IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

KAMEKA MANAGEMENT SOLUTIONS, INC., and ERYCK DZOTSI,

Plaintiffs,

v.

Case No. CACE-22-001852

16260 SADDLE CLUB ROAD, LLC, RYAN BURKE, VEW LIVE, LLC, and 2045 SW 127TH AVENUE, LLC,

Defendants.

VIDEOCONFERENCE DEPOSITION OF

RYAN BURKE

DATE: Thursday, February 23, 2023

TIME: 1:07 p.m.

LOCATION: Remote Proceeding
Sunrise, FL [redacted]

REPORTED BY: Gwen Dunn, Notary Public

JOB NO.: 5767415

[redacted] [redacted]

APPEARANCES

ON BEHALF OF PLAINTIFFS KAMEKA MANAGEMENT SOLUTIONS, INC., AND ERYCK DZOTSI:

RAYMOND CARRERO, ESQUIRE (by videoconference)
Raymond Carrero, P.A.
9771 South Dixie Highway
Pinecrest, FL 33156
[redacted]

ON BEHALF OF DEFENDANTS:

ROBERT "BOB" ROSENBLATT, ESQUIRE (by videoconference)
The Rosenblatt Law Firm
7695 Southwest 104th Street, Second Floor
Pinecrest, FL 33156
[redacted]

ALSO PRESENT:

Karim Kameka (by videoconference)

INDEX

EXAMINATION:		PAGE
By Mr. Carrero		6

EXHIBITS

NO.	DESCRIPTION	PAGE
Exhibit A	1/5/22 Sun Biz Printout	9
Exhibit B	2/18/22 Document	10
Exhibit C	Notice of Deposition	12

(**Note: Exhibits retained by counsel.)

PREVIOUSLY MARKED EXHIBITS

NO.	DESCRIPTION	PAGE
Exhibit 1	Black Flyer	20
Exhibit 2A	Airline Trip Confirmation	20
Exhibit 3A	9/13/22 Hotel Email	25
Exhibit 4A	Second Hotel Email Printout	25
Exhibit 5	Checking Account Statement	23

QUESTIONS INSTRUCTED NOT TO ANSWER

PAGE	LINE
31	20

PROCEEDINGS

THE REPORTER: Good afternoon. My name is Gwen Dunn, and I am your reporter assigned by Veritext to take record of this proceeding. We are now on the record at one oh seven eight -- 1:07 p.m.

And this is the deposition of Mr. Ryan Burke taken in the matter of Kameka Management Solutions, Inc., and Eryck Dzotsi vs. 16260 Saddle Club Road, LLC, Ryan Burke, VEW Live, LLC, and 2045 Southwest 127th Avenue, LLC. Case number is CACE-22-001852; and today's date is February 23, 2023; and we are all appearing Zoom videoconference.

I am a notary authorized to take acknowledgments and administer oaths in the state of Florida. Parties agree that I will swear in the witness remotely, outside of his presence.

Additionally, absent an objection on the record before the witness is sworn, all parties and the witness understand and agree that any certified transcript produced from the recording virtually of this proceeding:

- is intended for all uses permitted under applicable procedural and evidentiary rules and laws in the same manner as a deposition recorded by

- stenographic means; and
- shall constitute written stipulation of such.

At this time will everyone in attendance please identify yourself for the record and who you represent?

MR. CARRERO: Raymond Carrero for the plaintiffs.

MR. ROSENBLATT: Bob Rosenblatt for the defendants.

THE REPORTER: Thank you. Hearing no objection, I will now swear in the witness.

Mr. Burke, can you please raise your right hand?

WHEREUPON,

RYAN BURKE,

called as a witness, and having been first duly sworn to tell the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

THE REPORTER: Thank you. You can put your hand down, sir. Mr. Burke, can you please provide the city, state, and ZIP Code you're located at today for this deposition?

THE WITNESS: Sunrise, Florida[redacted]

THE REPORTER: Okay. Thank you.

[redacted] [redacted]

Mr. Carrero, he's all yours, sir.
MR. CARRERO: Okay.
EXAMINATION
BY MR. CARRERO:
Q Good morning, sir. How are you? I'm sorry. Good afternoon. How are you?
A Thanks for asking.
Q Okay. Could you please state your name and spell it for the court reporter so she can take it down accurately?
A Ryan, R-Y-A-N, Burke, B-U-R-K-E.
Q Okay. I'm going to ask you a series of questions, and I want you to allow me to complete the question before you give an answer. Okay?
A That's fine.
Q Okay. Great. Have you ever had your deposition taken before in the past?
A Yes. I have.
Q Okay. Just to go over the ground rules again, I'll be asking you questions. You'll be making answers, and the court reporter will be taking down a transcript of everything that's said here today. Do you understand this?
A I do.
Q Okay. Is there any reason that you are not

able to give your best testimony today?
A No.
Q I'm sorry. You have to answer audibly so that she can write your answer.
A I said "no."
Q Okay. Are you under any medications that would affect your concentration or memory today?
A No.
Q Okay. Can you please state your home address for the record?
A [redacted]
Q Okay. How long have you resided at that address?
A Since 2010.
Q Okay. Has there been any interruption in your residence there?
A No.
Q Okay. And are you married?
A Yes.
Q Okay. And does your spouse live with you at that home?
A Yes.
Q Okay. Do any other adults live in that home with you?

A No.
Q Okay. Do you ever have guests longer than seven days in your home?
A Yes.
Q Okay. Do you have an office?
A I have an office. Yes.
Q Where is that office? What's the address of that office?
A It's in my house.
Q Your same house, okay. Okay. And are you the registered agent for 16260 Saddle Club Road, LLC?
A Yes. I believe so.
Q Okay. Are you the registered agent for VEW Live Heights? That's V-E-W, L-I-V-E, LLC.
A I'm not sure about the -- I -- I'm -- I'm -- honestly, I'm not sure about the agent. I don't know if my agent -- I don't know about the agent. I know I'm a member, but I'm not sure about the agent for both of them.
Q Okay. Then I'll show you some documentation so hopefully you can confirm or deny.
MR. ROSENBLATT: Wait. Wait. This deposition is regarding process of service as to him being served --
MR. CARRERO: Yeah. I know, and I need

to know the registered agent --
MR. ROSENBLATT: -- as to him being served properly by the processor --
MR. CARRERO: Correct.
MR. ROSENBLATT: -- and whether or not he was in Broward County on April 11th, two thousand and, I guess, twenty-one.
MR. CARRERO: I want to make sure that this witness understands whether or not he's a registered agent for the defendants of the very service we're here to discuss.
MR. ROSENBLATT: All right. Well, go ahead; but let's see where it goes.
MR. CARRERO: Okay. I'm going to share my screen.
Is that okay, Madam Court Reporter?
THE REPORTER: Yes, Counsel.
MR. CARRERO: Okay. Let's go ahead and mark this as Exhibit A for identification.
(Exhibit A was marked for identification.)
BY MR. CARRERO:
Q This appears to be a Sun Biz Printout that was done on January 5, 2022; and it lists Ryan Burke as a registered agent for 16260 Saddle Club Road. Do

you see that document on your screen, sir?
A Who -- who are you speaking to? Me?
Q Yes. You're the one that's under oath answering questions. Yes.
A I do see it.
Q Okay. Is there any reason to think that this is incorrect, that Ryan Burke is not the registered agent for this company?
A No. If that's what it states, it means I'm the registered agent.
Q Fantastic.
MR. CARRERO: Can we mark that as Exhibit A for identification?
THE REPORTER: Yes, Counsel.
MR. CARRERO: Okay. Let me show you another.
This we'll mark as Exhibit B for identification.
(Exhibit B was marked for identification.)
BY MR. CARRERO:
Q It is for 2045 Southwest 127th Avenue, LLC; and it's from February 18, 2022; and it shows Ryan Burke as a registered agent for this company. Is there any reason to think that Ryan Burke is not --

you are not the registered agent for 2045 Southwest 127th Avenue, LLC?
A That -- that's correct. I am the registered agent.
Q Okay. Bear with me just a moment. Okay. Fantastic. You're here pursuant to a Notice of Taking Deposition Duces Tecum. Have you ever seen that document before?
A I'm sorry?
Q Let me show you the Notice under which you were called to be here, and I'm going to ask you whether you've seen this document in the past.
A Yeah. I don't recall.
Q Pardon? Sorry?
A I don't recall.
Q You don't recall. Okay. Do you see where there's four numbered paragraphs here?
A I do.
Q Okay. This is a request for you to bring documentation to this deposition, and your attorney has provided me with some documentation that I believe is in response to this.
A Okay.
Q Okay. I'm going to show you those documents in just a moment.

MR. CARRERO: We can go ahead and mark this as Exhibit C just for identification.
(Exhibit C was marked for identification.)
BY MR. CARRERO:
Q And I want you to tell me whether the documents that he provided to me are all the documents you have that are responsive to these four requests?
A I see.
Q Okay. I'm going to stop share for a second so I can show you both documents side by side. Sorry about that. This is obviously a cover letter on the first page, but we're talking about pages 2 through 9. I'll scroll through them in just a second. Let me know if I'm going too fast. Sorry about that. Are you able to see all the documents?
A I am.
THE REPORTER: I'm sorry. Can you speak up, Mr. Burke?
THE WITNESS: I -- I can see them. Yes.
THE REPORTER: Thank you.
BY MR. CARRERO:
Q Okay. Do you know if there are any other documents responsive to these four requests, which we

can go over line by line if you'd like, that you have in your possession or control?
A Those are the documents that I provided.
Q Do you have any others?
A Not at this moment, no.
Q Okay. Do you understand the four requests that were made?
A I haven't read them.
Q Okay. Let's go through them then. The first one says, "All documents and evidence that you believe supports your contention that you were not in Florida on April 11, 2023."
A Okay.
Q Do the documents submitted satisfy that request in terms of the documents you have in your --
MR. ROSENBLATT: Wait. First of all -- virtual connectivity interruption --
THE REPORTER: Mr. Rosenblatt, your audio is not --
MR. ROSENBLATT: -- for the -- virtual connectivity interruption --
THE REPORTER: Mr. Rosenblatt?
MR. ROSENBLATT: Okay. Can you --
THE REPORTER: Your audio is not good, sir.

MR. ROSENBLATT: Yes. I'm here. I'm here.
THE REPORTER: Okay.
MR. ROSENBLATT: Okay. I'm here.
THE REPORTER: Can you repeat?
MR. ROSENBLATT: All right. I'm saying -- yeah. I'm saying this is the --
THE REPORTER: I'm sorry. It's happening again, sir.
MR. ROSENBLATT: -- the day you have, 2023.
THE REPORTER: Mr. -- I apologize, Mr. Rosenblatt; but your audio wasn't good again. Can you repeat again?
MR. CARRERO: Got it. I understand. I understand what you're saying. I understand what you're saying.
THE REPORTER: You don't want the record to be clear?
MR. ROSENBLATT: Yeah. That was --
MR. CARRERO: No. No. I understand. Yeah. That's fine. Go ahead, Mr. Rosenblatt.
MR. ROSENBLATT: I was saying the Notice of Deposition is incorrect because you have the

wrong year, number one.
MR. CARRERO: That's fine. That's fine. Number 1 and Number 2 are incorrect.
MR. ROSENBLATT: So obviously, we're not in April of 2023 yet.
MR. CARRERO: I understand. I understand. Okay.
MR. ROSENBLATT: But out of good will and a gesture, we'll supply you the documents with 2022, which I think was your intent.
MR. CARRERO: Okay. So are the documents supplied for April 11, 2022?
MR. ROSENBLATT: That's the date of the service; right?
MR. CARRERO: Yes.
MR. ROSENBLATT: Reported service, yeah.
MR. CARRERO: Okay. So you treated this as if it said "2022" instead of "2023"; correct?
MR. ROSENBLATT: Well, to be honest with you, I've never seen this before.
MR. CARRERO: Okay. It was served on February 14th, but that's okay.
BY MR. CARRERO:
Q Okay. So let's go with Number 3, Mr. Burke.

Did you provide the documents responsive to Number 3, which are all documents and evidence that you believe support your contention that you were not served with service of process in this matter?
A That's correct.
Q And the documents you provided are responsive to this Request Number 3?
A Yes.
Q Okay. And then the last one is, "All documents and evidence that you believe contradict the return of service filed by Shirley Lowe"; and a copy is attached. Have you seen this document before?
A I don't recall.
Q You don't recall. Okay. Do you have any other documents that would show what your whereabouts were between April 1, 2022, and April 14, 2022, other than what your attorney provided to my office?
A Not at this moment, no.
Q Okay. Do you know if any other documents exist?
A Possibly.
Q Do you know where those --
MR. ROSENBLATT: Ray, you froze as well just then too, I think.
MR. CARRERO: The witness answered. So

I assume he heard. I don't know if it's slow getting on your side.
THE REPORTER: He said --
MR. CARRERO: Sorry.
THE REPORTER: He said "possibly."
BY MR. CARRERO:
Q Okay. Okay. Do you know where those documents might be located?
A I -- it's -- I -- I don't have the documents. I would have to -- if -- you know, if we -- if -- if other documents or other things were needed, I'd have to search. I don't have them on hand. I provided what I believed was enough to show that I was not here.
Q Okay. So the request is that you provide all documents, not what you think is enough.
A Right. Okay.
Q Did you provide all the documents you have in your possession, custody, or control?
A That's correct.
Q Okay. Where were you on April 11, 2022?
A Las Vegas.
Q What was the purpose of your trip?
A Grammys ceremony.
Q Was that the only purpose?

A That was the -- that was the reason for -- for my trip.
Q Okay. Was that a business trip or a vacation?
A Business.
Q And how long were you in Las Vegas?
A From the 1st to the 14th.
Q So what line of work are you in that dragged you to Las Vegas?
A I'm in the entertainment space, industry.
Q What exactly do you do in the entertainment space?
A I manage talent. I'm a booking agent. I'm a promoter. I am a marketing consultant. I'm a producer.
Q Wait. Sorry.
A Okay.
Q And which of those, if any of those functions, were you serving in Las Vegas?
A All of them.
Q Okay. Were you promoting an event?
A Yes. I was.
Q Okay. I noticed that in the documents provided there seems to be a photograph of a flyer.
A Uh-huh.

Q Let me show that to you so you can confirm.
THE REPORTER: I'm sorry. We lost Mr. Rosenblatt.
MR. CARRERO: Okay. We'll stop. We'll stop. We'll stop.
THE REPORTER: We're going off -- we're going off the record at 1:23 p.m. Oh, well, he's coming back.
MR. CARRERO: Let's wait until he gets back in his chair.
We stopped, Robert, when the thing went off. Okay?
MR. ROSENBLATT: Yeah. I just turned off some other things here. Maybe that was causing a problem here.
MR. CARRERO: Great. Okay.
So we were talking -- can we go back on the record?
THE REPORTER: I never went off because he popped back on.
MR. CARRERO: Got it. Thank you.
BY MR. CARRERO:
Q I'm going to show you again the documents you provided and ask you about this. It's marked here as Exhibit 1, but it's a black flyer.

(Exhibit 1 was previously marked for identification.)
Is this the event that you were promoting?
A It was one of the events. That's correct.
Q Okay. What other events did you --
A Well, that was the event. I'm sorry. I'm sorry. That was the event.
Q That was the event. Okay. So and it took place, it says here, on April 1, 2022; is that right?
A That's correct.
Q Okay. So this event was the first day you were in Las Vegas; correct?
A That's correct.
Q All right. Did you have any other events in Las Vegas after this one on April 1st?
A Not that I was promoting, other events that I got invited to.
Q Okay. Calling your attention to this page here, which was marked as Exhibit 2A when it was submitted to us, can you tell me what this is?
(Exhibit 2A was previously marked for identification.)
A It's a trip confirmation.
Q Okay. And it's a trip confirmation. It has American Airlines. Do you mean it's an airplane trip

confirmation?
A That is correct.
Q Okay. And this appears to be for a flight from April 1, 2022, from MIA to LAS and then a return flight from LAS to MIA on April 14, 2022; is that right?
A That's correct.
Q Okay. And does this $817.20 accurately reflect the amount that you paid for these tickets?
A I believe so.
Q Okay. And was this ticket for you?
A Yes. It was.
Q Okay. And did you board the flight that left April 1st from MIA to Las Vegas that's represented on this receipt?
A I did.
Q Okay. How did you get to the airport?
A I don't recall.
Q Pardon?
A I don't recall.
Q Were you given a boarding pass to board this flight?
A It may have been digital. I don't recall, but I did have a boarding pass.
Q Okay. Did you get a -- strike that. Would

you be able to obtain a copy of that boarding pass?
A I'm not sure.
Q Okay. Do you know if you have a copy -- you said it was digital. Do you know if you have a copy in a digital form?
MR. ROSENBLATT: No. No. He didn't [redacted] it was digital. He said it may have been.
BY MR. CARRERO:
Q If it was digital, do you have a copy of that in some kind of digital format?
A I wouldn't have a copy because the pass expired. It goes to your -- when -- in the past when it's been a digital boarding pass, it goes to your Apple Wallet; and once you've used it, it -- it expires, and it goes away.
Q Okay. But you're not sure if it was digital or paper?
A I do not recall.
Q When you arrived in Las Vegas, how did you get to your hotel room?
A I believe it was an Uber.
Q Okay. And how did you pay for that Uber?
A I don't recall.
Q Okay. Have you ever paid for Uber with your checking account?

A I have.
Q Okay. Let me show you the Checking Account Statement. What bank is this account in?
A I believe that's TD Bank.
Q Okay. This was marked as Exhibit 5; and I'm seeing here a charge for something that says, "Uber trip," on April 4th for $39.59.
(Exhibit 5 was previously marked for identification.)
A I'm sorry?
Q If you look towards the bottom here --
A Okay.
Q -- the transaction that appears to say, "Uber trip" --
A Okay.
Q -- do you see that?
A Yes.
Q On April 4, 2022, for $39.59, do you see what I'm talking about?
A Yes. I do.
Q Okay. So is it safe to say you have used this account to pay for your Uber?
A I have.
Q Okay. And would you have used this same account to pay for your Uber trips while you were in

Las Vegas?
A I -- I have -- I -- I'm not -- it doesn't have to necessarily be this particular account. I have multiple accounts.
Q Okay. Do you have any evidence of other Uber trips you took and [redacted] payments for those trips during this time period?
A Not at the moment, no. And I believe that this would be the Uber that I took from -- if I remember correctly, from the airport because the date that it posted was April 4th; but if you see in the line the detail, it says, "April 1st" when I arrived. It's a little blotted out with your exhibit thing with --
Q About this here?
A Correct.
Q Is that what you mean?
A That is correct.
Q Let me turn your attention to the Hotel Email. It looks like it's dated September 13, 2022; and it's HotelTonight. Do you see this? Do you recognize this document?
A I do.
Q Okay. It was marked as Exhibit 3A when it was given to us.

(Exhibit 3A was previously marked for [redacted] identification.)
This appears to show on April 1st a stay that runs through Sunday, April 3rd; is that correct?
A That's correct.
Q Okay. That's followed by a second similar report of the same date that shows a stay from April 9th through April 13th; is that correct?
A That's correct
Q Okay. So let me ask you. These notes on the side here, were those something you wrote?
A No. It's not.
Q Who wrote this on the side?
A That's -- that -- that came as is.
Q So when you got the email, this is what it had, these bullet points on the right?
A That's a printout of the -- of the page.
Q Okay. And is the same true for the second one, Exhibit 4A?
(Exhibit 4A was previously marked for identification.)
A That's correct
Q Okay. What is the reason that there's a gap in time between April 9th -- I'm sorry -- April 3rd and April 9th in your stay at this hotel?

A Because I was staying with -- with one of the -- the talent, one of the artists.
Q Okay. And is that artist related to you in any way?
A That artist is related to me. Yes.
Q What's their relationship to you?
A It's my cousin.
Q While you were in Las Vegas -- strike that. Did your hotel room have a kitchen in it?
A I don't recall.
Q Do you know if you cooked your meals while you were in Las Vegas?
A I didn't cook my meals.
Q Okay. So you ate out?
A I ate with many people.
Q Okay. Did you ever pick up the tab?
A I don't recall.
Q Okay. Do you know if you have any records or evidence of you having paid for meals while you were in Las Vegas?
A I -- probably.
Q I saw some transactions on your bank -- a portion of the bank statement you provided; and it shows a couple of transactions I want to ask you about, the first of which occurred on April 1st; and

it's Donna's Caribbean. Do you recognize that transaction for $9.62?
A I see it.
Q And do you see where it says, "Lauderhill, Florida"?
A Yes.
Q Okay. And then there's another one the same day for Fruits of Your Root in Pompano Beach, Florida, for nineteen twenty-six. Do you recognize that?
A Okay. I do. I mean, I -- I see it. I see what you're referencing.
Q Okay. Do you ever recall dining at either of these two establishments, Donna's Caribbean or Fruits of Your Root?
A I don't recall.
Q I see another transaction here for ExxonMobil on April 4th in Fort Lauderdale, Florida, for $96.02. Do you recognize that transaction?
A I -- I -- again, I see the transactions; but I -- I'd like you to also realize that this says, "Posting date"; and you can see the dates of the actual transaction, that they're all March 31, 2022.
Q I understand. I'm just asking whether you recognize these transactions.
A I don't remember. This was a year ago. I

don't remember where I ate or where I got gas.
Q All right. But, I mean, you know where you eat; right? If you've never been to Donna's Caribbean, would you know it?
A Okay. You -- you asked me if I recognize the transaction. I said I see the transaction. I didn't say that the restaurant is not familiar with me.
Q I understand, but I asked you specifically --
A Okay.
Q -- whether you've ever eaten at Donna's --
A That's not what you asked.
Q -- Caribbean or Fruits for Your --
A That's not what you asked.
Q Pardon?
A That's not what you asked, but yes. I have eaten at Donna's.
Q Please do not speak over me. Let me complete the question.
A Okay.
Q You can hear it completely, and then I'll let you speak, and you can give a complete answer. Okay? Donna's Caribbean, have you ever eaten at that establishment?

A Yes. I have.
Q Okay. Fruits of Your Root, have you ever eaten at that establishment?
A I am not familiar with that restaurant.
Q Okay. Have you ever -- okay. Is there any reason that you would not get -- strike that. Okay. At the conclusion of your reserved stay, the initial stint from April 1st to April 3rd, did you receive a folio or a receipt from your hotel?
A I received what I've provided to you in Exhibit 3B.
Q So you didn't get a closeout ledger that says your incidentals or any other charges that might have been charged to you in resort fees or anything along those lines?
A I don't recall. I checked out.
Q And did you receive a folio or final receipt for your stay between April 9th and April 13th?
A I don't -- I don't recall. No.
Q When you promote your events -- strike that. This event that occurred on April 1st, were you paid for that event?
A I was not. No.
Q Okay. Did you have a contract for the event with the client?

A I did not. No.
Q Did you have a reservation with the venue?
A No. I didn't.
Q Were you given a boarding pass on your return flight from Las Vegas to Miami on April 14, 2022?
A I don't recall. It may have been a digital as well.
Q Do you have a copy of the boarding pass?
A I would not have it if it was digital, and I don't -- I -- I don't have it if it's -- well, if -- if it was given to me physically either.
Q Okay. When you arrived in Miami after your return flight, how did you get home?
A I don't recall.
Q Do you remember if you drove and left your car at the airport during your stay in Las Vegas?
A If I drove and left my car at the airport? Can you repeat the question?
Q Do you remember whether you drove and left your car at the airport when you went to Las Vegas?
A I don't believe so.
Q You previously said you had an Apple Wallet. Does that mean you have an iPhone?
A I do.

Q Okay. Do you know whether your iPhone has location services turned on, location tracking turned on?
A No. I don't -- I don't recall. I -- I'm not sure.
Q Do you recall ever turning off location tracking on your cell phone?
A No. I don't recall.
Q Do you recall having received a proposed -- now, hold on. Before we go further, let me just explain one thing. I am not asking you to give me details of any settlement discussion that occurred because that is privileged. Okay? I cannot ask you about that.
What I'm trying to ask you is: Do you ever recall having received a proposal in writing from my office to settle the case we're here about today?
MR. ROSENBLATT: Don't answer the question. That's outside the scope of this deposition.
MR. CARRERO: Are you going to answer?
MR. ROSENBLATT: No. I instructed him not to answer the question.
MR. CARRERO: No. No. No. I know what you instructed. I'm asking him -- I want to know whether he's going to answer or not.

MR. ROSENBLATT: He's going to follow my instruction. That's outside the scope of the deposition.
MR. CARRERO: Okay. Then we're going to need to mark this, if we can, Madam Court Reporter.
THE REPORTER: Certified?
MR. CARRERO: Take it to the judge, please. Thank you.
THE REPORTER: You're certifying this question?
MR. CARRERO: Yes. I am.
THE REPORTER: Okay.
MR. ROSENBLATT: I mean, it's improper why you think it's relevant to this service process --
MR. CARRERO: Sure. It's part of the allegations. It's absolutely part of the allegations. We allege that he had actual knowledge of the lawsuit because he received a copy of the settlement agreement.
We believe that's the case.
MR. ROSENBLATT: You still need to process that. You need to process --
MR. CARRERO: I understand, but that's an argument. I understand.

MR. ROSENBLATT: Okay. Well, we'll instruct him -- with all due respect, that's outside the scope of --
MR. CARRERO: I understand. I know what you think.
MR. ROSENBLATT: -- the deposition and --
THE REPORTER: I'm sorry. There's a cross. There's a cross. There's a cross.
MR. ROSENBLATT: Okay. It's outside the scope of this deposition concerning process of services. He's instructed not to answer.
MR. CARRERO: It's not.
MR. ROSENBLATT: Counsel has --
MR. CARRERO: That's fine.
MR. ROSENBLATT: Counsel has certified it, and we'll let the Court decide on it.
MR. CARRERO: That's fine. Okay. Let me take a brief break for five minutes. Okay?
THE REPORTER: Okay.
MR. ROSENBLATT: Why?
THE REPORTER: We're going off the record at --
MR. CARRERO: Because I want to go over my notes and see what other questions I have. I want

to talk to my client about what questions he may have.
MR. ROSENBLATT: Okay.
MR. CARRERO: But you know what?
MR. ROSENBLATT: That's fine.
MR. CARRERO: I don't have to give you a reason.
MR. ROSENBLATT: I just had this as a short deposition, but that's --
MR. CARRERO: I understand. I'm asking for five minutes, Robert. Five minutes.
MR. ROSENBLATT: That's fine. You've got it. Take all the -- right. Right.
THE REPORTER: Okay. Do you guys want to go off record so --
MR. ROSENBLATT: Take all the time you need.
THE REPORTER: -- all of this is not on record?
MR. ROSENBLATT: Take all the time you need.
THE REPORTER: We're going off the record at 1:40 p.m.
(Off the record.)
THE REPORTER: We're back on the record at 1:43 p.m.

BY MR. CARRERO:
Q Mr. Burke, on April 11, 2022, did any other person have access to your home, the address you gave

[redacted]

Q Okay. Did you have anybody visiting or housesitting during the time you were gone?
A My -- I don't know who -- which guest may have been at my house. I don't know who would have been there.
Q Okay. Is there any reason that someone would answer to your name who's going into your house?
MR. ROSENBLATT: Objection. Calls for speculation and --
MR. CARRERO: No. There could be a reason. There could be a reason.
MR. ROSENBLATT: If he knows. I mean, it calls for speculation.
MR. CARRERO: Yeah.

BY MR. CARRERO:
Q Do you know? Do you know of any reason why someone would answer to the name Ryan if it was called out to them at your house?
MR. ROSENBLATT: Same objection.
Go ahead.
MR. CARRERO: Do you know the answer?
THE WITNESS: I have no idea.
MR. CARRERO: Okay. All right. I have nothing further.
MR. ROSENBLATT: Maybe his name was Ryan too. Maybe there's more than one.
MR. CARRERO: Yeah.
MR. ROSENBLATT: Ryan is a pretty common name. Okay. I don't have any questions today. Thank you very much.
MR. CARRERO: Okay.
THE REPORTER: Read or waive?
MR. ROSENBLATT: Regular with a digital copy.
THE REPORTER: Read or waive?
MR. ROSENBLATT: He'll waive.
THE REPORTER: Counsel, are you ordering regular; or are you holding?
MR. CARRERO: I'm going to hold for the

moment.
THE REPORTER: Okay. This concludes the deposition for Mr. Ryan Burke at 1:45 p.m.
(Signature waived.)
(Whereupon, at 1:45 p.m., the proceeding was concluded.)

CERTIFICATE OF DEPOSITION OFFICER

I, GWEN DUNN, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

[redacted]

GWEN DUNN

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[redacted]

SHANE WILLIAM SPROWL

[redacted] [redacted]

0

001852 4:11

1

1 3:13 15:3 16:16 19:25 20:1,9 21:4
1/5/22 3:7
10 3:8
104th 2:15
11 13:12 15:12 17:21 35:2
11th 9:6
12 3:9
[redacted] 7:11
127th 1:10 4:10 10:22 11:2
13 24:20
13th 25:8 29:18
14 16:16 21:5 30:5
14th 15:23 18:7
16 35:10
16260 1:8 4:8 8:11 9:25
17th 1:1
18 10:23
1:07 1:16 4:5
1:23 19:7
1:40 34:22
1:43 34:25
1:45 37:3,5
1st 18:7 20:15 21:14 24:12 25:3 26:25 29:8 29:21

2

2 12:13 15:3
2/18/22 3:8
20 3:13,14,21
2010 7:15
2022 9:24 10:23 15:10,12,19 16:16,16 17:21 20:9 21:4,5 23:18 24:20 27:22 30:6 35:2
2023 1:15 4:11 13:12 14:11 15:5,19
2045 1:10 4:9 10:22 11:1
22 4:10
22-001852 1:8
22857 38:20
23 1:15 3:17 4:11
25 3:15,16
28106 39:16
2a 3:14 20:19,21

3

3 15:25 16:1,7
305 2:9
31 3:21 27:22
[redacted] 7:11
33156 2:7,16
[redacted] 1:18 5:24 7:12
358-9495 2:9
39.59 23:18
39.59. 23:7
3a 3:15 24:24 25:1
3b 29:11
3rd 25:4,24 29:8

4

4 23:18
4a 3:16 25:19,20
4th 23:7 24:11 27:17

5

5 3:17 9:24 23:5 23:8
5767415 1:20

6

6 3:3

7

7695 2:15

8

817.20 21:8

9

9 3:7 12:13
9.62 27:2
9/13/22 3:15
96.02. 27:18
9771 2:6
9th 25:8,24,25 29:18

a

ability 38:10 39:7
able 7:1 12:16 22:1
absent 4:17
absolutely 32:17
access 35:3
account 3:17 22:25 23:2,3,22 23:25 24:3
[redacted]
accurate 38:9 39:5
accurately 6:10 21:8
acknowledgm... 4:14
action 38:12,16 39:8,12
actual 27:22 32:18
additionally 4:17
address 7:10,14 8:7 35:3
administer 4:14
adults 7:24 35:7
affect 7:7
afternoon 4:2 6:6
agent 8:11,13 8:16,17,17,18 9:1,10,25 10:8 10:10,24 11:1,4 18:13

[redacted] [redacted]

ago 27:25
agree 4:15,19
agreement 32:20
ahead 9:13,18 12:1 14:22 36:6
airline 3:14
airlines 20:25
airplane 20:25
airport 21:17 24:10 30:17,18 30:21
allegations 32:17,17
allege 32:18
allow 6:13
american 20:25
amount 21:9
answer 3:19 6:14 7:3,4 28:23 31:18,21,23 32:1 33:12 35:18 36:3,7
answered 16:25
answering 10:4
answers 6:21
anybody 35:12
apologize 14:12
appearing 4:12
appears 9:23 21:3 23:13 25:3
apple 22:14 30:23
applicable 4:23
april 9:6 13:12 15:5,12 16:16 16:16 17:21 20:9,15 21:4,5 21:14 23:7,18 24:11,12 25:3,4 25:7,8,24,24,25 26:25 27:17 29:8,8,18,18,21 30:5 35:2
argument 32:25
arrived 22:19 24:12 30:13
artist 26:3,5
artists 26:2
asked 28:5,9,13 28:15,17
asking 6:7,20 27:23 31:11,25 34:9
assigned 4:3
assume 17:1
ate 26:14,15 28:1
attached 16:12
attendance 5:5
attention 20:18 24:19
attorney 11:20 16:17 38:14 39:10
audibly 7:3
audio 13:19,24 14:13 38:8 39:4
authorized 4:13
avenue 1:10 4:10 7:11 10:22 11:2

b

b 3:5,8,11 6:11 10:17,19
back 19:8,10,17 19:20 34:24
bank 23:3,4 26:22,23
beach 27:8
bear 11:5
behalf 2:2,11
believe 8:12 11:21 13:11 16:2,10 21:10 22:21 23:4 24:8 30:22 32:21
believed 17:13
best 7:1 38:9 39:6
biz 3:7 9:23
black 3:13 19:25
blotted 24:13
board 21:13,21
boarding 21:21 21:24 22:1,13 30:4,9
bob 2:12 5:9
booking 18:13
bottom 23:11
break 33:19
brief 33:19
bring 11:19
broward 1:2 9:6
bullet 25:16
burke 1:9,14 4:7 4:9 5:13,16,21 6:11 9:24 10:7 10:24,25 12:19 15:25 35:2 37:3
business 18:3,5

c

c 2:1 3:9 4:1 12:2,3
cace 1:8 4:10
called 5:17 11:11 36:3
calling 20:18
calls 35:19,24
car 30:17,18,21
caribbean 27:1 27:13 28:4,14 28:24
carrero 2:4,5 3:3 5:7,7 6:1,2,4 8:25 9:4,8,14,18 9:22 10:12,15 10:21 12:1,5,23 14:15,21 15:2,6 15:11,15,18,22 15:24 16:25 17:4,6 19:4,9,16 19:21,22 22:8 31:21,24 32:5,8 32:12,16,24 33:4,13,15,18

33:24 34:3,5,9 35:1,21,25 36:1 36:7,9,13,17,25
carrerolegal.c... 2:8
case 1:7 4:10 31:17 32:21
causing 19:14
cell 31:7
ceremony 17:24
certificate 38:1 39:1
certified 4:20 32:7 33:16
certify 38:3 39:2
certifying 32:10
chair 19:10
charge 23:6
charged 29:14
charges 29:13
checked 29:16
checking 3:17 22:25 23:2
children 35:5,7
circuit 1:1,1
city 5:22
clear 14:19
client 29:25 34:1
closeout 29:12
club 1:8 4:9 8:11 9:25
code 5:22
coming 19:8
common 36:15
company 10:8 10:24
complete 6:13 28:20,23
completely 28:22
concentration 7:7
concerning 33:11
concluded 37:6
concludes 37:2
conclusion 29:7
confirm 8:21 19:1
confirmation 3:14 20:23,24 21:1
connectivity 13:17,21
constitute 5:2
consultant 18:14
contention 13:11 16:3
contract 29:24
contradict 16:10
control 13:2 17:19
cook 26:13
cooked 26:11
copy 16:11 22:1 22:3,4,9,11 30:9 32:19 36:20
correct 9:4 11:3 15:19 16:5 17:20 20:4,10 20:12,13 21:2,7 24:16,18 25:4,5 25:8,9,22
correctly 24:10
counsel 3:10 9:17 10:14 33:14,16 36:23 38:10,13 39:7 39:10
county 1:2 9:6
couple 26:24
court 1:1 6:9,21 9:16 32:6 33:17
cousin 26:7
cover 12:12
cross 33:9,9,9
custody 17:19

d

d 3:1,11 4:1
date 1:15 4:11 15:13 24:10 25:7 27:21
dated 24:20
dates 27:21
day 14:10 20:11 27:8
days 8:3
decide 33:17
defendants 1:11 2:11 5:10 9:10
deny 8:21
deposition 1:13 3:9 4:6,25 5:23 6:17 8:23 11:7 11:20 14:25 31:20 32:4 33:6 33:11 34:8 35:4 37:3 38:1
description 3:6 3:12
detail 24:12
details 31:12
digital 21:23 22:4,5,7,9,10,13 22:16 30:7,10 36:19 38:8 39:3
dining 27:12
discuss 9:11
discussion 31:12
dixie 2:6
document 3:8 10:1 11:8,12 16:12 24:22
documentation 8:20 11:20,21
documents 11:24 12:7,7,11 12:16,25 13:3 13:10,14,15 15:9,12 16:1,2,6 16:10,15,19 17:8,10,11,16 17:18 18:23 19:23

donna's 27:1,13 28:3,12,18,24
dragged 18:8
drove 30:16,18 30:20
duces 11:7
due 33:2
duly 5:17 38:5
dunn 1:19 4:3 38:2,21
dzotsi 1:5 2:3 4:8

e

e 2:1,1 3:1,5,11 3:11,11 4:1,1 6:11 8:14,14
eat 28:3
eaten 28:12,18 28:24 29:3
eight 4:5
either 27:12 30:12
email 3:15,16 24:20 25:15
employed 38:11 38:14 39:8,11
employee 38:13 39:10
entertainment 18:10,11
eryck 1:5 2:3 4:8
es 38:4
eservice 2:8
esquire 2:4,12
establishment 28:25 29:3
establishments 27:13
event 18:21 20:3 20:6,7,8,11 29:21,22,24
events 20:4,5,14 20:16 29:20
evidence 13:10 16:2,10 24:5 26:19
evidentiary 4:24
exactly 18:11
examination 3:2 6:3
examined 5:19
exhibit 3:7,8,9 3:13,14,15,16 3:17 9:19,20 10:13,17,19 12:2,3 19:25 20:1,19,21 23:5 23:8 24:13,24 25:1,19,20 29:11
exhibits 3:10
exist 16:20
expired 22:12
expires 22:15
explain 31:11
exxonmobil 27:17

f

familiar 28:7 29:4
fantastic 10:11 11:6
fast 12:15
february 1:15 4:11 10:23 15:23
fees 29:14
filed 16:11
final 29:17
financially 38:15 39:11
fine 6:15 14:22 15:2,3 33:15,18 34:4,11
firm 2:14
first 5:17 12:13 13:10,16 20:11 26:25
five 33:19 34:10 34:10
fl 1:18 2:7,16
flight 21:3,5,13 21:22 30:5,14
floor 2:15
florida 1:2 4:15 5:24 7:12 13:12 27:5,8,17 38:23
flyer 3:13 18:24 19:25
folio 29:9,17
follow 32:2
followed 25:6
follows 5:19
foregoing 38:3,4 39:4
form 22:5
format 22:10
fort 27:17
four 11:17 12:8 12:25 13:6
froze 16:23
fruits 27:8,14 28:14 29:2
functions 18:19
further 31:10 36:10 38:12 39:9

g

g 4:1
gap 25:23
gas 28:1
gesture 15:9
getting 17:1
give 6:14 7:1 28:23 31:11 34:5
given 21:21 24:25 30:4,12
go 6:19 9:12,18 12:1 13:1,9 14:22 15:25 19:17 31:10 33:24 34:14 36:6
goes 9:13 22:12 22:13,15

going 6:12 9:14 11:11,24 12:10 12:15 19:6,7,23 31:21 32:1,2,5 33:22 34:21 35:18 36:25
good 4:2 6:5,6 13:24 14:13 15:8
grammys 17:24
great 6:16 19:16
ground 6:19
guess 9:7
guest 35:14
guests 8:2
guys 34:13
gwen 1:19 4:3 38:2,21

h

h 3:5,11
hand 5:14,21 17:13
happening 14:9
he'll 36:22
hear 28:22
heard 17:1
hearing 5:11
heights 8:14
hereto 38:14 39:11
highway 2:6
hold 31:10 36:25
holding 36:24
home 7:9,22,24 8:3 30:14 35:3
honest 15:20
honestly 8:16
hopefully 8:21
hotel 3:15,16 22:20 24:19 25:25 26:9 29:9
hoteltonight 24:21
hotmail.com 2:17
house 8:9,10 35:15,18 36:4
housesitting 35:13
huh 18:25

i

idea 36:8
identification 9:19,21 10:13 10:18,20 12:2,4 20:2,22 23:9 25:2,21
identify 5:5
improper 32:14
incidentals 29:13
incorrect 10:7 14:25 15:3
industry 18:10
initial 29:7
instruct 33:2
instructed 3:19 31:22,25 33:12
instruction 32:3
intended 4:22
intent 15:10
interested 38:15 39:12
interruption 7:16 13:17,21
invited 20:17
iphone 30:24 31:1

j

january 9:24
job 1:20
judge 32:8
judicial 1:1

k

k 3:11 6:11
kameka 1:4 2:2 2:20 4:7
karim 2:20
kind 22:10
kitchen 26:9
know 8:16,17 8:17,25 9:1 12:15,24 16:19 16:22 17:1,7,10 22:3,4 26:11,18 28:2,4 31:1,24 31:25 33:4 34:3 35:6,14,15 36:2 36:2,7
knowledge 32:18 38:9 39:6
knows 35:23

l

l 3:11 8:14
las 17:22 18:6,9 18:19 20:12,15 21:4,5,14 22:19 24:1 26:8,12,20 30:5,17,21
lauderdale 27:17
lauderhill 27:4
law 2:14
laws 4:24
lawsuit 32:18
ledger 29:12
left 21:14 30:16 30:18,20
letter 12:12
line 3:20 13:1,1 18:8 24:12
lines 29:15
lists 9:24
little 24:13
live 1:9 4:9 7:21 7:24 8:14
llc 1:8,9,10 4:9,9 4:10 8:11,14 10:22 11:2
located 5:22 17:8
location 1:17 31:2,2,6
long 7:13 18:6
longer 8:2

look 23:11
looks 24:20
lost 19:2
lowe 16:11

m

m 3:11
madam 9:16 32:6
made 13:7
make 9:8
making 6:20
manage 18:13
management 1:4 2:2 4:7
manner 4:25
march 27:22
mark 9:19 10:12,17 12:1 32:6
marked 9:20 10:19 12:3 19:24 20:1,19 20:21 23:5,8 24:24 25:1,20
marketing 18:14
married 7:19
matter 4:7 16:4
meals 26:11,13 26:19
mean 20:25 24:17 27:10 28:2 30:24 32:14 35:23
means 5:1 10:9
medications 7:6
member 8:18
memory 7:7
mia 21:4,5,14
miami 30:5,13
minors 35:10
minutes 33:19 34:10,10
moment 11:5,25 13:5 16:18 24:8 37:1
morning 6:5
multiple 24:4

n

n 2:1 3:1 4:1 6:11
name 4:2 6:8 35:18 36:3,11 36:15
necessarily 24:3
need 8:25 32:6 32:22,23 34:16 34:20
needed 17:12
neither 38:10 39:7
never 15:21 19:19 28:3
nineteen 27:9
northwest 7:11
notary 1:19 4:13 38:22
note 3:10
notes 25:10 33:25
notice 3:9 11:6 11:10 14:25
noticed 18:23
number 4:10 15:1,3,3,25 16:1 16:7
numbered 11:17

o

o 3:11 4:1
oath 10:3
oaths 4:14
objection 4:17 5:12 35:19 36:5
obtain 22:1
obviously 12:12 15:4
occurred 26:25 29:21 31:12
office 8:5,6,7,8 16:17 31:17
officer 38:1,2
oh 4:5 19:7
okay 5:25 6:2,8 6:12,14,16,19 6:25 7:6,9,13,16 7:19,21,24 8:2,5 8:10,10,13,20 9:14,16,18 10:6 10:15 11:5,5,16 11:19,23,24 12:10,24 13:6,9 13:13,23 14:3,4 15:7,11,18,22 15:23,25 16:9 16:14,19 17:7,7 17:15,17,21 18:3,17,21,23 19:4,12,16 20:5 20:8,11,18,24 21:3,8,11,13,17 21:25 22:3,16 22:22,24 23:2,5 23:12,15,21,24 24:5,24 25:6,10 25:18,23 26:3 26:14,16,18 27:7,10,12 28:5 28:11,21,24 29:2,5,5,6,24 30:13 31:1,13 32:5,13 33:1,10 33:18,19,20 34:2,13 35:7,10 35:12,17 36:9 36:15,17 37:2
once 22:14
ordering 36:24
outcome 38:15 39:12
outside 4:16 31:19 32:3 33:2 33:10

p

p 2:1,1 3:11 4:1
p.a. 2:5
p.m. 1:16 4:5 19:7 34:22,25

37:3,5
page 3:2,6,12,20 12:13 20:18 25:17
pages 12:13
paid 21:9 22:24 26:19 29:21
paper 22:17
paragraphs 11:17
pardon 11:14 21:19 28:16
part 32:16,17
particular 24:3
parties 4:15,18 38:11,14 39:8 39:11
pass 21:21,24 22:1,11,13 30:4 30:9
past 6:17 11:12 22:12
pay 22:22 23:22 23:25
payments 24:7
people 26:15
period 24:7
permitted 4:22
person 35:3
phone 31:7
photograph 18:24
physically 30:12
pick 26:16
pinecrest 2:7,16
place 20:9
plaintiffs 1:6 2:2 5:8
please 5:5,13,21 6:8 7:9 28:19 32:9
points 25:16
pompano 27:8
popped 19:20
portion 26:23
possession 13:2 17:19
possibly 16:21 17:5
posted 24:11
posting 27:21
prepared 39:3
presence 4:16
present 2:19
pretty 36:14
previously 20:1 20:21 23:8 25:1 25:20 30:23
printout 3:7,16 9:23 25:17
prior 38:5
privileged 31:13
probably 26:21 35:5,6
problem 19:15
procedural 4:23
proceeding 1:17 4:4,21 37:6 39:4
proceedings 38:3,4,6,8 39:6
process 8:23 16:4 32:15,23 32:23 33:11
processor 9:3
produced 4:20
producer 18:15
promote 29:20
promoter 18:14
promoting 18:21 20:3,16
properly 9:3
proposal 31:16
proposed 31:9
provide 5:22 16:1 17:15,18
provided 11:21 12:7 13:3 16:6 16:17 17:13 18:24 19:24 26:23 29:10
public 1:19 38:22
purpose 17:23 17:25
pursuant 11:6
put 5:20

q

qualified 38:7
question 6:14 28:20 30:19 31:19,23 32:11
questions 3:19 6:13,20 10:4 33:25 34:1 36:15

r

r 2:1 3:11,11 4:1 6:11,11
raise 5:13
ray 16:23
raymond 2:4,5 5:7
read 13:8 36:18 36:21
realize 27:20
reason 6:25 10:6,25 18:1 25:23 29:6 34:6 35:17,22,22 36:2
recall 11:13,15 11:16 16:13,14 21:18,20,23 22:18,23 26:10 26:17 27:12,15 29:16,19 30:7 30:15 31:4,6,8,9 31:16
receipt 21:15 29:9,17
receive 29:8,17
received 29:10 31:9,16 32:19
recognize 24:22 27:1,9,18,24 28:5
record 4:4,5,18 5:5 7:10 14:19

19:7,18 33:23 34:14,18,22,23 34:24 38:9 39:5
recorded 4:25 38:6
recording 4:20 38:8 39:4
records 26:18
reduced 38:6
referencing 27:11
reflect 21:9 24:6
regarding 8:23
registered 8:11 8:13 9:1,10,25 10:8,10,24 11:1 11:3
regular 36:19 36:24
related 26:3,5 38:11 39:7
relationship 26:6
relative 38:13 39:10
relevant 32:15
remember 24:10 27:25 28:1 30:16,20
remote 1:17
remotely 4:16
repeat 14:5,14 30:19
report 25:7
reported 1:19 15:16
reporter 4:2,3 5:11,20,25 6:9 6:21 9:16,17 10:14 12:18,22 13:18,22,24 14:3,5,8,12,18 17:3,5 19:2,6,19 32:6,7,10,13 33:8,20,22 34:13,17,21,24 36:18,21,23 37:2
represent 5:6
represented 21:15
request 11:19 13:15 16:7 17:15
requests 12:8,25 13:6
reservation 30:2
reserved 29:7
resided 7:13
residence 7:17
resort 29:14
respect 33:2
response 11:22
responsive 12:8 12:25 16:1,7
restaurant 28:7 29:4
retained 3:10
return 16:11 21:4 30:5,14
right 5:14 9:12 14:6 15:14 17:17 20:9,14 21:6 25:16 28:2 28:3 34:12,12 36:9
road 1:8 4:9 8:11 9:25
robert 2:12 19:11 34:10
room 22:20 26:9
root 27:8,14 29:2
rosenblatt 2:12 2:14 5:9,9 8:22 9:2,5,12 13:16 13:18,20,22,23 14:1,4,6,10,13 14:20,23,24 15:4,8,13,16,20 16:23 19:3,13 22:6 31:18,22 32:2,14,22 33:1 33:6,10,14,16 33:21 34:2,4,7 34:11,15,19 35:19,23 36:5 36:11,14,19,22
rosenblattlaw 2:17
rules 4:24 6:19
runs 25:4
ryan 1:9,14 4:6 4:9 5:16 6:11 9:24 10:7,23,25 36:3,12,14 37:3

s

s 2:1 3:5,11,11 4:1
saddle 1:8 4:8 8:11 9:25
safe 23:21
satisfy 13:14
saw 26:22
saying 14:6,7,16 14:17,24
says 13:10 20:9 23:6 24:12 27:4 27:20 29:13
scope 31:19 32:3 33:3,11
screen 9:15 10:1
scroll 12:14
search 17:12
second 2:15 3:16 12:10,14 25:6,18
see 9:13 10:1,5 11:16 12:9,16 12:20 23:16,18 24:11,21 27:3,4 27:10,10,16,19 27:21 28:6 33:25
seeing 23:6
seems 18:24

seen 11:7,12 15:21 16:12
september 24:20
series 6:12
served 8:24 9:3 15:22 16:3
service 8:23 9:11 15:14,16 16:4,11 32:15
services 31:2 33:12
serving 18:19
settle 31:17
settlement 31:12 32:19
seven 4:5 8:3
shane 39:2,16
share 9:14 12:10
shirley 16:11
short 34:8
show 8:20 10:15 11:10,24 12:11 16:15 17:13 19:1,23 23:2 25:3
shows 10:23 25:7 26:24
side 12:11,11 17:2 25:11,13
signature 37:4 38:20 39:16
similar 25:6
sir 5:21 6:1,5 10:1 13:25 14:9
six 27:9
skills 38:10 39:6
slow 17:1
solutions 1:4 2:2 4:8
sorry 6:5 7:3 11:9,14 12:11 12:15,18 14:8 17:4 18:16 19:2 20:6,7 23:10 25:24 33:8
south 2:6
southwest 2:15 4:10 10:22 11:1
space 18:10,12
speak 12:19 28:19,23
speaking 10:2
specifically 28:10
speculation 35:20,24
spell 6:9
spouse 7:21
sprowl 39:2,16
start 35:4
state 4:14 5:22 6:8 7:9 38:23
statement 3:17 23:3 26:23
states 10:9
stay 25:3,7,25 29:7,18 30:17
staying 26:1
stenographic 5:1
stint 29:8
stipulation 5:2
stop 12:10 19:4 19:5,5
stopped 19:11
street 2:15
strike 21:25 26:8 29:6,20
submitted 13:14 20:20
sun 3:7 9:23
sunday 25:4
sunrise 1:18 5:24 7:11
supplied 15:12
supply 15:9
support 16:3
supports 13:11
sure 8:15,16,18 9:8 22:2,16 31:5 32:16
sw 1:10
swear 4:15 5:12
sworn 4:18 5:17 38:5

t

t 3:5,11
tab 26:16
take 4:4,13 6:9 32:8 33:19 34:12,15,19
taken 4:7 6:17 38:3,12 39:9
talent 18:13 26:2
talk 34:1
talking 12:13 19:17 23:19
td 23:4
tecum 11:7
tell 5:18 12:6 20:20
terms 13:15
testified 5:19
testifying 38:5
testimony 7:1
thank 5:11,20 5:25 12:22 19:21 32:9 36:16
thanks 6:7
thing 19:11 24:13 31:11
things 17:11 19:14
think 10:6,25 15:10 16:24 17:16 32:15 33:5
thousand 9:6
thursday 1:15
ticket 21:11
tickets 21:9
time 1:16 5:4 24:7 25:24 34:15,19 35:13

today 5:23 6:22 7:1,7 31:17 36:15
today's 4:11
took 20:8 24:6,9
towards 23:11
tracking 31:2,7
transaction 23:13 27:2,16 27:18,22 28:6,6
transactions 26:22,24 27:19 27:24
transcriber 39:1
transcript 4:20 6:22 39:3,5
transcriptionist 38:7
treated 15:18
trip 3:14 17:23 18:2,3 20:23,24 20:25 23:7,14
trips 23:25 24:6 24:7
true 25:18 38:9 39:5
truth 5:18,18,19
trying 31:15
turn 24:19
turned 19:13 31:2,2
turning 31:6
twenty 9:7 27:9
two 9:6 27:13
typewriting 38:7

u

u 3:11 6:11
uber 22:21,22 22:24 23:6,14 23:22,25 24:6,9
uh 18:25
under 4:23 7:6 10:3 11:10 35:10
understand 4:19 6:23 13:6 14:15,16,16,21 15:6,7 27:23 28:9 32:24,25 33:4 34:9
understands 9:9
used 22:14 23:21,24
uses 4:22

v

v 1:7 3:11 8:14 8:14
vacation 18:4
vegas 17:22 18:6,9,19 20:12 20:15 21:14 22:19 24:1 26:8 26:12,20 30:5 30:17,21
venue 30:2
veritext 4:4
vew 1:9 4:9 8:13
videoconferen... 1:13 2:4,13,20 4:12
virtual 13:17,20
virtually 4:21
visiting 35:12
vs 4:8

w

w 8:14
wait 8:22,22 13:16 18:16 19:9
waive 36:18,21 36:22
waived 37:4
wallet 22:14 30:23
want 6:13 9:8 12:6 14:18 26:24 31:25 33:24,25 34:13
way 26:4
went 19:11,19 30:21
whereabouts 16:15
wife 35:5
william 39:2,16
witness 4:16,18 4:19 5:12,17,24 9:9 12:20 16:25 36:8 38:4
work 18:8
write 7:4
writing 31:16
written 5:2
wrong 15:1
wrote 25:11,13

x

x 3:1,5,11

y

y 3:11 6:11
yeah 8:25 11:13 14:7,20,22 15:17 19:13 35:25 36:13
year 15:1 27:25

z

zip 5:22
zoom 4:12

FLORIDA RULES OF CIVIL PROCEDURE

Rule 1.310

(e) Witness Review. If the testimony is transcribed, the transcript shall be furnished to the witness for examination and shall be read to or by the witness unless the examination and reading are waived by the witness and by the parties. Any changes in form or substance that the witness wants to make shall be listed in writing by the officer with a statement of the reasons given by the witness for making the changes. The changes shall be attached to the transcript. It shall then be signed by the witness unless the parties waived the signing or the witness is ill, cannot be found, or refuses to sign. If the transcript is not signed by the witness within a reasonable time after it is furnished to the witness, the officer shall sign the transcript and state on the transcript the waiver, illness, absence of the witness, or refusal to sign with any reasons given therefor. The deposition may then be used as fully as though signed unless the court holds that the reasons given for the refusal to sign require rejection of

the deposition wholly or partly, on motion under rule 1.330(d)(4).

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