

Deposition Transcript

Case Number: 24CV001303

Date: September 16, 2025

In the matter of:

KIM LEE v KURIN, INC., et al.

Matt Heindel - 30(b)(6)

**CERTIFIED
COPY**

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1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 COUNTY OF SACRAMENTO
3 ---oo---
4 KIM LEE,) Case No.: 24CV001303
5 Plaintiff,)
6 v.)
7 KURIN, INC., a Corporation;)
8 KEITH NOBILE, an individual;)
9 and DOES 1-25, inclusive,)
Defendants.)

)

10
11 DEPOSITION OF MATT HEINDEL
12 REMOTE VIDEO DEPOSITION OF MATT HEINDEL, 30(b)(6)
13 located Via Web Video Conference, commencing at 2:00 PM on
14 Tuesday, September 16, 2025, before NANCY CHAVEZ,
15 Certified Shorthand Reporter, CSR No. 14580, in and for
16 the State of California.

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1 TUESDAY, SEPTEMBER 16, 2025, 2:04 PM - 2:42 PM

2 ---oo---

3 THE REPORTER: Good afternoon.

4 My name is Nancy Chavez. I'm a Certified
5 Shorthand Reporter for the State of California,
6 CSR No. 14580.

7 Counsel, please state your appearance and whom
8 you represent.

9 MR. CLARK: My name is James Clark, and I represent
10 the plaintiff, Kim Lee.

11 MR. OCEGUERA: Anthony Oceguera, and I represent
12 Defendants and the deponent, Matt Heindel.

13 MR. CLARK: Can we swear in the witness.

14 THE WITNESS: Oh, I think you're on mute, Nancy.

15 THE REPORTER: Thank you so much. Sorry about that.

16 ---oo---

17 MATTHEW HEINDEL,

18 called as a witness herein, having been administered an
19 oath remotely in accordance with C.C.P. Section 2096, was
20 examined and testified as follows:

21 THE WITNESS: I do.

22 THE REPORTER: Thank you.

23 ---oo---

24 ///

25 ///

1

EXAMINATION

2

BY MR. CLARK:

3

Q. Good evening -- or good afternoon, sir.

4

Can you state and spell your name for the record.

5

A. Yeah. It's Matt Heindel -- Matthew Heindel, H-e
-- Matthew, M-a-t-t-h-e-w, H-e-i-n-d-e-l. A lot of people
say Heindel, so don't worry.

8

Q. Mr. Heindel, have you had your deposition taken
before?

10

A. I have.

11

Q. And when was the last time you had your
deposition taken?

13

A. In approximately May of this year.

14

Q. Okay. And do you recall the nature of the
matter?

16

A. We have ongoing litigation with a competitor
regarding intellectual property.

18

Q. Okay. Any other depositions outside of that?

19

A. Well, I've been deposed three times. This is the
third time, the most recent one.

21

Q. Okay. And the other two? Do you recall the
nature of the other two?

23

A. One was similar -- intellectual property; and the
original -- I believe it was a Lanham Act, false
advertisement, all with the same competitor.

1 Q. Okay. You've just been sworn to tell the truth
2 under penalty of perjury just like under oath before a
3 judge and a jury and not telling the truth can lead to
4 possible incarceration or civil fines; so it's important
5 you tell the truth.

6 Do you understand?

7 A. Yes.

8 Q. And only one person can speak at a time, so
9 please let me finish the question before you answer.

10 And we need verbal answers such as "yes" and "no"
11 and not head nods or shoulder shrugs.

12 Do you understand?

13 A. Yes.

14 Q. After my question, your attorney may make an
15 objection. An objection is like a Post-it note. It goes
16 on the record, and later the judge will decide the legal
17 issue. It's not your job to figure out if the objections
18 are valid; therefore, after the objection, we'll still be
19 waiting for your answer unless your attorney instructs you
20 not to answer.

21 Do you understand?

22 A. Yes.

23 Q. And we're entitled to any evidence you may have
24 whether you heard it secondhand, rumor, or gossip.

25 We're not entitled to know things you only

1 learned through your attorney, but if you knew it before
2 and only repeated it to your attorney, then the
3 information is not privileged and we're entitled to know
4 it.

5 Do you understand?

6 A. Yes.

7 Q. And we're also entitled to your best estimate,
8 but we don't want you to guess.

9 I'll give you the example that I use as a
10 difference between an estimate and a guess.

11 If I asked you to estimate the length of the
12 table that you're sitting at with your personal knowledge,
13 you can observe it and estimate how many feet and inches
14 the table is. But if I asked you to estimate the table at
15 my house, you've never been there, you don't know if it's
16 round or square or even if I have a table, and that would
17 be a guess.

18 Do you understand the difference?

19 A. Yes.

20 Q. And if you don't understand a question, please
21 let me know; otherwise, I have to assume that you
22 understood it.

23 And the following questions we ask everyone and
24 you're not being singled out.

25 Were you ever convicted of a felony?

1 A. No.

2 Q. And are you under the influence of any drugs or
3 alcohol or medical condition that would interfere with
4 your ability to give truthful and accurate testimony?

5 A. No.

6 Q. Have you ever been a plaintiff or a defendant in
7 a lawsuit?

8 A. No.

9 Q. And what's your current age?

10 A. Sixty-eight.

11 MR. CLARK: And, Counsel, in lieu of asking the
12 deponent for his home address, will you stipulate to
13 receiving trial subpoenas on his behalf?

14 MR. OCEGUERA: Yes, so stipulated.

15 BY MR. CLARK:

16 Q. Mr. Heindel, did you review any documents to
17 prepare for the deposition?

18 A. When I got the notice for the deposition, I was
19 asked to search for emails, and there aren't many because
20 I've not ever met the plaintiff. So I looked at a couple
21 of things, but that's the extent of it.

22 Q. Okay. Did you find any text messages regarding
23 the plaintiff?

24 A. No.

25 Q. Did you search for text messages?

1 A. Yes.

2 Q. And have you ever text messaged Nandita Patel
3 regarding Kim Lee?

4 A. Not to my knowledge.

5 Q. Okay. Did you speak to anyone other than your
6 attorney to prepare for the deposition?

7 A. No.

8 Q. Mr. Heindel, what is your -- are you currently
9 employed?

10 A. Not -- well, I am employed. I don't have any
11 responsibilities. I've stepped down from day-to-day
12 operations quite some time ago.

13 Q. Okay. Are you on the board of directors?

14 A. No.

15 Q. And we're referring -- who was your last
16 employer?

17 A. Kurin.

18 Q. And do you currently re- -- are you currently
19 employed by Kurin, meaning do you currently receive a
20 paycheck?

21 A. Yes.

22 Q. And what's your current job title?

23 A. Executive Vice President.

24 Q. And in 2023, were you employed by Kurin?

25 A. Yes.

1 Q. And what was your job title in 2023?

2 A. Vice President Business Development.

3 Q. And what were your roles and responsibilities in
4 that position?

5 A. Marketing international and business development.

6 Q. Okay. Did you have any responsibilities over
7 training?

8 A. That's quite ambiguous.

9 I hosted training, but other people -- by 2023,
10 other people were running the training.

11 I used to run it back in 2018, '19, but that
12 changed over the years.

13 Q. In 2023, did Nandita Patel report to you?

14 A. No.

15 Q. Do you know who Ms. Patel reported to?

16 A. Actually, I'm not sure.

17 Q. Okay. In 2023, I believe, Nandita Patel -- her
18 last name was Patel. It could be different now.

19 Do you understand that?

20 A. Oh. Yeah, I do understand, but then it was
21 definitely Patel.

22 Q. Okay. And we're referring to the same person,
23 though; correct?

24 A. Correct.

25 Q. There's not multiple Nanditas that work at Kurin;

1 correct?

2 A. That is correct.

3 Q. And, Mr. Heindel, I will introduce Exhibit Number
4 1 to you. I guess, before I introduce this: Did you
5 produce any documents for the deposition today?

6 A. If that refers -- I did send Anthony a couple of
7 documents if that's what you're asking about.

8 Q. Okay. And those were in response to the
9 deposition notice?

10 A. That is correct.

11 Q. Okay.

12 MR. CLARK: And, Anthony, did you upload those?

13 MR. OCEGUERA: Yeah, they're in the chat right now.

14 MR. CLARK: Okay.

15 So let's introduce our first exhibit.

16 And I'll assert to you, Mr. Heindel, that this is
17 the deposition notice for you to be here today with us.

18 (Plaintiff's Exhibit No. 1, Notice of
19 Deposition, was marked for identification.)

20 BY MR. CLARK:

21 Q. And do you recognize this document?

22 A. I do.

23 Q. And this is the document we're referring to that
24 at the bottom asking for requests for documents; correct?

25 A. That is correct.

1 Q. And there were 13 requests for documents?

2 A. Correct.

3 MR. CLARK: Okay. We're done with that exhibit.

4 BY MR. CLARK:

5 Q. And in 2023, Mr. Heindel, did you conduct weekly
6 training meetings with new hire staff?

7 A. I did not.

8 Q. Okay. Did you participate in weekly training
9 meetings with the new hire staff?

10 A. Not usually. I was no doubt on a couple of
11 those, but at that point, I was no longer handling those
12 weekly calls.

13 Q. But you're aware that there were weekly training
14 calls that occurred in 2023?

15 A. I pause because I assume that was happening, but
16 I wasn't following those schedules very closely, but it
17 was our nature to do those calls.

18 Q. But yourself, you did not participate in weekly
19 training calls in 2023 with Kim Lee; correct?

20 A. I might have been on one or two, but I was not a
21 regular participant.

22 Q. Okay. And in 2023, did you ever instruct
23 Nandita Patel to not interact with Kim Lee for anything
24 unrelated to training?

25 A. I'm sorry. I need a clarification on that

1 question.

2 Q. Sure.

3 We know -- you know who I'm referring to with
4 Nandita Patel; correct?

5 A. Correct.

6 Q. In 2023, did you instruct Ms. Nandita Patel to
7 only interact with Kim Lee regarding training?

8 A. Nandita and I had a conversation.

9 She called me because she was troubled about a
10 conversation with Kim Lee, and I told her that her
11 responsibility was training.

12 So I could interpret your question as I was
13 directing her to focus on training, but I didn't
14 specifically tell her not to talk to Kim Lee.

15 Q. Okay. In 2023, did you instruct Nandita Patel
16 that anything other than training was not anything she
17 needed to get involved in?

18 A. Yeah. I'm sorry. That question is just too
19 ambiguous for me to give you a straight yes or no.

20 I specifically recall telling Nandita she -- she
21 was having a phone call with Kim.

22 Kim was complaining about her boss.

23 And I said, "Nandita, that's not your job. If
24 she has a complaint about Keith, she should talk to Keith
25 or Keith's boss."

1 So if that -- I don't know how that fits your
2 question.

3 Q. Okay. When did you have the discussion with
4 Nandita regarding Kim Lee's concerns?

5 A. This would've been sometime in late June.

6 Q. And what concerns did Nandita escalate to you?

7 A. She -- all -- it was vague. She said that Kim
8 did not like working for Keith.

9 And I believe she used the word "jerk." I will
10 say, with two years time, if it wasn't the word "jerk," it
11 was a word similar to that, certainly not a compliment. I
12 think it was "jerk," but that was it. It was a brief
13 conversation.

14 And I just said, "I don't know why you're in the
15 middle of that. That's not your training role."

16 Q. Did Nandita express to you that Kim Lee felt
17 harassed?

18 MR. OCEGUERA: Objection. Lacks foundation. Assumes
19 facts not in evidence.

20 THE WITNESS: I don't know in what way would she have
21 been -- no, I never heard the word "harassment."

22 But in what way do you mean harassment?

23 BY MR. CLARK:

24 Q. I'm just asking, did she use the word "harass"
25 when she expressed her concerns?

1 A. Definitely not.

2 Q. But you believe she used the word "jerk" or
3 something similar to that effect; correct?

4 A. I -- yeah. I believe what she said was Kim did
5 not like working for Keith, thought he was a jerk.

6 Q. Okay. And at the time Nandita Patel was training
7 Kim Lee; correct?

8 A. She was certainly one of the people training
9 Kim Lee. You know, Nandita at that time was still a
10 clinical outcomes director; so this was something she was
11 doing in addition to her other role. She was not
12 full-time training. So it wasn't just Nandita. There
13 were other people involved.

14 Q. And at the time that -- strike that.

15 What was your role in the decision to terminate
16 Kim Lee?

17 A. I have no involvement in any of the sales
18 decisions. I was not even aware she was terminated.

19 Q. Okay. So you -- your testimony today is you had
20 zero input into the decision to terminate Kim Lee;
21 correct?

22 A. That is correct.

23 Q. When did you learn that Kim Lee was terminated?

24 A. I don't remember anything specific. I don't
25 remember a specific date. I was sent a letter that she

1 sent shortly after her termination, but I can't tell you
2 if that was a day or a week. That was about the time we
3 were having our sales meeting and that was a
4 responsibility of mine; so I was pretty tied up with the
5 sales meeting.

6 Q. Do you recall who sent you the email that Ms. Lee
7 sent to Ms. Patel after her termination?

8 A. It's my best estimate that it would have been
9 Bob Rogers.

10 Q. Do you know of any investigation that was
11 conducted once Ms. Lee sent that email to Bob Rogers and
12 Nandita Patel?

13 A. Don't know. I don't know of any.

14 Q. And do you know why Nandita Patel reached out to
15 you to convey her concerns with Kim Lee?

16 MR. OCEGUERA: Calls for speculation.

17 But go ahead.

18 THE WITNESS: She didn't -- I don't know. She didn't
19 say.

20 BY MR. CLARK:

21 Q. And when you received that information from
22 Nandita Patel, did you escalate it to anyone?

23 A. No.

24 Q. Do you know other than yourself who Nandita Patel
25 conveyed the information regarding Kim Lee to?

1 MR. OCEGUERA: Calls for speculation. Vague and
2 ambiguous as to what information about Kim Lee.

3 Go ahead.

4 THE WITNESS: I'm not sure who else Kim -- or I'm
5 sorry. I'm not sure who else Nandita spoke to about Kim.

6 BY MR. CLARK:

7 Q. And do you know who made the decision to
8 terminate Kim Lee?

9 A. I do not.

10 MR. CLARK: Okay. We're just going to take a quick
11 break for -- until 2:30, so I can review the documents
12 that were produced, and we'll come back on the record at
13 2:30.

14 THE WITNESS: Okay.

15 (Break taken from 2:22 PM to 2:31 PM)

16 | THE REPORTER: Back on the record.

17 BY MR. CLARK:

18 Q. Mr. Heindel, is there any reason you cannot
19 continue with truthful and accurate testimony?

20 A. No.

21 MR. CLARK: This is -- Exhibit 2 is a document
22 already exchanged in this litigation. It's text messages
23 between Kim Lee and Nandita Patel.

24 (Plaintiff's Exhibit No. 2, Text Messages,
25 was marked for identification.)

1 BY MR. CLARK:

2 Q. Before I ask questions, Mr. Heindel, can you read
3 the text.

4 A. I can read what you have on the screen. You'd
5 have to scroll for me to read the entire thing.

6 Q. Okay. Let me know when you -- go ahead and read
7 it to yourself.

8 A. All right. And I'm sorry. This is from Kim?

9 Q. This is between Kim Lee on the right and
10 Nandita Patel on the left.

11 A. I'm sorry. I'm not seeing who's right and left
12 here on my screen. I just see a blue screen.

13 Q. When we get down here, there will be more.

14 A. Oh, there we go. Got it, got it, got it. Okay.

15 Q. It's okay.

16 A. You can scroll down. You can scroll down. You
17 can scroll down. You can scroll down.

18 Q. That's it.

19 A. Oh, that's it. Okay.

20 Q. So my first question is: Have you seen this
21 document before?

22 A. No.

23 Q. And does this refresh your memory when
24 Nandita Patel reached out to you?

25 MR. OCEGUERA: Objection. Assumes facts not in

1 evidence. Lacks foundation.

2 THE WITNESS: So this is dated July 5th. I know I
3 talked to her in June, late June.

4 So, yeah. This is -- there's a lot in here that
5 is a surprise to me, I was unaware of.

6 BY MR. CLARK:

7 Q. Okay. But if Ms. Patel testified in her
8 deposition that "I did reach out to Matt and other
9 leadership to let them know," -- do you see that? That
10 portion there?

11 A. I do see that.

12 Q. Is she being truthful about reaching out to Matt,
13 meaning yourself?

14 MR. OCEGUERA: Objection. Vague and ambiguous as to
15 time. Lacks foundation. Assumes facts not in evidence.
16 Incomplete hypothetical.

17 THE WITNESS: As I mentioned, she called me in late
18 June, so that is -- if she is referring to that, that is
19 correct. I have no knowledge of her reaching out to other
20 leadership; that is news.

21 BY MR. CLARK:

22 Q. Okay. And yeah, if somebody says, I did reach
23 out to someone, and they sent that on July 5th, that means
24 it happened sometime before that; correct?

25 A. Yes, that's correct.

1 Q. And does the message from Kim Lee that we read at
2 the start of this exhibit refresh your memory about what
3 Nandita Patel conveyed to you?

4 MR. OCEGUERA: Objection. Lacks foundation. Assumes
5 facts not in evidence. Asked and answered.

6 THE WITNESS: No, because none of this was relayed to
7 me from Nandita. I -- this is all -- all these sentences,
8 all these comments, everything I am reading there, is news
9 to me.

10 BY MR. CLARK:

11 Q. Okay. And midway through this document, on
12 July 3rd, 2023, it says: When I first started with Kurin,
13 I asked Keith who can I reach out to about benefits in HR,
14 and he said we don't have an HR department or person.

15 Do you see that statement?

16 A. I do see that statement.

17 Q. Was that correct in January of 2023?

18 A. In July of 2023?

19 Q. Well, she started in January --

20 A. Oh, okay. Okay. I'm sorry.

21 So that is correct, but there is an employee
22 handbook that I know I had to sign for that tells you what
23 to do for HR things, and that's -- and you would contact
24 Chuck Covington, our CFO. So yeah. That's correct. We
25 didn't have an HR department, but we did have a

1 connection.

2 Q. Okay. So the employee handbook in 2023
3 instructed employees to contact Chuck Covington for sexual
4 harassment?

5 MR. OCEGUERA: Objection. Misstates testimony.

6 THE WITNESS: I do not -- I've not read that entire
7 document since I've signed it. My recollection is it
8 tells you to take it to the CEO, the CFO, or an Executive
9 VP.

10 BY MR. CLARK:

11 Q. Okay.

12 A. There is a specific section on harassment for
13 that.

14 Q. Okay. And did you --

15 A. I'm sorry. I'm sorry to interrupt.

16 I just realized I'm calling it "employee
17 handbook." I'm old school. I actually don't think that's
18 what it's called. I believe it's got the word "people" in
19 the title, maybe "People Guideline" or something like
20 that.

21 Q. Okay.

22 A. Just to be clear.

23 Q. And does that document outline the company's
24 policies and procedures?

25 A. It does.

1 Q. And you can see in this text message from
2 Ms. Patel at the bottom she says: They said they would
3 look into it and do what they think is best.

4 Do you see that?

5 A. I see that.

6 Q. Did you -- is that the response you gave to
7 Ms. Patel when she reached out to you?

8 A. She did not ask me to look into anything, so this
9 is again -- I don't know if she talked to other
10 leadership.

11 Q. But from your memory, did you ever inform
12 Ms. Lee -- I'm sorry -- Ms. Patel that you would look into
13 it and do what's best?

14 A. No. And I was never asked to.

15 MR. CLARK: The next exhibit we have is Exhibit 3

18 BY MR. CLARK:

Q. These are the documents that were produced today.

20 I'm just going to -- I assume you're familiar
21 with them, Mr. Heindel? There are 12 pages.

22 A. I mean, if they are what I sent to Anthony, then
23 yes, but you zoomed through it a little quickly.

24 Q. My only question is: On page 9 of the 12 of the
25 documents you produced for today is an email from

1 Nandita Patel to yourself and someone named Ben Phillips.

2 Do you see that?

3 A. I do.

4 Q. And the Subject says: Feedback from Competency
5 Assessment and Next Steps.

6 Did you ask Ms. Patel to email you regarding
7 Kim Lee and her competency assessment?

8 A. I did not.

9 Q. Do you know why you received this email?

10 A. I have no idea.

11 Q. And once you received it, did you -- how did you
12 react, or who did you forward it to?

13 A. I didn't forward it to anybody.

14 I believe -- and it might be in that thread -- I
15 believe I responded back to her.

16 If you could scan, it might refresh my memory.

17 Q. Sure. You want me to go up or down?

18 A. Let's start with up.

19 Q. It looks like the original part of the email was
20 deleted.

21 A. Oh.

22 MR. OCEGUERA: Yeah. I think that's an
23 administrative issue on my end. I think that was him
24 forwarding the email to us --

25 THE WITNESS: Oh, okay.

1 MR. OCEGUERA: -- and with the comments.

2 I think we redacted that, but, of course, my
3 assistant didn't redact it the way I would have redacted
4 it. That's why there's a gap there.

5 THE WITNESS: Then perhaps scan down.

6 MR. CLARK: Sure.

7 BY MR. CLARK:

8 Q. And that's it.

9 A. Oh.

10 Q. So the last three pages appear to be
11 Nandita Patel forwarding you an email that was originally
12 an email that she had sent to Kim Lee.

13 A. Yeah. I remember being confused when -- if you
14 look at the second paragraph: (As read:) I asked not to
15 forward the original email to Kim primarily withhold
16 managerial observations.

17 Actually, that doesn't make sense to me.

18 I don't know what she is talking about, but it
19 just wasn't that relevant to me; so I didn't even address
20 it.

21 Q. Okay. And so -- so there was no follow-up to
22 this email from Nandita to yourself and Ben Phillips;
23 correct?

24 A. Certainly not between Nandita and me. I do not
25 know if Ben Phillips was involved other than being copied

1 on this, and if so, did he follow up.

2 That's beyond my knowledge.

3 Q. Okay. And do you know who Ben Phillips is?

4 A. I do.

5 Q. And is he still employed with Kurin?

6 A. He is not.

7 Q. What was his role in June of 2023?

8 A. I believe his -- he worked in marketing for me,
9 and I believe his title was Marketing Manager.

10 Q. Do you know who Nandita Patel reported to in June
11 of 2023?

12 A. No. You asked that and I'm struggling to
13 remember. I -- she's worked for different people; so I'm
14 just not sure. She was clinical outcomes director at the
15 time, so it was probably the director of clinical
16 outcomes, but I don't remember if that was Molly or Abbey.

17 Q. Okay.

18 THE REPORTER: Director of what, sir?

19 THE WITNESS: I'm sorry?

20 THE REPORTER: Director of what?

21 THE WITNESS: Director of clinical outcomes.

22 THE REPORTER: Oh, thank you.

23 MR. CLARK: Okay. Mr. Heindel, I have no further
24 questions. So unless my colleague has questions for you,
25 we will be done.

1 MR. OCEGUERA: No questions for me.

2 THE WITNESS: Thank you for your time, everybody.

3 THE REPORTER: And Mr. --

4 MR. OCEGUERA: Don't log off quite yet; Ms. Chavez
5 might have some spelling questions.

6 THE REPORTER: Well, Mr. Oceguera, do you want a --
7 do you need a copy of -- an electronic copy of this
8 transcript?

9 "No, thank you"?

10 MR. OCEGUERA: Electronic is fine, yes, thank you.

11 THE REPORTER: Oh, thank you.

12 (Proceedings were concluded at 2:42 PM)

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-oOo-

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PENALTY OF PERJURY

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I, MATT HEINDEL, do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.

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Executed this _____ day of _____,

20_____, at _____, _____.

(City)

(State)

Signature of the Deponent

1 CERTIFICATE OF REPORTER

2 -oOo-

3 I, the undersigned, a Certified Shorthand
4 Reporter, licensed by the State of California, being
5 empowered to administer oaths and affirmations remotely
6 pursuant to Section 2093(b) of the Code of Civil
Procedure, do hereby certify:

7 That the foregoing proceedings were taken
8 remotely before me at the time and place herein set forth;
9 that any witness in the foregoing proceedings, prior to
10 testifying, were placed under oath; that a verbatim record
11 of the proceedings was made by me using shorthand which
12 was thereafter transcribed under my direction; further,
13 that the foregoing is an accurate transcription thereof.

14 Further, that if the foregoing pertains to the
15 original transcript of a deposition in a Federal Case,
16 before completion of the proceedings, review of the
17 transcript [] was [] was not requested.

18 I further certify that I am neither financially
19 interested in the action nor a relative or employee of any
20 attorney or any of the parties.

21 IN WITNESS WHEREOF, I have this date subscribed
22 my name.

23 DATED: September 22, 2025.



25 _____
Nancy Chavez, CSR No. 14580

1

CHANGES AND SIGNATURE

2

WITNESS NAME: MATT HEINDEL

3

DATE:

4

PAGE/LINE

CHANGE

REASON

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Executed this _____ day of _____, _____.

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MATT HEINDEL (Witness Name)

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