8 Plaintiffs,

9 v.

10 BERNSTEIN FAMILY REALTY, LLC,
11 BRIAN O'CONNELL, AS SUCCESSOR
12 PERSONAL REPRESENTATIVE OF
13 THE ESTATE OF SIMON L. BERNSTEIN;
14 ALEXANDER BERNSTEIN, ERIC BERNSTEIN,
15 MICHAEL BERNSTEIN, MOLLY SIMON,
16 PAMELA B. SIMON, JILL IANTONI,
17 MAX FRIEDSTEIN, LISA FRIENDSTEIN,
18 INDIVIDUALLY AND TRUSTEES OF
19 THE SIMON L. BERNSTEIN REVOCABLE
20 TRUST AGREEMENT DATED MAY 20, 2008,
21 AS AMENDED AND RESTATED;
22 ELIOT BERNSTEIN, AND CANDICE
23 BERSTEIN, INDIVIDUALLY AND AS
24 NATURAL GUARDIANS OF MINOR
25 CHILDREN JO., JA. AND D. BERNSTEIN;
AND ALL UNKNOWN TENANTS,
Defendants.

16 DEPONENT: ELIOT BERNSTEIN
17 DATE: OCTOBER 2, 2024
18 REPORTER: ANESIA ROBERTS

COPY

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1 APPEARANCES

2 ON BEHALF OF THE PLAINTIFFS, WALTER E. SAHM, PATRICIA
3 SAHM, AND CHARLES REVARO AS GUARDIAN OF THE WARD PAMELA
4 A. SAHM:

5 Robert A. Sweetapple, Esquire
6 Sweetapple, Broeker & Varkas, P.L.
7 4800 North Federal Highway
8 Suite 306D
9 Boca Raton, Florida 33431
10 Telephone No.: (561) 392-1230
11 E-mail: pleadings@sweetapplelaw.com
12 (Appeared via videoconference)

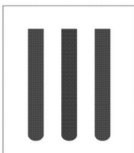
13 AND

14 Kathryn Lewis, Esquire
15 Kitroser Lewis & Mighdoll
16 631 U.S. Highway 1
17 Suite 406
18 North Palm Beach, Florida 33408
19 Telephone No.: (561) 721-0600
20 E-mail: kathryn@kitroserlaw.com
21 (Appeared via videoconference)

22 ON BEHALF OF THE DEFENDANTS, ELIOT BERNSTEIN, CANDICE
23 BERNSTEIN, ALEXANDER BERNSTEIN, ERIC BERNSTEIN, MICHAEL
24 BERNSTEIN, BERNSTEIN FAMILY REALTY, LLC, AND ALL

25 UNKNOWN TENANTS:
Inger M. Garcia, Esquire
Law Office of Inger Garcia
4839 Volunteer Road
Suite 514
Davie, Florida 33330
Telephone No.: (954) 394-7461
E-mail: attorney@ingergarcia.com
serviceinglaw@yahoo.com
(Appeared via videoconference)

Also Present: Cassandra Hahn, Attorney Sweetapple's
Office; Cynthia Miller, Attorney Sweetapple's
Paralegal; Robin Austin, Observer; Alee Carrino,
Observer; Luisa, Observer.



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INDEX

Page

PROCEEDINGS

5

DIRECT EXAMINATION BY MR. SWEETAPPLE

7

EXHIBITS

Exhibit

Page

1 - Draft Settlement Agreement

56

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STIPULATION

1
2
3 The VIDEO deposition of ELIOT BERNSTEIN was taken at
4 MILESTONE REPORTING COMPANY, 315 EAST ROBINSON STREET,
5 SUITE 510, ORLANDO, FLORIDA 32801, via videoconference
6 in which all participants attended remotely, on
7 WEDNESDAY the 2nd day of OCTOBER 2024 at approximately
8 10:03 a.m. (ET); said deposition was taken pursuant to
9 the Fla. R. Civ. P. 1.310.

10
11 It is agreed that ANESIA ROBERTS, being a Notary Public
12 and Court Reporter for the State of FLORIDA, may swear
13 the witness and that the reading and signing of the
14 completed transcript by the witness is not waived.

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PROCEEDINGS

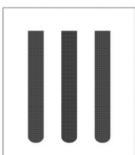
THE REPORTER: My name is Anesia Roberts, I'm the online video technician and court reporter today, representing Milestone Reporting Company, located at 315 East Robertson Street, Suite 510, Orlando, Florida 32801. Today is the second day of October 2024. The time is 10:04 a.m. We are convened by video conference to take the deposition of in the matter of Walter E. Sahn and Patricia Sahn v. Bernstein Family Realty, LLC, Brian O'Connell, as successor personal representative of the estate of Simon L. Bernstein, Michael Bernstein, Molly Simon, Pamela B. --

MR. SWEETAPPLE: Excuse me. We can -- excuse me. You can just say et al. Otherwise --

THE REPORTER: Okay. Thank you. Et al., pending in the Circuit Court of Palm Beach County, Florida. Case number 2018-CA-002317. Will everyone but the witness please state your appearance, how you're attending, and location you're attending from, starting with Plaintiff's Counsel?

MR. SWEETAPPLE: Yes. Robert Sweetapple and Cynthia Miller on behalf of the guardian, Charles Revard.

MS. LEWIS: Good morning. Kathryn Lewis on



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1 behalf of the guardian, Charles Revard. I am
2 attending from my home in Palm Beach County,
3 Florida. I am counsel of record in a related
4 guardianship matter, so I will be just observing,
5 not participating today.

6 MS. GARCIA: And I assume Mr. Sweetapple is
7 appearing from his office?

8 MR. SWEETAPPLE: Yes.

9 MS. GARCIA: Okay. Just because she asked.
10 Okay. Inger Garcia. I'm here with Mr. Eliot
11 Bernstein from my home office.

12 THE REPORTER: Mr. Bernstein, will you please
13 state your full name for the record and hold your ID
14 up to the camera, please?

15 THE WITNESS: Eliot Ivan Bernstein.

16 THE REPORTER: A little bit closer. Right
17 there. Okay. That's perfect. I can see your name
18 and you. Eliot. Thank you.

19 THE WITNESS: Uh-huh.

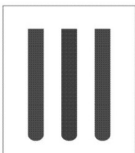
20 THE REPORTER: Do all parties agree that the
21 witness is in fact Mr. Bernstein?

22 MR. SWEETAPPLE: Yes.

23 MS. GARCIA: Yes.

24 THE WITNESS: Yes.

25 THE REPORTER: Mr. Bernstein, will you please



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1 raise your right hand? Do you solemnly swear or
2 affirm the testimony you're about to give will be
3 the truth, the whole truth, and nothing but the
4 truth?

5 THE WITNESS: I do.

6 THE REPORTER: Thank you. You may begin.

7 DIRECT EXAMINATION

8 BY MR. SWEETAPPLE:

9 Q. Good morning, Mr. Bernstein. How are you this
10 morning?

11 A. Good. How are you?

12 Q. I'm excellent. Thank you. Have you ever been
13 deposed before?

14 A. I have.

15 Q. On how many occasions?

16 A. One, I think.

17 Q. All right. And when was that?

18 A. That was a few years ago with your friend,
19 Alan Rose.

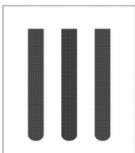
20 Q. Okay. And have you ever testified at a trial
21 before?

22 A. Trial?

23 Q. Or any court proceeding?

24 A. Oh. I've -- yes.

25 Q. How many times have you testified in court



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1 proceedings?

2 A. Numerous. I'm involved in numerous cases, and
3 I've represented myself pro se.

4 Q. Okay. So more than a dozen times you've
5 testified?

6 A. Oh, yeah. Yeah.

7 Q. More than 50 times?

8 A. Probably. Maybe 100 or so.

9 Q. Okay. So you're familiar with testifying?

10 A. I am.

11 Q. You've been placed under oath repeatedly?

12 A. Correct.

13 Q. Okay.

14 A. Well, no. Not under oath, meaning I've talked
15 to the Court pro se.

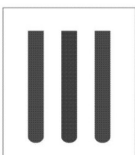
16 Q. Right.

17 A. So if that's testifying, I haven't been sworn
18 in, but maybe ten times.

19 Q. Okay. So basically, as you may remember from
20 Mr. Rose's deposition, I'm going to ask you questions
21 that you're expected to answer if you know the answer
22 under oath. Do you understand that?

23 A. I do.

24 Q. Okay. And it's quite possible that you're not
25 going to understand my question because it's



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1 complicated, confused, unintelligible. Just tell me
2 that you don't understand my question and I will
3 rephrase it; is that understood?

4 A. It is.

5 Q. All right. And we don't want you to speculate
6 or guess. If you don't know the answer, tell me you
7 don't know the answer; is that fair?

8 A. Sure.

9 Q. Is there any reason you're unable to give a
10 deposition here today? Are you on medication, doctor's
11 care?

12 A. I am on medication. I am in doctor's care. My
13 blood pressure is 230 over 150 this morning, and I'm on
14 heavy medication pending a two-year delay in an open
15 heart surgery for four arteries that are clotted. The
16 medicine does make me a little bit rough around the
17 edges on dates, but everything else I'm pretty clear
18 about.

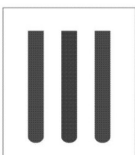
19 Q. Okay. So --

20 A. Okay. Yeah.

21 Q. With regard to your condition, if at any time
22 you need to stop and take a break, please let me
23 know --

24 A. Years ago.

25 Q. -- and we'll break, okay? I'm just saying,



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1 if --

2 A. Yeah, no.

3 Q. If it's too stressful or if you need to use
4 the facilities or -- you know, just let me know. This
5 is not --

6 A. Okay.

7 Q. This is not intended to be a painful
8 experience. It's a -- it's a -- it's a search for the
9 truth, essentially, regarding this case.

10 A. Okay.

11 Q. So what is your educational background?

12 A. Well, before we get started, under Rule 1310,
13 I just want to clarify with you that the deposition is
14 in good faith and whatnot. And I -- I wanted to find
15 out --

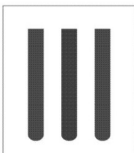
16 Q. Well, you're not here to ask me questions, and
17 you're not at all here --

18 A. No, but under 1310 I can ask the officer
19 conducting the deposition, which I think is you, if it's
20 being conducted purely. So the first question I have
21 is, were you contacted by the Palm Beach County
22 Sheriff --

23 Q. Okay.

24 A. -- regarding claims against you --

25 Q. Sir. Sir, excuse me.



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1 A. -- for criminal misconduct?

2 Q. Excuse me, sir.

3 A. Yes.

4 Q. I'm here to ask your -- to take your
5 deposition. It's in good faith.

6 A. Do you want me to repeat the rule?

7 Q. I'm doing this in good faith.

8 A. Do you want me to repeat -- it's -- it comes
9 under Florida 1310.

10 Q. Sir. Mr. Bernstein, I'm going to start asking
11 you questions. If you don't answer them, I will suspend
12 the deposition and go to the Court and seek sanction.

13 A. Okay. Good. And if you do do that --

14 Q. The deposition -- I'm telling you --

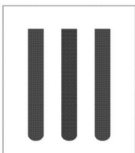
15 A. Listen, that's your --

16 Q. I'm telling you --

17 A. That's your right to do that.

18 Q. I'm telling you --

19 A. And I -- I accept that, but if you read the
20 rule, I have the right to tell the Court why I'm feeling
21 this is not a good faith deposition, which I'm telling
22 you because you're under a criminal investigation or
23 several, and you're aware of that, and therefore, I
24 think your objective is not to get to the truth, but try
25 to frame people for crimes or something or make up some



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1 fraud that you haven't exposed to anybody what the fraud
2 you're claiming is.

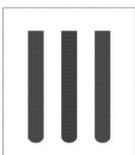
3 But more importantly, this deposition is being
4 used as a fishing for you to find out who is
5 investigating you, who we've talked to, et cetera, and I
6 think it's wholly bad faith, what you're doing, and how
7 broad and all that. So I do want you to take it up with
8 the judge, and I do have two exhibits I'd like you to
9 give to the judge to review if you're taking it to him,
10 and the first one --

11 Q. Are you done making -- are you done making
12 your statement?

13 A. -- has been submitted.

14 Q. Are you done making your statement?

15 A. Well, no. I'd like to -- I'd like to state on
16 the record for the judge to review, on 3-31-20 -- this
17 is from the Palm Beach County Sheriff Report. I'm sure
18 you got a copy of that. On 3-31-2023, I contacted Trust
19 Attorney Robert Sweetapple, who's listed as the attorney
20 of record or the plaintiff in this case involving the
21 Bernstein Family Trust. Mr. Sweetapple respectfully
22 declined to discuss the details of the case and stated
23 that Mr. Bernstein or his legal representatives had
24 previously raised all of this objection, all of their
25 objections in Court, and their appeals were denied --



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1 Q. Sir. Sir.

2 A. -- based on the evidence.

3 Q. Any records --

4 A. Did you make that statement to the police?

5 Q. Sir, any records that you -- Mr. Bernstein,
6 any records you want to append to this deposition for
7 the Court we will do at the end of the deposition. Now
8 I'm going to commence with your questioning, sir.

9 A. Well, if you're ending it to go get an order
10 from the judge --

11 Q. No, no. I'm going to -- if you're not --

12 A. -- because you're refusing to answer --

13 MS. LEWIS: Ms. Garcia, are you going to make
14 any attempt in good faith to control your client, or
15 should we just end this little song and dance?

16 THE WITNESS: Well, you're also in the
17 complaint --

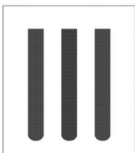
18 MS. LEWIS: I'm aware.

19 THE WITNESS: -- with the Palm Beach County
20 Sheriff. I'm sure you are.

21 MS. LEWIS: Yeah.

22 THE WITNESS: And so, you see, I don't think
23 you guys are doing this in good faith. You
24 shouldn't be doing this. You should both be --

25 MS. GARCIA: Okay.



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1 THE WITNESS: -- represented by Counsel at this
2 point.

3 MS. GARCIA: Five-minute break.

4 MR. SWEETAPPLE: Mr. Bernstein. Mr. Bernstein.

5 MS. GARCIA: Five-minute break, please, sir.
6 Five-minute break.

7 MR. SWEETAPPLE: Thank you. I -- please
8 understand. We're not going off the record.
9 Understand that Mr. Bernstein has been sanctioned by
10 Courts for this very type of conduct, and I will be
11 seeking to strike pleadings and to hold him in
12 contempt of Court.

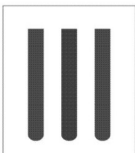
13 MS. GARCIA: The deposition hasn't started yet,
14 sir. I'm asking for a five-minute break --

15 MR. SWEETAPPLE: Yes.

16 MS. GARCIA: -- because you're --

17 MR. SWEETAPPLE: Yes, it has started. The
18 deposition has started, and I'm going to suspend it
19 for five minutes, and if this type of outrageous
20 conduct continues, I will be contacting --
21 suspending and contact the Court immediately. And,
22 you know, this abuse of the litigation system has
23 got to end, ma'am.

24 THE REPORTER: Okay. The time is 10:13 a.m.,
25 and we are off record.



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1 (OFF THE RECORD)

2 THE REPORTER: The time is 10:20 a.m., and we
3 are back on record.

4 BY MR. SWEETAPPLE:

5 Q. Mr. Bernstein, I was asking you, what is your
6 educational background?

7 A. I'm a college graduate.

8 Q. And where did you go?

9 A. University of Wisconsin-Madison.

10 Q. Okay. My son went there.

11 A. Yes.

12 Q. And when did you graduate?

13 A. On 1983 or so.

14 Q. You did graduate?

15 A. Yeah.

16 Q. And what -- did you get a -- what --

17 A. Psychology.

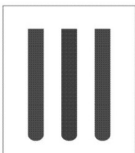
18 Q. Psychology. Okay. And did you ever practice
19 as a psychologist?

20 A. No.

21 Q. Okay. What type of work did you pursue after
22 you graduated?

23 A. Well, I was in the insurance business since I
24 was 14 years old at that point.

25 Q. Okay.



1 A. I had a dental company in college, and I
2 worked full-time and went to college full-time.

3 Q. Okay. And how long have you -- were you in
4 the insurance industry?

5 A. Wow. I don't -- 30-plus years.

6 Q. Are you still in the insurance industry?

7 A. I am not.

8 Q. Okay. And what was your relationship with the
9 Bernstein Family Realty, LLC, when it entered into a
10 note mortgage with the Sahms?

11 A. Well, nothing other than that I was taking
12 care of the property that my kids owned through
13 Bernstein Family Realty. And I --

14 Q. So you were --

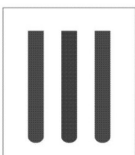
15 A. And it was a life estate my father set up so
16 that our family was protected by some bad attorneys we
17 were exposing in federal and state courts, similar to
18 what's going on with you right now.

19 Q. So you were never a member or an owner of any
20 interest in Bernstein Family Realty?

21 A. Well, it was later when it was necessary.

22 Q. So -- but I'm talking about the time that the
23 note mortgage was signed. You were not a member at that
24 time?

25 A. No. No.



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1 Q. Okay. And --

2 A. That was to protect our lives.

3 Q. Okay. But you were --

4 A. --

5 Q. -- living in the home. You were living in the
6 home that was owned by Bernstein Family Realty, LLC?

7 A. Which is owned by my three children, who were
8 minors at the time. So yeah, we were living there --

9 Q. Okay.

10 A. -- with them, and that was my dad's intent,
11 was to make -- with -- with Walt even knew all about it,
12 was to make the property secure, because I was in
13 litigation against lawyers, judges, and a whole bunch
14 of --

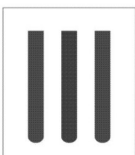
15 Q. How many judges have you been in litigation
16 against?

17 MS. GARCIA: Objection to relevance.

18 THE WITNESS: A lot. But there was also a bomb
19 in our car, which blew up three cars next to it, and
20 it's a very complicated situation, but my dad was
21 trying to protect my family from lawyers and others
22 who were trying to kill me to steal trillion-dollar
23 patents, so to speak.

24 BY MR. SWEETAPPLE:

25 Q. So how many judges have you litigated against?



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1 A. I don't know. You can look it up. It was a
2 Southern District of New York case that was related to a
3 whistleblower from the Disciplinary Department of New
4 York, and it's a RICO, so it named quite a lot of
5 lawyers and judges.

6 Q. And what about in Florida? How many Florida
7 judges have you sued?

8 MS. GARCIA: Objection to the relevance. We're
9 here on limited issues of the settlement, and you're
10 going back to history of years ago. But go ahead.

11 THE WITNESS: I don't mind. I'll tell him. A
12 bunch. Jorge Labarga, who was at the 15th, which it
13 kind of makes it why the 15th is not a good place to
14 be hearing anything of mine, but then several
15 Supreme Court members. The Florida Bar, I sued.
16 It's -- and whatnot. A whole lot of people.

17 BY MR. SWEETAPPLE:

18 Q. Have you sued any other judges in the 15th
19 Judicial Circuit or moved --

20 MS. GARCIA: Again, objection.

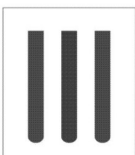
21 BY MR. SWEETAPPLE:

22 Q. -- to recuse any other judges?

23 MS. GARCIA: Again, objection to relevance.

24 We're here for the settlement issues only.

25 MR. SWEETAPPLE: Okay. Excuse me, Ms. Garcia.



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1 Please just object to form. Relevance isn't even a
2 proper objection at a deposition.

3 MS. GARCIA: In this particular deposition,
4 sir, because it's limited to the settlement issues,
5 I have a right to limit the scope of this
6 deposition, or then you can take it up with the
7 Judge. Go ahead.

8 MR. SWEETAPPLE: No. You can -- you can -- you
9 can make an instruction to your client that you
10 believe is appropriate, but relevance is not an
11 objection. I'm getting background on the witness
12 right now to go to his credibility. I'm entitled to
13 do that as a matter of law.

14 BY MR. SWEETAPPLE:

15 Q. So how many other judges have you sued in Palm
16 Beach County?

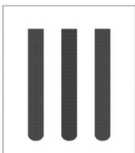
17 A. None.

18 Q. How many have you moved to recuse?

19 A. Quite a few.

20 Q. Okay. And do you --

21 A. And they were recused or disqualified, and
22 immediately after, most of them retired early off the
23 bench, getting rid of what I would say, was kind of a
24 cultish group of judges who were using predatory
25 guardianships to steal people's estates. And so those



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1 -- that group of judges is gone. And then I think
2 that's about it. That's the only -- you can look the
3 records up. They're Palm Beach County. I move to
4 recuse any judge that's not following the rules.

5 Q. Okay. And who was -- in terms of --

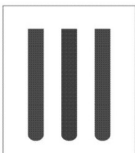
6 A. Oh, and by the way -- by the way, the -- you
7 should also know that I've been pursuing quite a few
8 attorneys, like Alan Rose, yourself, et cetera. And Don
9 Tescher and Robert Spallina were arrested, not directly
10 related to my complaint, but insider trading. And they
11 also admitted to forging my mother's trust document in
12 my mother's trust case to the Palm Beach sheriff when
13 questioned -- Mr. Spallina did.

14 And then I think Brian O'Connell also recently
15 has destroyed his career was disbarred for stealing a
16 half a million dollars, according to the Florida Supreme
17 Court, out of a client's trust account. Will he be
18 criminally prosecuted? We'll see. It takes time, as
19 you know, as we build a web around you. So -- but go
20 ahead. Yeah. Any other question?

21 Q. Do you remember my question, Mr. Bernstein?

22 A. Yeah. What judges had I been pursuing and
23 others.

24 Q. And was your question intended to be
25 responsive to that?



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1 A. Yeah.

2 Q. I asked judges, and you started talking about
3 oh --

4 A. Oh -- yeah -- what --

5 Q. So were you --

6 A. -- I thought it meant what other people in the
7 legal profession.

8 Q. And so do you have a power of attorney from
9 Bernstein Family Realty, LLC, to act on its behalf?

10 A. I was voted in as a -- as a manager.

11 Q. Okay. When were you voted in as a manager?

12 A. I believe in 2023. Like I said, I'm not real
13 good on dates. You want me to look it up, I'll get it
14 later.

15 Q. And was the -- was the entity reinstated with
16 the Secretary of State at or about that time?

17 A. Yeah.

18 Q. Okay. And so you are the manager currently of
19 the entity?

20 A. One of.

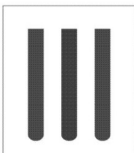
21 Q. How many other managers are there?

22 A. Two.

23 Q. Who are they?

24 A. My wife and Kevin Hall.

25 Q. Okay. And who is Kevin Hall?



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1 A. He's a consultant. Business consultant.

2 Q. Okay. And do you have any -- does -- do you
3 or the or Bernstein Family Realty, LLC, have any
4 contracts with him?

5 A. I'm not sure. I can check.

6 Q. Do you have any agreements with him to
7 compensate him?

8 A. I'm not sure what's there at this time.

9 Q. Is he working for free for the company?

10 A. I -- he may be.

11 Q. Do you know?

12 A. I don't.

13 Q. You -- so you don't know that there's a signed
14 agreement to pay him a percentage or compensate him in
15 any way with regard to --

16 A. I think he has some kind of agreement, maybe
17 verbal, with my kids and whatnot. I'm not exactly sure.
18 That's why I said I'm not --

19 Q. When you say your kids, are your kids managers
20 or members?

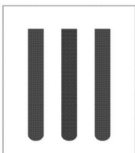
21 A. They're the members.

22 Q. Okay. And who are the members?

23 A. Jo.B. --

24 Q. Uh-huh.

25 A. -- Ja.B., and D.B.



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1 Q. Okay. And the property that is operated or
2 owned by the Bernstein Family Realty, LLC, has the
3 company -- when I say the company, I'm referring to
4 Bernstein Family Realty, LLC, paid the property taxes on
5 that property at any time in the last ten years.

6 A. The last ten years, I'm not sure.

7 Q. Okay.

8 A. I -- I don't -- I don't know. I -- yeah. Oh,
9 yeah. They -- they have paid the property taxes.

10 Q. What years?

11 A. I'd have to check.

12 Q. Okay. And what about in the last five years?

13 A. I believe so.

14 Q. And who would handle that as a manager, you,
15 your wife, or Mr. Hall?

16 MS. GARCIA: Objection. You're going beyond
17 the scope of the settlement issue. Go ahead.

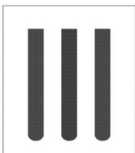
18 THE WITNESS: Shall I answer?

19 MS. GARCIA: Go ahead.

20 THE WITNESS: Okay. What was the question
21 again? Sorry.

22 BY MR. SWEETAPPLE:

23 Q. That -- who in the LLC is responsible for
24 conducting its affairs such as making payments, like
25 property tax?



1 A. Well, that would be me and my wife probably.

2 Q. Okay.

3 A. I mean, there'd be other people involved in
4 the discussion. Kevin --

5 Q. Okay. And who would be in -- who was anyone
6 involved from Bernstein Family Realty, LLC, in first
7 trying to negotiate or prepare a draft settlement
8 agreement of this case?

9 A. Which settlement?

10 Q. What's the -- I want to know the first time
11 there was ever any draft of a proposed settlement
12 agreement.

13 A. The first settlement?

14 Q. Yeah. Who prepared the first draft of a
15 settlement agreement?

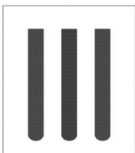
16 A. I -- I believe that would be my attorney,
17 Inger Garcia and John Ring.

18 Q. Inger Garcia and John Ring are the first ones
19 that tried to draft a settlement agreement?

20 A. Correct.

21 Q. And when was that?

22 A. They not only drafted it, my family signed it,
23 and then I believe because of your frauds that the
24 estate had somehow become a party. My attorney wasted a
25 lot of her time and John Raymond ate up a lot of



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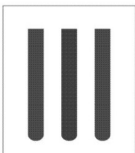
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1 attorney fees, I believe, trying to settle this. And we
2 thought that the estate of Walter, which was substituted
3 into the bankruptcy, also fraudulently, were parties to
4 this foreclosure.

5 Well, Inger and John, who I believe one of
6 these people, one of your co-counsels maybe belongs to
7 his firm, they went through all these steps of
8 negotiating a settlement, only for John Raymond to come
9 back after the terms were done, my family had signed it.
10 We were waiting for the sum approval, and he said, no,
11 the estate has no interest in this foreclosure. Which is
12 strange because Brad Schreiber, who I'm sure you know,
13 told the federal bankruptcy court falsely that Walter
14 Sahm's estate did have an interest.

15 And Inger wasted a lot of her time, months,
16 long before you ever filed your predatory guardianship
17 that's been filed by, I believe, Kathryn Lewis' firm to
18 silence Patricia Sahm, which has been effective of
19 silencing a witness against you because she claims she
20 didn't know you, never met you. You've seen her
21 statements. You know, we -- we wasted all this time
22 negotiating with the wrong people. In fact, we were
23 unable to have the proper parties in the state court
24 before the state court because you were running a dead
25 man there who had been dead for a long time. You failed



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1 to substitute.

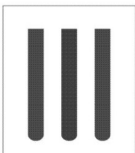
2 And then you were representing Patricia Sahm,
3 even though you actually weren't. You don't know her or
4 ever have talked to her really and we'll be requesting
5 your records to prove that out at some point.

6 But the bottom line is you were committing a
7 fraud in the state court because Joanna Sahm was your
8 client, not Patricia. And now, only now, months, years
9 later, we are learning, because you're busted, that
10 there was a power of attorney, and I just read something
11 where you didn't even have the power of attorney you
12 were acting under. So the proper parties to settle were
13 never before the state court from the day Walt died to
14 the day you and your partner, Joanna, concocted this
15 fraud to hide the real litigants in the case. So it
16 wasn't until bankruptcy where you -- suddenly they
17 switched the parties in the case because Brad Schreiber
18 got caught representing a dead person in court almost a
19 year or so after he'd been dead. He filed his -- his
20 notice of appearance for a dead person, kind of like you
21 running that same fraud on the state court. So you
22 know, that's pretty much my answer to that.

23 Q. Do you remember my question, sir?

24 A. Oh, can you repeat it back?

25 Q. Do you remember it?



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1 A. Can you repeat it back?

2 Q. What question were you answering?

3 A. Well, I just want to make sure it's the --

4 the --

5 Q. What question were you answering, sir?

6 A. Something about BFR's payments and whatnot.

7 Oh, the settlement. Yeah, the settlement.

8 Q. Who prepared the first draft of a settlement?

9 A. Oh, the settlement, right.

10 Q. Of a proposed settlement agreement. Who was
11 that?

12 A. Right. And I was answering that it was the
13 proposed settlement between John Raymond and Inger,
14 which was based on a fraud that you had committed --

15 Q. This --

16 A. -- leading up to believe that the estate --

17 Q. Mr. Bernstein, I asked you --

18 A. -- was a party.

19 Q. I asked you for the name of someone. You gave
20 me a name and you gave me a speech. So Ms. Garcia --

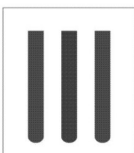
21 MS. GARCIA: Yes?

22 BY MR. SWEETAPPLE:

23 Q. -- prepared the first draft --

24 MS. GARCIA: No.

25 BY MR. SWEETAPPLE:



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1 Q. -- of a settlement agreement?

2 MS. GARCIA: Objection. Are you talking about
3 the settlement agreement at issue now or the prior
4 settlements prior to me coming -- the case?

5 MR. SWEETAPPLE: The first draft of a
6 settlement agreement.

7 MS. GARCIA: Ever in this case, back with Mr.
8 Morgurber, and Leslie, and everybody else?

9 MR. SWEETAPPLE: Whatever. I don't know who it
10 is --

11 THE WITNESS: Oh.

12 MS. GARCIA: Okay.

13 THE WITNESS: Okay. Oh, and even earlier, in
14 2019, Walt and I believe their former attorney,
15 who's supposed to be an outstanding guy, John
16 Cappellar, who Ms. Sahm recognized instantly -- when
17 we gave her her handwritten settlement with us in
18 2019, which covered all her costs, taxes, insurance,
19 everything to that point for \$200,000.

20 BY MR. SWEETAPPLE:

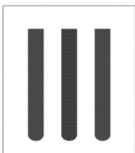
21 Q. Was that ever executed --

22 A. And then --

23 Q. Was that ever executed?

24 A. It was executed between us. Yeah.

25 Q. Who signed it?



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1 A. John Cappellar -- or Walt and Pat wrote it.
2 And it's in her handwriting. I submitted it as part of
3 my evidence.

4 Q. Okay. So you believe there was a settlement
5 agreement in 2019?

6 A. Correct.

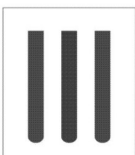
7 Q. And have any of your attorneys ever sought to
8 enforce that agreement in any court?

9 A. No.

10 Q. Okay. And then the next time --

11 A. And -- and actually -- actually what was being
12 sought, just so you know, was -- was \$200,000, which was
13 sitting in the registry for my kids. Now, we are not
14 responsible for paying off the BFR debt. That was
15 supposed to come out of the estates in trust. But since
16 Alan Rose knows that he's being hunted down, so to
17 speak, by state and federal criminal authorities, he's
18 been trying to force a foreclosure by the Sahms by not
19 letting me get the money out of my children's registry
20 funds to pay the Sahms. So that's caused a whole bunch
21 of delays, even in getting this money to pay off this
22 settlement.

23 He wants to oppose when he's also acting as
24 trustee for my children in a trust that's never been
25 produced and doesn't exist, but we'll get into that, if



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1 you'd like.

2 Q. Mr. Bernstein, I'm trying to take discovery
3 with regard to settlements.

4 A. Okay. That was a settlement.

5 Q. If you're -- okay. Yeah. I asked you if the
6 2019 settlement agreement that you claim existed was
7 ever sought to be enforced in court and you said --

8 A. Yes.

9 Q. -- no. You said no, it has not been --

10 A. Oh.

11 Q. -- in court, right?

12 A. I think I changed it to yes. I was trying to
13 get the money to achieve the settlement terms. You
14 can --

15 Q. Was there ever a motion filed to enforce that
16 alleged settlement?

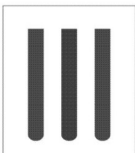
17 A. Well, I can't enforce it if I have -- no.

18 Q. Okay. And the next time that there was any
19 effort to draft what you claim was the settlement
20 agreement, when was that?

21 A. That was the one with Inger and Raymond.

22 Q. Okay. And Inger prepared a settlement
23 agreement indicating that Walter Sahn's estate was a
24 party.

25 A. Correct. Because that's what you told the



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1 bankruptcy court.

2 Q. Okay. And --

3 A. And Joanna Sahn illegally came in representing
4 the estate --

5 Q. Are you --

6 A. -- Walter.

7 Q. -- are you -- are you aware that there was
8 never any substitution of Walter Sahn estate in the
9 foreclosure case?

10 A. I am.

11 Q. Okay. And are you aware that there was never
12 a suggestion of death to substitute Walter Sahn out of
13 the case?

14 A. Oh, no. I made a suggestion of death and my
15 wife did.

16 MS. GARCIA: Sorry, let him finish his
17 questions --

18 THE WITNESS: Oh. Okay. Sorry.

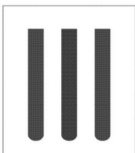
19 MS. GARCIA: -- because the court reporter
20 needs to take down --

21 THE WITNESS: Sorry. Okay.

22 MS. GARCIA: Delay for a moment when he asks
23 the question, so I have a chance to object.

24 THE WITNESS: You got it.

25 MS. GARCIA: Thank you. You can --



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1 BY MR. SWEETAPPLE:

2 Q. So did you -- so you're saying that you --
3 you're -- there was a settlement agreement prepared
4 where the party was Walter Sahn estate.

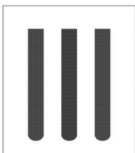
5 A. Correct. As one of the parties.

6 Q. Even though the Walter Sahn estate was never a
7 plaintiff in the foreclosure case.

8 A. Well, it became a plaintiff in the bankruptcy
9 case, which the underlying matter of the foreclosure. So
10 they claim they had an interest in the state case
11 through Walter Sahn. And by the way, your question was,
12 did -- the suggestion of death was filed.

13 Q. Okay.

14 A. And you have failed and have been representing
15 a client, I think even to this day, without notifying
16 the Court that he is dead, not -- and which could void
17 your judgment for your clients instantly. Well, we'll
18 get to all those issues, but you know, the -- the honest
19 to God truth is we left with Joanna Sahn coming into a
20 for -- to a bankruptcy saying she represented the
21 interest of Walter Sahn's estate. And for the first
22 time we learned that she was representing her mother
23 through some kind of power of attorney or -- guardian.
24 Of course, she never filed that as legally required.
25 But, okay, that is my answer to that.



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1 Q. Okay. So your attorney, Ms. Garcia, prepared
2 a draft settlement agreement for the foreclosure case,
3 and the alleged plaintiff was the Walter Sahn Estate?

4 A. Correct.

5 Q. Okay. Even though --

6 A. And Patricia Sahn. And Patricia Sahn. Of
7 course, I don't know if we knew at that point that it
8 was Joanna forging all her mother's documents.

9 Q. But Inger -- but --

10 A. And you were concealing all that from the
11 State Court.

12 Q. But, sir, the -- it was clear from the probate
13 file -- I mean, strike that. From the litigation file
14 and the foreclosure, it was clear that no estate of
15 Walter Sahn was substituted, correct?

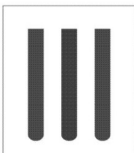
16 A. Correct. But we learned that the
17 bankruptcy --

18 Q. Okay.

19 A. After the foreclosure case, while the
20 foreclosure was still pending, we learned that Joanna
21 was now representing the interest in the foreclosure
22 case and the judgment as a PR of an estate of Walter.

23 Q. Uh-huh. Well, where did --

24 A. You see, you got so many frauds going it must
25 be hard for all of you.



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1 Q. Where did -- where did -- where did Joanna
2 Sahm ever appear --

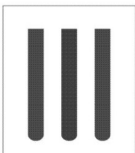
3 A. In the bankruptcy.

4 Q. -- in the foreclosure case?

5 A. She didn't, because you concealed her, but she
6 admits even in her affidavit in the guardianship case,
7 her own affidavit, that she was stunned that her mother
8 knew anything about the foreclosure case because she was
9 handling it. You --

10 Q. And didn't she have a power of -- didn't she
11 have a power of attorney, sir?

12 A. You never presented it to the court. She
13 never signed a document. Nobody knew it until the
14 bankruptcy case where your frauds were coming undone and
15 they had to change everything. So suddenly, we found
16 out who the real plaintiffs in the Sahm case were. Not
17 dead Walter. That's for sure. It was Joanna, I guess
18 acting as PR without telling anybody, and not Patricia
19 Sahm. She knew nothing about the case, according to
20 Joanna, and I think some of your recent comments show
21 that you really don't know her, and I'm sure that's
22 because the police are -- might be closing in on you.
23 And you're aware of that, since they contacted you,
24 which I believe makes the basis of this deposition you
25 trying to fish yourself out of some real serious charges



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1 here. You ran a fraud. Did you expose to the Court
2 that you were acting under a power of attorney for
3 Patricia Sahm?

4 Q. Mr. Bernstein.

5 A. No. Did you?

6 Q. Sir. Mr. Bernstein, I'm asking the questions
7 and you're answering them.

8 A. And nobody ever --

9 Q. Okay.

10 A. But that's why you shouldn't be doing this.
11 You're conflicted.

12 Q. Mr. Bernstein, you appear to think -- sir, you
13 appear to think that you have to notify the Court when
14 you're acting under a power of attorney. So you go
15 ahead and keep thinking whatever you think you know
16 about the law, okay?

17 A. You do.

18 Q. I'm asking you questions, all right?

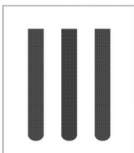
19 A. Right. You do.

20 Q. So what you're telling me is --

21 A. When the proper party --

22 Q. What you're telling me is that Ms. Garcia and
23 you were aware at the bankruptcy court that Mr. Sahm had
24 died, correct?

25 A. Yeah.



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1 Q. Okay. And did you file a suggestion of death
2 at that time?

3 A. No. I had filed it earlier in the State
4 Court.

5 Q. Okay. In the pro -- in the pro --

6 A. And you failed -- and you failed to notify the
7 Court --

8 Q. And after you filed the suggestion of death --

9 A. -- that the Plaintiff had died.

10 Q. And after you filed the suggestion of death,
11 do you know what happens as a matter of law if there's
12 no substitution?

13 A. No. I'm not a lawyer, so I'm not --

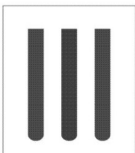
14 Q. Okay. So you're not aware, not aware of what
15 happens at that point?

16 A. I have my opinion.

17 Q. Okay. So Ms. Garcia was fully aware that
18 there was a suggestion of death and aware that the only
19 remaining plaintiff on a joint obligation was Patricia
20 Sahm, and did Ms. Garcia -- did Ms. Garcia or -- did Ms.
21 Garcia contact me to negotiate the settlement of the
22 foreclosure case, to your knowledge?

23 MS. GARCIA: Go ahead.

24 THE WITNESS: I think that's attorney-client
25 privilege, but --



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1 MS. GARCIA: No, no. Go ahead --

2 THE WITNESS: Okay. What was the question
3 again?

4 BY MR. SWEETAPPLE:

5 Q. Did you direct, or anyone from Bernstein
6 Family Realty, LLC, direct Ms. Garcia to communicate
7 with me as attorney for Patricia Sahm to settle the --
8 to settle the foreclosure case?

9 A. I -- I think she did contact you during the
10 John Raymond settlement, but then, as you know, Patricia
11 Sahm, Senior, when she --

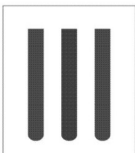
12 Q. I asked you a question, sir.

13 MS. GARCIA: (Audio cuts out.)

14 BY MR. SWEETAPPLE:

15 Q. Did you instruct her to contact me to handle a
16 settlement of the foreclosure case?

17 MS. GARCIA: Objection. Calls for attorney-
18 client privilege in our private conversations. You
19 know you were part of the e-mail chain, sir, so do
20 not ask him about our conversations. If you have a
21 question about attorney-client privilege, the judge
22 can determine if the answer must be had. So you can
23 ask his knowledge, but do not use this deposition to
24 try to set me up and get around the attorney-client
25 privilege. Ask your question.



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1 MR. SWEETAPPLE: Please mark this.

2 THE WITNESS: Again, further bad faith.

3 MR. SWEETAPPLE: Please mark that in the
4 record.

5 THE WITNESS: Yeah.

6 MR. SWEETAPPLE: I'm going to be going to the
7 Judge immediately.

8 THE WITNESS: Take it up with the Judge.

9 MR. SWEETAPPLE: Okay. I am asking the witness
10 if he told you something to tell to me. That is not
11 privileged. You made a speaking objection. You
12 never instructed him not to answer, which would be
13 the proper thing to do if you actually don't
14 understand that that's not a privileged
15 communication. I'm going to try it again, Ms.
16 Garcia.

17 BY MR. SWEETAPPLE:

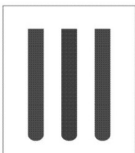
18 Q. Mr. Bernstein, did you ever instruct Ms.
19 Garcia at the time that she prepared a proposed
20 settlement agreement with the estate of Walter Sahn to
21 contact me to attempt to negotiate that settlement?

22 A. No.

23 Q. Why not?

24 A. What? I didn't hear you. You broke up.

25 Q. Why not? Didn't you know I represented the --



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1 Patricia Sahn in the foreclosure?

2 A. Because I don't tell my attorney what to do,
3 like I don't tell my brain surgeon what to do.

4 Q. Okay.

5 A. She's the attorney. She knows what she's
6 doing.

7 Q. Okay.

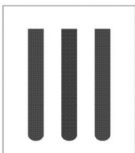
8 A. She's --

9 Q. So she knows what she's doing.

10 A. Correct.

11 Q. She knows what she's doing, but she has
12 prepared a proposed settlement of a case where she knows
13 Walter Sahn is dead and it's a joint obligation, and the
14 estate of Walter Sahn doesn't appear anywhere in the
15 foreclosure case, and she's doing a settlement with the
16 estate of Walter Sahn. Is that what you're telling me?
17 That's what happened?

18 MS. GARCIA: I'm going to object to -- I'm
19 going to object to him not to answer. Attorney-
20 client privilege communications. Take it up with
21 the Judge. You're not going to use this deposition
22 to set me up, sir. Go ahead. Mark it for the
23 Judge. You have a question of his knowledge and his
24 communications and what he understands, fine, but
25 you're not going to use this deposition like this.



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1 Go ahead.

2 MR. SWEETAPPLE: Stop making speaking
3 objections. Make an objection and state the basis
4 of your form objection if you have a basis of a form
5 objection.

6 BY MR. SWEETAPPLE:

7 Q. Were you aware that -- were you -- did --
8 strike that. So when this proposed settlement with the
9 Estate of Walter Sahn, that include the Estate of Walter
10 Sahn, are you aware if a proposed settlement agreement
11 was forwarded by Ms. Garcia to any lawyers?

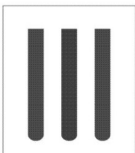
12 A. Yeah. John Raymond.

13 Q. Okay. And --

14 A. And you.

15 Q. And was that settlement --

16 A. And you. You were sent that settlement, even
17 though you've testified, I believe under oath, that she
18 didn't contact you about the settlement. You knew damn
19 well of that settlement because I saw your name on it,
20 and you were asked several times to do things regarding
21 the settlement and you chose to ignore it, because this
22 isn't about a settlement. This is about the fact that
23 you're using a predatory guardianship to silence
24 Patricia Sahn from testifying that she doesn't know you,
25 you never talked to her, you never brought her



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1 settlement offers, nothing, that you were working under
2 an undisclosed to the Court or any power -- party, a
3 power of attorney that you claimed way later, just not
4 too long ago, that you didn't have the power of attorney
5 in your possession. So you were representing Joanna
6 Sahn, who hired you. Miss -- Ms. Sahn couldn't pick you
7 out of a lineup.

8 Q. Okay.

9 A. But she might now.

10 Q. Okay. Mr. Bernstein --

11 A. Yes, sir.

12 Q. There was no guardianship of Patricia Sahn at
13 the time that Ms. Garcia prepared the settlement of the
14 Walter --

15 A. Garcia.

16 Q. Right?

17 A. Correct. The first settlement.

18 Q. Right. There was no --

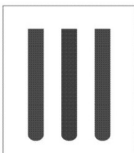
19 A. We'll get to it. We'll get into the second.

20 Q. So you're -- all your testimony about the
21 first settlement and mentioning guardianship is in
22 error, right?

23 A. I've got to think of the date.

24 MS. GARCIA: Objection to the form.

25 THE WITNESS: Yeah. No, I -- I -- I would --



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1 MS. GARCIA: -- you know.

2 THE WITNESS: I'm not sure. I -- I'll --

3 MS. GARCIA: Objection to the form. You can
4 answer if you know.

5 THE WITNESS: I don't.

6 MS. GARCIA: Don't speculate.

7 THE WITNESS: I don't. Yeah.

8 BY MR. SWEETAPPLE:

9 Q. Okay. So -- and you admit that there was a
10 power of attorney in effect at the time of that
11 attempted settlement agreement, correct?

12 A. I think it might have been revoked.

13 Q. It was revoked at the time -- at the time that
14 Ms. Garcia was preparing and attempting to get a
15 settlement with the estate of Walter Sahn signed?

16 MS. GARCIA: Objection to the form.

17 THE WITNESS: I -- I'm going to have to check,
18 but --

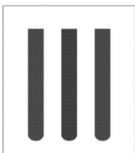
19 MS. GARCIA: Are you speaking about March 2023?

20 MR. SWEETAPPLE: I don't know the date yet.

21 MS. GARCIA: Speaking about which one during
22 March 2023? The estate one? The Pat one? There's
23 many settlements, so you need to be specific.

24 MR. SWEETAPPLE: The settlement --

25 MS. GARCIA: Show him the settlement, please,



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1 that you're discussing before he answers any more
2 questions. Put it on the screen so he can see which
3 settlement, which estate you're talking about.

4 BY MR. SWEETAPPLE:

5 Q. The only settlements I'm talking about and I'm
6 trying to learn about are --

7 A. You were copied on it.

8 Q. Please let me finish. Okay. I'm talking now
9 about only settlements and draft settlements and
10 negotiations concerning settlement of the foreclosure
11 case; is that understood?

12 A. Yeah. Let me check my notes here.

13 MS. GARCIA: Okay. And you -- Robert, you do
14 realize that there's many drafts. Some included the
15 estate. Some included Pat Sahn. Joanna was
16 involved in every one of them. You were copied on
17 the -- some of the e-mails. So you have to be
18 clearer, because you can't corner him with trick
19 questions.

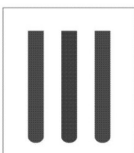
20 MR. SWEETAPPLE: All right. Okay.

21 MS. GARCIA: If you have a particular draft,
22 please put it on the screen.

23 MR. SWEETAPPLE: Okay. Okay. All right.

24 MS. GARCIA: I sent you many drafts.

25 MR. SWEETAPPLE: All right. I'm moving to hold



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1 you in contempt for continuing to make speaking
2 objections and coaching your client on what to say.
3 You just gave him a whole narrative with regard to
4 my questioning. It's unprofessional, it's
5 outrageous, and it needs to stop now.

6 THE WITNESS: Take it up with the Judge.

7 MR. SWEETAPPLE: I am going to do that, Mr.
8 Bernstein.

9 THE WITNESS: You want to -- okay. So you want
10 to stop the -- terminate this and pick it up?

11 MR. SWEETAPPLE: No. No. No. No.

12 MS. GARCIA: Robert, I'm just asking you, if
13 there's many forms of the settlement, please put the
14 one you're discussing. You can't ask a general
15 question.

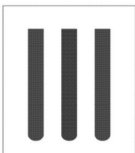
16 MR. SWEETAPPLE: Ms. Garcia. Ms. Garcia.

17 MS. GARCIA: Please cooperate here and put up
18 the evidence on the screen and let him see which one
19 you're talking about.

20 MR. SWEETAPPLE: Ms. Garcia. Ms. Garcia, make
21 your objections. I will take the deposition the way
22 I deem appropriate.

23 MS. GARCIA: Go ahead. Have fun, Robert.

24 THE WITNESS: And she'll object the way she
25 deems appropriate.



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1 MS. GARCIA: Go ahead.

2 THE WITNESS: And if you find something wrong,
3 take it up with the Judge.

4 MS. GARCIA: Go ahead.

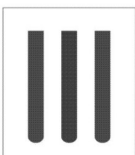
5 THE WITNESS: This bullying of people. Yeah.
6 And I just saw a letter from Leslie Ferderigos to
7 you, the other attorney you bullied. You're
8 misogynistic. You abuse women. It's obvious you
9 just are going to attack her and threaten her with
10 saying, because you're trying to use this to get
11 sanctions or create some fraud that nobody, but your
12 mind, is involved in, because you're worried that
13 the police are investigating your prior frauds, and
14 you know you've committed them.

15 MS. GARCIA: Okay. Let him ask the question.
16 Go ahead. I will make simple objections. Let him
17 go. Go ahead, Mr. Sweetapple.

18 MR. SWEETAPPLE: Thank you. Thank you.

19 BY MR. SWEETAPPLE:

20 Q. So when -- I'm only now talking about the time
21 period that Ms. Garcia was negotiating what you told me
22 was the first draft after the 2019 settlement agreement
23 you say existed. You've told me that Ms. Garcia was
24 negotiating a first draft and had prepared a first draft
25 of a settlement of the foreclosure case and the party,



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1 the Sahn party included the Walter Sahn Estate. Are we
2 clear that's what I'm talking about?

3 A. Yes. And I'm just --

4 Q. Okay.

5 A. Just looking to see when the first power of
6 attorney --

7 Q. And that question's not pending here, okay?

8 MS. GARCIA: Let him ask his question. Go
9 ahead.

10 THE WITNESS: I -- I heard his question.

11 MS. GARCIA: No question pending, is there?

12 MR. SWEETAPPLE: Yeah. I'm going to ask a
13 question.

14 MS. GARCIA: Go ahead.

15 BY MR. SWEETAPPLE:

16 Q. Who negotiated -- were there any -- were you
17 involved in any negotiations regarding that settlement
18 agreement?

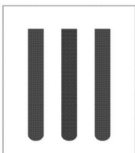
19 A. Just with my attorney.

20 Q. Okay. Did you ever speak with Patty Sahn,
21 Junior?

22 A. Not at that juncture, no.

23 Q. You had you hadn't spoken to her at all at
24 that juncture?

25 A. I don't believe so.



1 Q. Okay. And I take it that that draft of a
2 settlement agreement regarding where it mentioned Walter
3 Sahm Trust never was executed, correct? By Mrs. Sahm or
4 by Patricia Sahm as a power of attorney?

5 A. No.

6 Q. Correct? It was not executed ever, right?

7 A. Correct. It was not.

8 Q. And was another draft of a settlement
9 agreement prepared by Ms. Garcia after that, to your
10 knowledge, that did not list the Estate of Walter Sahm
11 as a party?

12 A. Yeah, right after John Raymond confirmed that
13 Joanna had misrepresented to a federal bankruptcy court
14 that the estate of Walter Sahm had an interest in the
15 foreclosure case and therefore bankruptcy. Yeah.

16 Q. Excuse me. Is that the case that your
17 attorney, Ms. Garcia was sanctioned by the Court?

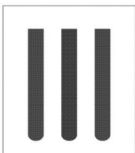
18 MS. GARCIA: Objection to the form. I was
19 never sanctioned, number one.

20 MR. SWEETAPPLE: And your --

21 MS. GARCIA: And number two --

22 BY MR. SWEETAPPLE:

23 Q. -- and your -- and your children were -- well,
24 she was identified by the Court as having engaged in
25 wrongdoing?



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1 A. I don't know what that means. I'm not a legal
2 expert.

3 Q. Okay.

4 A. Your word, not mine.

5 Q. All right. All right.

6 A. Take her deposition next, I think, so --

7 Q. So you understand there was another draft of a
8 settlement agreement prepared by Ms. Garcia concerning
9 the foreclosure.

10 A. Right. Like I was saying, John Raymond --

11 Q. Let me finish my question, sir.

12 A. -- he heard that the --

13 Q. Sir --

14 A. -- that the -- that the --

15 Q. -- can I finish my question?

16 A. Well, I'm finishing your last question.

17 Q. Can I finish my question, sir?

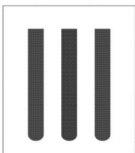
18 A. Well, I'm finishing the answer to my last
19 question.

20 Q. Sir, I want -- I -- you've already answered
21 the last question.

22 A. No, I didn't. You interrupted --

23 Q. What was the -- what was the question you're
24 now finishing your answer to?

25 A. I don't know. Can you have the court reporter



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1 read it back?

2 Q. No. No, because you've already finished it.

3 A. Oh, what was your question?

4 Q. I'm asking you a new question, sir.

5 A. Well, I wasn't finished answering the other
6 one. But okay.

7 Q. Okay. So then what --

8 MS. GARCIA: Objection.

9 BY MR. SWEETAPPLE:

10 Q. What question weren't you finished answering?

11 A. I wasn't finished answering about the next
12 settlement that Inger was going to do, and I was
13 explaining that --

14 Q. I haven't finished the question about that. I
15 want to know whether or not --

16 A. Well, what was your last question?

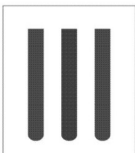
17 Q. I asked you if you were involved in
18 negotiating that second draft that didn't involve Walter
19 Sahm with Patricia Sahm, Junior. And you said you don't
20 believe you were at that time.

21 A. Okay. That was your last question. Okay.

22 Q. Well, that's what I'm trying to follow up on.

23 A. Okay.

24 Q. Now, did -- were you aware at the time that
25 that second draft was prepared that Patricia -- that



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1 Joanna Sahm held a power of attorney from her mother?

2 A. For the second one?

3 Q. At the time the second one was being prepared,
4 were you aware of that?

5 A. She didn't. She was revoked, I believe by the
6 time the second one came to be. It might have been at
7 the first one, too. See, when Pat Sahm, Senior --

8 Q. But when do believe when do you believe the
9 power of attorney was revoked?

10 A. I can't remember the exact date but hold on.

11 Q. You would know because you were involved in
12 getting that power of attorney revocation drafted,
13 right?

14 A. No.

15 Q. And what about Mr. Hall? Wasn't he involved
16 in getting that power of attorney?

17 A. I don't know. Take his deposition.

18 MS. GARCIA: Okay.

19 BY MR. SWEETAPPLE:

20 Q. So you're -- are you --

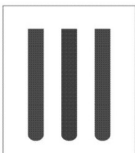
21 MS. GARCIA: I called for --

22 THE WITNESS: On March 28th.

23 BY MR. SWEETAPPLE:

24 Q. What year?

25 A. 2023.



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1 Q. And you have -- there's a signed revocation
2 for March 28 --

3 A. Correct.

4 Q. -- 2023?

5 A. Correct.

6 MS. GARCIA: Okay. Sir, I'm sorry. I
7 apologize. We need to take a five minute break
8 because I see my client shaking and I can't have him
9 have a heart attack. So we'd like a five minute
10 break, please. Thank you.

11 MR. SWEETAPPLE: Absolutely. I've told him if
12 he wants a break to ask any time.

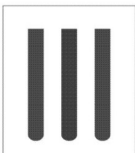
13 THE REPORTER: Okay. The time is 10:59 a.m.,
14 and we are off record.

15 (OFF THE RECORD)

16 THE REPORTER: The time is 11:10 a.m., and we
17 are back on record.

18 BY MR. SWEETAPPLE:

19 Q. Okay. Mr. Bernstein, the -- what -- the area
20 I'm -- the time period I'm trying to get into is before
21 the alleged March 23 revocation of the power of
22 attorney. And I want to talk about any settlement
23 agreements that Ms. Garcia was involved in negotiating
24 with Mr. Raymond, whether they contain the name Walter
25 Sahm Trust or not.



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1 So with regard to that time period, before the
2 power of attorney was allegedly revoked, were you
3 involved in any negotiations with Patricia Sahn, Junior,
4 Patricia Sahn, Senior, or anyone else, you personally,
5 regarding settling the foreclosure case?

6 A. No, I don't believe so.

7 Q. Okay. And did there come a time where you
8 became involved in any negotiations with anyone directly
9 in an attempt to settle the Patricia -- the Patricia
10 Sahn, Senior's judgment?

11 A. The settlement?

12 Q. Yes. Anytime you became involved after --
13 after -- after the dealings with Mr. Raymond --

14 A. Yeah.

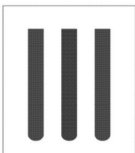
15 Q. Well, let me -- let me -- let me clear --
16 clean that up. As I understand it, the attempts of Ms.
17 Garcia to settle the foreclosure case with Mr. Raymond
18 were not successful, correct?

19 A. Correct.

20 Q. And Mr. Raymond was never an attorney of
21 record in the foreclosure case, was he?

22 A. Well, he became an attorney of record really
23 in the bankruptcy case when the estate entered as
24 replacing Walter for the final judgment.

25 Q. But he never represented the -- he never



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1 represented Patricia Sahn, Senior, in the foreclosure
2 case?

3 A. You'd have to talk to him. You'd have to talk
4 to him.

5 Q. Well, I want to know what you knew. Did you
6 -- were you aware --

7 A. I don't know.

8 Q. -- were you -- did you look at the docket
9 yourself of the foreclosure case?

10 A. I did.

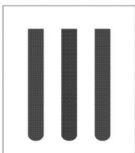
11 Q. Okay. And were you aware that Mr. Raymond was
12 an attorney for Patricia Sahn, Senior?

13 A. No, because you concealed first for months
14 that Walter had died. And then you failed when we filed
15 the suggestion of death to do anything with the court or
16 change the style of the case to reflect that Walter had
17 died and the interest went to Patricia wholly. Which is
18 all against all kinds of rules that I can see as a
19 layman and have reported to authorities. But --

20 Q. So did you know from looking at the docket
21 that my firm represented Patricia Sahn, Senior, in the
22 foreclosure?

23 MS. GARCIA: Objection. Calls for a legal
24 conclusion.

25 THE WITNESS: Oh, yeah.



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1 MS. GARCIA: You can answer.

2 BY MR. SWEETAPPLE:

3 Q. Did you understand that from looking at the
4 docket that my firm represented Patricia Sahn?

5 A. I did, up until the point that the power of
6 attorney revoked Joanna's powers because she was your
7 real client that you never put before the Court for
8 settlement or anything.

9 You never notified the Court that you were
10 operating, or any of the litigants, that you were
11 operating under a power of attorney for someone else. So
12 we all thought it was Patricia Sahn.

13 Q. So you weren't aware that the alleged power of
14 attorney, by the way, was allegedly revoked -- it was on
15 4-13-2023.

16 A. Yeah. There's also one earlier.

17 Q. Okay. There's one earlier than that?

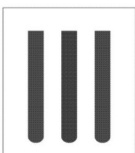
18 A. I believe so. And I believe I uploaded it as
19 part of the production.

20 Q. Okay. And when do you think the date on that
21 was?

22 A. I told you. On March -- on March 28th.

23 Q. Okay. And so prior to these alleged
24 revocations of the power of attorney --

25 A. All --



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1 Q. -- did you -- did you -- did you --

2 A. No, they're factual.

3 Q. Pardon?

4 A. Those are your words, alleged.

5 Q. Okay.

6 A. Factual.

7 Q. When did you -- did you -- when you looked at
8 the docket prior to March of 2023, you understood that I
9 was the attorney of record for Patricia Sahn, right?

10 MS. GARCIA: Objection. Asked and answered for
11 the 10th time. You can answer. Can you repeat the
12 question?

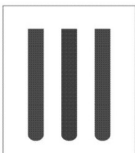
13 THE WITNESS: Repeat the question, please.

14 BY MR. SWEETAPPLE:

15 Q. Prior to March of 2023 you understood that I
16 was Counsel of record in the foreclosure case for the
17 plaintiff, right?

18 A. Well, no. In March we found out that the
19 plaintiff was really Joanna, not Pat Sahn. So you had
20 been falsely representing that you represented Pat Sahn
21 after Walter's death to the court. And that you were
22 actually working with Joanna through a power of attorney
23 you claim you didn't even have. Much later you claimed
24 that.

25 Q. So you didn't know I was the attorney of



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1 record in the foreclosure case prior to this alleged --
2 prior to the first alleged revocation?

3 A. I believe that I knew that you were falsely
4 representing Patricia Sahn.

5 Q. So you concluded that --

6 A. -- and Walter.

7 Q. -- so you concluded my representation was
8 false?

9 A. I did.

10 Q. Okay.

11 A. After talking to very --

12 Q. Well, don't tell me -- don't tell me what your
13 attorneys --

14 A. Okay.

15 Q. -- don't tell me what your attorneys told you.

16 A. Okay.

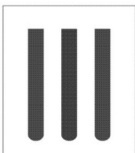
17 Q. It's privileged. So then by May of 2023 did
18 Kevin Hall work with you on preparing a draft settlement
19 agreement?

20 A. No.

21 MR. SWEETAPPLE: Okay. Why don't we put up as
22 Exhibit 1 -- she's in Bates stamp --

23 (EXHIBIT 1 MARKED FOR IDENTIFICATION)

24 THE WITNESS: Oh, wait. On the second -- on
25 the second settlement, are you asking?



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1 BY MR. SWEETAPPLE:

2 Q. I'm asking -- I'm asking --

3 A. Oh, okay.

4 Q. -- I'm asking if after you claim there was a
5 valid first revocation of a power of attorney, did you
6 work with Mr. Hall to prepare a draft settlement
7 agreement?

8 MS. GARCIA: Are you putting it on the screen,
9 sir? Can you please put the document you're
10 referring to on the screen?

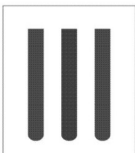
11 MR. SWEETAPPLE: I -- I'm asking him a
12 question. I'll tell you when I put it on the
13 screen.

14 MS. GARCIA: Oh, I thought you said you were
15 putting it. I'm sorry. That's why I was waiting
16 for --

17 MR. SWEETAPPLE: I was talking to -- I'm sorry.
18 I was talking to Ms. Miller.

19 THE WITNESS: I believe I talked to Kevin about
20 it because he was talking to Pat Sahn, Senior,
21 first. And then he brought me in to talk to Pat
22 Sahn, Senior, where we found out all kinds of stuff
23 about you and what you were up to. And that she had
24 never met you, didn't know you.

25 And so we needed -- I think what I was told was



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1 we couldn't really settle anything with Patricia
2 Sahm, Senior, BFR, or anybody until she had counsel.
3 And I believe that was the discussion, was that she
4 needed to have independent legal representation
5 because she didn't know who you were. She didn't
6 know you were representing her. She didn't know
7 Brad Schreiber was representing, so we told her to
8 get counsel.

9 BY MR. SWEETAPPLE:

10 Q. So tell me when this happened. So when did
11 you first involve Mr. Hall in meeting with Patricia
12 Sahm, Senior?

13 A. Well, I had nothing to do with that.

14 MS. GARCIA: Objection to form. Assumes facts
15 not in evidence. Go ahead. You can answer.

16 THE WITNESS: I --

17 MR. SWEETAPPLE: I'm sorry. What did you say,
18 Ms. Garcia?

19 MS. GARCIA: I said objection to form.

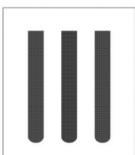
20 MR. SWEETAPPLE: Okay.

21 THE WITNESS: What was the question again?

22 BY MR. SWEETAPPLE:

23 Q. When -- you said that Mr. Hall contacted
24 Patricia Sahm, Senior.

25 A. Oh, and when?



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1 Q. Yeah, and when?

2 A. Okay. So it's my understanding --

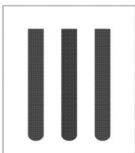
3 Q. Can you give me a date? Can you give me a
4 date?

5 A. It's my -- no. It's my understanding that
6 what happened was we found out -- Kevin found out once
7 we learned that Patty, Junior, and her sister were
8 involved in some kind of criminal thing. It popped up
9 on the thing.

10 Kevin went through the records and found
11 Patty, Junior's number. He called her and began talking
12 with her, is my recollection. And then they were next
13 to each other, Patty and her mother, and she was on a
14 speaker phone, and he had a -- I don't know how long,
15 but several days he had talked to them, to Junior.

16 And finally her mother wanted to be heard
17 since she was listening all of the calls basically. And
18 she wanted to talk to Kevin, and she began conversing
19 with Kevin about what was going on with the gun. What
20 was going on with you, Schreiber. She had never heard
21 that there were settlement offers. She was appalled
22 that 18 percent interest, called it unchristian.

23 She was appalled about everything her daughter
24 was doing. She thought her daughter was stealing money.
25 She couldn't believe her daughter had taken my kids



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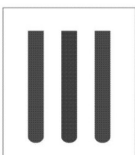
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1 through bankruptcy. She said her husband would be
2 rolling in his grave, which he would, by the way. And
3 so Kevin started talking to her and I think we -- when
4 she wanted to settle it with us he said I can't do that.
5 You got to get a lawyer to represent you, or else it
6 will be a void type settlement.

7 And she wanted to get it done right away.
8 Like, I believe she wanted to get her power of attorney
9 out of Joanna's hand because she was appalled by what
10 Joanna -- and there's handwritten letters in the record
11 now that show she thinks Joanna is scary. That she is
12 in a satanic relationship where they practice Santeria.

13 She was scared. She was left with no money.
14 She thought she only -- that Joanna was stealing her
15 pension money. She thought she had \$200 in her bank
16 account because Joanna was concealing, both from her
17 sister and mother, that they had three and a half
18 million dollars in cash in a bank, basically. So they
19 thought they were poor and starving and that the only
20 money was going to come upon the death of Pat, Sr.
21 That's -- and so when we heard -- and none of us knew at
22 that time that there was three and a half million.

23 Nobody could figure out the motive for what
24 Joanna and you were doing concealing the proper parties
25 from the estate. But I think when you read the police



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1 report we submitted against you, you'll see clearly what
2 we believe.

3 Q. So this is what Mr. Hall told you from his
4 meetings with Patricia, Junior and Patricia, Senior?

5 A. Well, I was not in (audio cuts out) --

6 Q. Were you involved in those conversations?

7 A. Yes. And I was involved -- he -- she wanted
8 to talk to me, so they conferenced me on, and I did talk
9 to her.

10 Q. And when did these conversations take place?

11 A. I don't have it in front of me.

12 Q. And were they on the telephone?

13 A. Yeah.

14 Q. And were there any in person?

15 A. I met with her in person several times.

16 Q. So you went to her home?

17 A. Correct.

18 Q. And when's the first time you went to her
19 home?

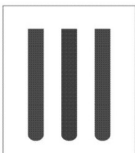
20 A. I don't know the date exactly, but I'm -- I --
21 you've got the records log, so you know when.

22 Q. So you went to her home with Mr. Hall?

23 A. No.

24 Q. Did Mr. Hall ever go to her home?

25 A. No.



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1 Q. Okay. And so you had these conversations with
2 Patty Sahn, Senior and Patty Sahn, Junior that you've
3 described?

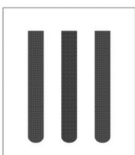
4 A. Correct.

5 Q. Okay. And --

6 A. Well, Patty, Junior, just so you know, on the
7 conversations, didn't want to be involved in any way,
8 shape, or form because she thought her sister would use
9 it to further frame her in the criminal gun charge,
10 where we believe also she's being framed as well. But
11 once Joanna knew we -- that her sister found out about
12 the judgment, we believe she went and instigated trouble
13 with her. And -- and her mom was actually going to be a
14 witness for Patty, Junior in the criminal case. And
15 when I said, hey, I don't know about that criminal case,
16 what happened?

17 The first thing Senior said was "If Patty,
18 Junior, didn't pull the gun on her, I would've." And I
19 said, "What?" And she goes, "Joanna came here looking
20 to start trouble, started attacking her dogs. Joanna is
21 a big bully, volleyball player type, Amazon person, and
22 Junior's a little brain-damaged, little innocent dog
23 walker who takes care of elderly people?" Yeah. That --
24 we talked about a bunch of things like that.

25 Q. So how many times -- how many times did you go



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1 meet with Patricia, Junior and Patricia Sahn, Senior?

2 A. I believe ten.

3 Q. Okay. And so --

4 A. My kids -- my kids also went.

5 Q. And you told her -- you told her that she
6 needed an attorney other than me?

7 A. If she wanted to settle. No, we said she
8 needed an attorney. And you were already out of the
9 picture because she had already revoked your -- Joanna's
10 power of attorney, and therefore you had no client at
11 that time.

12 Q. Was --

13 A. You know that. Come on.

14 Q. Was -- well, when the power of attorney was
15 revoked, I still represented Mrs. Sahn, didn't I?

16 A. No.

17 Q. Mrs. Sahn, Senior?

18 A. Yeah. No.

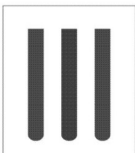
19 Q. Well, did she -- had she terminated me?

20 A. She never hired you. Joanna did.

21 Q. Okay. But I was counsel of record?

22 A. Yeah. You're misrepresenting to the Court.

23 Q. I had a power of attorney, you say, that was
24 revoked by a competent -- you say competent Mrs.
25 Patricia Sahn, Senior, right? You say she revoked her



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1 power of attorney?

2 A. Correct.

3 Q. And she knew -- did she know -- did she tell
4 you she knew she was still the plaintiff in a
5 foreclosure case?

6 A. She -- she -- she did not know you were
7 representing her as a plaintiff in the foreclosure.

8 Q. And didn't you tell her that?

9 A. Tell her what?

10 Q. Didn't you tell her that when she --

11 A. Oh, yeah, yeah. And she -- and she wanted to
12 remove you. And I think they sent you some letters
13 telling you get out, you've been replaced. She's hiring
14 new counsel because she didn't like anything she heard
15 about you, and she didn't know you.

16 Q. Okay.

17 A. And she -- Mr. Schreiber --

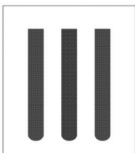
18 Q. Right.

19 A. -- who went into the bankruptcy court
20 similarly claiming that the client was Patricia, not
21 Joanna through her power of attorney.

22 Q. And you discussed with her that she needed to
23 fire me?

24 A. I didn't.

25 Q. You discussed with her she needed to get a new



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1 attorney?

2 A. I -- I don't believe I did. I believe Kevin
3 did when he said, you need an attorney, and she didn't
4 want you for sure.

5 Q. Okay.

6 A. So Kevin said, well, you got to have somebody.
7 So she said, okay, I'll go get somebody to -- to
8 represent me.

9 Q. And you and Kevin had no involvement in
10 finding that attorney?

11 A. Well, I don't know how it came to be that she
12 found Morgan Weinstein, not Amber Patwell, but she
13 found --

14 Q. How -- how -- how did she get Morgan
15 Weinstein's name?

16 A. I'm not sure.

17 Q. Did it come from Mr. Hall?

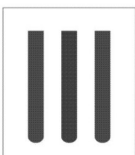
18 A. I -- you'd have to ask him.

19 Q. And Mr. Hall's a disbarred New York lawyer,
20 isn't he?

21 A. I'm not sure it's disbarment anymore. I don't
22 know how long it was for. But again, ask Kevin Hall.

23 Q. Okay. So Ms. Sahn allegedly hired Morgan
24 Weinstein?

25 A. Ms. Sahn hired Mister -- she filed a -- filled



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1 out a retainer with him.

2 Q. How do you know that?

3 A. Because there's copies of it.

4 Q. How did you get those?

5 A. I -- I don't know.

6 Q. Why do you have copies of a retainer?

7 A. I think there's -- I think they were put into
8 the Court record somewhere. Oh, in the bankruptcy case.

9 Q. They were put in the record in the bankruptcy
10 case?

11 A. Correct.

12 Q. Are you saying that Mr. Weinstein appeared as
13 counsel in the bankruptcy case?

14 A. No.

15 Q. Are you saying that there were signed
16 agreements between Mr. Weinstein and Mrs. Sahm?

17 A. Yes.

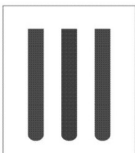
18 Q. Okay.

19 A. We uploaded that to you.

20 Q. Pardon?

21 A. It's uploaded in our evidence.

22 Q. And to your knowledge -- to your knowledge, no
23 one affiliated with the Bernstein Family Trust or the
24 Bernstein Family Realty, LLC had any involvement --
25 including Mr. Hall, had any involvement in the hiring of



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1 Morgan -- and the attempted or hiring of Morgan
2 Weinstein, is that your testimony?

3 A. You'd have to ask those people. Now it's your
4 testimony.

5 Q. So you have no knowledge about -- you have no
6 knowledge about Mr. Hall being involved or not being
7 involved with Morgan Weinstein; is that correct?

8 A. Correct.

9 Q. Okay. And you have no idea how --

10 A. I don't believe so.

11 Q. Okay. And Mr. Weinstein never appeared in the
12 foreclosure case, did he?

13 A. No. Because surreptitiously, we believe he
14 was terminated by Joanna Sahn since her mother didn't
15 ever remember terminating him. And -- and then she
16 wanted to hire him back, I know that, and tried to get
17 him back, and then he wouldn't and the -- she needed
18 another counsel.

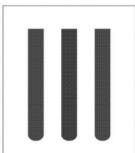
19 Q. How do you know that?

20 A. I don't know. Through conversations with
21 people.

22 Q. What conversations? With whom?

23 A. I don't know.

24 Q. So you know about conversations between Joanna
25 Sahn and Morgan Weinstein?



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1 A. I know that there's -- was a call to -- to
2 Morgan Weinstein, that -- that was canceling -- and it
3 came from a strange number, and it wasn't on Patricia
4 Sahn, Senior's phone, from what I heard. And she didn't
5 believe she had ever made that call firing him. And I --
6 I saw some e-mails. I think it might be with Patty,
7 Junior, trying to send her mother's wish to continue him
8 representing.

9 Q. So Patty, Junior was acting as Ms. Sahn's
10 power of attorney, correct? Is that what you're telling
11 me?

12 A. No.

13 Q. Did Patty, Junior, to your knowledge, ever
14 have a power of attorney?

15 A. No.

16 Q. Okay. And who was involved in preparing any
17 revocation of power of attorney, do you know?

18 A. I wasn't so I don't know.

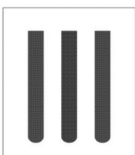
19 Q. You don't know? Was Mr. Hall involved?

20 A. Ask Mr. Hall.

21 Q. Okay. And so did you ever discuss with Patty
22 Sahn, Junior or Patty Sahn, Senior, the issue of hiring
23 Morgan Weinstein?

24 A. No.

25 Q. Did they ever tell you they had hired Morgan



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1 Weinstein?

2 A. Yes. I found that out that they had hired
3 him.

4 Q. They told you they had?

5 A. I had nothing -- yeah. I had nothing to do
6 with --

7 Q. So in one of your -- in one of your meetings,
8 they told you they hired Morgan Weinstein?

9 A. Correct.

10 Q. Okay. And it was --

11 A. It was a consult to talk to my attorney.

12 Q. And that was at your suggestion that they get
13 some other attorney other than me?

14 A. She didn't want to use you. Don't you get
15 that? She thought you were committing fraud on my
16 family and her and her dead husband. She was stunned
17 that Walter Sahn continued filing pleadings one minute
18 after he was dead in court.

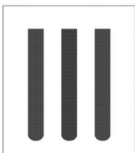
19 Q. Who told her that?

20 A. Well, it came out, I think in their
21 conversations.

22 Q. With you?

23 A. No, with Kevin, I believe.

24 Q. Oh. So Kevin told her all these things? Kevin
25 told her --



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1 A. You -- you -- you'd have to talk to Kevin and
2 take his deposition.

3 Q. But you -- but Kevin was acting on behalf of
4 the Bernstein Family Realty, LLC, right?

5 A. No, I don't believe so. I didn't -- nobody at
6 Bernstein Family Realty authorized that. Kevin was
7 acting on his own, for his own interest and he found the
8 number for Patty, Junior in the criminal file. He
9 contacted her and started to act on his own. He talked
10 to Patty and her mother without me for, I believe,
11 several days. And then she wanted to talk to me, and I
12 got on the phone with them, and we talked about certain
13 of these things.

14 Q. So Mister -- when Mr. Hall was meeting and
15 speaking with Patricia Sahn, Junior and Patricia Sahn,
16 Senior, he was affiliated with the defendant in this
17 case, Bernstein Family Realty, LLC, wasn't he?

18 A. Correct.

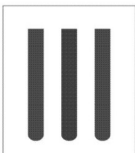
19 Q. Okay. And he is the one who introduced Patty
20 Sahn, Junior to Morgan Weinstein through one of his high
21 school friends, right?

22 A. I guess if you -- that's your words, not mine.

23 Q. But you know that?

24 A. I don't.

25 Q. He told you that.



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1 A. I don't know any of that. I just told you. I
2 don't know how Morgan Weinstein came in, who he knows,
3 what he did.

4 Q. Did Mr. Hall --

5 A. I wasn't a part of that.

6 Q. Did Mr. Hall tell you he was going to find an
7 attorney for the Sahms?

8 A. No. He said she needed to find an attorney.

9 Q. And did he ever tell -- he didn't tell you he
10 was going to take care of that?

11 A. He what?

12 Q. That he was going to take care of finding her
13 attorney?

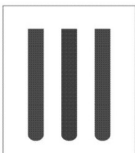
14 A. No. He never told me he was going to take
15 care of it.

16 Q. And so how do you believe Mrs. Sahn -- you
17 have no idea how Mrs. Sahn contacted Morgan Weinstein?

18 A. No, I -- I know she had contacted several
19 local attorneys. I don't know how she got to Morgan
20 Weinstein. I wasn't a part of that.

21 Q. How do you know she contacted several local
22 attorneys?

23 A. She told me, and she told me she was trying to
24 get a meeting to find counsel to settle this. She
25 wanted to get it settled. She's the one who wanted the



1 settlement. And she definitely wasn't going to use you,
2 because she didn't know you, she had never met you. And
3 you'd been representing to a court that you were
4 representing her. You never told anybody that it was
5 Joanna who was your client, that we would've to settle
6 with Joanna. You didn't have the proper parties before
7 the court because you were propounding a fraud on the
8 court, in my view.

9 Q. And you're not a lawyer, right?

10 A. No.

11 Q. Okay. So --

12 A. But now you've had lawyers tell that story,
13 too, and they are lawyers.

14 Q. Okay.

15 A. Who are all about to expose you for all the
16 fraud. And they're lawyers, not me, which is a lot
17 better, by the way.

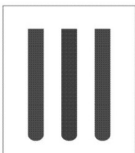
18 Q. All right. I --

19 A. I think in Inger's leading, she actually
20 requested the judge to report you.

21 Q. Okay. And when Mr. Hall was dealing with Ms.
22 Sahm, at any time was she in a guardianship proceeding?

23 MS. GARCIA: I'm sorry. Could you rephrase
24 that? I missed it. It cut --

25 BY MR. SWEETAPPLE:



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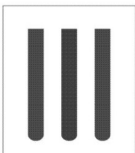
1 Q. At any time that Mr. Hall was communicating
2 with Ms. Sahn, Senior, was she in a guardianship
3 proceeding?

4 A. I believe later, after you were contacted by
5 the sheriff within days, you and Joanna concocted this
6 predatory guardianship, it appears, to silence the
7 witness against you who could point to you and say, I
8 never met this man. I would've never let him do this.
9 He never consulted with me. He never offered me a
10 settlement. I've never -- I didn't know that you were
11 offering settlements. She -- she didn't know any of
12 those things, because you were representing Joanna.
13 Nobody knew that. Not even the court, not the
14 litigants. Proper parties. A dead man and a woman's
15 daughter you were representing. Not the dead -- the --
16 the dead man, we know you can't represent, but you still
17 seem to think you can.

18 Q. You don't understand that I was representing
19 Joanna Sahn, Senior through a power of attorney granted
20 to Patricia Sahn. You don't understand that?

21 A. I don't know who Joanna Sahn, Senior is.

22 Q. No. Joanna -- I was representing Joanna Sahn
23 through -- I was representing Patricia Sahn, Senior
24 through a power of attorney held by Joanna Sahn. You
25 don't understand that?



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1 A. We -- we didn't know that until it was exposed
2 in bankruptcy court, which furthered the fraud you were
3 committing.

4 Q. So let's get back to --

5 A. Not only were you representing a dead person,
6 you were now representing what you're calling an
7 incapacitated person through a power of attorney that
8 you didn't disclose to any. So me and your -- how was I
9 supposed to settle with a dead man and a person who
10 wasn't before the court that was her daughter --

11 Q. So -- and that's why -- and that's why --

12 A. -- didn't -- didn't go back to me. And you --

13 Q. And that's why --

14 A. -- never notified anybody that you were
15 operating as an attorney through a power of attorney.
16 She didn't --

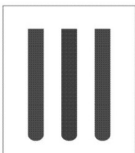
17 Q. And so that's why --

18 A. -- know that --

19 Q. -- and that's why -- that's why no one
20 contacted me. Even though I was Counsel of Record, no
21 one contacted me regarding this settlement in 2023, this
22 proposed settlement, correct?

23 A. I -- that -- that's your words. Again, I'm
24 not agreeing with that.

25 Q. Okay. So when -- when -- when Mr. Hall was



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1 talking to Patricia Sahn, Senior, Was that at any time
2 after a guardianship had been filed?

3 A. One more time, sir?

4 Q. When -- at any time that Mr. Hall was
5 communicating with Mrs. Sahn, Senior, was it after the
6 guardianship had been filed?

7 A. Yeah. I think there were conversations with
8 her after the guardianship was filed, but she wasn't
9 adjudicated incapacitated. I still don't think she has
10 been as of this day. There's been no incompetency
11 hearing where she's been adjudicated as --

12 Q. I didn't ask you that. I didn't ask you that.
13 I didn't ask you that.

14 A. Oh.

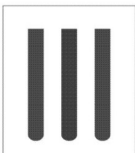
15 Q. I asked if Mr. Hall was speaking -- continuing
16 to speak to her after the guardianship proceeding was
17 filed?

18 A. I believe yeah. Again, ask Mr. Hall, but --

19 Q. And was he negotiating a settlement at that
20 time?

21 A. No, not that I know of.

22 Q. Okay. And were you -- did -- and the
23 conversations you described that Mrs. Sahn, Senior,
24 related to Mr. Hall, which of those were before the
25 guardianship was filed and which were after?



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1 A. I don't know. I -- I don't.

2 Q. And you met with her ten times, right?

3 A. I did.

4 Q. And how many times did you meet with her
5 before the guardianship was filed?

6 A. Probably most of the times.

7 Q. Well, after the guardianship was filed, did
8 you still meet with her to try to get her to sign a
9 settlement?

10 A. I have to look at my notes and figure that
11 out, but --

12 Q. Didn't you appear at her house on more than
13 one occasion before she signed the settlement agreement
14 to meet with her?

15 A. I did.

16 Q. Okay. And you had the settlement agreement in
17 your hand when you met with her, right?

18 A. I did.

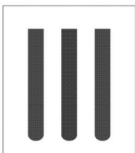
19 Q. Didn't you bring the settlement agreement to
20 her at her house?

21 A. I did --

22 MS. GARCIA: Wait.

23 THE WITNESS: -- on the request of her
24 attorney.

25 MS. GARCIA: Hold on. Time out. I'm sorry.



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1 Objection to form. Time frame, please?

2 BY MR. SWEETAPPLE:

3 Q. Didn't you -- so you met with Mrs. Sahn after
4 she had been -- after the guardianship had been filed,
5 right, at her house?

6 A. Yes.

7 Q. On more than one occasion, correct?

8 A. Yeah, most likely.

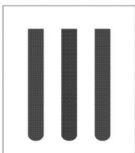
9 Q. Okay. And how many times that you met with
10 her did you have a signed settlement agreement? I mean
11 a -- strike that. A written settlement proposed draft
12 with you?

13 A. Once I had a proposed draft that was signed by
14 my family, and then because of location and whatnot, I
15 believe Amber Patwell asked Junior to have me bring it
16 over for her signature after we had just got all our
17 kids to sign, and then scan it and send it to her.

18 Q. So Amber Patwell --

19 A. Had already discussed it with her. She had
20 read it several times, according to my understanding,
21 before I got there. When I got there, she went through
22 it two times. She read it, signed it. I took it over
23 to my house, scanned it, and sent it out.

24 Q. Okay. So explain to me what happened. So
25 after the guardianship was filed, you met with Patricia



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1 Sahm at her house, correct?

2 A. Correct.

3 Q. And you did -- the -- prior to the time you
4 went there, this was -- I'm now talking about prior to
5 the time you went there with a written document. Who
6 was present during those conversations with Patricia
7 Sahm, Senior? Was her daughter always there?

8 MS. GARCIA: Objection. You're -- to the form.
9 You're assuming facts not in evidence. He testified
10 previously he went there with a document one time --

11 MR. SWEETAPPLE: You're making a speaking
12 objection again, okay?

13 MS. GARCIA: You --

14 MR. SWEETAPPLE: Again, you're making a
15 speaking objection.

16 MS. GARCIA: Objection. Form, sir. Objection.
17 Form.

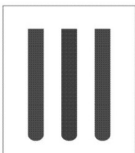
18 MR. SWEETAPPLE: Thank you.

19 MS. GARCIA: Facts in evidence. Go ahead.

20 MR. SWEETAPPLE: Thank you. Thank you.

21 BY MR. SWEETAPPLE:

22 Q. You've told me that you went after the
23 guardianship was filed and you spoke with Mrs. Sahm,
24 Senior, before you ever brought a proposed or signed
25 settlement agreement to her, right?



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1 A. Correct.

2 Q. Okay. Who was present at those occasions?

3 A. My son, my wife possibly once or twice, Patty,
4 Junior, who didn't want to get involved, obviously,
5 because of the situation she was in with her sister at
6 the time, and nobody. And that was it.

7 Q. Who was -- which son?

8 A. D. and Ja.

9 Q. So you went there with your wife and two of
10 your sons?

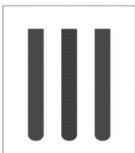
11 A. Correct.

12 Q. On how many occasions did you go there with
13 your wife and two of your sons?

14 A. I don't know the number with who. My son was
15 fixing their table because Joanna was letting the house
16 fall apart on her, wouldn't get the necessary repairs to
17 take care of her. So my son and I fixed the kitchen
18 table that was falling over on her for months, that she
19 had asked Joanna, according to her, for months to fix.

20 And then there was a shower door that was --
21 literally could have killed somebody, that was hanging
22 off the -- again, she had asked Joanna, and so my son
23 came over, helped out, fixed up a few things, and that
24 was about it.

25 Q. So while you were discussing settlement with



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1 Mrs. Sahn, Senior, you were --

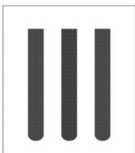
2 A. I didn't discuss settlement with Ms. Sahn,
3 Senior.

4 Q. You never discussed having a settlement
5 agreement?

6 A. I -- the only thing I discussed with her was
7 the amount of money. And we based it off the 2019
8 Settlement Agreement, which is the last settlement offer
9 she'd even heard of. And we added in the three years of
10 interest at three and a half percent because all of her
11 other costs were covered in the 200,000 2019 document,
12 if you read it --

13 Q. You negotiated that with her?

14 A. I -- I -- yeah. I offered -- I said -- well,
15 what I recall was that I said, here's what it would cost
16 for interest. Three years since the 2019, that's about
17 on the \$100,000 note, 10,000. I offered her money to
18 pay her legal bills because she didn't want to pay your
19 bill because she doesn't know -- you didn't know you
20 were representing her. She was adamant she would never
21 pay your fees. Let Joanna deal with that, I believe
22 were her words. And I offered her -- so we came up with
23 -- 225 was about what would be due if she was excluding
24 your fees and the 18 percent interest, and we did it at
25 the rate that was in the note. And she wasn't going to



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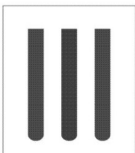
1 pay the 18 because, like I told you, she thought it was
2 un-Christian, unholy.

3 And so that wasn't -- even though I offered
4 that, I then said, you know what? My kids have 200 and,
5 I think, 75,000 in the registry. "Do you want that all,
6 even though the number we're at is 225?" And she said,
7 "I don't want a penny over what's due under the note, at
8 the terms of the note." And she was appalled at
9 everything that you had done and adding fees in on her
10 behalf when she never contracted you. So I'd like to see
11 your retainer to show who really signed it. Was it Pat
12 or was it Joanna? And so you're going to have to answer
13 those questions at some point, so I'm perfectly
14 comfortable waiting for your turn. But go ahead. You
15 want to --

16 Q. So we're talking about your -- we're talking
17 about your negotiations.

18 A. Well, I really didn't negotiate the settlement
19 with her. I negotiated a price that we thought was
20 fair. She had a lawyer who she was settling with. The
21 -- the lawyer -- I didn't have conversations with Amber
22 Patwell, Inger, and Sahn. They had their own settlement
23 conversations without me and, to the best of my
24 knowledge, without Kevin.

25 Q. And so -- and you and you came up to -- with



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1 this number. What was the number you came up with to
2 settle?

3 A. 225.

4 Q. And you came up with this negotiating with her
5 in her house?

6 A. Yeah.

7 Q. And you had your children there?

8 A. I might have had D. there that day. Yeah.

9 Q. And your wife was there?

10 A. I don't know. I don't think so.

11 Q. And you had done chores to help her fix her
12 house and her furniture?

13 A. Correct.

14 Q. Okay. And how many times had you gone there,
15 or your family members gone there to do work for her?

16 A. Out of the ten, maybe seven.

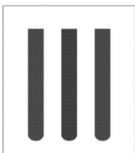
17 Q. Okay.

18 A. It was a lot of work that Joanna was
19 neglecting. Telling her --

20 Q. Okay. And was --

21 A. -- have any money, by the way. That's what's
22 so scary here.

23 Q. Was Joanna -- I'm sorry. Was Patricia Sahn,
24 Junior, present for all of these -- for the negotiations
25 you described?



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1 A. No. No. Like I told you, she didn't want to
2 be around when anything was happening because she didn't
3 want her sister to frame her more than she felt she was
4 already being.

5 Q. So you were meeting with this 80-plus-year-old
6 woman who was in a guardianship?

7 A. She wasn't in a guardianship.

8 Q. Well, at some point she was in a guardianship
9 proceeding?

10 A. No. She still isn't, as far as we're
11 concerned. We'll -- that -- that's still --

12 Q. And you're --

13 A. -- pending litigation.

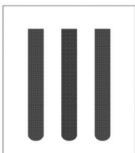
14 Q. As far as you're concerned, there was no
15 guardianship proceeding when you were meeting --

16 A. Now you're changing it. You said proceeding
17 first, you said in a guardianship --

18 Q. In a guardianship -- okay.

19 A. -- proceeding, but it hadn't been adjudicated
20 and it still hasn't ever been adjudicated that she's
21 incapacitated.

22 Q. So you were with this 80-plus-year-old woman
23 at her home, with your family, fixing her home and
24 negotiating a settlement, and she had no one else with
25 her?



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1 A. No.

2 MS. GARCIA: Objection to the form.

3 BY MR. SWEETAPPLE:

4 Q. Is that correct?

5 MS. GARCIA: Objection to the form.

6 THE WITNESS: Yeah, I would say that's correct.

7 I wasn't negotiating a settlement. The settlement
8 was negotiated between her competent counsel, Amber
9 Patwell, and her counsel, Inger Garcia.

10 BY MR. SWEETAPPLE:

11 Q. And was that done -- and so tell me how --
12 tell me how did Inger -- strike that. How did Ms.
13 Patwell get retained? Do you have any idea?

14 A. How did she get retained?

15 Q. Yeah. Who retained her?

16 A. Who retained her? I -- I believe Pat Sahn,
17 Sr.

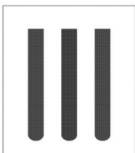
18 Q. Okay. And how was she located?

19 A. I don't -- I don't know. I never knew her,
20 so --

21 Q. Do you know if Miss -- Mr. Hall had any
22 involvement in that?

23 A. Talk to Mr. Hall, but I don't think so.

24 Q. Do you know if Ms. Garcia had any involvement
25 in that?



1 A. I definitely know she did not.

2 Q. Okay. Did you direct -- did you direct Ms.
3 Garcia to communicate with Ms. Patwell regarding a
4 settlement?

5 MS. GARCIA: Objection. That calls for
6 attorney-client privilege.

7 MR. SWEETAPPLE: No, it doesn't.

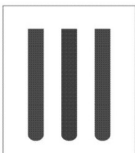
8 MS. GARCIA: You are asking him about his
9 comments and his communications with me. That
10 involves --

11 MR. SWEETAPPLE: With the purpose of
12 communicating it to a third party. Read the
13 evidence code, please. I -- we -- I already made
14 you aware of this the last time you tried this.

15 MS. GARCIA: Sir, I'm just putting my objection
16 on the record like you asked me to. You can go
17 ahead and do what you want. He can answer if he
18 wants. You said to put my objection on the record.
19 I object. That's attorney-client privilege. Go
20 ahead. You can answer.

21 THE WITNESS: What was your question?

22 MR. SWEETAPPLE: Then you follow it -- then you
23 follow it with an instruction not to answer. If you
24 want to assert the attorney-client privilege when
25 it's not founded, don't just make things --



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1 MS. GARCIA: Answer the man's questions. He's
2 having fun fishing. Go ahead.

3 THE WITNESS: Okay.

4 MR. SWEETAPPLE: I -- I'm talking to you now
5 about what --

6 THE WITNESS: I want to. I'm --

7 MS. GARCIA: Answer his questions. I'm not --

8 THE WITNESS: Wouldn't know the truth if it hit
9 him in the head.

10 MS. GARCIA: Go ahead.

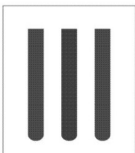
11 MR. SWEETAPPLE: Mr. Bernstein, I'm trying to
12 get to the truth.

13 THE WITNESS: Oh, yeah. I know.

14 BY MR. SWEETAPPLE:

15 Q. And that -- and that's what we're here for.
16 And in doing that, I'm trying to find out what you
17 instructed your attorney to communicate to other people,
18 which is not privileged. And I'm trying to do that with
19 regard to Ms. Patwell who comes in at -- during a
20 guardianship proceeding and is allegedly representing
21 the alleged incompetent. So I want to know what you
22 know about how Ms. Patwell was located and retained.
23 What do you know?

24 A. Well, I think she might have, and I can't
25 speak with certainty, been contacted by Hillary Hogue,



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1 who is a -- she is part of the Florida Court task force
2 on guardianship abuse and elder abuse. And in this
3 case, we were -- I might have asked her to look for an
4 attorney to help Pat, Senior. And --

5 Q. Right. And you're involved in that group that
6 deals with that --

7 A. No, the task force?

8 Q. Yeah.

9 A. No. It's a state task force.

10 Q. Pardon?

11 A. It's a state task force. I'm not --

12 Q. But you communicate with them, and you go on
13 marches with them, right?

14 A. With the task force? No.

15 Q. No, with the people who are protesting
16 guardianship -- alleged guardianship abuse?

17 A. Yeah, I --

18 Q. Okay. And you e-mail with them, right, you e-
19 mailed back --

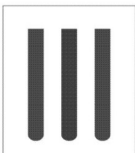
20 A. I do.

21 Q. Okay. And so you asked somebody who was in
22 that group that protests guardianship abuse to --

23 A. I might have asked everybody in the group --

24 Q. Pardon?

25 A. -- if they knew -- I might have asked



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1 everybody in the group if they knew an attorney --

2 Q. Okay. So you were -- so you were helping --
3 you were helping Patricia Sahn, Senior find an attorney?

4 A. Yeah.

5 Q. Okay. And you asked everybody in the
6 guardianship abuse group who you could get to represent
7 Patricia Sahn, Senior?

8 A. Correct.

9 Q. And who -- did anybody find such -- Ms.
10 Patwell for you? Who's the one that gave you Ms.
11 Patwell's name?

12 MS. GARCIA: Objection to the form. You're
13 assuming facts not in evidence.

14 THE WITNESS: I don't -- I don't know if they
15 gave me the name or they gave Pat Sahn, Senior the
16 name.

17 BY MR. SWEETAPPLE:

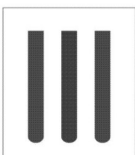
18 Q. Well, was the name -- who was this person that
19 came up with Ms. Patwell at your request?

20 A. I believe -- I believe, I don't know, Hillary
21 Hogue.

22 Q. Hillary, how do you spell the last name?

23 A. H-O-G-U-E.

24 Q. Okay. And did Ms. Hogue contact you at any
25 time letting you know that she recommended Ms. Patwell?



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1 A. Not that I recall.

2 Q. Did she e-mail you Ms. Patwell s name?

3 A. Not that I recall.

4 Q. Did you ever call Ms. Patwell at any time and
5 speak to her?

6 A. I don't believe so.

7 Q. Okay. Did anyone from -- did -- Mr. Hall talk
8 to Ms. Patwell?

9 A. I take his deposition. I don't speak for him.
10 I don't know.

11 Q. Did he ever tell you he spoke to Ms. Patwell?

12 A. I can't recall, but I don't think so.

13 Q. And so how did you learn that Ms. Patwell had
14 been hired after you recommended that someone go find an
15 attorney for Ms. Sahm, Senior?

16 A. How did I learn? I think through Patty,
17 Junior or something.

18 Q. So Patty --

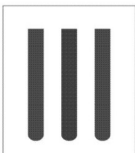
19 A. -- retained an attorney.

20 MS. GARCIA: Okay. I'm sorry. His legs are
21 shaking, sir. We need a break.

22 MR. SWEETAPPLE: Okay.

23 MS. GARCIA: We'll pick up right where you left
24 off. Thank you.

25 MR. SWEETAPPLE: A five-minute break or how



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1 long do you need? You're mute. You're on muted.
2 You're muted. You're muted. I haven't heard a word
3 you said.

4 MS. GARCIA: Okay. Make it ten because I have
5 someone here with a blood pressure kit. I want to
6 test this blood pressure.

7 MR. SWEETAPPLE: Fine.

8 THE REPORTER: The time is 11:54 a.m., we are
9 off record.

10 (OFF THE RECORD)

11 BY MR. SWEETAPPLE:

12 Q. It's a document. It's --

13 A. Well, did I already put up two exhibits that I
14 wanted in the record?

15 Q. I -- I'm putting up -- I'm putting up a -- an
16 exhibit that was produced by your attorney this morning
17 or yesterday? Yesterday. It's -- do you see that?
18 It's --

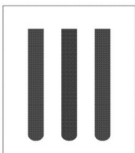
19 A. Yeah.

20 Q. It says, "Subject --"

21 MS. GARCIA: Can you make it bigger? A little
22 bigger, please? Can you like zoom it out, you know
23 what I mean? A little more? Okay. I -- okay.

24 THE WITNESS: That's good.

25 MS. GARCIA: That's good. Scroll slow.



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1 BY MR. SWEETAPPLE:

2 Q. You see, it's subject, "FW: KRH Version, BFR
3 Sahm settle with Pat 5-4-23." Do you see that?

4 A. Yep.

5 Q. Okay. Do you -- are -- does this refresh your
6 recollection or are you aware that Mr. Hall sent you a
7 draft of a settlement agreement on May 4, 2023?

8 A. This is a settlement that was never used. This
9 was his -- what he thought should be in a settlement. I
10 know that the attorneys never used any of it in their
11 settlement. They -- once their attorneys were involved
12 and Amber and Inger were settling, Kevin, me, nobody
13 else had anything to do with it.

14 Q. Do you remember my question?

15 A. Yeah.

16 Q. What was it?

17 A. If I recall this settlement of Kevin's?

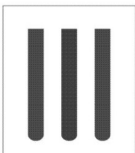
18 Q. Did you recall that on May 4, 2023, Mr. Hall
19 sent you the attached settlement agreement -- draft
20 settlement agreement?

21 A. Yeah.

22 Q. Okay. And you had -- you were talking with
23 Ms. Sahm at that time, right?

24 A. Yeah.

25 Q. On May 4, '23, right?



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1 A. Oh, I don't know. I -- that's your words. Not
2 mine.

3 Q. Well, there's a narrative here about a
4 settlement, so I presume --

5 A. Well, it's Mr. Hall.

6 Q. Well, Mr. Hall wouldn't -- there's a reference
7 to \$225,000. So --

8 A. Is it --

9 Q. So this must have been after you had
10 negotiated with Ms. Sahm, right?

11 A. Correct.

12 Q. Okay. So it's fair to say you were -- you
13 were -- you were negotiating with Ms. Sahm prior to May
14 4, '23?

15 A. Only on a number, not any of the terms of the
16 settlement or anything.

17 Q. Did you ever negotiate any of the other terms
18 other than the numbers?

19 A. No. None.

20 Q. Okay. So --

21 A. And none of the terms in this settlement of
22 Kevin's were ever made it into that either because once
23 there were attorneys involved, they didn't want to talk
24 to Kevin or me or anybody else. They were working with
25 their clients.



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1 Q. Okay. So look on this -- the bottom of this
2 page, it says, "You have to expect the fight, but this
3 should help minimize the fight and answers the question
4 that Attorney Morgan asked, but didn't really want to
5 hear about why this less than judgment amount is in fact
6 reasonable." So Mr. Hall told you there was going to be
7 a fight on that issue, right?

8 A. In his mind, yeah.

9 Q. And let's go through the settlement agreement
10 that you say wasn't used by the attorneys. Now, you
11 knew that I was attorney of record when this document
12 was prepared -- well, strike that. You read this draft
13 settlement agreement when it was prepared, didn't you?

14 A. I don't know if I did. I think I called
15 Inger, and she said, don't bother, we're not using it.
16 And that was about my understanding.

17 Q. So you --

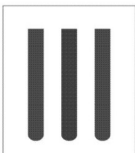
18 A. -- part of the settlement like I said, I --

19 Q. So how did you testify that none of these
20 terms were used in the final agreement if you never read
21 it?

22 A. How did what?

23 Q. You testified under oath that none of the
24 terms in this draft were used in the final draft?

25 A. Because my attorney told me she didn't use any



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1 of it for the final -- for the one she did with Amber.
2 That they didn't even use it. So that's all I know.

3 Q. Oh, so you didn't ever read this?

4 A. I don't believe so.

5 Q. Okay. But you -- and you didn't participate
6 in drafting this?

7 A. Not one drop.

8 Q. Okay. And you knew from your conversations
9 with Ms. Sahn, Senior, that she prepared a letter where
10 she indicated she didn't want me representing her
11 anymore, correct?

12 A. No.

13 MS. GARCIA: I'm sorry, sir. Wait, hold on a
14 second. He's pointing to his left arm. Hold on.
15 Hold on a second.

16 THE WITNESS: Can I have the Caladryl?

17 MS. GARCIA: Okay. Go ahead.

18 THE WITNESS: Okay. We can continue.

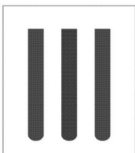
19 BY MR. SWEETAPPLE:

20 Q. Okay. Is anyone in the room with you besides
21 your attorney?

22 MS. GARCIA: Not in this room.

23 MR. SWEETAPPLE: In the -- in --

24 MS. GARCIA: In my house? Yeah. My daughter's
25 in my house.



1 MR. SWEETAPPLE: All right.

2 MS. GARCIA: My husband is in my house. Candy's
3 in the house, but they're not in this room right
4 now.

5 MR. SWEETAPPLE: I'm not -- I'm not -- I'm not
6 -- I'm not asking you questions, Ms. Garcia.

7 MS. GARCIA: Oh, I'm sorry. I thought you were
8 asking me. Sorry.

9 THE WITNESS: Well, I second that.

10 BY MR. SWEETAPPLE:

11 Q. Okay. So you became aware that a document was
12 typed and signed by Patricia Sahn, Senior allegedly that
13 indicated she wanted --

14 A. What document?

15 Q. -- she wanted me -- it was --

16 A. What document?

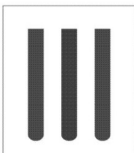
17 Q. -- it was placed into evidence in court by
18 your lawyer, or -- you mentioned that Ms. Sahn
19 wanted --

20 A. This settlement agreement that we're talking
21 about?

22 Q. No, no, I'm not talking -- no, I'm not talking
23 about the settlement agreement now.

24 A. This Kevin Hall thing?

25 MS. GARCIA: Let him finish the question.



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1 BY MR. SWEETAPPLE:

2 Q. Okay. Listen to my question, please.

3 A. Oh, okay.

4 Q. Okay. You testified earlier that there was a
5 decision that Ms. Sahm told you she wanted to terminate
6 me, and there was a document typed up where that was
7 stated, right?

8 A. I believe so.

9 Q. Okay. You were aware that was done, right?

10 A. Am I aware now? Yes. I'm not sure what I
11 knew then.

12 Q. Well, didn't she tell you she was terminating
13 me and sending out a letter or a document?

14 A. I don't believe she told me that. I think she
15 was in discussions from what I reviewed later with
16 Morgan to terminate you upon her signing him.

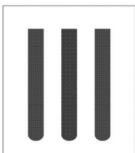
17 Q. So you thought I was terminated based on the
18 conversation with Morgan?

19 A. No. I thought you were terminated from the
20 power of attorney revocation.

21 Q. Okay. Even though I was still counsel of
22 record?

23 A. Yeah. For a party that didn't know you,
24 correct.

25 Q. Well, you -- so you're making decisions about



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1 whether I've ever talked to Ms. Sahn and whether or not
2 I was attorney, you made those decisions on your own?

3 A. No. No. Don't put words in my mouth. She
4 made those decisions --

5 Q. And so you --

6 A. -- on her own.

7 Q. Right.

8 A. And she was fully competent. She's more
9 competent than you, I --

10 Q. Okay.

11 A. And we even heard Judge Burton echo those same
12 remarks when he talked to her.

13 Q. So --

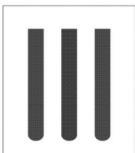
14 A. And he thought that he had mild cognitive
15 impairment, like everybody at AD does. And mild is to
16 say the least with Pat Sahn, Senior. She got a mind of
17 her own. She's an Irish woman. You don't tell her what
18 to do at all.

19 Q. Right. So based on your testimony, if she
20 wanted to have terminated me after the power of attorney
21 was revoked, she would have written me -- she could have
22 written me and she would have terminated me, right?

23 MS. GARCIA: Objection. Form. Speculation.

24 THE WITNESS: Yeah. I don't know.

25 BY MR. SWEETAPPLE:



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1 Q. Well, based on your dealing with her and your
2 description of her, she told you she wanted to terminate
3 me?

4 A. Yeah.

5 Q. And she told you she did terminate me, right?

6 A. She believed she did.

7 Q. Okay. And when is -- what's -- do you --

8 A. And by the way, she didn't terminate you. I
9 want to get that clear a little bit. Because she said
10 you never represented her. She didn't know you,
11 couldn't pick you out from a lineup, is what she said.
12 But yet she knows every other attorney in her and Walt's
13 life dating back years. The only two she'd never heard
14 of in her life were you and Brad Schreiber. So you
15 weren't representing her in her mind.

16 Q. So you listened to a woman who was in a
17 guardianship --

18 A. No. She wasn't in a guardianship.

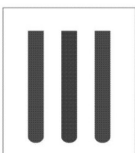
19 Q. -- a guardianship proceeding, tell you that
20 she had never dealt with me and didn't know who I was,
21 and you relied on that?

22 MS. GARCIA: Objection to form.

23 THE WITNESS: Yes.

24 BY MR. SWEETAPPLE:

25 Q. Okay.



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1 A. Yeah. When we realized for ourselves that you
2 had already been running one scheme filing on behalf of
3 a dead man, not notifying a court that he was dead and
4 not notifying the court that you were operating and
5 running under a power of attorney, that later, you
6 claimed you didn't even have at the time. Yeah, we
7 started to put it together what you were up to. We
8 didn't know the main motive at that point. We still
9 might not, but hopefully the authorities will find out.
10 And that's all I can tell you.

11 Q. Well, while you were talking --

12 A. -- mind here, we didn't --

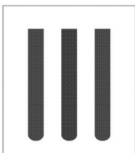
13 Q. -- while you were talking --

14 A. -- I didn't settle with her. She got an
15 attorney. She got an attorney to make her settlement.
16 She didn't settle with me. Her attorney and my attorney
17 settled. The settlement -- the only thing I did with
18 that settlement was bring it over to her for a signature
19 at the request of the attorneys to get it --

20 Q. And it's the veracity of that I'm examining
21 right now.

22 A. Right. I didn't settle with her.

23 Q. I -- and I -- and I -- and I -- and I think
24 what you're saying is that while in these ten meetings
25 with Ms. Sahn, she made it clear to you she was going to



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1 terminate me from -- as counsel of record, right?

2 A. And terminate Joanna. Correct.

3 Q. Okay. So do you know when the first time Ms.
4 Sahm ever wrote me and suggested that I wasn't her
5 attorney anymore?

6 A. I don't -- I believe it might have been
7 through her attorneys trying to tell you to get out
8 because you had no client anymore.

9 Q. Do you know when the first time there's any
10 writing where Ms. Sahm indicates that I'm -- I shouldn't
11 be her attorney anymore?

12 A. Yeah. She wrote a sworn statement that she
13 had notarized, that said she wanted nothing to do with
14 you, didn't know you, and all kinds of things.

15 Q. Right. And you were --

16 A. And you were part of a plot with her daughter.

17 Q. You were involved in the preparation of that,
18 right?

19 A. Not a drop.

20 Q. Oh, you didn't talk to her about that at all?

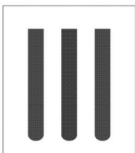
21 A. No.

22 Q. She told you about it, right?

23 A. I got a copy of it.

24 Q. And she gave you a copy of it?

25 A. I believe so.



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1 Q. Right.

2 A. Somebody did.

3 Q. Right. When did you get it? From her or from
4 her daughter?

5 A. I might have got it from a relative of theirs.

6 Q. Okay. And you wouldn't have gotten it before
7 it was signed. You got it after it was signed, right?

8 A. Yeah.

9 Q. Okay. So that document -- well, I'll show you
10 the date of that document as -- when I put it up after
11 this document. You see this document is May 4 of 2023,
12 this draft, right?

13 MS. GARCIA: Yeah. Okay. Look, he's asking
14 you a question. Look up at the screen. Sorry.

15 THE WITNESS: Okay. Hold on. I --

16 BY MR. SWEETAPPLE:

17 Q. You see the e-mail and it's a draft 5-4-23,
18 and it's attached? Just go to the next -- to the
19 document itself. Okay. So this was prepared by Mr.
20 Hall, your associate in --

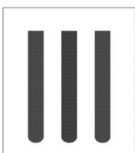
21 A. No. He's not --

22 Q. -- the LLC.

23 A. He's a consultant.

24 Q. Your consultant for the LLC, right?

25 A. He -- he did this on his own.



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1 Q. This was not prepared by Ms. Patwell, right?

2 A. No.

3 Q. And it was not prepared by Ms. Garcia, right?

4 A. I believe the -- no, I don't think they -- I
5 -- I don't think they ever used it. I don't know if
6 they read it, but --

7 Q. Okay. Well, I'm going to put up the
8 settlement agreement, sir and we can --

9 A. Okay.

10 Q. -- we can -- we can all compare it.

11 A. Okay. Good.

12 Q. Just to start and you'll be able to see what's
13 in there.

14 A. Okay.

15 Q. Your testimony isn't going to trump what's in
16 the documents.

17 A. I got it.

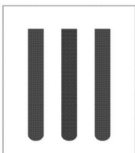
18 Q. Okay. So on May 4th -- are you aware that May
19 4th I was still counsel of record for Ms. Sahn?

20 A. You were never counsel of record for Ms. Sahn,
21 according to Ms. Sahn.

22 Q. According to the Court file, sir --

23 A. Well, let me ask you this -- let me ask you
24 this: Who was your client, Ms. Sahn or Joanna?

25 Q. Okay. Sir --



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1 A. See, well, let's ask the question correct. You
2 were never counsel for Pat Sahn, Senior. She never
3 retained you. You --

4 Q. You -- that's because you believe that -- you
5 believe that, but the court file showed I've been
6 counsel for Mrs. Sahn for years.

7 A. No. You've -- you've even stated that you
8 were operating under Joanna Sahn's --

9 Q. A power of attorney.

10 A. Right.

11 Q. A power -- so you knew I was --

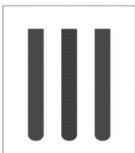
12 A. Undisclosed power of attorney.

13 Q. You knew I was counsel of record for Mrs. Sahn
14 in this case, right? On -- in May -- on May 4 when this
15 was prepared by Mister --

16 A. No. I -- I was aware that she had revoked
17 your power of attorney for Joanna, who was your client.
18 You had been misrepresenting to the court for some
19 period of time, I believe since Walt's death, and --
20 hold on one second. Okay.

21 Q. So on May 4, when this is done, you know that
22 I am counsel of record for Patricia Sahn, Senior, in the
23 foreclosure case, correct?

24 A. Yeah. And on -- and on May 1, 2023, I was
25 aware that Amber Patwell was her attorney.



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1 Q. Okay. But not in the foreclosure case?

2 A. Well, yeah.

3 Q. Amber Patwell had not filed a notice of
4 appearance in the foreclosure case.

5 A. Oh, that might have come later, but she was --
6 my understanding was she was representing her in the
7 mental health and the foreclosure.

8 Q. Assuming that Patricia Sahn, Senior, was
9 competent enough to hire Patricia -- Ms. Patwell,
10 correct?

11 MS. GARCIA: Objection. Calls --

12 THE WITNESS: No. There was no question of her
13 competency by anybody prior to your filing a
14 petition, which is not a guardianship. And she
15 still has not had an adjudicatory hearing deeming
16 her incapacitated, showing that that whole thing is
17 a big old fat fraud, too.

18 BY MR. SWEETAPPLE:

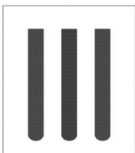
19 Q. Okay. So let's talk about fat fraud, sir.

20 A. Okay.

21 Q. This settlement agreement, are you aware the
22 first paragraph is exactly the same as what's in the one
23 that was signed?

24 A. No.

25 Q. Are you aware when it says recitals, that's



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1 exactly the same font and it's laid out the same way?

2 A. I think that's the same as was in the John
3 Raymond. So Kevin might have -- might have, and I
4 again, you need to talk to him, taken John Raymond's
5 settlement and put his comments into it. And part of
6 John Raymond's settlement might have fallen into the
7 settlement that Inger and Amber negotiated.

8 MS. GARCIA: Excuse me, Mr. Sweetapple?

9 MR. SWEETAPPLE: Uh-huh.

10 MS. GARCIA: Just to help you. So we don't sit
11 here and waste an hour and a half on this
12 settlement. Ms. Patwell and I had never considered
13 a settlement. Kevin drafted it on his own. The
14 client, your client -- former client never saw it.
15 So you are wasting your time. It was only produced
16 to you in good faith. So you can go down --

17 MR. SWEETAPPLE: Okay.

18 MS. GARCIA: -- the road you --

19 MR. SWEETAPPLE: Okay. I -- that's it.

20 MS. GARCIA: -- waste of time.

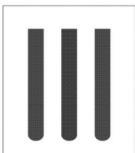
21 MR. SWEETAPPLE: Okay. Ma'am --

22 MS. GARCIA: I'm just telling you --

23 MR. SWEETAPPLE: Ma'am, I'm suspending the --

24 MS. GARCIA: You can ask your question, sir.

25 I'm just trying to help you.



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1 MR. SWEETAPPLE: I'm going to -- I'm going to
2 suspend the deposition now. I'm going to ask the
3 Court

4 MS. GARCIA: Oh, okay.

5 MR. SWEETAPPLE: -- to sanction you. I've
6 repeatedly asked you not to coach your client and to
7 tell him your testimony and your --

8 THE WITNESS: I just told you all that.

9 MR. SWEETAPPLE: -- view of the facts. I'm
10 suspending the deposition, sir.

11 MS. GARCIA: That's ridiculous, sir.

12 MR. SWEETAPPLE: And --

13 MS. GARCIA: We're here and we're ready to move
14 forward.

15 MR. SWEETAPPLE: Okay.

16 MS. GARCIA: Go ahead with your question, sir.

17 MR. SWEETAPPLE: No. I'm suspending the
18 deposition.

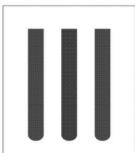
19 MS. GARCIA: I was just helping you, sir.

20 MR. SWEETAPPLE: I -- I'm not going to have you
21 help me by coaching a witness.

22 THE WITNESS: This is what she is trying to
23 tell you.

24 MR. SWEETAPPLE: It's unethical. All right.

25 Would you please overnight this transcript, please?



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1 I'm going to be filing an emergency motion with the
2 Court. I want to -- I want to establish facts
3 without Counsel continuing to coach and obstruct.
4 And I want responsive answers, not these long
5 diatribes. So I'm going to take this all up with
6 the judge. Thank you very much.

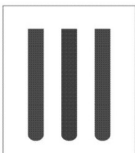
7 MS. GARCIA: We're here ready to continue, sir.

8 MR. SWEETAPPLE: I'm not going to continue with
9 the fact of --

10 MS. GARCIA: Okay. So my deposition is being
11 suspended too, I assume? To --

12 MR. SWEETAPPLE: No. Your deposition is going
13 to go on. And I trust you're going to have an
14 attorney with you who will make proper objections
15 and comply with the rules with regard to speaking
16 objections that you full well know, and you are
17 intentionally violating time and time again. And
18 the last violation was so blatant and so offensive
19 that I just can't even -- and I -- I'm losing my
20 patience with you. You're acting so
21 unprofessionally. Thank you very much. I'll see
22 you at 2:00 at your deposition.

23 THE REPORTER: Oh, wait. Mr. Sweetapple. So
24 would you like -- would you like that
25 electronically?



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1 MR. SWEETAPPLE: Yes.

2 THE WITNESS: (Audio cuts out.)

3 MR. SWEETAPPLE: Overnight, electronically,
4 please.

5 THE REPORTER: Okay. And --

6 MS. GARCIA: We do not waive reading. We do
7 not waive reading.

8 MR. SWEETAPPLE: There's no -- this deposition
9 is not completed. I'm suspending it.

10 MS. GARCIA: We do not waive reading at this
11 point for you to present any deposition to a court.
12 I have authority and I'm allowed to read and see it
13 before you present it or use it in any form
14 whatsoever. So we do not waive. We expect a copy.
15 Thank you -- Court Reporter.

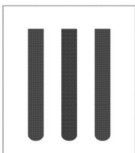
16 THE WITNESS: And -- and I would like -- and I
17 would like to --

18 THE REPORTER: Oh, wait. One moment, Mr.
19 Bernstein. So Ms. Garcia, you would -- you want me
20 to send that to your e-mail address since you want
21 to read it?

22 MS. GARCIA: Yes. Yes. Thank you.

23 THE REPORTER: Okay. And would you like a
24 copy?

25 THE WITNESS: Yeah.



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1 MS. GARCIA: Not yet until we know the price.

2 THE WITNESS: Oh.

3 THE REPORTER: Okay. And Ms. Lewis, would you
4 like to order today?

5 MS. LEWIS: No, I don't need a separate copy.
6 Thank you.

7 THE REPORTER: Okay. Let me get us off record.

8 THE WITNESS: Oh, no. Don't go off record yet.

9 MR. SWEETAPPLE: Yeah. I'm -- I'm -- I'm --

10 THE WITNESS: Because I wanted to make --

11 (DEPOSITION CONCLUDED AT 12:29 P.M. ET)

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CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF ORANGE

I, the undersigned, certify that the witness in the foregoing transcript personally appeared before me and was duly sworn.

Identification: Produced Identification

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Anesia Roberts

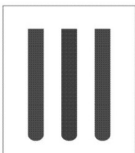
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C E R T I F I C A T E

STATE OF FLORIDA)
COUNTY OF ORANGE)

I, ANESIA ROBERTS, Court Reporter and Notary Public
for the State of Florida at Large, do hereby certify
that I was authorized to and did report the foregoing
proceeding, and that said transcript is a true record of
the said proceeding.

I FURTHER CERTIFY that I am not of counsel for,
related to, or employed by any of the parties or
attorneys involved herein, nor am I financially
interested in said action.

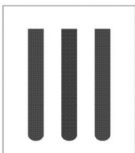
Submitted on: October 3, 2024.

Anesia Roberts

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ERRATA

PAGE	LINE	CHANGE	REASON
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I have read the entire transcript of my deposition taken in the captioned matter or the same has been read to me.I request that the following changes be entered upon the record for the reasons indicated. I have signed my name to the Errata Sheet and authorize you to attach the changes to the original transcript.

Date NAME



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October 03, 2024

Inger Garcia, Esquire
Law Office of Inger Garcia
4839 Volunteer Road
#514
Davie, FL 33330

RE: Deposition of **Eliot Bernstein** taken on **10/2/2024**
Walter E. Sahm and Patricia Sahm v. Bernstein Family Realty LLC et.al.

Dear Ms. Garcia,

IMPORTANT NOTICE FOR DEPOSITION TRANSCRIPT READ AND SIGN

It is suggested that the review of this transcript be completed within 30 days of your receipt of this letter,
as considered reasonable under Federal Rules*.

 Attorney - Copy of Transcript Enclosed: Signature of the Deponent is required. Please have the deponent make any corrections/changes necessary on the Errata Sheet ONLY, sign name on the form where indicated. Please return ONLY the original signed Errata Sheet to our offices within 30 days from the date of this memorandum. If you have any questions, please call our offices.

 x **Attorney - No Copy Ordered:** Since you did not request a copy of the transcript, it will be necessary for the Deponent to call our offices to arrange for an appointment to read and sign the transcript of the Deposition within 30 days of this memorandum.

 Deponent: At the time of your deposition, you did not waive your right to read and sign the transcript of your testimony, therefore, attached please find a copy of the transcript and Errata Sheet. Please read the transcript, make any corrections necessary on the Errata Sheet ONLY, sign the bottom of the Errata Sheet, and return it within 30 days from the date of this memorandum. Please call our offices if you have any questions.

 Deponent: At the time of your deposition, you did not waive your right to read and sign the transcript of your testimony, therefore, it is necessary for you to come to our offices to read and sign same. Please call Milestone Reporting Company to arrange for an appointment at your earliest convenience.

 The attached executed copies of the Errata Sheet(s) are sent to you for your files. If you have any questions, please call our offices.

Thank you for your attention to this matter.

No. 345492

cc: Kathryn Lewis, Esquire
Robert Sweetapple, Esquire

Waiver:

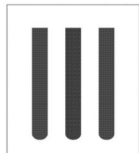
I, Eliot Bernstein, hereby waive the reading and signing of my deposition transcript.

Deponent Signature

Date

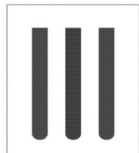
*Federal Civil Procedure Rule 30 (e) / Florida Civil Procedure Rule 1.310 (e)

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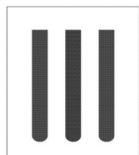


<p>70:3,7 107:20</p> <p>action 111:15</p> <p>actually 26:3 29:11 38:13 55:22 62:13 72:19</p> <p>AD 97:15</p> <p>adamant 80:20</p> <p>added 80:9</p> <p>adding 81:9</p> <p>address 108:20</p> <p>adjudicated 75:9,11 83:19,20</p> <p>adjudicatory 104:15</p> <p>admit 42:9</p> <p>admits 34:6</p> <p>admitted 20:11</p> <p>affairs 23:24</p> <p>affidavit 34:6,7</p> <p>affiliated 66:23 70:16</p> <p>affirm 7:2</p> <p>against 10:24 17:13,16,25 25:19 53:18 61:1 73:7</p> <p>ago 7:18 9:24 18:10 41:4</p> <p>agreed 4:11</p> <p>agreeing 74:24</p> <p>agreement 1:11</p>	<p>3:8 22:14,16 24:8,12,15,19 27:10 28:1,3,6 29:5,8 30:6,20,23 32:3 33:2 38:20 40:10 42:11 45:22 46:18 47:2,9 48:8 56:19 57:7 76:13,16,19 77:10 78:25 80:5,8 91:7,19,20 93:9,13,20 95:20,23 102:8 104:21</p> <p>agreements 22:6 51:23 66:16</p> <p>ahead 18:10 19:7 20:20 23:17,19 35:15 36:23 37:1 39:22 40:1 44:23 45:1,4,16,17 46:9,14 58:15 78:19 81:14 85:17,20 86:2,10 94:17 106:16</p> <p>al 5:15,16</p> <p>Alan 7:19 20:8 29:16</p> <p>Alee 2:21</p> <p>ALEXANDER 1:8 2:14</p> <p>alleged 30:16</p>	<p>33:3 51:21 54:13,23 55:4 56:1,2 86:21 87:16</p> <p>allegedly 52:2 54:14 65:23 86:20 95:12</p> <p>allowed 108:12</p> <p>already 48:20 49:2 63:8,9 77:19 83:4 85:13 90:13 99:2</p> <p>am 6:1,3 8:10 9:12 16:7 31:10 38:9 44:7 96:10 103:22 111:12,14</p> <p>Amazon 62:21</p> <p>Amber 65:12 77:15,18 81:21 84:8 91:12 94:1 103:25 104:3 105:7</p> <p>AMENDED 1:12</p> <p>amount 80:7 93:5</p> <p>Anesia 1:17 4:11 5:2 110:21 111:6,24</p> <p>answer 8:21 9:6,7 11:11 13:12 23:18 26:22 32:25 37:22 38:12 39:19 42:4</p>	<p>48:18,24 54:1 55:11 58:15 81:12 85:17,20,23 86:1,7</p> <p>answered 48:20 55:10</p> <p>answering 27:2,5,12 35:7 49:5,10,11</p> <p>answers 43:1 93:3 107:4</p> <p>anybody 12:1 34:18 58:2 72:4 74:14 88:9 92:24 104:13</p> <p>anymore 65:21 94:11 100:5,8,11</p> <p>anyone 24:5 37:5 52:4,8 89:7 94:20</p> <p>anything 18:14 34:8 53:15 54:8 58:1 64:14 83:2 91:13 92:16</p> <p>Anytime 52:12</p> <p>anywhere 39:14</p> <p>apart 79:16</p> <p>apologize 51:7</p> <p>appalled 59:21,23 60:9 81:8</p> <p>appeals 12:25</p>
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<p>appear 34:2 35:12,13 39:14 76:12</p> <p>appearance 5:19 26:20 104:4</p> <p>APPEARANCES 2:1</p> <p>appeared 2:7,12,19 66:12 67:11 110:7</p> <p>appearing 6:7</p> <p>appears 73:6</p> <p>append 13:6</p> <p>appropriate 19:10 44:22,25</p> <p>approval 25:10</p> <p>approximately 4:7</p> <p>area 51:19</p> <p>arm 94:14</p> <p>arrested 20:9</p> <p>arteries 9:15</p> <p>assert 85:24</p> <p>associate 101:20</p> <p>assume 6:6 107:11</p> <p>Assumes 58:14</p> <p>assuming 78:9 88:13 104:8</p> <p>ate 24:25</p> <p>attach 112:20</p> <p>attached 91:19 101:18</p>	<p>attack 45:9 51:9</p> <p>attacking 62:20</p> <p>attempt 13:14 38:21 52:9</p> <p>attempted 42:11 67:1</p> <p>attempting 42:14</p> <p>attempts 52:16</p> <p>attended 4:6</p> <p>attending 5:20 6:2</p> <p>attorney 2:20,21 12:19 21:8 24:16,24 25:1 26:10,11 28:14 32:23 33:1 34:11 35:2,14 37:7,17 39:2,5,19 41:3,4 42:10 45:7 46:6,19 47:4,17 50:1,9,12,16 51:22 52:2,20,22 53:12 54:6,11,14,24 55:9,22,25 57:5 60:8 63:6,8,10,14,2 3 64:1,21 65:1,3,10 68:10,14,17 69:11,13 71:7,8,13 73:19,24</p>	<p>74:7,15 76:24 86:17 87:4 88:1,3 89:15,19 90:16 93:4,11,25 94:21 96:20 97:2,20 98:12 99:5,15,16 100:5,11 103:9,12,17,25 107:14</p> <p>attorney@ingergarcia.com 2:18</p> <p>attorney-client 36:24 37:21,24 85:6,19,24</p> <p>attorneys 16:16 20:8 29:7 56:13,15 71:19,22 91:10,11 92:23 93:10 99:19 100:7 111:14</p> <p>audio 37:13 61:5 108:2</p> <p>Austin 2:21</p> <p>authorities 29:17 53:19 99:9</p> <p>authority 108:12</p> <p>authorize 112:20</p> <p>authorized 70:6 111:8</p> <p>aware 11:23 13:18 31:7,11 34:23 35:23</p>	<p>36:14,17,18 40:7,10 49:24 50:4 53:6,11 54:13 85:14 91:6 95:11 96:9,10 102:18 103:16,25 104:21,25</p> <p>away 60:7</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>background 10:11 15:6 19:11</p> <p>bad 12:6 16:16 38:2</p> <p>bank 60:15,18</p> <p>bankruptcy 25:3,13 26:16 31:1 32:8,20 33:17 34:3,14 35:23 47:13,15 52:23 60:1 64:19 66:8,9,13 74:2</p> <p>Bar 18:15</p> <p>based 13:2 27:14 80:7 96:17 97:19 98:1</p> <p>basically 8:19 59:17 60:18</p> <p>basis 34:24 40:3,4</p> <p>Bates 56:22</p> <p>Beach 1:2 2:11 5:17 6:2 10:21 12:17 13:19</p>
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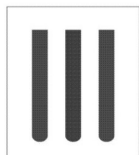
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19:16 20:3,12 became 32:8 52:8,12,22 95:11 become 24:24 begin 7:6 behalf 2:2,13 5:23 6:1 21:9 70:3 81:10 99:2 believe 19:10 21:12 23:13 24:16,23 25:1,5,17 27:16 28:14 29:4 34:24 40:17 46:25 49:20 50:5,8 52:6 54:18 56:3 57:19 58:3 59:25 60:8 61:2 62:10,12 63:2 65:2 67:10,13 68:5 69:23 70:5,10 71:16 73:4 75:18 77:15 80:21 84:16 88:20 89:6 94:4 96:8,14 100:6,25 102:4 103:4,5,19 believed 98:6 belongs 25:6 bench 19:23 Bernstein 1:6,8,9,11,12,	14,16 2:13,14 4:3 5:10,12 6:11,12,15,21, 25 7:9 11:10 12:21,23 13:5 14:4,9 15:5 16:9,13,20 17:6 20:21 21:9 22:3 23:2,4 24:6 27:17 30:2 35:4,6,12 37:5 38:18 41:10 44:8 51:19 66:23,24 70:4,6,17 86:11 108:19 BERSTEIN 1:13 2:14 besides 94:20 best 81:23 better 72:17 beyond 23:16 BFR 29:14 58:2 91:2 BFR's 27:6 bigger 90:21,22 bill 80:19 bills 80:18 bit 6:16 9:16 98:9 blatant 107:18 blew 17:19 blood 9:13 90:5,6 Boca 2:5	bomb 17:18 bother 93:15 bottom 26:6 93:1 Brad 25:12 26:17 58:7 98:14 brain 39:3 brain-damaged 62:22 break 9:22,25 14:3,5,6,14 51:7,10,12 89:21,25 Brian 1:7 5:10 20:14 bring 76:19 77:15 99:18 broad 12:7 Broeker 2:4 broke 38:24 brought 40:25 57:21 78:24 build 20:19 bullied 45:7 bully 62:21 bullying 45:5 bunch 17:13 18:12 29:20 62:24 Burton 97:11 business 15:23 22:1 busted 26:9	<hr/> C <hr/> Caladryl 94:16 camera 6:14 canceling 68:2 CANDICE 1:12 2:13 Candy's 95:2 Cappellar 28:16 29:1 captioned 112:17 car 17:19 care 9:11,12 16:12 62:23 71:10,12,15 79:17 career 20:15 Carrino 2:21 cars 17:19 case 1:2 5:18 10:9 12:20,22 18:2 20:12 24:8 26:15,17 28:4,7 31:9,13 32:7,9,10 33:2,19,22 34:4,6,8,14,16 ,19 36:22 37:8,16 39:12,15 43:11 45:25 47:15,16 52:5,17,21,23 53:2,9,16 55:16 56:1 62:14,15 64:5 66:8,10,13
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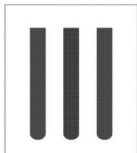
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<p>67:12 70:17 87:3 103:14,23 104:1,4</p> <p>cases 8:2</p> <p>cash 60:18</p> <p>Cassandra 2:20</p> <p>caught 26:18</p> <p>caused 29:20</p> <p>certain 70:12</p> <p>certainty 86:25</p> <p>CERTIFICATE 110:1</p> <p>certify 110:6 111:7,12</p> <p>cetera 12:5 20:8</p> <p>chain 37:19</p> <p>chance 31:23</p> <p>change 34:15 53:16 112:3</p> <p>changed 30:12</p> <p>changes 112:18,21</p> <p>changing 83:16</p> <p>charge 62:9</p> <p>charges 34:25</p> <p>Charles 2:2 5:23 6:1</p> <p>check 22:5 23:11 42:17 43:12</p> <p>children 1:14 17:7 29:24 47:23 82:7</p>	<p>children's 29:19</p> <p>chores 82:11</p> <p>chose 40:21</p> <p>Circuit 1:1 5:17 18:19</p> <p>Civ 4:9</p> <p>claim 30:6,19 32:10 55:23 57:4</p> <p>claimed 41:3 55:23 99:6</p> <p>claiming 12:2 64:20</p> <p>claims 10:24 25:19</p> <p>clarify 10:13</p> <p>clean 52:16</p> <p>clear 9:17 33:12,14 46:2 52:15 98:9 99:25</p> <p>clearer 43:18</p> <p>clearly 61:1</p> <p>client 13:14 19:9 26:8 32:15 37:18 39:20 44:2 51:8 54:7 63:10 64:20 72:5 100:8 102:24 103:17 105:14 106:6</p> <p>clients 32:17 92:25</p>	<p>client's 20:17</p> <p>closer 6:16</p> <p>closing 34:22</p> <p>clotted 9:15</p> <p>coach 106:6 107:3</p> <p>coaching 44:2 106:21</p> <p>co-counsels 25:6</p> <p>code 85:13</p> <p>cognitive 97:14</p> <p>college 15:7 16:1,2</p> <p>comes 11:8 86:19</p> <p>comfortable 81:14</p> <p>coming 28:4 32:19 34:14</p> <p>commence 13:8</p> <p>comments 34:20 85:9 105:5</p> <p>Commission 110:24,25</p> <p>committed 27:14 45:14</p> <p>committing 26:6 69:15 74:3</p> <p>communicate 37:6 85:3 86:17 87:12</p> <p>communicating 73:1 75:5</p>	<p>85:12</p> <p>communication 38:15</p> <p>communications 39:20,24 85:9</p> <p>company 4:4 5:4 16:1 22:9 23:3</p> <p>compare 102:10</p> <p>compensate 22:7,14</p> <p>competency 104:13</p> <p>competent 63:24 84:8 97:8,9 104:9</p> <p>complaint 13:17 20:10</p> <p>completed 4:14 108:9</p> <p>complicated 9:1 17:20</p> <p>comply 107:15</p> <p>concealed 34:5 53:13</p> <p>concealing 33:10 60:16,24</p> <p>concerned 83:11,14</p> <p>concerning 43:10 48:8</p> <p>concluded 56:5,7 109:11</p> <p>conclusion 53:24</p> <p>concocted 26:14</p>
--	---	---	--



73:5 condition 9:21 conduct 14:10,20 conducted 10:20 conducting 10:19 23:24 conference 5:8 conferenced 61:8 confirmed 47:12 conflicted 35:11 confused 9:1 considered 105:12 consult 69:11 consultant 22:1 101:23,24 consulted 73:9 contact 14:21 36:21 37:9,15 38:21 40:18 88:24 contacted 10:21 12:18 34:23 58:23 70:9 71:17,18,21 73:4 74:20,21 86:25 contacting 14:20 contain 51:24 contempt 14:12 44:1	continue 68:7 94:18 107:7,8 continued 69:17 continues 14:20 continuing 44:1 75:15 107:3 contracted 81:10 contracts 22:4 control 13:14 convened 5:8 conversation 96:18 conversations 37:18,20 61:6,10 62:1,7 67:20,22,24 69:21 75:7,23 78:6 81:21,23 94:8 conversing 59:18 cooperate 44:17 copied 43:7,16 copies 66:3,6 copy 12:18 100:23,24 108:14,24 109:5 corner 43:18 correct 8:12 24:20 29:6 30:25 32:5 33:4,15,16 35:24 39:10 41:17 42:11	47:3,6,7 51:3,5 52:18,19 61:17 62:4 64:2 66:11 67:7,8 68:10 69:9 70:18 74:22 77:7 78:1,2 79:1,11 82:13 84:4,6 88:8 92:11 94:11 96:24 100:2 103:1,23 104:10 cost 80:15 costs 28:18 80:11 counsel 5:21 6:3 14:1 55:16 58:2,8 63:21 64:14 66:13 67:18 71:24 74:20 84:8,9 96:21 100:1 102:19,20 103:2,6,13,22 107:3 111:12 County 1:2 5:17 6:2 10:21 12:17 13:19 19:16 20:3 110:4 111:4 course 32:24 33:7 court 1:1 4:12 5:3,17 7:23,25 8:15 11:12,20 12:25 13:7 14:12,21 18:15	20:17 25:13,23,24 26:7,13,18,21 29:8 30:7,11 31:1,19 32:16 33:11 34:12 35:1,13,23 36:4,7 41:2 47:13,17,24 48:25 53:15 54:7,9 55:21 63:22 64:19 66:8 69:18 72:3,7,8 73:13 74:2,10 87:1 95:17 99:3,4 102:22 103:5,18 106:3 107:2 108:11,15 110:22 111:6,25 courts 14:10 16:17 covered 28:18 80:11 create 45:11 credibility 19:12 crimes 11:25 criminal 11:1,22 29:17 59:8 62:9,14,15 70:8 criminally 20:18 cultish 19:24
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<p>currently 21:18</p> <p>cut 72:24</p> <p>cuts 37:13 61:5 108:2</p> <p>Cynthia 2:21 5:23</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>D.B 22:25</p> <p>dad 17:20</p> <p>dad's 17:10</p> <p>damn 40:18</p> <p>dance 13:15</p> <p>date 1:16 41:23 42:20 50:10 54:20 59:3,4 61:20 101:10 112:25</p> <p>DATED 1:11</p> <p>dates 9:17 21:13</p> <p>dating 98:13</p> <p>daughter 59:23,24,25 73:15 74:10 78:7 100:16 101:4</p> <p>daughter's 94:24</p> <p>Davie 2:17</p> <p>day 4:7 5:6 26:13,14 32:15 75:10 82:8</p> <p>days 59:15 70:11 73:5</p>	<p>dead 25:24,25 26:18,19,20 32:16 34:17 39:13 69:16,18 73:14,15,16 74:5,9 99:3</p> <p>deal 80:21</p> <p>dealing 72:21 98:1</p> <p>dealings 52:13</p> <p>deals 87:6</p> <p>dealt 98:20</p> <p>death 31:12,14 32:12 36:1,8,10,18 53:15 55:21 60:20 103:19</p> <p>debt 29:14</p> <p>decision 96:5</p> <p>decisions 96:25 97:2,4</p> <p>declined 12:22</p> <p>deem 44:22</p> <p>deeming 104:15</p> <p>deems 44:25</p> <p>defendant 70:16</p> <p>Defendants 1:15 2:13</p> <p>definitely 72:1 85:1</p> <p>delay 9:14 31:22</p> <p>delays 29:21</p> <p>denied 12:25</p>	<p>dental 16:1</p> <p>Department 18:3</p> <p>DEPONENT 1:16</p> <p>deposed 7:13</p> <p>deposition 4:3,8 5:8 8:20 9:10 10:13,19 11:5,12,14,21 12:3 13:6,7 14:13,18 19:2,3,6 34:24 37:23 39:21,25 44:21 48:6 50:17 70:2 89:9 106:2,10,18 107:10,12,22 108:8,11 109:11 112:16</p> <p>described 62:3 75:23 82:25</p> <p>description 98:2</p> <p>destroyed 20:15</p> <p>details 12:22</p> <p>determine 37:22</p> <p>diatribes 107:5</p> <p>died 26:13 35:24 36:9 53:14,17</p> <p>direct 3:4 7:7 37:5,6 85:2</p> <p>directly 20:9 52:8</p> <p>disbarment 65:21</p>	<p>disbarred 20:15 65:19</p> <p>Disciplinary 18:3</p> <p>disclose 74:8</p> <p>discovery 30:2</p> <p>discuss 12:22 68:21 80:2</p> <p>discussed 64:22,25 77:19 80:4,6</p> <p>discussing 43:1 44:14 79:25</p> <p>discussion 24:4 58:3</p> <p>discussions 96:15</p> <p>disqualified 19:21</p> <p>District 18:2</p> <p>docket 53:8,20 54:4 55:8</p> <p>doctor's 9:10,12</p> <p>document 20:11 34:13 57:9 78:5,10 80:11 90:12 93:11 95:11,14,16 96:6,13 101:9,10,11,19</p> <p>documents 33:8 102:16</p> <p>dog 62:22</p> <p>dogs 62:20</p>
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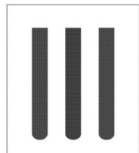
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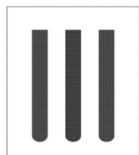
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<p>dollars 20:16 60:18</p> <p>Don 20:8</p> <p>done 12:11,14 25:9 60:7 81:9 82:11 84:11 96:9 103:21</p> <p>door 79:20</p> <p>dozen 8:4</p> <p>draft 3:8 24:7,11,14,19 27:8,23 28:5 30:19 33:2 43:9,21 45:22,24 47:1,8 48:7 49:18,25 56:18 57:6 77:11,13 91:7,19 93:12,24 101:12,17</p> <p>drafted 24:22 50:12 105:13</p> <p>drafting 94:6</p> <p>drafts 43:14,24</p> <p>drop 94:7 100:19</p> <p>due 80:23 81:7</p> <p>duly 110:8</p> <p>during 37:9 42:21 78:6 86:19</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>earlier 28:13 36:3 54:16,17 96:4</p>	<p>early 19:22</p> <p>East 4:4 5:5</p> <p>echo 97:11</p> <p>edges 9:17</p> <p>educational 10:11 15:6</p> <p>effect 42:10</p> <p>effective 25:18</p> <p>effort 30:19</p> <p>either 92:22</p> <p>elder 87:2</p> <p>elderly 62:23</p> <p>electronically 107:25 108:3</p> <p>Eliot 1:12,16 2:13 4:3 6:10,15,18</p> <p>else 9:17 28:8 52:4 54:11 60:5 83:24 91:13 92:24</p> <p>e-mail 2:6,12,18 37:19 87:18 89:2 101:17 108:20</p> <p>e-mails 43:17 68:6</p> <p>emergency 107:1</p> <p>employed 111:13</p> <p>enforce 29:8 30:15,17</p> <p>enforced 30:7</p> <p>engaged 47:24</p>	<p>entered 16:9 52:23 112:18</p> <p>entire 112:16</p> <p>entitled 19:12</p> <p>entity 21:15,19</p> <p>ERIC 1:8 2:14</p> <p>Errata 112:1,20</p> <p>error 41:22</p> <p>Esquire 2:3,9,15</p> <p>essentially 10:9</p> <p>establish 107:2</p> <p>estate 1:8 5:11 16:15 24:24 25:2,11,14 27:16 30:23 31:4,8 32:4,6,21 33:3,14,22 38:20 39:14,16 40:9 42:15,22 43:3,15 46:1 47:10,14 52:23 60:25</p> <p>estates 19:25 29:15</p> <p>et 4:8 5:15,16 12:5 20:8 109:11</p> <p>everybody 28:8 87:23 88:1,5 97:15</p> <p>everyone 5:18</p> <p>everything 9:17 28:19 34:15</p>	<p>59:23 81:9</p> <p>evidence 13:2 29:3 44:18 58:15 66:21 78:9,19 85:13 88:13 95:17</p> <p>exact 50:10</p> <p>exactly 22:17 61:20 104:22 105:1</p> <p>EXAMINATION 3:4 7:7</p> <p>examining 99:20</p> <p>excellent 7:12</p> <p>excluding 80:23</p> <p>excuse 5:14 10:25 11:2 18:25 47:16 105:8</p> <p>executed 28:21,23,24 47:3,6</p> <p>exhibit 3:7 56:23 90:16</p> <p>Exhibit 1 56:22</p> <p>exhibits 3:6 12:8 90:13</p> <p>exist 29:25</p> <p>existed 30:6 45:23</p> <p>expect 93:2 108:14</p> <p>expected 8:21</p> <p>experience 10:8</p> <p>expert 48:2</p>
--	---	--	---



Expires 110:24	family 1:6 2:14	107:1	fishing 12:4
explain 77:24	5:10 12:21	filled 65:25	86:2
explaining	16:9,13,16,20	final 52:24	five 14:19
49:13	17:6,21 21:9	93:20,24 94:1	23:12 51:7,9
expose 35:1	22:3 23:2,4	finally 59:16	five-minute
72:15	24:6,22 25:9	financially	14:3,5,6,14
exposed 12:1	37:6 66:23,24	111:14	89:25
74:1	69:16	finding 65:10	fix 79:19 82:11
exposing 16:17	70:4,6,17	71:12	fixed 79:17,23
	77:14 82:15	fine 39:24 90:7	fixing 79:15
	83:23	finish 31:16	83:23
	fat 104:17,19	43:8	Fla 4:9
	father 16:15	48:11,15,17	Florida 1:2
	federal 2:4	95:25	2:5,11,17
	16:17 25:13	finished	4:5,12 5:6,18
	29:17 47:13	49:2,5,10,11,1	6:3 11:9
	feeling 11:20	4	18:6,15 20:16
	fees 25:1	finishing	87:1 110:3,23
	80:21,24 81:9	48:16,18,24	111:3,7
	felt 83:3	fire 64:23	font 105:1
	Ferderigos 45:6	firing 68:5	force 29:18
	fight 93:2,3,7	firm 25:7,17	87:1,7,9,11,14
	figure 60:23	53:21 54:4	foreclosure
	76:10	first 10:20	25:4,11 29:18
	file 33:13 36:1	12:10	31:9 32:7,9
	70:8 102:22	24:6,10,13,14,	33:2,14,19,20,
	103:5	18 27:8,23	21 34:4,8
	filed 25:16,17	28:5 32:21	36:22 37:8,16
	26:19 30:15	41:17,21	39:1,15 43:10
	32:12,24	45:22,24 46:5	45:25 47:15
	36:3,8,10	50:7 53:13	48:9
	53:14 65:25	56:2 57:5,21	52:5,17,21
	75:2,6,8,17,25	58:11 61:18	53:1,9,22
	76:5,7 77:4,25	62:17 83:17	55:16 56:1
	78:23 104:3	100:3,9 104:22	64:5,7 67:12
	filing 69:17	fish 34:25	103:23
	99:2 104:13		104:1,4,7



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<p>foregoing 110:7 111:8</p> <p>forging 20:11 33:8</p> <p>form 19:1 40:4 41:24 42:3,16 47:18 58:14,19 62:8 77:1 78:8,16,17 84:2,5 88:12 97:23 98:22 108:13</p> <p>former 28:14 105:14</p> <p>forms 44:13</p> <p>forward 106:14</p> <p>forwarded 40:11</p> <p>founded 85:25</p> <p>frame 11:25 62:9 77:1 83:3</p> <p>framed 62:10</p> <p>fraud 12:1 26:7,15,21 27:14 35:1 45:11 69:15 72:7,16 74:2 104:17,19</p> <p>frauds 24:23 33:24 34:14 45:13</p> <p>fraudulently 25:3</p> <p>free 22:9</p> <p>FRIEDSTEIN 1:10</p> <p>friend 7:18</p>	<p>friends 70:21</p> <p>FRIENDSTEIN 1:10</p> <p>front 61:11</p> <p>full 6:13 107:16</p> <p>full-time 16:2</p> <p>fully 36:17 97:8</p> <p>fun 44:23 86:2</p> <p>funds 29:20</p> <p>furniture 82:12</p> <p>furthered 74:2</p> <p>FW 91:2</p> <hr/> <p style="text-align: center;">G</p> <hr/> <p>Garcia 2:15,16 6:6,9,10,23 13:13,25 14:3,5,13,16 17:17 18:8,20,23,25 19:3 23:16,19 24:17,18 27:20,21,24 28:2,7,12 31:16,19,22,25 33:1 35:22 36:17,20,21,23 37:1,6,13,17 38:16,19 39:18 40:11 41:13,15,24 42:1,3,6,14,16 ,19,21,25 43:13,21,24 44:12,16,17,20 ,23</p>	<p>45:1,4,15,21,2 3 46:8,11,14 47:9,17,18,21 48:8 49:8 50:18,21 51:6,23 52:17 53:23 54:1 55:10 57:8,14 58:14,18,19 72:23 76:22,25 78:8,13,16,19 84:2,5,9,24 85:3,5,8,15 86:1,7,10 88:12 89:20,23 90:4,21,25 94:13,17,22,24 95:2,6,7,25 97:23 98:22 101:13 102:3 104:11 105:8,10,18,20 ,22,24 106:4,11,13,16 ,19 107:7,10 108:6,10,19,22 109:1</p> <p>general 44:14</p> <p>getting 19:11,23 29:21 50:12,16</p> <p>God 32:19</p> <p>gone 20:1 82:14,15</p> <p>gotten 101:6</p> <p>graduate 15:7,12,14</p> <p>graduated 15:22</p>	<p>granted 73:19</p> <p>grave 60:2</p> <p>group 19:24 20:1 87:5,22,23 88:1,6</p> <p>guardian 2:2 5:23 6:1 32:23</p> <p>GUARDIANS 1:13</p> <p>guardianship 6:4 25:16 34:6 40:23 41:12,21 72:22 73:2,6 75:2,6,8,16,25 76:5,7 77:4,25 78:23 83:6,7,8,15,17 ,18 86:20 87:2,16,22 88:6 98:17,18,19 104:14</p> <p>guardianships 19:25</p> <p>guess 9:6 34:17 70:22</p> <p>gun 59:19 62:9,18</p> <p>guy 28:15</p> <p>guys 13:23</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>Hahn 2:20</p> <p>half 20:16 60:17,22 80:10 105:11</p> <p>Hall 21:24,25</p>
---	---	---	---



23:15 50:15 56:18 57:6 58:11,23 61:3,22,24 65:17,22 66:25 67:6 68:19,20 70:14 71:4,6 72:21 73:1 74:25 75:4,15,18,24 84:21,23 89:7 91:6,18 92:5,6 93:6 95:24 101:20 Hall's 65:19 hand 7:1 60:9 76:17 handle 23:14 37:15 handling 34:9 handwriting 29:2 handwritten 28:17 60:10 hanging 79:21 happened 39:17 58:10 59:6 62:16 77:24 happens 36:11,15 hard 33:25 haven't 8:17 12:1 49:14 90:2 having 47:24 80:4 86:2 head 86:9	health 104:7 hear 38:24 93:5 heard 46:10 48:12 59:16,20 60:21 64:14 68:4 80:9 90:2 97:11 98:13 hearing 18:14 75:11 104:15 heart 9:15 51:9 heavy 9:14 he'd 26:19 held 50:1 73:24 help 82:11 87:4 93:3 105:10,25 106:21 helped 79:23 helping 88:2,3 106:19 hereby 111:7 herein 111:14 here's 80:15 he's 22:1 29:16,17,23 86:1 94:14 101:13,21,23 hey 62:15 HH445598 110:25 hide 26:15 high 70:20 Highway 2:4,10 Hillary 86:25 88:20,22 hire 67:16	104:9 hired 41:6 63:20 65:23,25 68:25 69:2,8 89:14 hiring 64:13 66:25 67:1 68:22 history 18:10 hit 86:8 Hogue 86:25 88:21,24 H-O-G-U-E 88:23 hold 6:13 14:11 43:25 50:10 76:25 94:13,14,15 101:15 103:20 home 6:2,11 17:5,6 61:16,19,22,24 83:23 honest 32:18 hopefully 99:9 hour 105:11 house 76:12,20 77:5,23 78:1 79:15 82:5,12 94:24,25 95:2,3 hunted 29:16 husband 60:1 69:16 95:2 <hr/> I <hr/> IANTONI 1:9	I'd 12:8,15 23:11 81:10 ID 6:13 idea 67:9 71:17 84:13 Identification 56:23 110:10 identified 47:24 ignore 40:21 I'll 18:11 21:13 42:2 57:12 65:7 101:9 107:21 illegally 31:3 I'm 5:2 6:10 7:12 8:2,20 9:13,17,25 11:4,7,10,14,1 6,18,20,21 12:17 13:8,11,18,20 14:14,18 15:7 16:22 19:11,12 21:12 22:5,8,17,18 23:3,6 25:12 30:2 34:21 35:6,18 36:13 38:6,15 39:18 42:2,17 43:5,8,25 44:12 45:20 46:2,3,12 48:1,16,18 49:4,22 51:6,20 57:2,4,11,15,1 7 58:17 61:20
--	--	--	---



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65:16,21 72:23 74:23 76:25 78:4 81:13 82:23 85:15 86:4,6,7,11,16 ,18 87:11 89:20 90:15 94:13 95:5,6,7,22 96:10 99:20 100:10 102:7 105:22,23,25 106:1,2,9,17,2 0 107:1,5,8,19 108:9,12 109:9	95:13 112:19 indicates 100:10 indicating 30:23 INDIVIDUALLY 1:10,13 industry 16:4,6 Inger 2:15,16 6:10 24:17,18 25:5,15 27:13 30:21,22 33:9 49:12 81:22 84:9,12 91:12 93:15 105:7 Inger's 72:19 innocent 62:22 insider 20:10 instantly 28:16 32:17 instigated 62:12 instruct 37:15 38:18 instructed 38:12 86:17 instruction 19:9 85:23 insurance 15:23 16:4,6 28:18 intended 10:7 20:24 intent 17:10 intentionally 107:17	interest 16:20 25:11,14 32:10,21 33:21 47:14 53:17 59:22 70:7 80:10,16,24 interested 111:15 interrupted 48:22 introduced 70:19 investigating 12:5 45:13 investigation 11:22 involve 49:18 58:11 involved 8:2 24:3,6 43:16 45:12 46:17 49:17 50:11,15 51:23 52:3,8,12 59:8 61:6,7 62:7 67:6,7 68:16,19 79:4 87:5 91:11 92:23 100:17 111:14 involvement 65:9 66:24,25 84:22,24 involves 85:10 involving 12:20 Irish 97:17 isn't 19:1	40:22 65:20 83:10 102:15 issue 23:17 28:3 68:22 93:7 issues 18:9,24 19:4 32:18 Ivan 6:15 I've 7:24 8:3,14 20:7 41:23 51:11 73:10 97:1 103:5 106:5 <hr/> J <hr/> Ja 1:14 79:8 Ja.B 22:25 JILL 1:9 JO 1:14 Jo.B 22:23 Joanna 26:7,14 31:3 32:19 33:8,20 34:1,17,20 41:5 43:15 47:13 50:1 55:19,22 60:10,11,14,16 ,24 62:11,19,20 63:20 64:21 67:14,24 72:5,6 73:5,12,19,21, 22,24 79:15,19,22 80:21 81:12 82:18,23 100:2
---	--	---	---



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102:24 103:8,17 Joanna's 54:6 60:9 63:9 John 24:17,18,25 25:5,8 27:13 28:15 29:1 37:10 40:12 47:12 48:10 105:2,4,6 joint 36:19 39:13 Jorge 18:12 judge 12:8,9,16 13:10 19:7 20:4 37:21 38:7,8 39:21,23 44:6 45:3 72:20 97:11 107:6 judges 17:13,15,25 18:5,7,18,22 19:15,24 20:1,22 21:2 judgment 32:17 33:22 52:10,24 62:12 93:5 Judicial 1:1 18:19 junction 46:22,24 Junior 46:21 49:19 52:3 59:7,15 61:4 62:2,6,14,18 63:1	68:7,9,13,22 70:8,15,20 77:15 79:4 82:24 89:17 Junior's 59:11 62:22 <hr/> K <hr/> Kathryn 2:9 5:25 25:17 kathryn@kitrose rlaw.com 2:12 Kevin 21:24,25 24:4 56:18 57:19 59:6,10,18,19 60:3 65:2,6,9,22 69:23,24 70:1,3,6 81:24 91:12 92:24 95:24 105:3,13 Kevin's 91:17 92:22 kids 16:12 22:17,19 29:13 59:25 63:4 77:17 81:4 kill 17:22 killed 79:21 kinds 53:18 57:22 100:14 kit 90:5 kitchen 79:17 Kitroser 2:9 knew 17:11 33:7 34:8,13,19	40:18 53:5 56:3 60:21 62:11 64:3,4 73:13 84:19 87:25 88:1 93:11 94:8 96:11 103:11,13 knowledge 36:22 37:23 39:23 47:10 66:22 67:5,6 68:13 81:24 KRH 91:2 <hr/> L <hr/> Labarga 18:12 laid 105:1 Large 111:7 last 23:5,6,12 48:16,18,21 49:16,21 80:8 85:14 88:22 107:18 later 16:21 21:14 26:9 41:3 55:23 73:4 96:15 99:5 104:5 law 2:16 19:13 35:16 36:11 lawyer 36:13 60:5 65:19 72:9 81:20,21 95:18 lawyers 17:13,21 18:5 40:11	72:12,13,16 layman 53:19 leading 27:16 72:19 learn 43:6 89:13,16 learned 32:22 33:16,20 59:7 learning 26:9 least 97:16 legal 12:23 21:7 48:1 53:23 58:4 80:18 legally 32:24 legs 89:20 Leslie 28:8 45:6 less 93:5 let's 74:4 93:9 103:1 104:19 letter 45:6 94:9 96:13 113:5 letters 60:10 64:12 letting 29:19 79:15 88:25 Lewis 2:9 5:25 13:13,18,21 25:17 109:3,5 life 16:15 98:13,14 likely 77:8
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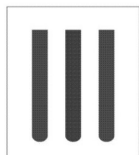
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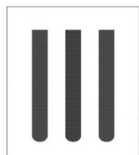
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<p>limit 19:5</p> <p>limited 18:9 19:4</p> <p>line 26:6 112:3</p> <p>lineup 41:7 98:11</p> <p>LISA 1:10</p> <p>list 47:10</p> <p>listed 12:19</p> <p>Listen 11:15 96:2</p> <p>listened 98:16</p> <p>listening 59:17</p> <p>literally 79:21</p> <p>litigants 26:15 54:10 73:14</p> <p>litigated 17:25</p> <p>litigation 14:22 17:13,15 33:13 83:13</p> <p>little 6:16 9:16 13:15 62:22 90:21,23 98:9</p> <p>lives 17:2</p> <p>living 17:5,8</p> <p>LLC 1:6 2:14 5:10 16:9 17:6 21:9 22:3 23:2,4,23 24:6 37:6 66:24 70:4,17 101:22,24</p> <p>local 71:19,21</p> <p>located 5:5</p>	<p>84:18 86:22</p> <p>location 5:20 77:14</p> <p>log 61:21</p> <p>long 16:3 25:16,25 41:4 59:14 65:22 90:1 107:4</p> <p>losing 107:19</p> <p>lot 17:18 18:4,16 24:25 25:15 72:16 82:18</p> <p>Luisa 2:22</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>ma'am 14:23 105:21,23</p> <p>mailed 87:19</p> <p>main 99:8</p> <p>man 25:25 73:8,14,16 74:9 99:3</p> <p>manager 21:10,11,18 23:14</p> <p>managers 21:21 22:19</p> <p>man's 86:1</p> <p>March 42:19,22 50:22 51:2,21 54:22 55:8,15,18</p> <p>marches 87:13</p> <p>mark 38:1,3 39:22</p>	<p>MARKED 56:23</p> <p>matter 5:9 6:4 19:13 32:9 36:11 112:17</p> <p>MAX 1:10</p> <p>may 1:11 4:12 7:6 8:19 22:10 56:17 91:7,18,25 92:13 101:11 102:18 103:14,21,24</p> <p>maybe 8:8,18 22:16 25:6 82:16</p> <p>me.I 112:18</p> <p>mean 24:3 33:13 77:10 90:23</p> <p>meaning 8:14</p> <p>means 48:1</p> <p>meant 21:6</p> <p>medication 9:10,12,14</p> <p>medicine 9:16</p> <p>meet 63:1 76:4,8,14</p> <p>meeting 58:11 70:14 71:24 83:5,15</p> <p>meetings 61:4 69:7 99:24</p> <p>member 16:19,23</p> <p>members 18:15 22:20,21,22 82:15</p>	<p>mental 104:7</p> <p>mentioned 47:2 95:18</p> <p>mentioning 41:21</p> <p>met 25:20 57:24 61:15 72:2 73:8 76:2,17 77:3,9,25</p> <p>Michael 1:9 2:14 5:12</p> <p>Mighdoll 2:9</p> <p>mild 97:14,15</p> <p>Milestone 4:4 5:4</p> <p>Miller 2:21 5:23 57:18</p> <p>million 20:16 60:18,22</p> <p>mind 18:11 45:12 93:8 97:16 98:15 99:12</p> <p>mine 18:14 48:4 70:22 92:2</p> <p>minimize 93:3</p> <p>MINOR 1:13</p> <p>minors 17:8</p> <p>minute 51:7,9 69:17</p> <p>minutes 14:19</p> <p>misconduct 11:1</p> <p>misogynistic 45:8</p> <p>misrepresented</p>
--	---	---	--



<p>47:13 misrepresenting 63:22 103:18 Miss 41:6 84:21 missed 72:24 Mister 65:25 70:14 103:15 Molly 1:9 5:12 mom 62:13 moment 31:22 108:18 money 29:19,21 30:13 59:24 60:13,15,20 80:7,17 82:21 months 25:15 26:8 53:13 79:18,19 Morgan 65:12,14,23 67:1,7,25 68:2,23,25 69:8 70:20 71:2,17,19 93:4 96:16,18 Morgurber 28:8 morning 5:25 7:9,10 9:13 90:16 mortgage 16:10,23 mother 32:22 34:7 50:1 59:13,16 60:17 67:14 70:10 mother's</p>	<p>20:11,12 33:8 68:7 motion 30:15 107:1 motive 60:23 99:8 mouth 97:3 move 20:3 106:13 moved 18:19 19:18 moving 43:25 mute 90:1 muted 90:1,2 myself 8:3 <hr/> <p style="text-align: center;">N</p> <hr/> narrative 44:3 92:3 NATURAL 1:13 necessary 16:21 79:16 neglecting 82:19 negotiate 24:7 36:21 38:21 81:18 92:17 negotiated 46:16 80:13 81:19 84:8 92:10 105:7 negotiating 25:8,22 45:21,24 49:18 51:23 75:19 82:4 83:24</p>	<p>84:7 92:13 negotiations 43:10 46:17 52:3,8 81:17 82:24 nobody 34:13 35:8 45:11 60:23 70:5 73:13 79:6 91:12 none 19:17 60:21 92:19,21 93:19,23 nor 111:14 North 2:4,11 notarized 100:13 Notary 4:11 110:22 111:6,25 note 16:10,23 80:17,25 81:7,8 notes 43:12 76:10 nothing 7:3 16:11 34:19 41:1 58:13 69:5 100:13 notice 26:20 104:3 notified 54:9 74:14 notify 35:13 36:6 notifying 32:15</p>	<p>99:3,4 numerous 8:2 <hr/> <p style="text-align: center;">O</p> <hr/> oath 8:11,14,22 40:17 93:23 110:1 object 19:1 31:23 39:18,19 44:24 85:19 objection 12:24 17:17 18:8,20,23 19:2,11 23:16 28:2 37:17 38:11 40:3,4,5 41:24 42:3,16 47:18 49:8 53:23 55:10 58:14,19 77:1 78:8,12,15,16 84:2,5 85:5,15,18 88:12 97:23 98:22 104:11 objections 12:25 40:3 44:2,21 45:16 107:14,16 objective 11:24 obligation 36:19 39:13 Observer 2:21,22 obstruct 107:3 obvious 45:8 obviously 79:4</p>
--	--	--	---



occasion 76:13 77:7	8:4, 9, 13, 19, 24 9:19, 20, 25 10:6, 10, 23 11:13 13:25 14:24 15:10, 18, 21, 25 16:3, 8 17:1, 3, 9 18:25 19:20 20:5 21:11, 18, 25 22:2, 22 23:1, 7, 12, 20 24:2, 5 28:12, 13 29:4, 10 30:4, 5, 18, 22 31:2, 11, 18, 21 32:13, 25 33:1, 5, 18 35:9, 16 36:1, 5, 14, 17 37:2 38:9 39:4, 7 40:13 41:8, 10 42:9 43:8, 13, 20, 23 44:9 45:15 46:4, 7, 20 47:1 48:3 49:6, 7, 21, 23 50:18 51:6, 13, 19 52:7 53:11 54:17, 20, 23 55:5 56:10, 14, 16, 21 57:3 58:20 59:2 62:1, 5 63:3, 21 64:16 65:5, 7, 23 66:18 67:9, 11 68:16, 21 69:10	70:19 72:11, 14, 21 74:25 75:22 76:16 77:9, 24 78:12 79:2 82:14, 17, 20 83:18 84:18 85:2 86:3 87:18, 21 88:2, 5, 24 89:7, 20, 22 90:4, 23 91:5, 22 92:12, 20 93:1 94:5, 8, 17, 18, 2 0 95:11 96:2, 3, 4, 9, 21 97:10 98:7, 25 100:3 101:6, 9, 13, 15, 19 102:7, 9, 11, 14, 18, 25 103:20 104:1, 19, 20 105:17, 19, 21 106:4, 15 107:10 108:5, 23 109:3, 7	oppose 29:23 ORANGE 110:4 111:4 order 13:9 109:4 original 112:21 Orlando 4:5 5:6 others 17:21 20:23 Otherwise 5:15 ourselves 99:1 outrageous 14:19 44:5 outstanding 28:15 overnight 106:25 108:3 owned 16:12 17:6, 7 23:2 owner 16:19 <hr/> P <hr/> P.L 2:4 P.M 109:11 page 3:2, 7 93:2 112:3 paid 23:4, 9 painful 10:7 Palm 1:2 2:11 5:17 6:2 10:21 12:17 13:19 19:15 20:3, 12 Pamela 1:9 2:2 5:13
occasions 7:15 79:2, 12			
O'Connell 1:7 5:10 20:14			
October 1:16 4:7 5:7 111:17			
offensive 107:18			
offer 80:8			
offered 73:9 80:14, 17, 22 81:3			
offering 73:11			
offers 41:1 59:21			
office 2:16, 21 6:7, 11			
officer 10:18			
oh 7:24 8:6 20:6 21:3, 4 23:8 26:24 27:7, 9 28:11, 13 30:10 31:14, 18 49:3 53:25 56:24 57:3, 14 58:25 64:11 66:8 69:24 75:14 86:13 92:1 94:3 95:7 96:3 100:20 104:5 106:4 107:23 108:18 109:2, 8			
okay 5:16 6:9, 10, 17 7:20			
	old 15:24 104:17 ones 24:18 online 5:3 open 9:14 operated 23:1 operating 54:10, 11 74:15 99:4 103:8 opinion 36:16		



<p>paragraph 104:22</p> <p>Paralegal 2:21</p> <p>Pardon 55:3 66:20 87:10,24</p> <p>participants 4:6</p> <p>participate 94:5</p> <p>participating 6:5</p> <p>particular 19:3 43:21</p> <p>parties 6:20 25:3,23 26:12,17 32:5 60:24 72:6 73:14 111:13</p> <p>partner 26:14</p> <p>party 24:24 27:18 30:24 32:4 35:21 41:2 45:25 46:1 47:11 85:12 96:23</p> <p>Pat 29:1 42:22 43:15 50:7 55:19,20 57:20,21 60:20 81:11 84:16 87:4 88:15 91:3 97:16 103:2</p> <p>patents 17:23</p> <p>patience 107:20</p> <p>Patricia 1:4 2:2 5:9 25:18</p>	<p>26:2,8 33:6 34:18 35:3 36:19 37:7,10 39:1 40:24 41:12 47:4 49:19,25 52:3,4,9 53:1,12,17,21 54:4,12 55:9 56:4 58:1,11,24 61:4 63:1,25 64:20 68:3 70:15 73:20,23 75:1 77:25 78:6 82:23 88:3,7 95:12 103:22 104:8,9</p> <p>Patty 46:20 59:7,11,13 62:2,6,14,17 68:6,9,13,21,2 2 70:8,10,19 79:3 89:16,18</p> <p>Patwell 65:12 77:15,18 81:22 84:9,13 85:3 86:19,22 88:10,19,25 89:2,4,8,11,13 102:1 103:25 104:3,9 105:12</p> <p>Patwell's 88:11</p> <p>pay 22:14 29:20,21 80:18,21 81:1</p> <p>paying 29:14</p> <p>payments 23:24 27:6</p>	<p>pending 5:17 9:14 33:20 46:7,11 83:13</p> <p>penny 81:7</p> <p>pension 60:15</p> <p>people 11:25 18:16 21:6 24:3 25:6,22 45:5 62:23 67:3,21 86:17 87:15</p> <p>people's 19:25</p> <p>percent 59:22 80:10,24</p> <p>percentage 22:14</p> <p>perfect 6:17</p> <p>perfectly 81:13</p> <p>period 45:21 51:20 52:1 103:19</p> <p>person 26:18,20 61:14,15 62:21 74:5,7,9 88:18</p> <p>personal 1:7 5:11</p> <p>personally 52:4 110:7</p> <p>petition 104:14</p> <p>phone 59:14 68:4 70:12</p> <p>pick 41:6 44:10 89:23 98:11</p> <p>picture 63:9</p> <p>placed 8:11</p>	<p>95:17</p> <p>plaintiff 12:20 32:7,8 33:3 36:9,19 55:17,19 64:4,7</p> <p>plaintiffs 1:4 34:16</p> <p>Plaintiff's 5:21</p> <p>PLAINTIFFS 2:2</p> <p>player 62:21</p> <p>pleadings 14:11 69:17</p> <p>pleadings@sweet applelaw.com 2:6</p> <p>please 5:19 6:12,14,25 9:22 14:5,7 19:1 38:1,3 42:25 43:8,22 44:13,17 51:10 55:13 57:9 77:1 85:13 90:22 96:2 106:25 108:4</p> <p>plot 100:16</p> <p>point 14:2 15:24 26:5 28:19 33:7 36:15 54:5 73:7 81:13 83:8 99:8 108:11</p> <p>pointing 94:14</p> <p>police 13:4</p>
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34:22 45:13 60:25 poor 60:19 popped 59:8 possession 41:5 possible 8:24 possibly 79:3 power 21:8 26:10,11 32:23 34:10,11 35:2,14 41:2,3,4 42:10 46:5 47:4 50:1,9,12,16 51:21 52:2 54:5,11,13,24 55:22 57:5 60:8 63:10,14,23 64:1,21 68:10,14,17 73:19,24 74:7,15 96:20 97:20 99:5 103:9,11,12,17 powers 54:6 PR 33:22 34:18 practice 15:18 60:12 predatory 19:24 25:16 40:23 73:6 preparation 100:17 prepare 24:7 57:6 prepared 24:14	27:8,23 30:22 32:3 33:1 38:19 39:12 41:13 45:24 47:9 48:8 49:25 50:3 93:12,13 94:9 101:19 102:1,3 103:15 preparing 42:14 56:18 68:16 present 2:20 78:6 79:2 82:24 108:11,13 presented 34:12 pressure 9:13 90:5,6 presume 92:4 pretty 9:17 26:22 previously 12:24 78:10 price 81:19 109:1 prior 28:3,4 45:13 54:23 55:8,15 56:1,2 78:3,4 92:13 104:13 private 37:18 privilege 36:25 37:18,21,25 39:20 85:6,19,24 privileged 38:11,14 56:17	86:18 pro 8:3,15 36:5 probably 8:8 24:1 76:6 probate 33:12 proceeding 7:23 72:22 73:3 75:16 83:9,15,16,19 86:20 98:19 111:9,10 proceedings 3:3 5:1 8:1 produced 29:25 90:16 105:15 110:10 production 54:19 profession 21:7 proper 19:2 25:23 26:12 35:21 38:13 60:24 72:6 73:14 107:14 property 16:12 17:12 23:1,4,5,9,25 proposed 24:11 27:10,13 38:19 39:12 40:8,10 74:22 77:11,13 78:24 propounding 72:7 prosecuted 20:18	protect 17:2,21 protected 16:16 protesting 87:15 protests 87:22 prove 26:5 psychologist 15:19 Psychology 15:17,18 Public 4:11 110:22 111:6,25 pull 62:18 purely 10:20 purpose 85:11 pursuant 4:8 pursue 15:21 pursuing 20:7,22 putting 57:8,15 85:15 90:15 <hr/> Q <hr/> question 8:25 9:2 10:20 20:20,21,24 23:20 26:23 27:2,5 31:23 32:11 37:2,12,21,25 39:23 44:15 45:15 46:8,10,11,13 48:11,15,16,17 ,19,21,23
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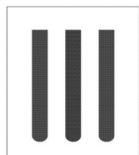
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49:3,4,10,14,1 6,21 55:12,13 57:12 58:21 85:21 91:14 93:3 95:25 96:2 101:14 103:1 104:12 105:24 106:16	108:6,7,10 ready 106:13 107:7 real 21:12 26:15 34:16,25 54:7 realize 43:14 realized 99:1 really 26:4 34:21 52:22 55:19 58:1 81:11,18 93:4 Realty 1:6 2:14 5:10 16:9,13,20 17:6 21:9 22:3 23:2,4 24:6 37:6 66:24 70:4,6,17 reason 9:9 112:3 reasonable 93:6 reasons 112:19 recall 80:15 89:1,3,12 91:17,18 recent 34:20 recently 20:14 recitals 104:25 recognized 28:16 recollection 59:12 91:6 recommended 88:25 89:14	record 6:3,13 12:16,20 14:8,25 15:1,3 38:4 51:14,15,17 52:21,22 55:9,16 56:1 60:10 63:21 66:8,9 74:20 85:16,18 90:9,10,14 93:11 96:22 100:1 102:19,20 103:13,22 109:7,8 111:9 112:19 records 13:3,5,6 20:3 26:5 59:10 61:21 recuse 18:22 19:18 20:4 recused 19:21 reference 92:6 referring 23:3 57:10 reflect 53:16 refresh 91:5 refusing 13:12 regard 9:21 22:15 30:3 44:3 52:1 86:19 107:15 regarding 10:9,24 40:20 46:17 47:2 52:5 74:21	85:3 registry 29:13,19 81:5 reinstated 21:15 related 6:3 18:2 20:10 75:24 111:13 relationship 16:8 60:12 relative 101:5 relevance 17:17 18:8,23 19:1,10 relied 98:21 remaining 36:19 remarks 97:12 remember 8:19 20:21 26:23,25 50:10 67:15 91:14 remotely 4:6 remove 64:12 repairs 79:16 repeat 11:6,8 26:24 27:1 55:11,13 repeatedly 8:11 106:6 rephrase 9:3 72:23 replaced 64:13 replacing 52:24 report 12:17 61:1 72:20
<hr/> questioned 20:13 questioning 13:8 44:4 questions 8:20 10:16 11:11 31:17 35:6,18 43:2,19 81:13 86:1,7 95:6 question's 46:7 quite 8:24 18:4 19:19 20:7			
<hr/> <p style="text-align: center;">R</p> <hr/>			
raise 7:1 raised 12:24 ran 35:1 rate 80:25 Raton 2:5 Raymond 24:25 25:8 27:13 30:21 37:10 40:12 47:12 48:10 51:24 52:13,17,20 53:11 105:3 Raymond's 105:4,6 reading 4:13			



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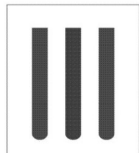
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<p>111:8</p> <p>reported 53:19</p> <p>reporter 1:17</p> <p>4:12 5:2,3,16</p> <p>6:12,16,20,25</p> <p>7:6 14:24 15:2</p> <p>31:19 48:25</p> <p>51:13,16 90:8</p> <p>107:23</p> <p>108:5,15,18,23</p> <p>109:3,7 110:22</p> <p>111:6,25</p> <p>Reporting 4:4</p> <p>5:4</p> <p>represent 60:5</p> <p>65:8 73:16</p> <p>88:6</p> <p>representation</p> <p>56:7 58:4</p> <p>representative</p> <p>1:7 5:11</p> <p>representatives</p> <p>12:23</p> <p>represented 8:3</p> <p>14:1 32:20</p> <p>38:25 52:25</p> <p>53:1,21 54:4</p> <p>55:20 63:15</p> <p>98:10</p> <p>representing</p> <p>5:4 26:2,18</p> <p>31:3 32:14,22</p> <p>33:21 41:5</p> <p>55:20 56:4</p> <p>58:6,7 64:7</p> <p>68:8 72:3,4</p> <p>73:12,15,18,22</p> <p>,23 74:5,6</p>	<p>80:20 86:20</p> <p>94:10 98:15</p> <p>104:6</p> <p>request 76:23</p> <p>88:19 99:19</p> <p>112:18</p> <p>requested 72:20</p> <p>requesting 26:4</p> <p>required 32:24</p> <p>respectfully</p> <p>12:21</p> <p>responsible</p> <p>23:23 29:14</p> <p>responsive</p> <p>20:25 107:4</p> <p>RESTATED 1:12</p> <p>retained</p> <p>84:13,14,15,16</p> <p>86:22 89:19</p> <p>103:3</p> <p>retainer 66:1,6</p> <p>81:11</p> <p>retired 19:22</p> <p>Revard 2:2 5:24</p> <p>6:1</p> <p>review 12:9,16</p> <p>reviewed 96:15</p> <p>REVOCABLE 1:11</p> <p>revocation</p> <p>50:12 51:1,21</p> <p>56:2 57:5</p> <p>68:17 96:20</p> <p>revocations</p> <p>54:24</p> <p>revoked</p>	<p>42:12,13</p> <p>50:5,9 52:2</p> <p>54:6,14</p> <p>63:9,15,24,25</p> <p>97:21 103:16</p> <p>RICO 18:4</p> <p>rid 19:23</p> <p>ridiculous</p> <p>106:11</p> <p>Ring 24:17,18</p> <p>road 2:16</p> <p>105:18</p> <p>Robert 2:3 5:22</p> <p>12:19 20:9</p> <p>43:13 44:12,23</p> <p>Roberts 1:17</p> <p>4:11 5:2</p> <p>110:21</p> <p>111:6,24</p> <p>Robertson 5:5</p> <p>Robin 2:21</p> <p>ROBINSON 4:4</p> <p>rolling 60:2</p> <p>room 94:20,22</p> <p>95:3</p> <p>Rose 7:19 20:8</p> <p>29:16</p> <p>Rose's 8:20</p> <p>rough 9:16</p> <p>rule 10:12</p> <p>11:6,20</p> <p>rules 20:4</p> <p>53:18 107:15</p> <p>running 25:24</p> <p>26:21 99:2,5</p>	<p style="text-align: center;">S</p> <hr/> <p>Sahm 1:3,4</p> <p>2:2,3 5:9</p> <p>25:18 26:2,7</p> <p>28:16</p> <p>31:3,8,12</p> <p>32:4,6,11,19</p> <p>33:3,6,15</p> <p>34:2,16,19</p> <p>35:3,23 36:20</p> <p>37:7,11 38:20</p> <p>39:1,13,14,16</p> <p>40:9,10,24</p> <p>41:6,12 42:15</p> <p>43:15 46:1,20</p> <p>47:3,4,10,14</p> <p>49:19 50:1,7</p> <p>51:25</p> <p>52:3,4,10</p> <p>53:1,12,21</p> <p>54:4,12</p> <p>55:9,19,20</p> <p>56:4 57:20,22</p> <p>58:2,12,24</p> <p>62:2</p> <p>63:1,15,17,25</p> <p>65:23,25 66:16</p> <p>67:14,25</p> <p>68:4,22 69:17</p> <p>70:15,20</p> <p>71:16,17 72:22</p> <p>73:2,19,20,21,</p> <p>22,23,24</p> <p>75:1,5,23 77:3</p> <p>78:1,7,23</p> <p>80:1,2 81:22</p> <p>82:23 84:16</p> <p>88:3,7,15</p> <p>89:15 91:3,23</p> <p>92:10,13 94:9</p>
---	--	---	---



95:12,18 96:5 97:1,16 99:25 100:4,10 102:19,20,21,2 4 103:2,6,13,22 104:8 Sahms 16:10 29:18,20 71:7 Sahm's 25:14 30:23 32:21 68:9 103:8 sanction 11:12 106:5 sanctioned 14:9 47:17,19 sanctions 45:11 Santeria 60:12 satanic 60:12 saw 40:19 45:6 68:6 105:14 scan 77:17 scanned 77:23 scared 60:13 scary 60:11 82:22 scheme 99:2 school 70:21 Schreiber 25:12 26:17 58:7 59:20 64:17 98:14 scope 19:5 23:17 screen 43:2,22	44:18 57:8,10,13 101:14 Scroll 90:25 se 8:3,15 search 10:8 second 5:6 41:19 49:18,25 50:2,3,6 56:24,25 94:14,15 95:9 103:20 Secretary 21:16 secure 17:12 seek 11:12 seeking 14:11 seem 73:17 seen 25:20 send 68:7 77:17 108:20 sending 96:13 Senior 37:11 50:7 52:4 53:1,12,21 57:20,22 58:2,12,24 61:4 62:2,17 63:1,17,25 68:22 70:16 73:2,19,21,23 75:1,5,23 78:7,24 80:1,3 87:4 88:3,7,15 89:15 94:9 95:12 97:16 103:2,22 104:8	Senior's 52:10 68:4 sent 40:16 43:24 64:12 77:23 91:6,19 separate 109:5 serious 34:25 serviceimglaw@ ahoo.com 2:19 settle 25:1 26:12 37:7,8 52:9,17 58:1 60:4 63:7 71:24 72:5 74:9 82:2 91:3 99:14,16,22 settled 71:25 99:17 settlement 3:8 18:9,24 19:4 23:17 24:7,9,11,13,1 5,19 25:8 27:7,8,9,10,13 28:1,3,6,17 29:4,22 30:4,6,13,16,1 9,22 32:3 33:2 36:21 37:10,16 38:20,21 39:12,15 40:8,10,15,16, 18,19,21,22 41:1,13,17,21 42:11,15,24,25 43:3,10 44:13 45:22,25 46:17 47:2,8 48:8 49:12 51:22	52:11 54:8 56:18,25 57:6 59:21 60:6 72:1 73:10 74:21,22 75:19 76:9,13,16,19 77:10,11 78:25 79:25 80:2,4,8 81:18,22 83:24 84:7 85:4 91:7,8,9,11,17 ,19,20 92:4,16,21 93:9,13,18 95:20,23 99:15,17,18 102:8 104:21 105:5,6,7,12,1 3 settlements 28:4 30:3 42:23 43:5,9 73:11 settling 52:5 81:20 91:12 seven 82:16 several 11:23 18:14 40:20 59:15 61:15 70:11 71:18,21 77:20 shaking 51:8 89:21 shape 62:8 she'd 80:9 98:13 Sheet 112:20 she'll 44:24
--	--	---	--



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sheriff 10:22 12:17 13:20 20:12 73:5	sir 10:25 11:2,10 13:1,5,8 14:5,14 19:4 26:23 27:5 33:12 34:11 35:6,12 37:12,19 39:22 41:11 48:11,13,17,20 49:4 51:6 57:9 75:3 78:16 85:15 89:21 94:13 102:8,22,25 104:19 105:24 106:10,11,16,1 9 107:7	2 song 13:15 sons 79:10,13 sorry 23:21 31:16,18,21 51:6 57:15,17 58:17 72:23 76:25 82:23 89:20 94:13 95:7,8 101:14 sought 29:7,12 30:7 Southern 18:2 Spallina 20:9,13 speak 17:23 29:17 46:20 75:16 86:25 89:5,9 speaker 59:14 speaking 38:11 40:2 42:19,21 44:1 70:15 75:15 78:11,15 107:15 specific 42:23 speculate 9:5 42:6 Speculation 97:23 speech 27:20 spell 88:22 spoke 78:23 89:11 spoken 46:23	Sr 60:20 84:17 stamp 56:22 start 11:10 62:20 102:12 started 10:12 14:13,17,18 21:2 60:3 62:20 70:9 99:7 starting 5:21 starving 60:19 state 4:12 5:19 6:13 12:15 16:17 21:16 25:23,24 26:7,13,21 29:17 32:10 33:11 36:3 40:3 87:9,11 110:3,23 111:3,7 stated 12:22 96:7 103:7 statement 12:12,14 13:4 100:12 statements 25:21 steal 17:22 19:25 stealing 20:15 59:24 60:14 steps 25:7 STIPULATION 4:1 stop 9:22 40:2 44:5,10
she's 39:5,8,9,11,15 56:22 62:10 64:13 71:25 75:11 83:20 97:8,17 showed 103:5 shower 79:20 showing 104:16 sign 76:8 77:17 113:5 signature 77:16 99:18 signed 16:23 22:13 24:22 25:9 28:25 34:13 42:15 51:1 66:15 76:13 77:10,13,22 78:24 81:11 95:12 101:7 104:23 112:19 signing 4:13 96:16 silence 25:18 40:23 73:6 silencing 25:19 similar 16:17 similarly 64:20 Simon 1:8,9,11 5:12 simple 45:16	sister 59:7 60:17 62:8,11 79:5 83:3 sit 105:10 sitting 29:13 situation 17:20 79:5 slow 90:25 solemnly 7:1 somebody 65:6,7 79:21 87:21 101:2 somehow 24:24 someone 27:19 54:11 89:14 90:5 somewhere 66:8 son 15:10 79:3,7,14,17,2		



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story 72:12	36:1,8,10,18	19:8,14 23:22	system 14:22
strange 25:12	53:15 69:12	27:22,25	<hr/>
68:3	Suite 2:5,10,17	28:5,9,20 32:1	T
Street 4:4 5:5	4:5 5:5	37:4,14	table 79:15,18
stressful 10:3	sum 25:10	38:1,3,6,9,17	taking 12:9
strike 14:11	supposed 28:15	40:2,6	16:11
33:13 40:8	29:15 74:9	42:8,20,24	talk 51:22 53:3
77:11 84:12	Supreme 18:15	43:4,20,23,25	57:21 59:18
93:12	20:16	44:7,11,16,20	61:8 69:11
stuff 57:22	sure 9:8 12:17	45:17,18,19	70:1,11 84:23
stunned 34:7	13:20	46:12,15	89:7 92:23
69:16	22:5,8,17 23:6	47:20,22 49:9	100:20 104:19
style 53:16	25:12 27:3	50:19,23	105:4
subject 90:20	34:17,21 42:2	51:11,18 54:2	talked 8:14
91:2	65:4,16,21	55:14 56:21	12:5 26:4
submitted 12:13	96:10	57:1,11,17	40:25 57:19
29:2 61:1	surgeon 39:3	58:9,17,20,22	59:15 62:24
111:17	surgery 9:15	72:25 77:2	70:9,12
substitute 26:1	surreptitiously	78:11,14,18,20	97:1,12
31:12	67:13	,21 84:3,10	talking 16:22
substituted	suspend 11:11	85:7,11,22	21:2 28:2
25:2 33:15	14:18 106:2	86:4,11,14	43:3,5,8 44:19
substitution	suspended	88:17 89:22,25	45:20 46:2
31:8 36:12	107:11	90:7,11 91:1	56:11
successful	suspending	94:19,23	57:17,18,20
52:18	14:21 105:23	95:1,5,10 96:1	59:11 60:3
successor 1:7	106:10,17	97:25 98:24	75:1 78:4
5:11	108:9	101:16 104:18	81:16 86:4
suddenly 26:16	swear 4:12 7:1	105:8,9,17,19,	91:22 95:20,22
34:15	Sweetapple	21,23	99:11,13
sued 18:7,15,18	2:3,4 3:4	106:1,5,9,12,1	task
19:15	5:14,22	5,17,20,24	87:1,7,9,11,14
suggested 100:4	6:6,8,22 7:8	107:8,12,23	tax 23:25
suggestion	12:19,21	108:1,3,8	taxes 23:4,9
31:12,14 32:12	14:4,7,15,17	109:9	28:18
	15:4 17:24	Sweetapple's	technician 5:3
	18:17,21,25	2:20,21	telephone
		switched 26:17	2:6,11,18
		sworn 8:17	
		100:12 110:8	



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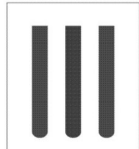
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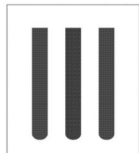
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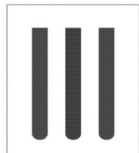
<p>61:12</p> <p>ten 8:18 23:5,6</p> <p>63:2 76:2</p> <p>82:16 90:4</p> <p>99:24</p> <p>TENANTS 1:14</p> <p>2:15</p> <p>terminate 44:10</p> <p>96:5,16</p> <p>98:2,5,8</p> <p>100:1,2</p> <p>terminated</p> <p>63:19 67:14</p> <p>96:17,19</p> <p>97:20,22</p> <p>terminating</p> <p>67:15 96:12</p> <p>terms 20:5 25:9</p> <p>30:13 81:8</p> <p>92:15,17,21</p> <p>93:20,24</p> <p>Tescher 20:9</p> <p>test 90:6</p> <p>testified</p> <p>7:20,25 8:5</p> <p>40:17 78:9</p> <p>93:23 96:4</p> <p>testify 93:19</p> <p>testifying</p> <p>8:9,17 40:24</p> <p>testimony 7:2</p> <p>41:20 67:2,4</p> <p>97:19 102:15</p> <p>106:7</p> <p>Thank 5:16 6:18</p> <p>7:6,12 14:7</p> <p>31:25 45:18</p>	<p>51:10 78:18,20</p> <p>89:24 107:6,21</p> <p>108:15,22</p> <p>109:6</p> <p>theirs 101:5</p> <p>there'd 24:3</p> <p>therefore 11:23</p> <p>47:15 63:10</p> <p>there's 22:13</p> <p>36:11 42:22</p> <p>43:14 44:13</p> <p>51:1 54:16,17</p> <p>60:10 66:3,7</p> <p>68:1 75:10</p> <p>92:3,6 100:9</p> <p>108:8</p> <p>they're 20:3</p> <p>22:21 55:2</p> <p>72:16 95:3</p> <p>third 85:12</p> <p>threaten 45:9</p> <p>today 5:4,6 6:5</p> <p>9:10 109:4</p> <p>trading 20:10</p> <p>transcript 4:14</p> <p>106:25 110:7</p> <p>111:9</p> <p>112:16,21</p> <p>trial 7:20,22</p> <p>trick 43:18</p> <p>tried 24:19</p> <p>67:16 85:14</p> <p>trillion-dollar</p> <p>17:22</p> <p>trouble</p> <p>62:12,20</p>	<p>true 111:9</p> <p>trump 102:15</p> <p>trust 1:11</p> <p>12:18,21</p> <p>20:11,12,17</p> <p>29:15,24 47:3</p> <p>51:25 66:23</p> <p>107:13</p> <p>trustee 29:24</p> <p>TRUSTEES 1:10</p> <p>truth 7:3,4</p> <p>10:9 11:24</p> <p>32:19 86:8,12</p> <p>try 11:24 37:24</p> <p>38:15 76:8</p> <p>trying 17:21,22</p> <p>24:7 25:1</p> <p>29:18 30:2,12</p> <p>34:25 43:6</p> <p>45:10 49:22</p> <p>51:20 68:7</p> <p>71:23</p> <p>86:11,16,18</p> <p>100:7 105:25</p> <p>106:22</p> <p>turn 81:14</p> <p>twice 79:3</p> <p>two-year 9:14</p> <p>type 14:10,19</p> <p>15:21 60:6</p> <p>62:21</p> <p>typed 95:12</p> <p>96:6</p> <hr/> <p>U</p> <hr/> <p>U.S 2:10</p> <p>Uh-huh 6:19</p>	<p>22:24 33:23</p> <p>105:9</p> <p>unable 9:9</p> <p>25:23</p> <p>unchristian</p> <p>59:22</p> <p>un-Christian</p> <p>81:2</p> <p>underlying 32:9</p> <p>undersigned</p> <p>110:6</p> <p>understand</p> <p>8:22,25 9:2</p> <p>14:8,9 38:14</p> <p>48:7 52:16</p> <p>54:3</p> <p>73:18,20,25</p> <p>understanding</p> <p>59:2,5 77:20</p> <p>93:16 104:6</p> <p>understands</p> <p>39:24</p> <p>understood 9:3</p> <p>43:11 55:8,15</p> <p>undisclosed</p> <p>41:2 103:12</p> <p>undone 34:14</p> <p>unethical</p> <p>106:24</p> <p>unholy 81:2</p> <p>unintelligible</p> <p>9:1</p> <p>University 15:9</p> <p>UNKNOWN 1:14</p> <p>2:15</p>
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<p>unprofessional 44:4</p> <p>unprofessionall y 107:21</p> <p>uploaded 54:18 66:19,21</p> <p>upon 60:20 96:16 112:18</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>valid 57:5</p> <p>Varkas 2:4</p> <p>veracity 99:20</p> <p>verbal 22:17</p> <p>Version 91:2</p> <p>via 2:7,12,19 4:5</p> <p>video 4:3 5:3,8</p> <p>videoconference 2:7,12,19 4:5</p> <p>view 72:8 106:9</p> <p>violating 107:17</p> <p>violation 107:18</p> <p>void 32:16 60:6</p> <p>volleyball 62:21</p> <p>Volunteer 2:16</p> <p>voted 21:10,11</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>wait 56:24 76:22 94:13 107:23 108:18</p>	<p>waiting 25:10 57:15 81:14</p> <p>waive 108:6,7,10,14</p> <p>waived 4:14</p> <p>walker 62:23</p> <p>Walt 17:11 26:13 28:14 29:1</p> <p>Walter 1:3 2:2 5:9 25:2,13 30:23 31:6,8,12 32:4,6,11,21 33:3,15,22 34:17 38:20 39:13,14,16 40:9 41:14 42:15 46:1 47:2,10,14 49:18 51:24 52:24 53:14,16 56:6 69:17</p> <p>Walter's 55:21</p> <p>Walt's 98:12 103:19</p> <p>WARD 2:2</p> <p>wasn't 26:16 49:5,11 50:15 68:3,18 70:17 71:5,20 72:1 74:10 75:8 80:25 81:3 83:7 84:7 93:10 98:18 100:4</p> <p>waste 105:11,20</p>	<p>wasted 24:24 25:15,21</p> <p>wasting 105:15</p> <p>web 20:19</p> <p>we'd 51:9</p> <p>WEDNESDAY 4:7</p> <p>Weinstein 65:12,24 66:12,16 67:2,7,11,25 68:2,23 69:1,8 70:20 71:2,17,20</p> <p>Weinstein's 65:15</p> <p>we'll 9:25 20:18 26:4 29:25 32:17 41:19 83:11 89:23</p> <p>we're 14:8 18:8,24 81:6,16 83:10 86:15 93:15 95:20 106:13 107:7</p> <p>we've 12:5</p> <p>whatever 28:9 35:15</p> <p>whatnot 10:14 18:16 22:17 27:6 77:14</p> <p>whatsoever 108:14</p> <p>when's 61:18</p> <p>whether 49:15</p>	<p>51:24 97:1</p> <p>whistleblower 18:3</p> <p>whole 7:3 17:13 18:16 29:20 44:3 104:16</p> <p>wholly 12:6 53:17</p> <p>whom 67:22</p> <p>who's 12:19 28:15 88:10</p> <p>wife 21:24 23:15 24:1 31:15 79:3,9,13 82:9</p> <p>Wisconsin- Madison 15:9</p> <p>wish 68:7</p> <p>witness 4:13,14 5:19 6:15,19,21,24 7:5 13:16,19,22 14:1 17:18 18:11 19:11 23:18,20 25:19 28:11,13 31:18,21,24 36:24 37:2 38:2,5,8,9 41:25 42:2,5,7,17 44:6,9,24 45:2,5 46:10 50:22 53:25 55:13 56:24 57:19 58:16,21 62:14 73:7</p>
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<p>76:23 84:6 85:21 86:3,6,8,13 88:14 90:24 94:16,18 95:9 97:24 98:23 101:15 104:12 106:8,21,22 108:2,16,25 109:2,8,10 110:6</p> <p>woman 83:6,22 97:17 98:16</p> <p>woman's 73:14</p> <p>women 45:8</p> <p>work 15:21 56:18 57:6 82:15,18</p> <p>worked 16:2</p> <p>working 22:9 41:1 55:22 92:24</p> <p>worried 45:12</p> <p>would've 62:18 72:5 73:8</p> <p>Wow 16:5</p> <p>writing 100:10</p> <p>written 77:11 78:5 97:21,22</p> <p>wrong 25:22 45:2</p> <p>wrongdoing 47:25</p> <p>wrote 29:1 100:4,12</p>	<hr/> <p style="text-align: center;">Y</p> <hr/> <p>Yep 91:4</p> <p>yesterday 90:17</p> <p>yet 14:13 42:20 98:12 109:1,8</p> <p>York 18:2,4 65:19</p> <p>you'll 61:1 102:12</p> <p>yourself 20:8 34:25 53:9</p> <p>you've 8:4,11 25:20 40:17 45:14,23 48:20 49:2 61:21 62:2 64:13 72:12 78:22 103:7</p> <hr/> <p style="text-align: center;">Z</p> <hr/> <p>zoom 90:22</p>		
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