Court File No. T-1059-22

FEDERAL COURT

BETWEEN:

SEYLYNN (NORTH SHORE) DEVELOPMENT LIMITED PARTNERSHIP

Plaintiff

- and -

DENNA HOMES GROUP and ABO TAHERI

Defendants

AND BETWEEN:

ABO TAHERI

Plaintiff by Counterclaim

- and -

SEYLYNN (NORTH SHORE) DEVELOPMENT LIMITED
PARTNERSHIP, SEYLYNN (NORTH SHORE) PROPERTIES
PHASE II LIMITED PARTNERSHIP, DENNA HOMES GROUP,
DENNA HOMES CORP., DENNA MARKETING CORP., DENNA
DEVELOPMENT CORP., DENNA PROPERTIES CORP., and
ABBASALI SHAPOUR HOSSEINI
Defendants to the Counterclaim

CROSS-EXAMINATION OF ABBASALI HOSSEINI Held via Arbitrtion Place Virtual on Friday, May 19, 2023, at 1:00 p.m.

CONDENSED TRANSCRIPT WITH INDEX

Arbitration Place © 2023 900-333 Bay Street Toronto, Ontario M5H 2R2

APPEARANCES:

Mark Davis Alexander De Pompa

on behalf of the Defendant Jessica Zagar and Plaintiff by Counterclaim, Abo Taheri

Julien Dawson

on behalf of Abbasali Hosseini

Scott Foster Mike Myschyshyn Nick Pike Katherine Williams on behalf of the Plaintiff and Defendant to the Counterclaim, Seylynn (North Shore) Development Limited Partnership, and the Defendants to the Counterclaim Seylynn (North Shore) Development Limited Partnership, Seylynn (North Shore) Properties Phase II Partnership, Denna Development Corp., and Denna Properties Corp.

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LIST OF UNDERTAKINGS, REFUSALS, AND UNDER ADVISEMENTS

Undertakings (U/T) found at pages: 92

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79

Page 4 LIST OF EXHIBITS NO. DESCRIPTION PAGE 22 Α For identification: Email chain dated December 25, 2012 Email from Shapour Hosseini to Abo 1 47 Taheri dated December 18, 2012 For identification: Email from В 53 Hirad Hosseini dated May 30, 2017

For identification: Email from

Steve Sugrim dated May 31, 2017

Taheri dated October 15, 2020

Email from Dr. Hosseini to Dr. Abo

Arbitration Place

	Page 5		Page 6
1	Arbitation Place Virtual	1	
1 2		1 2	A. No. Q. I will ask a question, we
3	Upon commencing on Friday, May 19, 2023,	3	
4	at 1:00 p.m.	4	will pause so that we don't speak over one another, and then you will answer my question.
5	MR. DAWSON: Mr. Davis, just before we begin, I noticed that there is a	5	Okay?
6	typographical error in Dr. Hosseini's affidavit,	6	A. Sure.
7	paragraph 19, where it says, "I became a director	7	4 Q. I will assume that you
8	of the company on December 8, 2021," that should	8	have understood my question and that your answer
9	be 2011.	9	is responsive to my question. Is that fair?
10	MR. DAVIS: Sorry, Julien.	10	A. That is fair.
11	Can you give that to me again?	11	5 Q. This examination is being
12	MR. DAWSON: It is	12	conducted over Zoom. You understand you should
13	paragraph 19 of Dr. Hosseini's affidavit. It	13	keep your camera and microphone on?
14	says, "I became a director of the company on	14	A. It is on.
15	December 8, 2021." That should be 2011.	15	6 Q. And you are alone in the
16	MR. DAVIS: Thank you.	16	room?
17	AFFIRMED: Abbasali Hosseini	17	A. I am alone.
18	CROSS-EXAMINATION BY MR. DAVIS:	18	7 Q. You understand that
19	1 Q. Good morning, Dr.	19	during the cross-examination, you can't talk, text
20	Hosseini.	20	or email with anyone about your evidence?
21	A. Good morning, Mark.	21	A. Let me silence my phones.
22	2 Q. I am counsel for Dr. Abo	22	Okay.
23	Taheri. I am going to ask you a series of	23	8 Q. That is great. Do you
24	questions this morning. You have been	24	have any documents there with you?
25	cross-examined before?	25	A. Documents? The petition
	Page 7		Page 8
1	I have in front of me.	1	reviewed your affidavit before you swore it?
2	9 Q. You mean your affidavit?	2	A. I did.
3	A. Affidavit. Sorry, yes.	3	16 Q. You are satisfied that it
4	10 Q. That is your affidavit	4	was accurate and complete subject to the one
5	sworn April 28, 2023?	5	correction that Mr. Dawson identified this
6	A. Let me check. I	6	morning?
7	think so.	7	A. I think so, yes.
8	11 Q. If you look at page 9	8	17 Q. Have you reviewed it
9	A. Page 9. That is right.	9	before giving evidence today?
10	28 April 2023.	10	A. No, not really, but I
11	Q. Are you looking at a	11	have it in front of me and we can go paragraph by
12	paper copy of your affidavit or are you looking at	12	paragraph and check it.
13	an electronic copy?	13	Q. We will go through
14	A. No, it is iPad.	14	certain aspects of it. Did you meet with counsel
	4.0 0 7771 1 2 2 2		to discuss the cross-examination process?
15	Q. What is the video camera	15	
15 16	that you are using?	16	A. You mean my counsel,
15 16 17	that you are using? A. Video camera? What do	16 17	A. You mean my counsel, Julien?
15 16 17 18	that you are using? A. Video camera? What do you mean?	16 17 18	A. You mean my counsel, Julien? 19 Q. Yes.
15 16 17 18 19	that you are using? A. Video camera? What do you mean? 14 Q. The image that you are	16 17 18 19	A. You mean my counsel, Julien? Q. Yes. A. Yes.
15 16 17 18 19 20	that you are using? A. Video camera? What do you mean? 14 Q. The image that you are broadcasting is coming from what device? It is	16 17 18 19 20	A. You mean my counsel, Julien? 19 Q. Yes. A. Yes. 20 Q. Did you discuss the
15 16 17 18 19 20 21	that you are using? A. Video camera? What do you mean? 14 Q. The image that you are broadcasting is coming from what device? It is not the same as your iPad. Right?	16 17 18 19 20 21	A. You mean my counsel, Julien? 19 Q. Yes. A. Yes. 20 Q. Did you discuss the questions that I might ask?
15 16 17 18 19 20 21 22	that you are using? A. Video camera? What do you mean? 14 Q. The image that you are broadcasting is coming from what device? It is not the same as your iPad. Right? A. There are two iPads in	16 17 18 19 20 21 22	A. You mean my counsel, Julien? 19 Q. Yes. A. Yes. 20 Q. Did you discuss the questions that I might ask? MR. DAWSON: Objection.
15 16 17 18 19 20 21 22 23	that you are using? A. Video camera? What do you mean? 14 Q. The image that you are broadcasting is coming from what device? It is not the same as your iPad. Right? A. There are two iPads in front of me. One is the video and one is the	16 17 18 19 20 21 22 23	A. You mean my counsel, Julien? 19 Q. Yes. A. Yes. 20 Q. Did you discuss the questions that I might ask? MR. DAWSON: Objection. THE WITNESS: No, please
15 16 17 18 19 20 21 22	that you are using? A. Video camera? What do you mean? 14 Q. The image that you are broadcasting is coming from what device? It is not the same as your iPad. Right? A. There are two iPads in	16 17 18 19 20 21 22	A. You mean my counsel, Julien? 19 Q. Yes. A. Yes. 20 Q. Did you discuss the questions that I might ask? MR. DAWSON: Objection.

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(613) 564-2727 (416) 861-8720

	Page 9		Page 10
1	MR. DAVIS:	1	Q. You know that this
2	Q. Dr. Hosseini, Mr. Dawson	2	dispute relates to ownership and use of trademarks
3	has the right to object to questions. That is why	3	that include the word Denna?
4	we have to not talk over one another.	4	A. That is right.
5	A. Okay.	5	Q. Have you reviewed the
6	Q. Have you seen the	6	amended statement of claim in this proceeding?
7	affidavit of Rouzbeh Ghahroud sworn April 28,	7	A. Not in details, no. I
8	2023?	8	can say no.
9	A. No, I didn't.	9	Q. Do you know that Seylynn
10	Q. Have you spoken with Mr.	10	(North Shore) Development Limited Partnership is
11	Mr. Ghahroud about this matter?	11	claiming to own the Denna trademarks and trade
12	A. No.	12	names?
13	Q. Have you discussed the	13	A. Sure, of course.
14	cross-examination of Mr. Ghahroud with anyone	14	Q. Can we call Seylynn
15	before giving evidence today?	15	(North Shore) Development Limited Partnership
16	A. No.	16	Seylynn LP for the purposes of today?
17	Q. You understand that this	17	A. Yes, that is okay. That
18	proceeding relates to ownership of certain	18	is a short form.
19	trademarks?	19	Q. You have attached as
20	A. That is right. This is	20	Exhibit A to your affidavit a copy of the
21	what Mr. Taheri is arguing.	21	statement of defence and counterclaim. Do you see
22	Q. I know there are other	22	that?
23	proceedings, but this one in particular is the	23	A. Exhibit A. Right?
24	trademark dispute. You understand that?	24	32 Q. Correct. You are
25	A. That's it.	25	familiar with that document?
	Page 11		Page 12
1	_	1	•
1 2	A. No, I have not found it	1 2	see it on the screen?
	A. No, I have not found it yet. Do you want me to have it in front of me?	1	•
2	A. No, I have not found it yet. Do you want me to have it in front of me?	2	see it on the screen? A. Could you bring it a
2 3	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini?	2 3	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check.
2 3 4	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can	2 3 4	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your
2 3 4 5	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini?	2 3 4 5	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check.
2 3 4 5 6	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence	2 3 4 5 6	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this?
2 3 4 5 6 7 8 9	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your	2 3 4 5 6 7	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because
2 3 4 5 6 7 8 9	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence	2 3 4 5 6 7 8 9	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions?
2 3 4 5 6 7 8 9 10	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence and counterclaim. A. Do you have the page number?	2 3 4 5 6 7 8 9 10	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions? 39 Q. Let me understand the
2 3 4 5 6 7 8 9 10 11	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence and counterclaim. A. Do you have the page number? 35 Q. It has page 1 on the	2 3 4 5 6 7 8 9 10 11	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions? 39 Q. Let me understand the problem that you are having because we have been
2 3 4 5 6 7 8 9 10 11 12	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence and counterclaim. A. Do you have the page number? 35 Q. It has page 1 on the version that I have. Why don't we put it up on	2 3 4 5 6 7 8 9 10 11 12 13	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions? 39 Q. Let me understand the problem that you are having because we have been spending several minutes trying to get an exhibit
2 3 4 5 6 7 8 9 10 11	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence and counterclaim. A. Do you have the page number? 35 Q. It has page 1 on the	2 3 4 5 6 7 8 9 10 11 12 13 14	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions? 39 Q. Let me understand the problem that you are having because we have been
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence and counterclaim. A. Do you have the page number? 35 Q. It has page 1 on the version that I have. Why don't we put it up on the screen. Dr. Hosseini, can you look at the screen?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions? 39 Q. Let me understand the problem that you are having because we have been spending several minutes trying to get an exhibit to your affidavit up in front of you. Do you see on the screen Exhibit A to your affidavit, the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence and counterclaim. A. Do you have the page number? 35 Q. It has page 1 on the version that I have. Why don't we put it up on the screen. Dr. Hosseini, can you look at the screen? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions? 39 Q. Let me understand the problem that you are having because we have been spending several minutes trying to get an exhibit to your affidavit up in front of you. Do you see on the screen Exhibit A to your affidavit, the statement of defence and counterclaim?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence and counterclaim. A. Do you have the page number? 35 Q. It has page 1 on the version that I have. Why don't we put it up on the screen. Dr. Hosseini, can you look at the screen?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions? 39 Q. Let me understand the problem that you are having because we have been spending several minutes trying to get an exhibit to your affidavit up in front of you. Do you see on the screen Exhibit A to your affidavit, the statement of defence and counterclaim? A. Yes, I do.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence and counterclaim. A. Do you have the page number? 35 Q. It has page 1 on the version that I have. Why don't we put it up on the screen. Dr. Hosseini, can you look at the screen? A. Yes. 36 Q. Can you see here Exhibit A to your affidavit?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions? 39 Q. Let me understand the problem that you are having because we have been spending several minutes trying to get an exhibit to your affidavit up in front of you. Do you see on the screen Exhibit A to your affidavit, the statement of defence and counterclaim? A. Yes, I do. 40 Q. You are familiar with
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence and counterclaim. A. Do you have the page number? 35 Q. It has page 1 on the version that I have. Why don't we put it up on the screen. Dr. Hosseini, can you look at the screen? A. Yes. 36 Q. Can you see here Exhibit A to your affidavit? A. Yes, that is Abo Taheri	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions? 39 Q. Let me understand the problem that you are having because we have been spending several minutes trying to get an exhibit to your affidavit up in front of you. Do you see on the screen Exhibit A to your affidavit, the statement of defence and counterclaim? A. Yes, I do. 40 Q. You are familiar with this document?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence and counterclaim. A. Do you have the page number? 35 Q. It has page 1 on the version that I have. Why don't we put it up on the screen. Dr. Hosseini, can you look at the screen? A. Yes. 36 Q. Can you see here Exhibit A to your affidavit? A. Yes, that is Abo Taheri and Seylynn (North Shore) Development Limited	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions? 39 Q. Let me understand the problem that you are having because we have been spending several minutes trying to get an exhibit to your affidavit up in front of you. Do you see on the screen Exhibit A to your affidavit, the statement of defence and counterclaim? A. Yes, I do. 40 Q. You are familiar with this document? A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence and counterclaim. A. Do you have the page number? 35 Q. It has page 1 on the version that I have. Why don't we put it up on the screen. Dr. Hosseini, can you look at the screen? A. Yes. 36 Q. Can you see here Exhibit A to your affidavit? A. Yes, that is Abo Taheri and Seylynn (North Shore) Development Limited Partnership. Is that the one?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions? 39 Q. Let me understand the problem that you are having because we have been spending several minutes trying to get an exhibit to your affidavit up in front of you. Do you see on the screen Exhibit A to your affidavit, the statement of defence and counterclaim? A. Yes, I do. 40 Q. You are familiar with this document? A. Yes. 41 Q. You reviewed it
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence and counterclaim. A. Do you have the page number? 35 Q. It has page 1 on the version that I have. Why don't we put it up on the screen. Dr. Hosseini, can you look at the screen? A. Yes. 36 Q. Can you see here Exhibit A to your affidavit? A. Yes, that is Abo Taheri and Seylynn (North Shore) Development Limited Partnership. Is that the one? 37 Q. It is the document on the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	see it on the screen? A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions? 39 Q. Let me understand the problem that you are having because we have been spending several minutes trying to get an exhibit to your affidavit up in front of you. Do you see on the screen Exhibit A to your affidavit, the statement of defence and counterclaim? A. Yes, I do. 40 Q. You are familiar with this document? A. Yes. 41 Q. You reviewed it carefully?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence and counterclaim. A. Do you have the page number? 35 Q. It has page 1 on the version that I have. Why don't we put it up on the screen. Dr. Hosseini, can you look at the screen? A. Yes. 36 Q. Can you see here Exhibit A to your affidavit? A. Yes, that is Abo Taheri and Seylynn (North Shore) Development Limited Partnership. Is that the one? 37 Q. It is the document on the screen that says statement of defence and	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions? 39 Q. Let me understand the problem that you are having because we have been spending several minutes trying to get an exhibit to your affidavit up in front of you. Do you see on the screen Exhibit A to your affidavit, the statement of defence and counterclaim? A. Yes, I do. 40 Q. You are familiar with this document? A. Yes. 41 Q. You reviewed it carefully? A. No, in fact. I didn't
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence and counterclaim. A. Do you have the page number? 35 Q. It has page 1 on the version that I have. Why don't we put it up on the screen. Dr. Hosseini, can you look at the screen? A. Yes. 36 Q. Can you see here Exhibit A to your affidavit? A. Yes, that is Abo Taheri and Seylynn (North Shore) Development Limited Partnership. Is that the one? 37 Q. It is the document on the screen that says statement of defence and counterclaim, and it has the exhibit stamp as	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions? 39 Q. Let me understand the problem that you are having because we have been spending several minutes trying to get an exhibit to your affidavit up in front of you. Do you see on the screen Exhibit A to your affidavit, the statement of defence and counterclaim? A. Yes, I do. 40 Q. You are familiar with this document? A. Yes. 41 Q. You reviewed it carefully? A. No, in fact. I didn't review it right now because
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. No, I have not found it yet. Do you want me to have it in front of me? 33 Q. Yes, I do. Can you find it, Dr. Hosseini? A. Not yet. Mr. Davis, can you tell me what is that about? 34 Q. It is Exhibit A to your affidavit. It is called the statement of defence and counterclaim. A. Do you have the page number? 35 Q. It has page 1 on the version that I have. Why don't we put it up on the screen. Dr. Hosseini, can you look at the screen? A. Yes. 36 Q. Can you see here Exhibit A to your affidavit? A. Yes, that is Abo Taheri and Seylynn (North Shore) Development Limited Partnership. Is that the one? 37 Q. It is the document on the screen that says statement of defence and	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Could you bring it a little bit down? Statement of defence and counterclaim? Let me check. 38 Q. You are looking on your second iPad for your own version of this? A. That's it, yes, because in fact it is a smaller image. I can't read it exactly. Could you read it and go ahead with your questions? 39 Q. Let me understand the problem that you are having because we have been spending several minutes trying to get an exhibit to your affidavit up in front of you. Do you see on the screen Exhibit A to your affidavit, the statement of defence and counterclaim? A. Yes, I do. 40 Q. You are familiar with this document? A. Yes. 41 Q. You reviewed it carefully? A. No, in fact. I didn't

	Page 13		Page 14
1	affidavit, you reviewed it	1	Correct?
2	A. Yes, I did.	2	A. No, that is not correct.
3	Q. You are familiar that	3	In fact, whatever we had in Seylynn development
4	these are the allegations that Dr. Taheri is	4	belongs to the partnership
5	making. Correct?	5	48 Q. [Inaudible].
6	A. That is right.	6	A me and Dr. Taheri.
7	Q. Okay. I would like to go	7	May I go ahead?
8	to paragraph 50A of Exhibit A. You understand,	8	49 Q. You absolutely may.
9	Dr. Hosseini, that Dr. Taheri claims to own the	9	Sorry. I thought you were finished.
10	Denna trademarks and trade names?	10	A. Me and Dr. Taheri were
11	A. Yes, I know this is his,	11	managers of this project, and whatever we did, we
12	in fact, argument.	12	were acting on behalf of the partnership. We
13	Q. You know that Dr.	13	didn't own anything.
14	Taheri's position is that as long as he had	14	Q. I understand that that is
15	control over a particular project, it was okay to	15	your position. Do you understand that Dr.
16	use the Denna trademarks and trade names in	16	Taheri's position is that he owned the Denna
17	association with that project. Right?	17	trademarks and trade names?
18	A. No.	18	A. No, I don't understand
19	Q. Go to paragraph 41.	19	because this is somehow odd. Dr. Taheri, how come
20	A. Paragraph 41 is in front	20	he could own this? Because we didn't own none
21	of me, yes.	21	of our managers, me or Dr. Taheri, we didn't own
22	Q. You understand that Dr.	22	anything. Whatever we did and whatever we acted
23	Taheri is alleging that the Denna trademarks and	23	was acting on behalf of the partnership.
24	trade names were used to identify Taheri's	24	Q. Okay.
25	services on real estate development projects.	25	A. We were paid to act on
	Page 15		Page 16
1	behalf of the partnership.	1	the defendants to continue to use the Denna
2	Q. Again, I understand, Dr.	2	trademarks and trade names without his permission?
3	Hosseini, that that is your position. Do you	3	A. In fact, Denna was
4	understand paragraph 41 to be setting out Dr.	4	incorporated in my name and Dr. Taheri, so
5	Taheri's position that he owned the Denna	5	whatever we did in using this should be, in fact,
6	trademarks?	6	with approval of both parties. I mean both
7	A. I read this, yes. I know	7	managers.
8	that he is arguing this, but I don't understand	8	Q. Okay. You say Denna was
9	the basis of that.	9	incorporated. Which Denna entity are you talking
10	Q. All I am asking is what	10	about?
11	you understand of Dr. Taheri's position.	11	A. Denna Homes. Denna Homes
12	A. Yes. I do.	12	was incorporated, and the managers of that
13	Q. All right. You	13	incorporation were Dr. Taheri and myself,
14	understand that Dr. Taheri's position is that if	14	Hosseini.
15	he was ousted from a particular project, his	15	Q. Understood. Denna Homes
16	permission to use the Denna trademarks and trade	16	Corporation was incorporated. It was controlled
17	names was revoked. Correct?	17	by you and Dr. Taheri, and it was to own the Denna
18	A. No. In fact, Dr. Taheri	18	trademark. Is that your understanding?
19	was not ousted. At the time the partnership	19	A. That is it.
20	terminated its old GP, including me and Dr.	20	59 Q. Okay. You understand
21	Taheri, that was not just Dr. Taheri to be ousted.	21	that Dr. Taheri is claiming that you have
22 23	Q. We will come to that.	22	personally directed the infringing activities of
23	A. Okay.	23 24	the defendants to counterclaim. Correct?
24 25	56 Q. Do you understand Dr.	25	A. No, not at all. 60 O. You don't understand that
23	Taheri claims that you have directed and caused	23	Q. You don't understand that

	Page 17		Page 18
1	to be Dr. Taheri's position?	1	that his allegation is that you are using Denna
2	A. I know that is his	2	without his permission?
3	position, but I can't understand what is the basis	3	A. Yes, this is what he is
4	of that argument.	4	arguing, but I have not used Denna.
5	Q. You understand that Dr.	5	Q. We will come to that.
6	Taheri claims that you have caused the defendants	6	A. Okay.
7	individually and collectively to use the Denna	7	Q. You have known Dr. Taheri
8	trademarks and trade names?	8	for about 12 years. Is that right?
9	A. No.	9	A. Maybe that is right,
10	Q. You don't understand that	10	because we started our cooperation and doing
11 12	to be Dr. Taheri's position?	11 12	management of the Seylynn 1 since 2011. That's
13	A. No, Dr. Taheri's position I don't know, but I didn't do anything against him	13	right. 68 O. Okay. When you say
14	or against the benefits of the partnership.	14	68 Q. Okay. When you say Seylynn 1, you mean Seylynn (North Shore)
15	63 Q. You have the statement of	15	Developments Limited Partnership. Correct?
16	defence and counterclaim Exhibit A to your	16	A. Seylynn (North Shore)
17	affidavit in front of you, and you have carefully	17	Development, Seylynn Village. We have two
18	reviewed this document. Correct?	18	projects in Seylynn. One is Seylynn 1 and the
19	A. Yes, I remember I	19	other one is Seylynn 2.
20	reviewed it.	20	69 Q. The limited partnership
21	Q. You understand that this	21	that is Seylynn 1 is called Seylynn (North Shore)
22	sets out Dr. Taheri's allegations?	22	Development Limited Partnership?
23	A. Yes, this is his	23	A. That's it.
24	allegation.	24	Q. Okay. And it is
25	65 Q. Okay. You understand	25	sometimes referred to as Seylynn Village?
	Page 19		Page 20
1	-	1	•
1 2	A. That is right.	1 2	trade names in association with a luxury high-rise
2	A. That is right. Q. There is also a Sentinel	2	trade names in association with a luxury high-rise tower in Iran?
	A. That is right. 71 Q. There is also a Sentinel development. Is that right?		trade names in association with a luxury high-rise tower in Iran? A. No, not at all.
2 3	A. That is right. 71 Q. There is also a Sentinel development. Is that right? A. Sentinel is a separate	2 3	trade names in association with a luxury high-rise tower in Iran? A. No, not at all.
2 3 4	A. That is right. 71 Q. There is also a Sentinel development. Is that right?	2 3 4	trade names in association with a luxury high-rise tower in Iran? A. No, not at all. 77 Q. You have no awareness of
2 3 4 5	A. That is right. 71 Q. There is also a Sentinel development. Is that right? A. Sentinel is a separate project that is not a part of Seylynn 1.	2 3 4 5 6 7	trade names in association with a luxury high-rise tower in Iran? A. No, not at all. 77 Q. You have no awareness of that?
2 3 4 5 6	A. That is right. 71 Q. There is also a Sentinel development. Is that right? A. Sentinel is a separate project that is not a part of Seylynn 1. 72 Q. I understand. You and Dr. Taheri are also partners in Sentinel. Is that right?	2 3 4 5 6	trade names in association with a luxury high-rise tower in Iran? A. No, not at all. 77 Q. You have no awareness of that? A. No. 78 Q. You are aware that Dr. Taheri was the one who suggested that Seylynn LP
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. That is right. 71 Q. There is also a Sentinel development. Is that right? A. Sentinel is a separate project that is not a part of Seylynn 1. 72 Q. I understand. You and Dr. Taheri are also partners in Sentinel. Is that right? A. That is right. 73 Q. You worked on those projects as business partners? A. You mean me and Dr. Taheri? 74 Q. Yes. A. We both as managers of the project, managers of the project, managers of the project. That is right. Limited partnership appointed Dr. Taheri and myself as managers. 75 Q. Right, and you and Dr. Taheri controlled the business and directed the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	trade names in association with a luxury high-rise tower in Iran? A. No, not at all. 77 Q. You have no awareness of that? A. No. 78 Q. You are aware that Dr. Taheri was the one who suggested that Seylynn LP use the Denna trademark? A. No, he is not the one, the only one who did it. 79 Q. I would like to show you a document. Under the protocol we have established, Mr. De Pompa is going to email that to counsel, and we are going to put it up on the screen. A. That is an email from Mr. Bob Marzbani. Right? 80 Q. Yes, that is correct, and it is dated December 25, 2012. Do you see that?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. That is right. 71 Q. There is also a Sentinel development. Is that right? A. Sentinel is a separate project that is not a part of Seylynn 1. 72 Q. I understand. You and Dr. Taheri are also partners in Sentinel. Is that right? A. That is right. 73 Q. You worked on those projects as business partners? A. You mean me and Dr. Taheri? 74 Q. Yes. A. We both as managers of the project, managers of the project, managers of the project. That is right. Limited partnership appointed Dr. Taheri and myself as managers. 75 Q. Right, and you and Dr. Taheri controlled the business and directed the business of Seylynn LP. Correct?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	trade names in association with a luxury high-rise tower in Iran? A. No, not at all. 77 Q. You have no awareness of that? A. No. 78 Q. You are aware that Dr. Taheri was the one who suggested that Seylynn LP use the Denna trademark? A. No, he is not the one, the only one who did it. 79 Q. I would like to show you a document. Under the protocol we have established, Mr. De Pompa is going to email that to counsel, and we are going to put it up on the screen. A. That is an email from Mr. Bob Marzbani. Right? 80 Q. Yes, that is correct, and it is dated December 25, 2012. Do you see that? A. I do.
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	Page 21		Page 22
1	A. To Bob.	1	Rabiee didn't like the Denna group name?
2	Q to Bob Marzbani and to	2	A. No, I don't.
3	you. Do you see that?	3	Q. It is your evidence that
4	A. Yes.	4	you and Dr. Taheri decided to go ahead with the
5	Q. The subject of the email	5	Denna group name. Is that right?
6	is Denna group. Do you see that?	6	A. Yes, I think we did, but
7	A. I can see that. I can't	7	Mr. Rabiee didn't oppose. Maybe he didn't like
8	read that. It is very	8	the name. I don't know. I don't remember. But
9	Q. We will make it larger.	9	whatever we did was on the same page with
10	A. Okay, good, good. Dear	10	partnership. It was what we did when they were
11	Bob, hope you are doing well. I was invited to	11	they were not comfortable with this name.
12	Mr. Hashemi's home couple nights ago. Okay.	12	Q. Okay. You don't remember
13	Planning to go to Dubai for one day to meet him	13	this specific email?
14	and Mr. Rabiee at the same time. Again, please,	14	A. No.
15	from the beginning?	15	90 Q. Okay. I am going to mark
16	Q. [Inaudible].	16	this email as Exhibit A for identification
17	A. He did not like the name	17	purposes.
18	Denna group as he thought it is Iranian	18	EXHIBIT NO. A: For
19	Q. Dr. Hosseini, just a	19	identification: Email
20	second. I just want to ask, do you remember	20	chain dated December 25,
21	receiving this email?	21	2012.
22	A. No, I think it is years	22	MR. DAWSON: Mr. Davis, just
23	ago. I don't remember, no.	23	on that point, what exactly is being marked? Is
24	Q. Okay. Do you remember	24	it just the bottom email or is it the one on top
25	Dr. Taheri discussing with you the fact that Mr.	25	⁻
	D 22		D. 24
	Page 23		Page 24
1	MR. DAVIS: I think I would	1	-
1 2	MR. DAVIS: I think I would	1 2	92 Q. Do you understand this to
	MR. DAVIS: I think I would like to mark the entire document. I know that my	I	92 Q. Do you understand this to be the document by which Seylynn (North Shore)
2	MR. DAVIS: I think I would	2	92 Q. Do you understand this to
2 3	MR. DAVIS: I think I would like to mark the entire document. I know that my questions have been restricted to the bottom email, but this is the document in the form that I	2 3	92 Q. Do you understand this to be the document by which Seylynn (North Shore) Development Limited Partnership started this
2 3 4	MR. DAVIS: I think I would like to mark the entire document. I know that my questions have been restricted to the bottom	2 3 4	92 Q. Do you understand this to be the document by which Seylynn (North Shore) Development Limited Partnership started this action?
2 3 4 5 6 7	MR. DAVIS: I think I would like to mark the entire document. I know that my questions have been restricted to the bottom email, but this is the document in the form that I have it, so I want to make sure we have a clear	2 3 4 5	92 Q. Do you understand this to be the document by which Seylynn (North Shore) Development Limited Partnership started this action? A. What is the date of this?
2 3 4 5 6	MR. DAVIS: I think I would like to mark the entire document. I know that my questions have been restricted to the bottom email, but this is the document in the form that I have it, so I want to make sure we have a clear record.	2 3 4 5 6	92 Q. Do you understand this to be the document by which Seylynn (North Shore) Development Limited Partnership started this action? A. What is the date of this? No.
2 3 4 5 6 7 8 9	MR. DAVIS: I think I would like to mark the entire document. I know that my questions have been restricted to the bottom email, but this is the document in the form that I have it, so I want to make sure we have a clear record. MR. DAWSON: I suppose the	2 3 4 5 6 7	92 Q. Do you understand this to be the document by which Seylynn (North Shore) Development Limited Partnership started this action? A. What is the date of this? No. 93 Q. This particular document is dated January 16, 2023, and it replaces a
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. DAVIS: I think I would like to mark the entire document. I know that my questions have been restricted to the bottom email, but this is the document in the form that I have it, so I want to make sure we have a clear record. MR. DAWSON: I suppose the difficulty, though, is that I don't know if the witness is going to be taken to the email on the top. It is certainly not a document that he has identified or authenticated. MR. DAVIS: I understand that, and that is why I am marking it for identification purposes. MR. DAWSON: All right. MR. DAVIS: 91 Q. I would like to turn to the amended statement of claim, and that is not a document attached to your affidavit, so we are going to put it up on the screen for you. Alex, if you can just scroll down, please, to the amended statement of claim so the witness can see what the document is. You see this amended	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	92 Q. Do you understand this to be the document by which Seylynn (North Shore) Development Limited Partnership started this action? A. What is the date of this? No. 93 Q. This particular document is dated January 16, 2023, and it replaces a statement of claim that was dated May 26, 2022. Do you see that? A. I do. I see that. 94 Q. Okay. Did you give instructions to commence this action? A. As far as I remember, no. 95 Q. Do you know who gave instructions to the limited partnership to commence this action? A. No, I don't know. 96 Q. Let's go to paragraph 13. It says the plaintiff, which is Seylynn LP, by itself and through its licensees has adopted and used the Denna word trademarks and Denna trade names in Canada in association with the

	Page 25		Page 26
1	MR. DAWSON: Mr. Davis, I	1	98 Q. When the permission was
2	don't mean to interrupt, but the witness has	2	given to use Denna in association with Sentinel,
3	testified that he hasn't reviewed this document	3	who gave it?
4	before. If you are going to be asking questions	4	A. There was no permission.
5	about it, I think the witness should have the	5	In Denna Sentinel, Denna group has the majority of
6	opportunity to review it.	6	the shares, so the LP and management of Sentinel
7	MR. DAVIS: I have some very	7	were part of Denna group. They could monitor what
8	specific questions about particular paragraphs.	8	is going on to check that the quality is according
9	MR. DAWSON: I understand	9	to Denna quality.
10	that, but I think in fairness to the witness, if	10	99 Q. Again, that is you and
11	you are going to be asking him questions about the	11	Dr. Taheri. Right?
12	document itself, then he should have an	12	A. That is right.
13	opportunity to review it.	13	Q. You had to give
14	MR. DAVIS: Okay. Let me try	14	permission. Is that right?
15	and do it this way because it is a lengthy	15	A. No, I didn't. There was
16	document, and I hadn't planned to take the time to	16	no permission for this. I said Denna group had
17	have the witness go through it. I thought he	17	the majority of the shares, so they had the
18	would be familiar with it. Let me ask the	18	majority, and they could monitor what is going on
19	question this way, Mr. Dawson.	19	over there.
20	97 Q. Dr. Hosseini, do you know	20	101 Q. You say Denna group. Who
21	if Seylynn LP has licensed anyone to use the Denna	21	is Denna group?
22	trademark or Denna trade names?	22	A. Denna group investment.
23	A. No, not officially	23	If you have information about the investment in
24	licensing, but the only case is Sentinel, which	24	Sentinel, you see two groups of investors.
25	they used Denna Sentinel as their project.	25	Q. What are they?
	Page 27		Page 28
			1 450 20
1	-	1	record of how the trademarks and trade names were
1 2	A. Denna group were Denna original investors. They have majority of shares	1 2	•
	A. Denna group were Denna		record of how the trademarks and trade names were
2	A. Denna group were Denna original investors. They have majority of shares	2	record of how the trademarks and trade names were to be used?
2 3	A. Denna group were Denna original investors. They have majority of shares on Denna Sentinel.	2 3	record of how the trademarks and trade names were to be used? A. No.
2 3 4	 A. Denna group were Denna original investors. They have majority of shares on Denna Sentinel. Q. Is the Denna group a 	2 3 4 5 6	record of how the trademarks and trade names were to be used? A. No. Q. And they didn't give
2 3 4 5 6 7	A. Denna group were Denna original investors. They have majority of shares on Denna Sentinel. 103 Q. Is the Denna group a legal entity, Dr. Hosseini?	2 3 4 5 6 7	record of how the trademarks and trade names were to be used? A. No. 108 Q. And they didn't give examples of how the trademarks and trade names were to be used? A. No.
2 3 4 5 6	A. Denna group were Denna original investors. They have majority of shares on Denna Sentinel. 103 Q. Is the Denna group a legal entity, Dr. Hosseini? A. No, no. I just want to	2 3 4 5 6	record of how the trademarks and trade names were to be used? A. No. 108 Q. And they didn't give examples of how the trademarks and trade names were to be used? A. No. 109 Q. And they didn't say who
2 3 4 5 6 7 8 9	A. Denna group were Denna original investors. They have majority of shares on Denna Sentinel. 103 Q. Is the Denna group a legal entity, Dr. Hosseini? A. No, no. I just want to give you this information.	2 3 4 5 6 7 8 9	record of how the trademarks and trade names were to be used? A. No. 108 Q. And they didn't give examples of how the trademarks and trade names were to be used? A. No.
2 3 4 5 6 7 8 9	A. Denna group were Denna original investors. They have majority of shares on Denna Sentinel. 103 Q. Is the Denna group a legal entity, Dr. Hosseini? A. No, no. I just want to give you this information. 104 Q. I understand. I just want to understand what it is that you are saying. You are saying that the Denna group was involved	2 3 4 5 6 7 8 9	record of how the trademarks and trade names were to be used? A. No. 108 Q. And they didn't give examples of how the trademarks and trade names were to be used? A. No. 109 Q. And they didn't say who could use them specifically? A. No.
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	Page 29		Page 30
1	Q. Do you know who created	1	Q. You don't know if anybody
2	those logos?	2	has been licensed to use it?
3	A. I think that was created	3	A. No.
4	inside the Denna employees, people who were	4	120 Q. Do you know how Seylynn
5	working for Denna were as Denna. This is not a	5	LP has controlled the use of the logos?
6	very complicated logo, and they just put together	6	A. This logo belongs to
7	this and they did. I don't remember the names of	7	Seylynn LP. I don't know how controls it, no, I
8	who. Usually I don't know. I don't remember	8	don't know any kind of control instrument or
9	the names, but that was done by the Denna	9	whatever, no.
10	employees.	10	Q. Prior to April 13, 2021,
11	Q. Do you know when that was	11	Dr. Taheri would have directed how the logo was
12	done?	12	used. Is that fair?
13	A. Not exactly. Maybe it	13	A. With me. Right?
14	was 2015, 2016, 2015, 2016.	14	Q. I am asking you.
15	Q. Do you know who is using	15	A. In fact, me and Dr.
16	the logos?	16	Taheri, this logo was for Denna Home Corp, was
17	A. Denna is using the logo.	17	incorporated. And Dr. Taheri and myself, we are
18	Q. When you say Denna, who	18	managers of that company.
19	do you mean? Denna Homes Corp?	19	Q. You directed how the
20	A. Denna Homes Corp, in	20	trademark would be used?
21	fact, partnership is using it.	21	A. Yes, both of us.
22	117 Q. Seylynn LP is using it?	22	Q. Both of you together.
23	A. Yes.	23	Okay. If we could go to paragraph 16 of your
24	Q. Is anybody else using it?	24	affidavit, tell me when you have that up on the
25	A. As far as I know, no.	25	screen?
	Page 31		Page 32
	1 480 31		rage 32
1	-	1	_
1 2	A. I have it here in front	1 2	130 Q. And Pan-Pacific
2	A. I have it here in front of me.	2	Q. And Pan-Pacific owns 20.7 percent of Seylynn LP?
2 3	A. I have it here in front of me. 125 Q. You say, "Contrary to	2 3	130 Q. And Pan-Pacific owns 20.7 percent of Seylynn LP? A. I think it is more than
2 3 4	A. I have it here in front of me. 125 Q. You say, "Contrary to what Dr. Taheri alleges, I am not an owner,	2 3 4	130 Q. And Pan-Pacific owns 20.7 percent of Seylynn LP? A. I think it is more than that.
2 3 4 5	A. I have it here in front of me. 125 Q. You say, "Contrary to what Dr. Taheri alleges, I am not an owner, officer, and director of the LP or, for that	2 3 4 5	130 Q. And Pan-Pacific owns 20.7 percent of Seylynn LP? A. I think it is more than that. 131 Q. Do you know how much?
2 3 4 5 6	A. I have it here in front of me. 125 Q. You say, "Contrary to what Dr. Taheri alleges, I am not an owner, officer, and director of the LP or, for that matter, Gardens LP." Do you see that? The first	2 3 4 5 6	130 Q. And Pan-Pacific owns 20.7 percent of Seylynn LP? A. I think it is more than that. 131 Q. Do you know how much? A. I don't know the exact
2 3 4 5 6 7	A. I have it here in front of me. 125 Q. You say, "Contrary to what Dr. Taheri alleges, I am not an owner, officer, and director of the LP or, for that matter, Gardens LP." Do you see that? The first sentence?	2 3 4 5 6 7	130 Q. And Pan-Pacific owns 20.7 percent of Seylynn LP? A. I think it is more than that. 131 Q. Do you know how much? A. I don't know the exact number.
2 3 4 5 6 7 8	A. I have it here in front of me. 125 Q. You say, "Contrary to what Dr. Taheri alleges, I am not an owner, officer, and director of the LP or, for that matter, Gardens LP." Do you see that? The first sentence? A. No. Sixteen? It is not	2 3 4 5 6 7 8	130 Q. And Pan-Pacific owns 20.7 percent of Seylynn LP? A. I think it is more than that. 131 Q. Do you know how much? A. I don't know the exact number. 132 Q. Okay. Pan-Pacific is
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2 3 4 5 6 7 8 9	A. I have it here in front of me. 125 Q. You say, "Contrary to what Dr. Taheri alleges, I am not an owner, officer, and director of the LP or, for that matter, Gardens LP." Do you see that? The first sentence? A. No. Sixteen? It is not about that. In or around 2012, Taheri instructed his son. This is what you are meaning?	2 3 4 5 6 7 8 9	130 Q. And Pan-Pacific owns 20.7 percent of Seylynn LP? A. I think it is more than that. 131 Q. Do you know how much? A. I don't know the exact number. 132 Q. Okay. Pan-Pacific is wholly owned by your family? A. That is right.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. I have it here in front of me. 125 Q. You say, "Contrary to what Dr. Taheri alleges, I am not an owner, officer, and director of the LP or, for that matter, Gardens LP." Do you see that? The first sentence? A. No. Sixteen? It is not about that. In or around 2012, Taheri instructed his son. This is what you are meaning? 126 Q. No, I am looking at paragraph 16 of your affidavit. It is on the screen, Dr. Hosseini. A. Contrary to what Mr. Taheri alleges, I am not an owner, officer and director of the LP or, for that matter, Gardens LP. 127 Q. Okay. You have that? A. Yes, I do. 128 Q. Your family owns part of Seylynn LP. Is that correct? A. That is correct. 129 Q. You own it through	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	130 Q. And Pan-Pacific owns 20.7 percent of Seylynn LP? A. I think it is more than that. 131 Q. Do you know how much? A. I don't know the exact number. 132 Q. Okay. Pan-Pacific is wholly owned by your family? A. That is right. 133 Q. You yourself are a shareholder? A. Of Pan-Pacific, you mean? 134 Q. Yes. A. Yes. 135 Q. We can pull it up if you would like. It is Exhibit O to the affidavit of Stephanie Mills, but I just wanted to confirm that Pedram Hosseini is a director of Pan-Pacific? A. One of the directors, yes. 136 Q. Pedram is your son? A. He is.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. I have it here in front of me. 125 Q. You say, "Contrary to what Dr. Taheri alleges, I am not an owner, officer, and director of the LP or, for that matter, Gardens LP." Do you see that? The first sentence? A. No. Sixteen? It is not about that. In or around 2012, Taheri instructed his son. This is what you are meaning? 126 Q. No, I am looking at paragraph 16 of your affidavit. It is on the screen, Dr. Hosseini. A. Contrary to what Mr. Taheri alleges, I am not an owner, officer and director of the LP or, for that matter, Gardens LP. 127 Q. Okay. You have that? A. Yes, I do. 128 Q. Your family owns part of Seylynn LP. Is that correct? A. That is correct.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	130 Q. And Pan-Pacific owns 20.7 percent of Seylynn LP? A. I think it is more than that. 131 Q. Do you know how much? A. I don't know the exact number. 132 Q. Okay. Pan-Pacific is wholly owned by your family? A. That is right. 133 Q. You yourself are a shareholder? A. Of Pan-Pacific, you mean? 134 Q. Yes. A. Yes. 135 Q. We can pull it up if you would like. It is Exhibit O to the affidavit of Stephanie Mills, but I just wanted to confirm that Pedram Hosseini is a director of Pan-Pacific? A. One of the directors, yes. 136 Q. Pedram is your son?

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1	A. That is right.	1	fairness, listed Oranous Hosseini?
2	138 Q. Who is that?	2	A. Oranous is my daughter.
3	A. Hirad is my son.	3	Is she a director?
4	Q. And you are a director?	4	Q. If you look at the middle
5	A. Yes. I think so, yes.	5	of the screen
6	Q. And also the president?	6	A. Okay.
7	A. Should be. I don't know	7	Q. The third name there,
8	exactly. Pan-Pacific incorporated in 1995. It is	8	Oranous Hosseini?
9	a long time, Mr. Davis.	9	A. Okay. Where do you see
10	Q. You don't know whether	10	that Oranous is a director?
11	you are a director. Is that fair?	11	Q. On the first page it says
12	A. I am a director. I don't	12	director information and then it lists your sons,
13	remember if I am the president or not. I don't	13	yourself, and then Oranous?
14	know.	14	A. You mean we have four
15	142 Q. Got it.	15	directors in Pan-Pacific?
16	A. But I am a director.	16	Q. I think that is what it
17	Q. Okay. Who controls the	17	looks like to me based on the corporate search.
18	business of Pan-Pacific?	18	A. Maybe.
19	A. Management of the	19	150 Q. Okay.
20	company.	20	A. Corporate search. I know
21	Q. That is you?	21	this is Mr. Davis, it goes back to 1995, so if
22	A. Who else are the	22	you checked it, that is okay. There is no
23	directors? I think it is myself, Pedram, and	23	Q. Really my question is
24	perhaps Hirad.	24	just this is a family business to hold your share
25	Q. There is also, in	25	of Seylynn. Right?
	Page 35		Page 36
1	A. That is right. It is a	1	A. I think it was a very old
2	family company.	2	story. For a short time, Mr. Hashemi was one of
3	Q. Okay. You control that	3	the directors, but later I think even from 2011,
4	business with your family?	4	end of 2011 or beginning of 2012, the managers of
5	A. That is right. The	5	the company, I mean Seylynn 1, were Dr. Taheri and
6	directors of the company, they control the	6	myself.
7	business.	7	Q. Right, and the first
8	Q. We talked about Seylynn	8	general partner of Seylynn LP was Seylynn (North
9	LP being formed on December 6, 2021. That is at	9	Shore) MP Limited. Correct?
10	paragraph 13 of your affidavit?	10	A. Yes, I see that was not
11	MR. DAWSON: Mr. Davis, sorry,	11	GP. The name was MP.
12	that was 2011.	12	Q. That is right. That is
13	MR. DAVIS: You are right. I	13	at paragraph 17 of your affidavit?
14	apologize, Mr. Dawson. I am a lawyer, not an	14	A. The first general
15	accountant, so I often transpose numbers. Let me	15	partner. That is correct.
16 17	try that again.	16	Q. Both you and Dr. Taheri
17	Q. Seylynn LP was formed on	17	are directors of Seylynn (North Shore) MP Limited?
10		1 10	
18	December 6, 2011. Is that right, Dr. Hosseini?	18	A. Managers. We were
19	December 6, 2011. Is that right, Dr. Hosseini? A. That is right.	19	managing partners. Yes, directors of the company.
19 20	December 6, 2011. Is that right, Dr. Hosseini? A. That is right. 155 Q. You have personally been	19 20	managing partners. Yes, directors of the company. 160 Q. That was your business
19 20 21	December 6, 2011. Is that right, Dr. Hosseini? A. That is right. 155 Q. You have personally been involved with Seylynn since that time?	19 20 21	managing partners. Yes, directors of the company. 160 Q. That was your business partnership and you directed the activities of
19 20 21 22	December 6, 2011. Is that right, Dr. Hosseini? A. That is right. 155 Q. You have personally been involved with Seylynn since that time? A. That is right.	19 20 21 22	managing partners. Yes, directors of the company. 160 Q. That was your business partnership and you directed the activities of Seylynn LP. Right?
19 20 21 22 23	December 6, 2011. Is that right, Dr. Hosseini? A. That is right. 155 Q. You have personally been involved with Seylynn since that time? A. That is right. 156 Q. Initially Dr. Taheri and	19 20 21 22 23	managing partners. Yes, directors of the company. 160 Q. That was your business partnership and you directed the activities of Seylynn LP. Right? A. That is right.
19 20 21 22 23 24	December 6, 2011. Is that right, Dr. Hosseini? A. That is right. 155 Q. You have personally been involved with Seylynn since that time? A. That is right. 156 Q. Initially Dr. Taheri and another individual, Ali Hashemi, were managing the	19 20 21 22 23 24	managing partners. Yes, directors of the company. 160 Q. That was your business partnership and you directed the activities of Seylynn LP. Right? A. That is right. MR. DAWSON: Sorry, Mr. Davis.
19 20 21 22 23	December 6, 2011. Is that right, Dr. Hosseini? A. That is right. 155 Q. You have personally been involved with Seylynn since that time? A. That is right. 156 Q. Initially Dr. Taheri and	19 20 21 22 23	managing partners. Yes, directors of the company. 160 Q. That was your business partnership and you directed the activities of Seylynn LP. Right? A. That is right.

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1	asking who the directors of a particular company	1	makers?
2	are?	2	A. Yes, in fact, we did take
3	MR. DAVIS: I am not asking	3	decisions, but everything was in coordination with
4	who the directors of a particular company are. I	4	the partnership.
5	am following up on the witness's description of he	5	Q. Ownership of Seylynn
6	and Dr. Taheri as managers.	6	(North Shore) MP Limited was split 50/50 between
7	MR. DAWSON: Right, but my	7	you and Dr. Taheri?
8	confusion with the questions, you are asking the	8	A. That is right.
9	witness a legal term. People use that term in a	9	Q. And Seylynn (North Shore)
10	colloquial sense. So that I understand what the	10	MP Limited was removed as the general partner of
11	question is, are you referring back to Seylynn	11	Seylynn MP on April 13, 2021. Correct?
12	(North Shore) MP Ltd.?	12	A. I don't remember exactly
13	MR. DAVIS: I am following up	13	the date, but that was correct. During 2021, the
14	on the answer that the witness gave.	14	old MP or old GP was removed and terminated by the
15	MR. DAWSON: I need to	15	partnership.
16 17	understand what the question is, Mr. Davis. That	16 17	Q. And by removing Seylynn
18	is why I am asking for some clarification.	18	(North Shore) MP Limited as the general partner of Seylynn LP, Dr. Taheri was effectively removed
19	MR. DAVIS: Let me try this	19	from his role in managing Seylynn LP. Correct?
20	again. 161 Q. Dr. Hosseini, you and Dr.	20	A. Both of us. Both of us
21	Taheri managed the business of Seylynn (North	21	were terminated.
22	Shore) MP Limited. Is that fair?	22	166 Q. Specifically Dr. Taheri
23	A. On behalf of the	23	was terminated?
24	partnership.	24	A. No, the MP was
25	162 Q. You were the decision	25	terminated.
	Page 39		Page 40
1	Q. And by virtue of that,	1	individual who manages the business of Seylynn
2	167 Q. And by virtue of that, Dr. Taheri's management was terminated. Correct?	2	individual who manages the business of Seylynn Village MP Limited with Mr. Ghahroud?
2 3	167 Q. And by virtue of that, Dr. Taheri's management was terminated. Correct? A. No, not correct. In	2 3	individual who manages the business of Seylynn Village MP Limited with Mr. Ghahroud? A. No, no, no. It is not
2 3 4	167 Q. And by virtue of that, Dr. Taheri's management was terminated. Correct? A. No, not correct. In fact, the management of the old MP was terminated.	2 3 4	individual who manages the business of Seylynn Village MP Limited with Mr. Ghahroud? A. No, no, no. It is not individually done. It is a company. It is a GP
2 3 4 5	167 Q. And by virtue of that, Dr. Taheri's management was terminated. Correct? A. No, not correct. In fact, the management of the old MP was terminated. That includes Dr. Taheri and Dr. Hosseini.	2 3 4 5	individual who manages the business of Seylynn Village MP Limited with Mr. Ghahroud? A. No, no, no. It is not individually done. It is a company. It is a GP that governs and runs the company.
2 3 4 5 6	167 Q. And by virtue of that, Dr. Taheri's management was terminated. Correct? A. No, not correct. In fact, the management of the old MP was terminated. That includes Dr. Taheri and Dr. Hosseini. 168 Q. I understand what you are	2 3 4 5 6	individual who manages the business of Seylynn Village MP Limited with Mr. Ghahroud? A. No, no, no. It is not individually done. It is a company. It is a GP that governs and runs the company. Q. So who gives instructions
2 3 4 5 6 7	167 Q. And by virtue of that, Dr. Taheri's management was terminated. Correct? A. No, not correct. In fact, the management of the old MP was terminated. That includes Dr. Taheri and Dr. Hosseini. 168 Q. I understand what you are saying. The same day that Seylynn (North Shore)	2 3 4 5 6 7	individual who manages the business of Seylynn Village MP Limited with Mr. Ghahroud? A. No, no, no. It is not individually done. It is a company. It is a GP that governs and runs the company. 172 Q. So who gives instructions on behalf of the company?
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1 /	o talk
16 1 (d 1'' 1) 1 (d 1 d 1) 1 (d 1 d 1) 1 (d 1 d 1)	
what the claim is about. 16 been talking about Seylynn LP. Now I want to	
MR. DAVIS: I am asking the 17 about Gardens LP. Okay?	
question. If the witness doesn't know, the 18 A. Okay. It is Seylynn 2.	
19 witness doesn't know. 19 181 Q. Your family owns part of	
20 MR. DAWSON: My only concern 20 the Seylynn (North Shore) Properties phase 2	
21 is that it shouldn't be a misleading question to 21 limited partnership?	
the witness. That is not what the claim is about. 22 A. Yes, correct.	
MR. DAVIS: It was not 23 182 Q. Pretty much the same	
intended to be a misleading question. Let me ask ownership structure as Seylynn LP?	
25 it this way. 25 A. As far as I remember,	
Page 43	Page 44
	1 450 77
there is no big difference.	
2 183 Q. Seylynn phase 2 LP was 2 A. No, not official	• ,
formed on December 23, 2011? 3 licensing, but I don't know. Maybe in the f	
4 A. No, I think that was 4 there will be a license. But as far as I know	v ,
5 after that, but I don't have the exact date. 5 there is no licensing.	_
6 184 Q. Would it have been long 6 188 Q. You gave permission for	•
7 after 2011 or shortly after? 7 Seylynn 2 to use Denna. Is that right? 8 A. I think it was sometime 8 A. Partnership gave it	
The Talliant IV was sometime	
9 I am not quite accurate on this, but it should 10 have been sometime 2014, 2015. I think so. But 10 mean to interrupt you. Go ahead.	
that was not incorporated at the beginning. I that was not incorporated at the beginning. I mean 2011, no. 11 A. I mean Denna is property of the partnership. Partnership owns it, and	J
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24 187 Q. Is there a license 24 permission to use Denna? 25 between Seylynn 1 and Seylynn 2 for the Denna 25 MR. DAWSON: Mr. Davis, j	net
	ust

	Page 45		Page 46
1	to be helpful, I think you repeated Seylynn 2	1	Q. Does Seylynn phase 2 have
2	twice. I think you meant to say did the families	2	permission to use the Denna trademarks and trade
3	in Seylynn 1 give permission	3	names?
4	MR. DAVIS: No. No, I didn't.	4	A. Potentially it can use.
5	MR. DAWSON: I am sorry.	5	There is a potential that Seylynn 1 authorizes
6	THE WITNESS: Mr. Davis, to	6	Seylynn 2 to use Denna. As I said, Denna,
7	clarify, I can say that Seylynn 2 is at a very	7	Seylynn 2 has not started any type of activity
8	preliminary stage. We have not yet done any	8	yet.
9	development or any permitting or anything for	9	194 Q. Okay. That permission
10	Seylynn 2. So usually the trademark or trade name	10	from Seylynn 1 to Seylynn 2 would be given by you.
11	is going to be used at the time of marketing.	11	Correct?
12	MR. DAVIS:	12	A. In future maybe.
13	192 Q. I understand that, but	13	Q. I would like to show you
14	you had told me that Denna had given Seylynn 2	14	another document. We will pull it up on the
15	permission to use Denna, and I want to understand,	15	screen. This is an email from you to
16	was that just the families who were invested in	16	A. Dr. Taheri.
17	there who gave that permission?	17	196 Q Dr. Taheri. Do you
18	MR. DAWSON: Mr. Davis, I	18	see that?
19	don't think you have faithfully recorded what the	19	MR. DAWSON: Could you email
20	witness's evidence was. I think what the witness	20	us a copy, please?
21	said was that Seylynn 1 partnership gave	21	MR. DAVIS: Alex, let me know
22	permission to Seylynn 2.	22	when that is done. Okay. Do you have it, Mr.
23	MR. DAVIS: I don't think that	23 24	Dawson?
24 25	is the case, but let me just try to get to the	25	MR. DAWSON: Not yet, no.
23	bottom of this.	23	MR. DAVIS: You let me know
	Page 47		Page 48
1	_	1	•
1 2	when you do. MR. DAWSON: I will. I still	1 2	Page 48 you very much MR. DAVIS:
	when you do.	1	you very much
2	when you do. MR. DAWSON: I will. I still don't have it.	2	you very much MR. DAVIS:
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	Page 49		Page 50
1	an update on the successful rezoning of the	1	MR. DAVIS: You know what? I
2	Seylynn Village project. Correct?	2	am happy to take a break. We are moving about
3	A. Yes.	3	half as quickly as I had expected. I don't have
4	Q. He says, "To make a very	4	any time constraints, but if there are any time
5	long story short, we have an approved rezoned	5	constraints on your end, I think we need to deal
6	project with three towers." Correct?	6	with them right now.
7	MR. DAWSON: Mr. Davis, if you	7	THE WITNESS: Mr. Davis, I
8	want to ask questions about the document, you have	8	have a time constraint. After two hours, in fact,
9	to let the witness read the document, and you told	9	I mean, half an hour after that, I have a meeting.
10	him not to, so if you want to ask him questions, I	10	My time, I can be available just for two hours.
11	think in fairness to the witness he should be able	11	MR. DAVIS:
12	to read it.	12	Q. Then we are not going to
13	MR. DAVIS: I am not intending	13	be able to take a break. We are going to have to
14	to move through this any more quickly than Dr.	14	keep moving on.
15	Hosseini needs, but I don't know.	15	A. Okay. If you are not
16	Q. Dr. Hosseini, would you	16	tired, let's go.
17	like to read the entire email?	17	Q. That is fine. Okay. You
18	A. I tell you just a piece	18	have had a chance to review the email?
19	of it I want to.	19	A. Okay. Go ahead. It is a
20	Q. Okay. You don't need to	20	long email.
21	read it out loud. Just read it to yourself. Let	21	Q. Fair to say the Seylynn 2
22	me know when you are ready.	22	project that Dr. Taheri is referring to, that is
23	MR. DAWSON: Mr. Davis, would	23	the Seylynn Gardens project. Right?
24	this be a convenient time for a break and then Dr.	24	A. No, if you see the time
25	Hosseini could read the document?	25	of this email, which was 2012, there was no
	Page 51		Page 52
1	•	1	
1 2	Page 51 Seylynn 2 existing at that time. 211 Q. Do you know what Dr.	1 2	Page 52 email, Dr. Hosseini? A. CC Abo Taheri, Pedram,
	Seylynn 2 existing at that time. 211 Q. Do you know what Dr.	I	email, Dr. Hosseini? A. CC Abo Taheri, Pedram,
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2 3	Seylynn 2 existing at that time. 211 Q. Do you know what Dr. Taheri was referring to there when he says "our	2 3	email, Dr. Hosseini? A. CC Abo Taheri, Pedram, Tammy, Dr. Shapour Hosseini, yes, I am copied.
2 3 4	Seylynn 2 existing at that time. 211 Q. Do you know what Dr. Taheri was referring to there when he says "our Seylynn 2 project if applicable"?	2 3 4	email, Dr. Hosseini? A. CC Abo Taheri, Pedram, Tammy, Dr. Shapour Hosseini, yes, I am copied. 215 Q. You recall receiving this
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	Page 53		Page 54
1	Q. We will mark this as	1	that this is right. Hirad was not authorized to,
2	Exhibit B for identification purposes.	2	because he was not part of the management or
3	EXHIBIT NO. B: For	3	anything. Maybe as I said, at that time, we were
4	identification: Email	4	cooperating on everything. You see, all of these
5	from Hirad Hosseini dated	5	emails are kind of courtesy emails.
6	May 30, 2017.	6	MR. DAVIS:
7	MR. DAVIS:	7	Q. Right. What they are
8	220 Q. In 2017, Mr. Hirad	8	saying is: We are going to use Denna for
9	Hosseini is saying, "Denna is very beautiful and	9	Seylynn 2, as well. Right?
10	the name of our company," and, "My perception is	10	A. Okay. This is what Hirad
11	that Denna is like a protective umbrella which	11	believes. Hirad is who? He is not a manager. He
12	acts like a corporate brand over all of our	12	is not authorized to give direction or whatever.
13	projects." Do you see that?	13	He is my son.
14	A. Yes.	14	Q. Right. Only you and Dr.
15	Q. Is that a correct	15	Taheri were authorized to give direction?
16	expression of how Denna was being used at the	16	A. That is right.
17	time?	17	Q. Was it your intention
18	MR. DAWSON: Sorry. Are you	18	that Denna be used for Seylynn 2?
19	asking this isn't an email from the witness.	19	A. No, not at that time,
20	MR. DAVIS: No, it is an email	20	2017, no.
21	from his son, and I am asking if to his knowledge	21	Q. Was it Dr. Taheri's
22	that is a correct expression of how Denna was	22	intention, to your knowledge?
23	being used at the time.	23	A. I don't know. You can
24	THE WITNESS: This is what	24	ask Dr. Taheri about this.
25	Hirad argues. Never I discussed it, never I said	25	Q. I am asking what you know
	Page 55		D. 56
	rage 33		Page 56
1	-	1	-
1 2	about Dr. Taheri's knowledge?	1 2	Exhibit C for identification. EXHIBIT NO. C: For
	about Dr. Taheri's knowledge? A. No, I don't know.	1	Exhibit C for identification.
2	about Dr. Taheri's knowledge? A. No, I don't know. Q. Okay. Let's show you	2	Exhibit C for identification. EXHIBIT NO. C: For identification: Email
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	Page 57		Page 58
1	employees of Seylynn.	1	your affidavit, you have that?
2	234 Q. He has certainly been	2	A. Eleven? Yes. On or
3	included on an email that is circulating amongst	3	about -
4	management. Correct?	4	238 Q. You don't need to read
5	A. No, I don't think so. I	5	it, Dr. Hosseini. Just to be clear, if you want
6	can also see people confusing the development of	6	to read it to yourself, please go ahead. But you
7	Denna's no, no. This is what he thinks, and	7	don't need to read it into the record.
8	who is Steve? What is his role in this whole	8	A. No, no, I just wanted to
9	story?	9	make sure that we are on the same page.
10	Q. You don't know if he was	10	239 Q. Okay.
11	employed by Seylynn?	11	MR. DAWSON: Sorry to
12	A. He was, definitely it	12	interrupt, but I don't think the witness is on the
13	looks like he was, but I don't remember him, and I	13	same page with you, Mr. Davis. I think he was
14	don't know what was his position and whether he	14	reading from the amended statement of claim, so
15	was authorized to send emails to managers or	15	you might just want to clarify that with the
16	whatever. I don't know.	16	witness, please.
17	Q. You don't recall	17	MR. DAVIS: Okay.
18	responding to this and saying: You are not	18	Q. Dr. Hosseini, on the
19	authorized to send this email?	19	screen is paragraph 11 of your affidavit. You
20	A. No, I didn't. As far as	20	have that?
21	I know, as far as I recall, I didn't reply to	21	A. No, what I have is
22	Steve, but I didn't this is not my character to	22	something different. This is statement of
23	ask someone like Steve, please don't send emails	23	defence. Yes, I have it.
24	to me or whatever.	24	Q. Okay. There it states:
25	Q. Okay. In paragraph 11 of	25	"Although Gardens LP has
	Page 59		Page 60
			1 uge 00
1	_	1	•
1 2	not started construction,	1 2	portion of the witness's affidavit. No more.
2	not started construction, both it and the LP are	2	portion of the witness's affidavit. No more. MR. DAVIS: I am not sure what
	not started construction, both it and the LP are developing the properties		portion of the witness's affidavit. No more. MR. DAVIS: I am not sure what you mean by that.
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Page 63 Page 64 government-issued photo identification and reviewed each page of the printed affidavit and exhibits with the exhibits with the commissioner to verify that the pages are identical. I have sold described in the notice followed the process of the public, and the media dated March 27, 2020." A. Not exactly, but that is okay. Please ask your questions. Page 64 Page 64 1 acquiring and developing property that was located near Fern Street and Mountain Highway in North Vancouver. Right? A. Yes. Sold D. That was the Seylynn (North Shore) Development Limited Partnership. Correct? Vancouver. Right? A. Yes. A. Yes. Sold D. That was the Seylynn (North Shore) Development Limited Partnership. Correct? Vancouver. Right? A. Yes. A. Yes. A. Correct. 9 256 Q. If we go to paragraph 16, you say that during this period, the partnership constructed three residential buildings. Do you see that? A. Yes, the first was called the Beacon. 15 Do you remember that? A. Yes, the first was called the Beacon. 16 Paragraph 17, the second building was called Horizon? A. Paragraph 14 — 19 258 Q. Is that correct? A. Paragraph 14. We should 20 A. Yes, that is correct. 21 go there. I can't - yes. 22 253 Q. You see that? A. Yes. The partnership was called Compass? A. Yes. The partnership was called Compass? A. Yes. The partnership was called Compass? A. That is right.	25		25	
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printed affidavit and exhibits with the commissioner to verify that the pages are identical. I have so followed the process of followed the process of profession, the public, and the media dated March 27, 2020." that was the Seylymn (North Shore) Development Limited Partnership. Correct? A. Correct. A. Correct. A. Correct. O. If we go to paragraph 16, you say that during this period, the partnership constructed three residential buildings. Do you see that? A. Yes, the first was called the Beacon. A. Yes, the first was called the Beacon. Do you remember that? the Beacon. Do you remember that? the Beacon. A. Not exactly, but that is the paragraph 14 okay. Please ask your questions. If we look at paragraph 14 okay. Please ask my questions. If we look at paragraph 14 okay. Please ask my questions. A. Paragraph 14. We should the paragraph 18, the third building was called Compass? A. Yes, the first was called the Beacon. A. Okay. Paragraph 18, the third building was called Compass? A. Yes. The partnership was called Compass? A. Yes. The partnership was called Compass? A. That is right. A. That is right.				
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	21 22 23	Q. You see that? A. Yes. The partnership was	22 23	building was called Compass? A. That is right.

	Page 65		Page 66
1	Apex. Do you see that?	1	who knows? But now we don't call it Seylynn
2	A. Yes, that was, in fact,	2	Garden. We call it Seylynn Centre for the time
3	the project to be, but at that time I think, as I	3	being.
4	recall at that time, just Beacon, Horizon, and	4	Q. Has there been an
5	Compass were built.	5	application filed to redevelop the property for
6	261 Q. As of June 2022?	6	Seylynn Centre?
7	A. Let's say that, yes.	7	A. No, not yet.
8	Q. Apex was not yet built?	8	Q. And there is no rezoning
9	A. No.	9	application being considered by the city of
10	Q. Those were called	10	Vancouver. Is that right?
11	collectively the Seylynn Village project. Right?	11	A. That is right. In the
12	A. Seylynn Village or	12	past there was an application which was rejected
13	Seylynn 1. That is right.	13	by the partnership and we cancel because it was
14	Q. Is Apex Seylynn 2?	14	not in the benefit of the partnership, but the new
15	A. No, Seylynn 1, part of	15	development.
16	Seylynn 1.	16	Q. Okay. If we go to your
17	Q. Okay. That is what I	17	affidavit that is on the screen, you have that?
18	thought. Thank you. The Seylynn Garden LP	18	MR. DAWSON: I don't mean to
19	project?	19	be difficult about this, Mr. Davis, but it is not
20	A. Yes.	20	his affidavit. It is just a portion of his
21	Q. I understand that is now	21	affidavit, and it is the portion that I took. The
22	called Seylynn Centre?	22	other portions are missing.
23	A. Yes, just as a name for	23	MR. DAVIS: Got it. Okay.
24	the time being, but once we have the permit and we	24	Fair enough. I don't think anything turns on
25	want to start the construction and marketing it,	25	that, Mr. Dawson, but I am asking questions about
		i e	
	Page 67		Page 68
1	Page 67 the statements that are made in this particular	1	Page 68 273 Q. If we look at page 6 of
1 2	_	2	•
	the statements that are made in this particular affidavit. 270 Q. If you would look at		Q. If we look at page 6 of
2	the statements that are made in this particular affidavit.	2	Q. If we look at page 6 of the affidavit, paragraph 36? A. Yes. Q. You say, "As I have
2 3	the statements that are made in this particular affidavit. 270 Q. If you would look at paragraph 21, beginning at the bottom of the page, it says:	2 3 4 5	 Q. If we look at page 6 of the affidavit, paragraph 36? A. Yes. Q. You say, "As I have mentioned, Mr. Taheri was the person at the
2 3 4	the statements that are made in this particular affidavit. 270 Q. If you would look at paragraph 21, beginning at the bottom of the page, it says: "Moreover, apart from	2 3 4 5 6	 Q. If we look at page 6 of the affidavit, paragraph 36? A. Yes. 274 Q. You say, "As I have mentioned, Mr. Taheri was the person at the company who was chiefly responsible for managing
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19 289 Q. You and Dr. Taheri were 19 A. Could you repeat your		9 ·	18	managing this new project. Correct?
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TOTAL YOU.	20	removed?	20	question?
21 A. That is right. 21 297 Q. Yes, you are very aware				
				of the considerable amount of work that has gone
23 Mr. Ghahroud. Right? 23 into managing this new project. Correct?		1	1	
24 A. Replaced with a new GP, 24 A. Correct.			1	
new general partner. 25		<u>*</u>	1	

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	Page 73		Page 74
1	been directly involved in it?	1	built." (As read.)
2	A. You know, besides the	2	Do you see that?
3	management, I am one of the main shareholders of	3	A. Yes, I do. This is the
4	the company. I have to take care of my	4	job of a manager, in fact.
5	investment, and I wanted to make sure that	5	Q. Right. You are directly
6	everything is going smoothly.	6	involved. You go on and say, "I have been
7	Q. Right. You have been	7	responsible for causing the second GP to build
8	directly involved in all aspects of the project.	8	Apex's presentation centre." Do you see that?
9	Fair?	9	A. Okay.
10	A. Yes.	10	Q. That is your
11	Q. In fact, in paragraph 62	11	responsibility?
12	you say, and I am skipping the first two	12	A. The presentation centre
13	sentences, but if you want to read them I am happy	13	was, in fact, the PC for Compass in the past.
14	to have you read them. I want to focus on the	14	Then it was removed and redesigned to be
15	sentence that begins "additionally." It says:	15	removed, I mean moved, not removed, and redesigned
16	"Additionally I have	16	to be the PC for Apex 2.
17	caused the second GP to	17	Q. Right. And you were
18	hire a new marketing	18	responsible for building that presentation centre?
19	team, and given changes	19	A. No, not me. I don't know
20 21	in the market, I have	20 21	what you are
22	caused the second GP to	22	Q. I am just reading the
23	source and price new materials, equipment, and	23	paragraph, the sentence that says, "Also, I have been responsible for causing the second GP to
24	appliances for the strata	24	build the Apex's presentation centre." Do you see
25	properties that are being	25	that?
23	properties that are being	23	uat:
	Page 75		Page 76
1	A. Maybe the better version	1	Page 76 MR. DAWSON: Mr. Davis, that
1 2	A. Maybe the better version was that the new GP is responsible to do that.	2	•
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1	fact. Not Mr. Taheri. The old GP was terminated,	1	as several consultants."
2	so there was no role for Mr. Taheri to manage the	2	(As read.)
3	company or to do this coordination.	3	Do you see that?
4	310 Q. I am just trying to	4	A. Yes.
5	understand, Dr. Hosseini, what you meant when you	5	Q. Is that accurate?
6	said, "I can say without any hesitation that	6	A. That is accurate.
7	thousands of man hours have been devoted to these	7	Q. Okay. You are the person
8	management tasks." Do you see that?	8	directly involved in this?
9	A. Yes.	9	A. The GP is directly
10	Q. Is that thousands of man	10	involved in it.
11	hours of your time?	11	Q. And you are acting for
12	A. Our times. I mean	12	the GP?
13	management, Mr. Ghahroud and my time.	13	A. No. Management, Mr.
14	Q. Go to paragraph 63. I	14	Ghahroud and myself, we are acting for the GP.
15	will give you a chance to read that. Okay?	15	Q. The activities of the GP
16	A. Okay, but I think	16	and, in turn, the activities of the LP are
17	okay. Go ahead, please, with your question.	17	controlled by you and Mr. Ghahroud. Is that fair?
18	Q. The third sentence says:	18	A. The GP, yes, but not the
19	"To carry out its duties	19	LP. The LP has its own independent body. We are
20	to the partnership, I	20	not coordinating, and we are not giving direction
21	have caused the second GP	21	to LP.
22	to hire a team of eight	22	Q. The activities of the LP
23	employees, and I also	23	are not directed by the GP. Is that what you are
24	supervised the sales team	24	saying?
25	of six members, as well	25	A. Maybe we could give them
	Page 79		Page 80
1	_	1	•
1 2	consultant, but no, no, they have their own, as I	1 2	Page 80 October 15, 2020. MR. DAVIS:
	consultant, but no, no, they have their own, as I said, independent body and it is the entire		October 15, 2020. MR. DAVIS:
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2 3	consultant, but no, no, they have their own, as I said, independent body and it is the entire authority of the GP.	2 3	October 15, 2020. MR. DAVIS:
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1	this action, Dr. Hosseini?	1	regard to any decision to
2	A. Yes, please go ahead.	2	commence a proceeding
3	Q. You understand that in	3	against the partnership."
4	this proceeding, Dr. Taheri was granted leave to	4	(As read.)
5	commence a proceeding on behalf of Seylynn (North	5	Do you see that?
6	Shore) MP for unpaid management fees?	6	A. I see that this is a new
7	A. Okay.	7	ruling. I have not yet been able to study about
8	Q. If we look at	8	that and consult with my lawyers, but okay, what
9	paragraph 1, that is what it is saying. Right?	9	do you mean? I see that.
10	 A. Regarding the leave you 	10	Q. You are aware that that
11	mean, yes.	11	is what the court has found. Correct?
12	Q. Okay. If we look at	12	A. Yes.
13	paragraph 76, it says:	13	Q. If we go to paragraph 83,
14	"At the outset, I note	14	it says:
15	that Dr. Hosseini is a	15	"In contrast, Dr.
16	director of the new	16	Hosseini initially
17	general partner company.	17	refused to decide one way
18	He, therefore, has	18	or another on the
19	fiduciary duties to both	19	arbitration, claiming he
20	the new company and the	20	needed more information
21	partnership. Mr.	21	because he did not
22	Hosseini, therefore, has	22	understand the claim. He
23	a prima facie conflict of	23	then asked for a formal
24	interest between his	24	directors meeting to
25	duties to Seylynn with	25	discuss the merits of
	Page 83		Page 84
1	claim (which was not	1	of his aforementioned
1 2	claim (which was not necessary) and suggested	1 2	of his aforementioned conflict of interest.
	necessary) and suggested		
2		2	conflict of interest.
2 3	necessary) and suggested they seek a legal opinion	2 3	conflict of interest. Given that the
2 3 4	necessary) and suggested they seek a legal opinion (which he could have	2 3 4	conflict of interest. Given that the partnership has
2 3 4 5	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As	2 3 4 5	conflict of interest. Given that the partnership has significant assets and
2 3 4 5 6	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.)	2 3 4 5 6	conflict of interest. Given that the partnership has significant assets and operations and Seylynn
2 3 4 5 6 7	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes.	2 3 4 5 6 7	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or
2 3 4 5 6 7 8	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes.	2 3 4 5 6 7 8	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr.
2 3 4 5 6 7 8 9	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes. Q. You are aware that the	2 3 4 5 6 7 8 9	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr. Hosseini's retention of
2 3 4 5 6 7 8 9	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes. 333 Q. You are aware that the court found this, as well?	2 3 4 5 6 7 8 9	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr. Hosseini's retention of his directorship in Seylynn would appear to serve one purpose: To
2 3 4 5 6 7 8 9 10	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes. 333 Q. You are aware that the court found this, as well? A. Okay. This is a new	2 3 4 5 6 7 8 9 10	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr. Hosseini's retention of his directorship in Seylynn would appear to
2 3 4 5 6 7 8 9 10 11	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes. 333 Q. You are aware that the court found this, as well? A. Okay. This is a new ruling. I have not yet been able to study it	2 3 4 5 6 7 8 9 10 11 12 13 14	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr. Hosseini's retention of his directorship in Seylynn would appear to serve one purpose: To
2 3 4 5 6 7 8 9 10 11 12	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes. 333 Q. You are aware that the court found this, as well? A. Okay. This is a new ruling. I have not yet been able to study it carefully.	2 3 4 5 6 7 8 9 10 11 12 13	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr. Hosseini's retention of his directorship in Seylynn would appear to serve one purpose: To prevent the company from
2 3 4 5 6 7 8 9 10 11 12 13	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes. 333 Q. You are aware that the court found this, as well? A. Okay. This is a new ruling. I have not yet been able to study it carefully. 334 Q. But you know that that is	2 3 4 5 6 7 8 9 10 11 12 13 14	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr. Hosseini's retention of his directorship in Seylynn would appear to serve one purpose: To prevent the company from pursuing arbitration."
2 3 4 5 6 7 8 9 10 11 12 13 14 15	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes. 333 Q. You are aware that the court found this, as well? A. Okay. This is a new ruling. I have not yet been able to study it carefully. 334 Q. But you know that that is what the court found. Right?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr. Hosseini's retention of his directorship in Seylynn would appear to serve one purpose: To prevent the company from pursuing arbitration." (As read.)
2 3 4 5 6 7 8 9 10 11 12 13 14 15	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes. 333 Q. You are aware that the court found this, as well? A. Okay. This is a new ruling. I have not yet been able to study it carefully. 334 Q. But you know that that is what the court found. Right? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr. Hosseini's retention of his directorship in Seylynn would appear to serve one purpose: To prevent the company from pursuing arbitration." (As read.) Do you see that?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes. 333 Q. You are aware that the court found this, as well? A. Okay. This is a new ruling. I have not yet been able to study it carefully. 334 Q. But you know that that is what the court found. Right? A. Yes. 335 Q. Okay. In paragraph 84:	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr. Hosseini's retention of his directorship in Seylynn would appear to serve one purpose: To prevent the company from pursuing arbitration." (As read.) Do you see that? A. This is a part of the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes. 333 Q. You are aware that the court found this, as well? A. Okay. This is a new ruling. I have not yet been able to study it carefully. 334 Q. But you know that that is what the court found. Right? A. Yes. 335 Q. Okay. In paragraph 84: "On balance, Dr. Taheri	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr. Hosseini's retention of his directorship in Seylynn would appear to serve one purpose: To prevent the company from pursuing arbitration." (As read.) Do you see that? A. This is a part of the ruling.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes. 333 Q. You are aware that the court found this, as well? A. Okay. This is a new ruling. I have not yet been able to study it carefully. 334 Q. But you know that that is what the court found. Right? A. Yes. 335 Q. Okay. In paragraph 84: "On balance, Dr. Taheri has a better claim to the moral high ground of good	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr. Hosseini's retention of his directorship in Seylynn would appear to serve one purpose: To prevent the company from pursuing arbitration." (As read.) Do you see that? A. This is a part of the ruling. 336 Q. Okay. Again, you are
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes. 333 Q. You are aware that the court found this, as well? A. Okay. This is a new ruling. I have not yet been able to study it carefully. 334 Q. But you know that that is what the court found. Right? A. Yes. 335 Q. Okay. In paragraph 84: "On balance, Dr. Taheri has a better claim to the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr. Hosseini's retention of his directorship in Seylynn would appear to serve one purpose: To prevent the company from pursuing arbitration." (As read.) Do you see that? A. This is a part of the ruling. 336 Q. Okay. Again, you are aware of the court's decision there.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes. 333 Q. You are aware that the court found this, as well? A. Okay. This is a new ruling. I have not yet been able to study it carefully. 334 Q. But you know that that is what the court found. Right? A. Yes. 335 Q. Okay. In paragraph 84: "On balance, Dr. Taheri has a better claim to the moral high ground of good faith in this proceeding	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr. Hosseini's retention of his directorship in Seylynn would appear to serve one purpose: To prevent the company from pursuing arbitration." (As read.) Do you see that? A. This is a part of the ruling. 336 Q. Okay. Again, you are aware of the court's decision there. Paragraph 134, it says:
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes. 333 Q. You are aware that the court found this, as well? A. Okay. This is a new ruling. I have not yet been able to study it carefully. 334 Q. But you know that that is what the court found. Right? A. Yes. 335 Q. Okay. In paragraph 84: "On balance, Dr. Taheri has a better claim to the moral high ground of good faith in this proceeding than does Dr. Hosseini.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr. Hosseini's retention of his directorship in Seylynn would appear to serve one purpose: To prevent the company from pursuing arbitration." (As read.) Do you see that? A. This is a part of the ruling. 336 Q. Okay. Again, you are aware of the court's decision there. Paragraph 134, it says: "Seylynn is in a deadlock
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	necessary) and suggested they seek a legal opinion (which he could have sought himself)." (As read.) Do you see that? A. Yes. 333 Q. You are aware that the court found this, as well? A. Okay. This is a new ruling. I have not yet been able to study it carefully. 334 Q. But you know that that is what the court found. Right? A. Yes. 335 Q. Okay. In paragraph 84: "On balance, Dr. Taheri has a better claim to the moral high ground of good faith in this proceeding than does Dr. Hosseini. Every position Dr.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	conflict of interest. Given that the partnership has significant assets and operations and Seylynn has no assets or operations Dr. Hosseini's retention of his directorship in Seylynn would appear to serve one purpose: To prevent the company from pursuing arbitration." (As read.) Do you see that? A. This is a part of the ruling. 336 Q. Okay. Again, you are aware of the court's decision there. Paragraph 134, it says: "Seylynn is in a deadlock position, and Dr. Taheri

	Page 85		Page 86
1	Hosseini consent to	1	lawyers about it.
2	letting this claim	2	Q. Okay. I don't want to
3	proceed. Dr. Hosseini	3	get into what you are going to talk to your lawyer
4	resists and is in a clear	4	about. That is fine.
5	conflict of interest	5	Denna Properties Corp,
6	between his duties to	6	switching gears here, you and Mr. Ghahroud are the
7	Seylynn and the	7	directors of Denna Properties Corp?
8	partnership. I have	8	A. I don't recall whether we
9	concluded that Dr. Taheri	9	have changed. I think no.
10	brings this application	10	Q. Denna Properties Corp was
11	in good faith and the	11	incorporated on February 18, 2022?
12	proposed claim appears to	12	A. Oh, you are right. Denna
13	be in the best interests	13	Properties and Denna Development. You are right.
14	of Seylynn." (As read.)	14	Mr. Ghahroud and myself, we are managers of those
15	Do you see that?	15	companies.
16	A. I see that, but I am not	16	Q. You also have ownership
17	in a position to judge Judge Burke's decision. I	17	50/50?
18	see that.	18	A. That is right.
19	Q. That is what Judge Burke	19	Q. Whose idea was it to
20	found. Right?	20	incorporate these companies with Denna in the
21	A. Yes.	21	name?
22	Q. And you know that?	22	A. Mr. Ghahroud and myself.
23	A. I know that, but I have	23	I mean the new GP.
24	not been able to go through it and to carefully	24	Q. Did you get permission to
25	read it, and I don't know. I have to talk to my	25	use Denna from anyone?
	Page 87		Page 88
1	A. No.	1	personally. Whatever we act, whatever we do is on
2	Q. My understanding is that	2	behalf of the partnership. We are employees of
3	Denna Properties and Denna Development were	3	the partnership. We were employees of the
4	incorporated to potentially conduct business in	4	partnership in the past, and we were paid by
5	the future?	5	partnership, so we don't do anything for
6	A. Who knows? Yes, we have	6	ourselves. We don't own anything for ourselves.
7	not used these two companies. That was just an	7	Q. The shares in those
8	incorporation, and maybe in future, it depends if	8	companies are held in trust for the partnership.
9	the partnership decided maybe in the future it	9	Is that what I understand?
10	will be used, but we have not used it yet.	10	A. This incorporation of
11	345 Q. It is going to be used	11	these two companies are on behalf of the
12	for the Denna group, though. Right?	12	partnership.
13	A. Who knows? That is for	13	Q. So they could be used for
14	the future.	14	Seylynn phase 2. Right?
15	346 Q. Might be used for	15	A. Who knows? I don't know.
16	something else?	16	Maybe Seylynn has more projects in future. For
17	A. I don't know.	17	the time being, these two companies are
18	Q. Why did you incorporate	18	incorporated, not being used. Maybe in future the
19	the companies, then?	19	partnership decides about these companies to be
20	A. Because this was two	20	used for other projects or other projects. I
21	companies to be incorporated for future potential	21	don't know.
22	possibilities to be used for limited partnership.	22	Q. Did you get any license
23	348 Q. To be used by the limited	23	or permission from Dr. Taheri to use the name?
24	partnership, not you or Mr. Ghahroud?	24	A. To use, if I want to use,
25	A. Not me and Mr. Ghahroud	25	I have to have some kind of coordination maybe
	· · · · · · · · · · · · · · · · · · ·		

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1	with Dr. Taheri.	1	sequentially from the affidavit, but page 43.
2	352 Q. In order to use the name	2	A. Could you show it to me,
3	Denna, did you get Dr. Taheri's permission?	3	please?
4	A. No. I didn't use the name	4	Q. Yes, we are going to get
5	of Denna on these two companies.	5	it up on the screen.
6	Q. Did you get Dr. Taheri's	6	A. Thank you.
7	permission to incorporate the companies with those	7	Q. It starts out on the
8	names?	8	first page, an email from Dr. Taheri to you,
9	A. No, because these	9	copied to Darren Donnelly. Do you see that?
10	companies were just we incorporated, but we didn't	10	A. No, I don't see that.
11	want to use it. Dr. Taheri himself incorporated	11	From Dr. Abo Taheri? I just see here Dr.
12	Denna Projects without asking me. I don't know	12	Hosseini.
13	whether he is using it or not. If it is using it,	13	Q. Then it goes over to the
14	it is against.	14	next page:
15	Q. If these companies were	15	"Our legal counsel has
16	going to use the name Denna, to your knowledge,	16	brought it to my
17	they would require Dr. Taheri's permission.	17	attention that you wrote
18	Right?	18	a letter to the B.C.
19	A. No, it depends at that	19	corporate registry on
20	time who is or who are the owners of Denna. I	20	February 26 authorizing
21	don't know at that time who can say for future	21	another company to
22	next 10 years.	22	incorporate under the
23	Q. Okay. If you could turn	23	Denna name." (As read.)
24	to Exhibit F to your affidavit, and it is page 43.	24	Do you see that?
25	The exhibits are numbered. They don't follow	25	A. Yes.
	Page 91		Page 92
1	Q. Did you write to the B.C.	1	U/T A. No, that is the lawyer
2	corporate registry authorizing Denna Properties to	2	who incorporated. He knows much better than me.
3	register under the Denna name?	3	I don't recall if it was necessary, and I don't
4	A. I don't recall this. I	4	recall if I signed anything in this respect. I
5	don't recall.	5	can check and let you know later.
6	Q. Do you recall requiring	6	Q. I would appreciate you
7	permission?	7	checking and letting me know. Thank you.
8	A. No, no, I don't recall	8	MR. DAWSON: This isn't a
9			
_	whether I signed anything and authorized on behalf	9	discovery. This is a cross-examination.
10	whether I signed anything and authorized on behalf of Denna. I don't know. But anyhow, please	10	discovery. This is a cross-examination. MR. DAVIS: The witness has
10 11		1	
10 11 12	of Denna. I don't know. But anyhow, please	10 11 12	MR. DAVIS: The witness has
10 11 12 13	of Denna. I don't know. But anyhow, please remember that these two companies are dormant	10 11 12 13	MR. DAVIS: The witness has offered it up, Mr. Dawson. The horses have
10 11 12 13 14	of Denna. I don't know. But anyhow, please remember that these two companies are dormant companies, let's say. These are companies to be used in future, and if we were in a position to use it, definitely we have to take care of	10 11 12 13 14	MR. DAVIS: The witness has offered it up, Mr. Dawson. The horses have bolted. MR. DAWSON: I don't think that is the case, Mr. Davis.
10 11 12 13 14 15	of Denna. I don't know. But anyhow, please remember that these two companies are dormant companies, let's say. These are companies to be used in future, and if we were in a position to use it, definitely we have to take care of ownership of Denna.	10 11 12 13 14 15	MR. DAVIS: The witness has offered it up, Mr. Dawson. The horses have bolted. MR. DAWSON: I don't think that is the case, Mr. Davis. MR. DAVIS: We will see what
10 11 12 13 14 15	of Denna. I don't know. But anyhow, please remember that these two companies are dormant companies, let's say. These are companies to be used in future, and if we were in a position to use it, definitely we have to take care of ownership of Denna. 361 Q. I will ask you one more	10 11 12 13 14 15 16	MR. DAVIS: The witness has offered it up, Mr. Dawson. The horses have bolted. MR. DAWSON: I don't think that is the case, Mr. Davis. MR. DAVIS: We will see what you do, but clearly Dr. Hosseini knows that there
10 11 12 13 14 15 16 17	of Denna. I don't know. But anyhow, please remember that these two companies are dormant companies, let's say. These are companies to be used in future, and if we were in a position to use it, definitely we have to take care of ownership of Denna. 361 Q. I will ask you one more time. Did you write to the B.C. corporate	10 11 12 13 14 15 16 17	MR. DAVIS: The witness has offered it up, Mr. Dawson. The horses have bolted. MR. DAWSON: I don't think that is the case, Mr. Davis. MR. DAVIS: We will see what you do, but clearly Dr. Hosseini knows that there might be such a letter, and if you refuse to
10 11 12 13 14 15 16 17	of Denna. I don't know. But anyhow, please remember that these two companies are dormant companies, let's say. These are companies to be used in future, and if we were in a position to use it, definitely we have to take care of ownership of Denna. 361 Q. I will ask you one more time. Did you write to the B.C. corporate registry and give permission to register either of	10 11 12 13 14 15 16 17 18	MR. DAVIS: The witness has offered it up, Mr. Dawson. The horses have bolted. MR. DAWSON: I don't think that is the case, Mr. Davis. MR. DAVIS: We will see what you do, but clearly Dr. Hosseini knows that there might be such a letter, and if you refuse to produce it, the court can draw an adverse
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10 11 12 13 14 15 16 17 18 19 20 21 22	of Denna. I don't know. But anyhow, please remember that these two companies are dormant companies, let's say. These are companies to be used in future, and if we were in a position to use it, definitely we have to take care of ownership of Denna. 361 Q. I will ask you one more time. Did you write to the B.C. corporate registry and give permission to register either of those companies? A. I don't recall.	10 11 12 13 14 15 16 17 18 19 20 21 22	MR. DAVIS: The witness has offered it up, Mr. Dawson. The horses have bolted. MR. DAWSON: I don't think that is the case, Mr. Davis. MR. DAVIS: We will see what you do, but clearly Dr. Hosseini knows that there might be such a letter, and if you refuse to produce it, the court can draw an adverse inference from that. I think you are on the horns of a dilemma. THE WITNESS: Mr. Davis, I have just one minute left.
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1	Exhibit E to your affidavit, please.	1	That is not true.
2	A. Turn to Exhibit E, but	2	Q. But you know that is Dr.
3	please note that the time is over and you didn't	3	Taheri's position. Correct?
4	give me even a break.	4	A. This is his allegation.
5	366 Q. Dr. Hosseini, I don't	5	Q. And you know it is his
6	accept that the time is over. I have a few more	6	allegation that he never officially licensed it to
7	questions, so if you bear with me, we can probably	7	the partnership?
8	get through this in the next five or six minutes.	8	A. No, never. He didn't.
9	A. That is okay. Five, six	9	You know, the name of Denna and the registering of
10	minutes, that is okay.	10	Denna happened in 2015, 2016. Nothing before
11	Q. Okay. Looking at	11	that.
12	Exhibit E to your affidavit, this is an email from	12	Q. Dr. Taheri went ahead and
13	Dr. Taheri to you dated January 7, 2022. Do you	13	registered the trademark
14	see that?	14	MR. DAWSON: Mr. Davis, I
15	A. Yes, I do.	15	think you cut off the witness. He hadn't finished
16	368 Q. He says:	16	his answer.
17	"I don't agree with your	17	MR. DAVIS: I am sorry. I
18 19	position you have taken	18 19	thought he was.
20	in regards to the Denna		Q. Dr. Hosseini, did you
20	brand. I have been using	20 21	have anything to add?
22	Denna both here and back	22	A. Yes, if you want to know the story of Denna, you know, I recall. Dr.
23	in Iran for several	23	Taheri recalls, too. It was 2015, 2016 that we
24	decades now." (As read.) Do you see that?	24	had a kind of brainstorming. It was Dr. Taheri
25	A. I see that. I object.	25	present, myself, Sassan, who was the construction
	A. Tsee that, Tobject.	23	present, mysen, Sassan, who was the constitution
	Page 95		Page 96
1	manager of the company, and Nick Askew. I think	1	THE WITNESS: Please listen to
2	Sassan, since he comes from Shiraz, a city in the	2	my answer. My license plate
3	south part of Iran, and this name, Denna, is the	3	MR. DAVIS:
4	name of a mountain over there. And Sassan	4	Q. Your answer doesn't
5	proposed Denna, and at the beginning, we just	5	respond to my question. My question is very
6	thinking about Denna, Denna.	6	simple
7	Later Nick Askew, who was the	7	MR. DAWSON: Mr. Davis
8	marketing manager of the company at that time,	8	MR. DAVIS:
9 10	said Denna is not enough. You better add homes to be Denna Homes. I think for the first time Dr.	9	Q. You have a license plate
11	Taheri heard this word.	11	that says Denna. Right? MR. DAWSON: Mr. Davis, you
12	373 Q. You think Dr. Taheri	12	are talking over me.
13	didn't hear of this until 2016?	13	THE WITNESS: When you say
14	A. Maybe, I don't mean that,	14	MR. DAVIS:
15	maybe you have heard many things in music or	15	378 Q. No, it is a very simple
16	whatever, but the name Denna as a trade name came	16	question
17		17	MR. DAWSON: Mr. Davis, you
	out of that brainstorning for few days, and these	1	
18	out of that brainstorming for few days, and these four people were involved.	18	are taiking over the witness and you are taiking
18 19	four people were involved.	18 19	are talking over the witness and you are talking over me.
	four people were involved.	1	· · · · · · · · · · · · · · · · · · ·
19	four people were involved. 374 Q. Your license plate is	19	over me.
19 20	four people were involved. 374 Q. Your license plate is Denna, isn't it?	19 20 21 22	over me. MR. DAVIS: The witness has
19 20 21 22 23	four people were involved. 374 Q. Your license plate is Denna, isn't it? A. That's it, but my license plate has nothing to do with development 375 Q. You needed	19 20 21 22 23	over me. MR. DAVIS: The witness has MR. DAWSON: Please, you are
19 20 21 22 23 24	four people were involved. 374 Q. Your license plate is Denna, isn't it? A. That's it, but my license plate has nothing to do with development 375 Q. You needed MR. DAWSON: Please, Mr.	19 20 21 22 23 24	over me. MR. DAVIS: The witness has MR. DAWSON: Please, you are still doing that, sir. You are still talking over me. You are interrupting the witness. You have done it three times in a row. Please let the
19 20 21 22 23	four people were involved. 374 Q. Your license plate is Denna, isn't it? A. That's it, but my license plate has nothing to do with development 375 Q. You needed	19 20 21 22 23	over me. MR. DAVIS: The witness has MR. DAWSON: Please, you are still doing that, sir. You are still talking over me. You are interrupting the witness. You have

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	Page 97		Page 98
1	MR. DAVIS: The witness's	1	interrupting the witness. I am asking the witness
2	answer is not responsive to my question. We have	2	for a responsive answer.
3	very limited time because of Dr. Hosseini's	3	381 Q. Dr. Hosseini, your
4	availability. I want to address my question and	4	license plate is Denna. Correct?
5	the answer.	5	A. Yes.
6	MR. DAWSON: Sir, Dr. Hosseini	6	382 Q. You required Dr. Taheri's
7	is giving	7	permission in order to obtain that license plate,
8	MR. DAVIS:	8	didn't you?
9	Q. Is your license plate	9	A. I didn't need to do that
10	MR. DAWSON: You are still	10	because I was trying to explain, trying to
11	MR. DAVIS: Now you are	11	clarify. This Denna on my car doesn't have
12	interrupting me, Mr. Dawson.	12	anything to do with development or real estate or
13	MR. DAWSON: With respect,	13	properties or whatever. And please know that Dr.
14	sir	14	Taheri had his license plate, has Seylynn for more
15	MR. DAVIS: Again you are	15	than six years, and he didn't ask for any
16	interrupting me, Mr. Dawson.	16	permission. He didn't ask for any authorization.
17	MR. DAWSON: Because you	17	Q. Did Dr. Taheri give you
18	interrupted me and I haven't gotten my point	18	permission to use Denna as your license plate?
19	through.	19	A. I didn't need permission
20	MR. DAVIS: Your point is loud	20	of Dr. Taheri.
21	and clear. It is irrelevant.	21	384 Q. I am not
22	Q. Dr. Hosseini	22	A. This is a license plate.
23	MR. DAWSON: Interrupting the	23	This is not a development trademark.
24	witness is irrelevant	24	Q. I am not asking you
25	MR. DAVIS: I am not	25	whether you needed permission. I am asking did
	Page 99		Page 100
1	Page 99 Dr. Taheri give you permission. He did,	1	Page 100 389 Q. You are using Denna on
1 2	•	2	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your
	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he	2 3	Q. You are using Denna on
2	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for	2 3 4	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your
2 3	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years	2 3 4 5	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna
2 3 4 5 6	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or	2 3 4 5 6	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all.
2 3 4 5 6 7	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that	2 3 4 5 6 7	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. Q. That is my perception,
2 3 4 5 6 7 8	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that 386 Q. You are using sorry.	2 3 4 5 6 7 8	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. Q. That is my perception, and that is the public perception. Right?
2 3 4 5 6 7 8 9	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that 386 Q. You are using sorry. Go ahead.	2 3 4 5 6 7 8 9	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. Q. That is my perception,
2 3 4 5 6 7 8 9	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that 386 Q. You are using sorry. Go ahead. A. In fact, as I said, this	2 3 4 5 6 7 8 9	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. Q. That is my perception, and that is the public perception. Right? A. No, no, that is not correct.
2 3 4 5 6 7 8 9 10	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that 386 Q. You are using sorry. Go ahead. A. In fact, as I said, this is just a license plate. Maybe it was moon.	2 3 4 5 6 7 8 9 10	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. 390 Q. That is my perception, and that is the public perception. Right? A. No, no, that is not correct. 391 Q. Give me one minute. I
2 3 4 5 6 7 8 9 10 11	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that 386 Q. You are using sorry. Go ahead. A. In fact, as I said, this is just a license plate. Maybe it was moon. Maybe it was Vancouver, whatever.	2 3 4 5 6 7 8 9 10 11	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. 390 Q. That is my perception, and that is the public perception. Right? A. No, no, that is not correct. 391 Q. Give me one minute. I think I may be finished.
2 3 4 5 6 7 8 9 10 11 12 13	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that 386 Q. You are using sorry. Go ahead. A. In fact, as I said, this is just a license plate. Maybe it was moon. Maybe it was Vancouver, whatever. 387 Q. It is not moon or	2 3 4 5 6 7 8 9 10 11 12 13	389 Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. 390 Q. That is my perception, and that is the public perception. Right? A. No, no, that is not correct. 391 Q. Give me one minute. I think I may be finished. A. Okay, because it is
2 3 4 5 6 7 8 9 10 11 12 13	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that 386 Q. You are using sorry. Go ahead. A. In fact, as I said, this is just a license plate. Maybe it was moon. Maybe it was Vancouver, whatever. 387 Q. It is not moon or Vancouver, Dr. Hosseini. It is Denna, and you are	2 3 4 5 6 7 8 9 10 11 12 13 14	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. Q. That is my perception, and that is the public perception. Right? A. No, no, that is not correct. Q. Give me one minute. I think I may be finished. A. Okay, because it is already seven minutes over. Okay, but that is
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that 386 Q. You are using sorry. Go ahead. A. In fact, as I said, this is just a license plate. Maybe it was moon. Maybe it was Vancouver, whatever. 387 Q. It is not moon or Vancouver, Dr. Hosseini. It is Denna, and you are using that license plate	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. Q. That is my perception, and that is the public perception. Right? A. No, no, that is not correct. Q. Give me one minute. I think I may be finished. A. Okay, because it is already seven minutes over. Okay, but that is okay.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that 386 Q. You are using sorry. Go ahead. A. In fact, as I said, this is just a license plate. Maybe it was moon. Maybe it was Vancouver, whatever. 387 Q. It is not moon or Vancouver, Dr. Hosseini. It is Denna, and you are using that license plate A. No, no	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. Q. That is my perception, and that is the public perception. Right? A. No, no, that is not correct. Q. Give me one minute. I think I may be finished. A. Okay, because it is already seven minutes over. Okay, but that is okay. Q. Thank you, Dr. Hosseini.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that 386 Q. You are using sorry. Go ahead. A. In fact, as I said, this is just a license plate. Maybe it was moon. Maybe it was Vancouver, whatever. 387 Q. It is not moon or Vancouver, Dr. Hosseini. It is Denna, and you are using that license plate A. No, no 388 Q to promote your	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. 90 Q. That is my perception, and that is the public perception. Right? A. No, no, that is not correct. 91 Q. Give me one minute. I think I may be finished. A. Okay, because it is already seven minutes over. Okay, but that is okay. 92 Q. Thank you, Dr. Hosseini. Those are my questions.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that 386 Q. You are using sorry. Go ahead. A. In fact, as I said, this is just a license plate. Maybe it was moon. Maybe it was Vancouver, whatever. 387 Q. It is not moon or Vancouver, Dr. Hosseini. It is Denna, and you are using that license plate A. No, no 388 Q to promote your personal association with Denna. Correct?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. Q. That is my perception, and that is the public perception. Right? A. No, no, that is not correct. Q. Give me one minute. I think I may be finished. A. Okay, because it is already seven minutes over. Okay, but that is okay. Q. Thank you, Dr. Hosseini. Those are my questions. A. My pleasure, my pleasure.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that 386 Q. You are using sorry. Go ahead. A. In fact, as I said, this is just a license plate. Maybe it was moon. Maybe it was Vancouver, whatever. 387 Q. It is not moon or Vancouver, Dr. Hosseini. It is Denna, and you are using that license plate A. No, no 388 Q to promote your personal association with Denna. Correct? A. No, Denna is my license plate. It is not Denna Homes. As I said, this is	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. 390 Q. That is my perception, and that is the public perception. Right? A. No, no, that is not correct. 391 Q. Give me one minute. I think I may be finished. A. Okay, because it is already seven minutes over. Okay, but that is okay. 392 Q. Thank you, Dr. Hosseini. Those are my questions. A. My pleasure, my pleasure. MR. DAWSON: Sorry, Mr. Davis. I do have some re-examination, but I do require
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that 386 Q. You are using sorry. Go ahead. A. In fact, as I said, this is just a license plate. Maybe it was moon. Maybe it was Vancouver, whatever. 387 Q. It is not moon or Vancouver, Dr. Hosseini. It is Denna, and you are using that license plate A. No, no 388 Q to promote your personal association with Denna. Correct? A. No, Denna is my license plate. It is not Denna Homes. As I said, this is nothing to be doing with development businesses,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. 390 Q. That is my perception, and that is the public perception. Right? A. No, no, that is not correct. 391 Q. Give me one minute. I think I may be finished. A. Okay, because it is already seven minutes over. Okay, but that is okay. 392 Q. Thank you, Dr. Hosseini. Those are my questions. A. My pleasure, my pleasure. MR. DAWSON: Sorry, Mr. Davis. I do have some re-examination, but I do require one minute before I do that.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that 386 Q. You are using sorry. Go ahead. A. In fact, as I said, this is just a license plate. Maybe it was moon. Maybe it was Vancouver, whatever. 387 Q. It is not moon or Vancouver, Dr. Hosseini. It is Denna, and you are using that license plate A. No, no 388 Q to promote your personal association with Denna. Correct? A. No, Denna is my license plate. It is not Denna Homes. As I said, this is nothing to be doing with development businesses, real estate or whatever. This is just a license plate. And I told you that Dr. Taheri has Seylynn	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	389 Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. 390 Q. That is my perception, and that is the public perception. Right? A. No, no, that is not correct. 391 Q. Give me one minute. I think I may be finished. A. Okay, because it is already seven minutes over. Okay, but that is okay. 392 Q. Thank you, Dr. Hosseini. Those are my questions. A. My pleasure, my pleasure. MR. DAWSON: Sorry, Mr. Davis. I do have some re-examination, but I do require one minute before I do that. MR. DAVIS: Given the temporal restraints that I was under, Mr. Dawson, I will
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Dr. Taheri give you permission. He did, didn't he? A. No, I didn't ask, but he knew that I have Denna on my license on my car for at least two, three years before, two years before, and he didn't have any comment or objection about that 386 Q. You are using sorry. Go ahead. A. In fact, as I said, this is just a license plate. Maybe it was moon. Maybe it was Vancouver, whatever. 387 Q. It is not moon or Vancouver, Dr. Hosseini. It is Denna, and you are using that license plate A. No, no 388 Q to promote your personal association with Denna. Correct? A. No, Denna is my license plate. It is not Denna Homes. As I said, this is nothing to be doing with development businesses, real estate or whatever. This is just a license	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. You are using Denna on your license plate, Dr. Hosseini, to promote your personal association with Denna and the Denna trademarks. Correct? A. That is your perception. No, not at all. Q. That is my perception, and that is the public perception. Right? A. No, no, that is not correct. Q. Give me one minute. I think I may be finished. A. Okay, because it is already seven minutes over. Okay, but that is okay. Q. Thank you, Dr. Hosseini. Those are my questions. A. My pleasure, my pleasure. MR. DAWSON: Sorry, Mr. Davis. I do have some re-examination, but I do require one minute before I do that. MR. DAVIS: Given the temporal

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1	THE WITNESS: If it is one	1	of the partnership.
2	minute, two minutes, I am okay, because I don't	2	Q. When you refer to the
3	want to be very rigid. But really I have other	3	partnership, you are referring to the Seylynn
4	businesses to do and I have to go.	4	limited
5	RE-EXAMINATION BY MR. DAWSON:	5	A. Exactly. The partnership
6	393 Q. Sorry, Dr. Hosseini. I	6	LP. Right.
7	will be very brief in my re-examination.	7	398 Q. All right. Thank you.
8	A. Thank you.	8	Those are my questions, sir.
9	Q. My friend earlier asked	9	Whereupon the proceedings adjourned at
10	you questions about the ownership of the Denna	10	3:10 p.m.
11	trademark and trade names. Sir, can you tell me	11	
12	for whose benefit the branding Denna and the trade	12	
13	names was for?	13	
14	MR. DAVIS: Objection. That	14	
15	is an improper question.	15	
16	MR. DAWSON: I disagree. I	16	
17	would like an answer to my question.	17	
18	395 Q. Dr. Hosseini, I am not	18	
19	quite sure if you heard my question. My friend	19	
20	asked you who owned the Denna trademarks and trade	20	
21	names. Can you tell me for whose benefit the use	21	
22	of the Denna trade names and trademarks was for?	22	
23	A. You ask me this question?	23	
24	396 Q. I do. I am.	24	
25	A. That is for the benefit	25	

	•	•		
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