

Page 1

Case: Brian Roland et al. vs. New Country Motor Cars of Naples et al. Plaintiffs: Brian, Nicole Roland, on behalf of Remington Roland. Defendants: Multiple companies including Ferrari of Naples, Interlux Group, Envirostruct, Elite Consulting, Collier County Board, Miner Enterprises, Snap-On Incorporated. Deposition of Brian Alan Roland. Date: October 26, 2023. Location: McLaughlin & Stern, Naples, FL. Duration: 9:42 a.m. - 4:39 p.m. Reporter: Dana G. Sturdevant, RPR.

Page 2

Plaintiff representation: McLaughlin & Stern, Dena Sisk Foman, William T. Abel; Defendant New Country: Dickinson & Gibbons, David S. Preston; Other Defendant: Burr & Forman, Adrian Rust; Interlux Group: Banker Lopez Gassler, Jeffrey M. Bell; Elite Permits of Naples: Marshall Dennehey, Jonathan Eric Kanov via Zoom.

Page 3

Defendant Envirostruct, LLC represented by Kubicki Draper, Jeremy Chevres, Stephen Hawley via Zoom; Defendant Snap-on Incorporated represented by Sellars, Marion & Bachi, Dina Contri via Zoom; Defendant Autoquip Corporation represented by Lewis Brisbois, Todd Ehrenreich, Kelly Kesner via Zoom; Additional representation for Autoquip by McCarter & English, Katherine Althoff via Zoom; Clyde & Co US LLP representation by Douglas Horelick via Zoom; Present: Mary Scott, Videographer.

Page 4

Deposition of Brian Alan Roland; Direct Examination by Mr. Preston; Certificate of Oath; Certificate of Reporter; Read and Sign Letter; Errata Sheet; Exhibits: 1-3 Photographs.

Page 5

Deposition taken by Dana G. Sturdevant in Florida, Date: October 26, 2023, Time: 9:42 a.m., Location: Naples, Florida, Case Number: 2023-CA-000302, Parties: Brian Roland vs. New Country Motor Cars of Naples, LLC, Court reporter: Dana Sturdevant, Videographer: Mary Scott, Witness sworn in, Witness confirms to tell the truth.

Page 6

Brian Alan Roland sworn in; Mr. Preston conducting deposition; Roland has no prior deposition experience; purpose is to ask questions for factual information; emphasis on clarity and understanding; will rephrase if needed.

Page 7

Understanding instructions confirmed, clear answers required (yes/no), nonverbal responses not recorded accurately, guessing/ speculation discouraged, if confused or unsure, acknowledge that, breaks allowed anytime, periodic breaks typical.

Page 8

deposition setting, participant confirms readiness, no questions before start, participant acknowledges oath, understands it parallels court testimony, assumes understanding of questions, agrees to answer truthfully, background information requested.

Page 9

Current address: 4432 Aurora Street, Naples, Florida 34119; Lives with wife Nicole and daughter Remington; Remington's age: almost 2; Birthday: November 9, 2021; Remington stays at home, not in daycare; No one else lived there permanently since incident; Hired doula Amy for nights, initially 3 weeks, extended to 9 months; Last name of doula unknown.

Page 10

Name: Silver, S-I-L-V-E-R; planned initial stay: 3-6 weeks; actual stay: 9 months due to injury; no hired help post-stay, only family assistance; residence: owned home; deposition includes background questions, e.g., date of birth.

Page 11

Born October 11, 1979; born in New Jersey; New Brunswick; attended South Brunswick High School; graduated in 1997; parents alive; mother in Florida; father in NJ and Arizona; mother's name Laurie Shuss (S-H-U-S-S).

Page 12

Mother remarried, Father's name Bruce Roland, Father not retired, Father is a dentist in Somerset, New Jersey, Father works three weeks on, three weeks off, Mother retired from teaching, Mother and stepfather have a travel business, Mother taught home economics in New Jersey.

Page 13

Home economics memorable subject; has one brother Scott Roland, age 40/41; Scott is general manager at INFINITI Naples; no sisters; just her and Scott; high school A-student; unsure about GPA; attended additional schooling after high school.

Page 14

Attended Culinary Institute of America in Hyde Park, NY; admission requires application and essay; unknown number of annual admissions; incoming class had about 25-30 students; education lasted a little over two years; certification or title received upon completion.

Page 15

Associate's degree in culinary arts obtained in '99; always aspired to culinary field; considered four-year culinary education but chose to enter field quickly; attended community college courses to test academic capabilities; wanted to ensure cooking was the right path.

Page 16

Attended Mercer Community College New Jersey after Culinary Institute; only took 2 courses, no degree; worked at 2 country clubs in NJ; did internship in Naples while in school; returned to Naples seasonally after graduation.

Page 17

Degree in culinary arts obtained in 1999, no further schooling, certifications not from culinary school, Certified Chef de Cuisine from American Culinary Federation, certification involves intense practical and written tests, Certified Culinarian obtained while in school, Certified Chef de Cuisine obtained sometime between 2000 and 2010.

Page 18

Chef career in NJ country clubs, internship in Naples; moved to Naples full-time in 2001; worked at Maxwell's on the Bay; restaurant still open, now under new name; position was line cook; worked about a year total including internship.

Page 19

Worked at Chops City Grill on Fifth Avenue as line cook for full season (5-6 months) Owner offered sous chef position for new location in Bonita Springs Wanted experience before opening Went to Manhattan Worked for Daniel Boulud at Restaurant Daniel and Cafe Boulud As entremetier in charge of vegetables and starches Worked there for about 8 months

Page 20

Witness returned to Naples for Chops City Grill opening after working at TPC at Jasna Polana in Princeton, NJ; spent eight months with Daniel Boulud; unsure of exact sequence of events post-Boulud; started working on new restaurant in Bonita Springs; continued with restaurant after opening; year of opening not specified.

Page 21

Started working in 2010, worked almost five years, position: sous chef then executive chef, owner was Skip Quillen (real name Greg), worked full time year-round, moved to Cru in Bell Tower Shops in Fort Myers after leaving Chops City Grill, left because of youth and desire for change.

Page 22

Experience in different environments, helped restaurant grow, felt comfortable operating without me, loved innovative restaurant Cru, owner reached out after I left, unsure of next step, offered position after dinner discussion, worked at Cru for over two years, owners were Dr. Liz and John Kagan, step up from Chops City Grill not specified.

Page 23

Chef's career started with education and experience; stepped down from executive chef to line cook to learn; promoted to sous chef in six months, then executive chef; became co-operating partner after operating partner left; no ownership shares, involved in operational discussions; manager was Mike Knox, now in Fort Myers, restaurant closed years ago; worked at Cru for two years.

Page 24

2007-2008 economic downturn impact on business; operating partner and executive chef roles; decrease in customer frequency; discussions of cutting labor; societal lifestyle changes affecting restaurant industry; received headhunter call for new opportunity in Naples; restaurant seeking name and concept change.

Page 25

hired by restaurant owners persistent recruitment initial decline comfortable conversation restaurant name Maxwell's on the Bay previous internship good concept transition to M Waterfront Grille location Venetian Village position executive chef

Page 26

Same ownership group since 2001; Peter and Chris Sereno owners; still owners of M Waterfront Grille; returned in 2008; executive chef for almost five years; left to open own business; still executive chef when left; no ownership stake; not an operating partner.

Page 27

Left job to open own business end of 2012; communicated with owners 45 days before leaving; no corporation set up initially; goal discussed with wife; leap of faith from high-paying job; concept not fully tested; unsure when corporation established; business idea not restaurant-related.

Page 28

Started personal chef concierge company 2013; named Crave Culinaire, LLC; known wife over 10 years; met at Maxwell's on the Bay; worked at M Waterfront Grille when met; was executive chef there.

Page 29

Met at work, she visited with family; not married at that time; married in 2016; unsure of exact date; recalls September 4, 2016; acknowledges memory issues; deposition questioning about memory accuracy.

Page 30

Dating duration four years, lived together three-and-a-half years, Nicole's career hotel event coordinator in Boston, she moved to Fort Lauderdale for work, no job in Naples found.

Page 31

Crave Culinary, LLC formation discussion; reliance on partner; shared hospitality experience; back of house vs front of house roles; partner's expertise in client service; collaboration for business vision.

Page 32

Crave formed in 2013; she had moved to Naples; worked at Fleming's Steakhouse as private dining director and in marketing; then at Humane Society for marketing events; initially stayed in full-time job for financial security; he focused on building business; unsure of timeline for her full-time transition to Crave.

Page 33

formed company Crave Culinary, LLC in 2013; full-time commitment about 1.5-2 years; no changes in ownership since formation; managing member and sole shareholder is the same person; treated business as joint after marriage.

Page 34

Started business in 2013, built reputation in restaurants, community contributions led to publicity, innovative food attracted attention, gained publicity through media, press release opened business led to client inquiries, major client acquisition through word of mouth, discussion shifts to employee count before Nicole joined.

Page 35

Nicole joined Crave in 2015, worked full time, had 4-5 employees, 3-4 were chefs, one assisted with warehouse, one handled admin tasks, balanced cooking with client communication, not focused on marketing, involved in proposals and menu writing, joint effort in operations.

Page 36

Menu writing decreased since fall 2021, good contribution before that; brought Nicole in 2015 for expertise, company had stable clients, increasing revenue; communication daily about business; trust and experience were key factors; trustworthy employees make work easier; unclear on specific salary start date from Crave; unsure if drawing salary when Nicole joined.

Page 37

Role at Crave changed slightly after bringing in new staff; responsibilities shifted, allowing focus on business growth; initial focus on food presentation and connection with chefs; communicated vision for food with team; oversaw tasting and quality; wrote menus and prepared dishes; instructed other chefs on preparation; confirmed involvement in actual cooking.

Page 38

Cooking full-time for events hybrid role 2015 small business full-time role connected to details paperwork client communications team prep office chef coat prep with team communication with chefs set them up for success prep lists menus emailed everything

Page 39

Employee roles at Crave in 2021: full-time 15-18; main roles included director of operations, catering manager, warehouse manager, executive chef, sous chefs, prep cooks, dishwashers, event chefs, vice president; daily tasks involved taste testing, prepping, loading vehicles, executing events, cleaning up.

Page 40

Sales and culinary development in 2021; Josh Cook was a long-term employee, promoted to sous chef; Owner/founder labeled as chef; Dropped executive chef title after hiring; Still recognized as overall chef; Inquiry about vice president position.

Page 41

Chase Toussaint role to grow restaurant management group; responsibilities included hiring, training, and openings; joined Crave for 4-5 months as of 2021; no longer with Crave; left after fall in 2022; committed to assist with Nest at Pelican Marsh opening; owner/founder present.

Page 42

Vice president present, Nicole also there, Kyle - Director of Operations, catering manager - Kari Jones (K-A-R-I), warehouse manager not remembered, warehouse in same building as operations, location in Bonita Springs, one executive chef - David Orochena, spelling of last name requested.

Page 43

Orochena; two sous chefs; Sam Sorenson remembered; David Or- not with company; left mid-2021; became private chef; likely still doing that; Sam moved to sous chef; hired James Ortiaga as executive chef; Sam not fully ready; executive chef role requires more than cooking; includes training, organization, inventories.

Page 44

Menu writing experience limited, role involved more than cooking, unable to invest time in training Sam, daily communication maintained, hired James for executive chef role to help train Sam, James no longer with the company, left after personal issues post-fall in 2022, transitioned to event chef role for balance, worked several months before finding full-time job, Adam Kimball is current executive chef at Crave.

Page 45

Executive chef role at Crave: responsible for all food-related tasks; food purchasing, ordering, pricing; menu development and recipes; menu trials; execution of menus for guests; handles custom requests from clients; menus are dynamic and require research; development and training often led by the chef; collaboration varies

between chef and executive chef.

Page 46

chef had responsibility but oversight maintained, discussions and tastings before decisions, in 2021 had 2-3 prep cooks, roles often dual with event chefs assisting, event chefs paid hourly, considered employees even part-time.

Page 47

no independent contractors for chefs, occasional staffing shortages, used agency for dishwashers and prep help, sales catering director was Josh Cook, role focused on sales and culinary development, first time hiring for this position, aimed for growth.

Page 48

- Crave experienced significant growth over nine years. - Sales director role seen as key to maintaining growth. - Josh conducted door-to-door cold calling. - He researched community and industry for opportunities. - Participated in wedding shows to promote the brand. - Josh had prior experience as chef and held various director roles. - He returned to Crave in a sales role for less than a year. - His sales role focused on meeting new clients, distinct from owner's broader responsibilities.

Page 49

Hired someone to focus on marketing daily, couldn't leave building for sales efforts, created marketing plans with team, involved in menu development with team members, collaborated with executive chef/sous chef for specific projects, creativity essential in culinary industry.

Page 50

owner stifled creativity tried to involve chefs in menu writing preparation primarily on-site 15-20% in building focus on finishing food at events cleanup larger role depending on event overall success

Page 51

owner/founder of Crave; involved in cooking and menu creation; worked with executive chef; described desired dishes; sampled dishes; also handled logistics; focused on space planning; assisted with equipment rentals; managed staffing; wrote weekly schedules; networked with local chefs; December 2021 timeframe.

Page 52

Out of state work, extra hands needed on big weeks, collaborated with marketing team for social media, did photography for social media/websites, worked with web designer for updates, focused on client communication, built relationships and trust with clients, took a break for restroom.

Page 53

Brian's job at Ferrari event December 2021: cook and manage Crave operation; time spent varies by event; Crave Culinary, LLC still operating; has accountant for finances; accountant's name: Matthew Soldavini; role and duties changed significantly, faced limitations for a period.

Page 54

Started reading emails became overwhelming; evolved to checking emails only; weekly conversations with leaders; occasional face-to-face meetings; team handles most prior responsibilities; focus on coaching from afar; team size increased from 10% to 16-18 employees; significant hiring after losing team members; had 15-18 full-time employees in 2021.

Page 55

Part-time contractors utilized seasonal hiring strategy; goal to retain staff through summer; sometimes hours reduced due to lack of events; employees may seek other jobs; owner/founder position unchanged.

Page 56

No current vice president; previous one left in 2022; considering hiring for the role but facing financial difficulties; wife involved in discussions; Nicole still director of operations; has two catering managers.

Page 57

Mike Sulkey and Lizette Boulanger mentioned; warehouse manager is Jason Avery; new executive chef is Adam Kimball; Sam was sous chef; currently two sous chefs.

Page 58

Dan Dunn and Mark Furr mentioned; two full-time prep cooks; difficulty hiring dishwashers; actively interviewing; hired one who left first day; need dishwashers; typically require two full-time dishwashers; may need more for events.

Page 59

Need still exists for sales culinary director; role dissolved after internal changes; general manager promoted from within (Josh); general manager handles client communication, site tours, menu writing, staffing assistance; oversees operations meetings, maintenance, equipment orders; can make deposits; menu writing involves creating and planning menu items.

Page 60

Josh responsible for writing menus, combines current items for client presentation, formats menus, collaborates with executive chef, may jot down own ideas, discuss as a team; established classic items on menu; Crave creates new dishes frequently; ongoing process; inquiry about who is currently responsible for new dishes at Crave.

Page 61

Involvement with executive chef, sous chefs, catering managers; infrequent participation; reviews menus weekly; curious about dishes; provides feedback on challenging dishes; limitations on creativity; brain function changed; struggles with creative tasks; recognizes personal limitations.

Page 62

Writer's block experienced, hard to create new items, feels limited in creativity, can piece together familiar things, unable to cook like before, can't stand for long periods, knee and foot pain restrict kitchen activity.

Page 63

Loss of confidence in cooking, concern about safety, discomfort with knives and kitchen tasks, decreased awareness of kitchen precautions, difficulty standing for long periods.

Page 64

Difficulty standing varies daily; foot pain significant, knee pain (left knee) also an issue; hip problems and balance struggles noted; overexertion leads to regret and pain later.

Page 65

Pain upon waking; cooking very seldom now; using meal prep delivery service for 8 months; Nicole did most cooking before; couple times a month cooking on days off; mental/creative limitations; physical/emotional limitations affect cooking.

Page 66

overwhelmed in cooking process different now apprehensive uncomfortable in kitchen limited attempts physical pain comes and goes need breaks sometimes Nicole finishes tasks current smell taste issues significant alterations testing showed low recovery about 30-40% of previous ability some smells/dishes still unrecognizable

Page 67

Initial inability to smell dirty diaper; Nicole could smell it; tested by smelling diaper directly; could not detect smell at all; other smells like smoke and flowers also undetectable; currently limited ability to smell; can smell dirty diaper when changing it, but still difficult to detect.

Page 68

Change in smell detected, not overpowering; weekly smell checks; recent incident with Nicole about possible odor; couldn't smell urine; slight ability to smell gasoline/smoke; last week cleaning ladies left gas on, strong smell noticed by Nicole, not by me; concern for safety if unable to detect dangerous smells.

Page 69

Remi might have turned gas knob without notice, worries about safety; belief in 30% improvement; uncertain future improvement discussed with doctors; consulted neurologist, PCP, massage therapist, chiropractor; seeking answers from various specialists; changes in taste related to smell; specific changes in perception of acidic foods.

Page 70

trained palate and sense of smell important for success; needed to evaluate food; noticed flavors became bland after fall; trained chef previously skilled in balancing flavors; felt useless without ability to taste; tested with recognizable flavors like lemon; could sense changes but didn't recognize flavors.

Page 71

Tasting flavors changed post-medication; wine tasted acidic and off; specific pinot noir didn't taste right; career focused on palate sensitivity; unable to sense flavors as before felt devastating.

Page 72

Person can taste food now better than before; can identify grilled chicken by taste but relies on texture for differentiation; struggles to distinguish between similar meats like chicken and turkey; can sense and taste food when dining out.

Page 73

No specific foods bring pleasure; tries smelling prepared meals; Indian food has spices but not as remembered; recently tried pinot noir, less acidic but still lacks pleasure; can't distinguish between vanilla and chocolate ice cream blindfolded.

Page 74

Chocolate affects palate uniquely; can differentiate strawberry and vanilla but less reliably; discussing Crave business; reviewed 2022 financials, no 2023 financials yet; business down in first three quarters of 2023 compared to 2022; unsure of percentage

decrease; hasn't closely reviewed 2023 financials; can access QuickBooks for more information.

Page 75

Transition to QuickBooks online for accessibility Laptop reporting on financials
Accountant's input relevant for reports First quarter of 2023 down compared to 2022
Second quarter numbers also down Fourth quarter typically highest generating for
Crave

Page 76

Q1 bookings affected by holiday season performance, fluctuations impact Q4/Q1;
unsure of exact percentage down from last year, relies on accountant; no comparison
data for current Q4 vs. last year's; current activities for Crave not specified.

Page 77

No public work promoting Crave, not attending events in 2023, feels unprepared for
events, physical condition affecting comfort, mental state not great, speech issue
causing anxiety, insecurities about public speaking, experiencing mouth spasms.

Page 78

brain thinks faster than mouth can speak; speech stutter/twitch during stress; triggers
by nervousness/overwhelm; ongoing issue, varies in intensity; sometimes days
without spasms; Josh fills role at Crave events, acts as face but not prominent in
branding

Page 79

Catering managers turn into event leads; some long-term team members also act as
client communication leads; Nicole's role has changed due to inability to attend events
and her new responsibilities as a full-time mother; she hasn't attended events since
the fall; no direct involvement in planning events catered by Crave since the fall, but
assistance provided.

Page 80

Communications with team via phone, email, text; No direct client communication since fall regarding Crave; Crave has repeat customers; Noticed decrease in repeat customers since incident; Some non-profits that used to hire Crave for years opted for other options; Loss of at least two non-profit clients this year; Higher-end clients also choosing different directions; CMON (Children's Museum of Naples) switched to another chef this year.

Page 81

- Strong support from community over the year - Communication with CMON regarding Crave's absence - Chair of the event decides theme and direction annually - Personal connection with current chair through past catering - Chair expressed regret about missing Crave but chose a different direction - Chair started using a different service for personal events - Relationship building efforts felt impacted by changes

Page 82

Client misses previous service provider Brian, feels current team's service isn't the same, tough to accept impact on decisions, chair at CMON is Ashley Gary (spelled G-E-R-R-Y), another non-profit not using Crave is Captains For Clean Water, they requested rentals for another catering company.

Page 83

Inventory includes dishes found; No direct discussions with entity on why not using Crave; Reached out to Ashley to express missing her and wishing event success; No direct communication with Captains For Clean Water; Team shared some client concerns about not booking Crave; Unable to recall specific client names; Increasing frequency of clients mentioning Crave absence; Inquiry about Crave Culinary, LLC office and warehouse location.

Page 84

Crave based in Bonita Springs; geographic range Marco Island to Captiva/Sanibel; expanded to Tampa, Sarasota, Siesta Key; events in Fort Lauderdale, West Palm Beach, Miami; currently marketing Sarasota, Bradenton, Siesta Key; minimal marketing efforts like website banner; previous test marketing via social media; currently drawing a salary from Crave.

Page 85

Salary \$115,000 now; increased since incident for medical/regular expenses; 2021 salary around \$90,000-\$100,000; Nicole's salary \$52,000; no change in Nicole's salary since incident; additional income from Crave Management Group; Crave Management Group manages restaurants.

Page 86

Restaurant Zest at Valencia Bonita still operating; located in Bonita Springs; in business since 2020; salary drawn since operating; salary through Crave Management Group; currently drawing \$50,000 a year; salary unchanged; Nicole also drawing same amount; Nicole's role was director at Crave.

Page 87

Nicole's role involved operations for multiple companies, limited direct responsibilities at restaurant, communication with housing developer during planning, attended HOA meetings, assisted in restaurant during busy times, Zest at Valencia has approximately 25 employees, financial performance in 2023 worse than 2022, personal funds used to support business.

Page 88

2022 Zest at Valencia Bonita sales uncertain compared to 2021 COVID impact significant first year and a half community private 55+ opened March 17, 2020 closed March 17, 2020 gatherings restricted sales affected many residents uncomfortable public dining tables spaced out masks required 2022 more openings community HOA transitioned from GL Homes to resident-run

Page 89

2022 sales stronger than 2021; unsure of specific figures; 2023 financial struggles; bank account going negative; needing to inject money for operations; reliance on community subsidy and food/beverage minimum; rising labor and food costs; recent cash injection required.

Page 90

Restaurant performance in 2023 affected by multiple factors; absence of key personnel (Brian and Nicole Roland) impacted operations; GL Homes utilized restaurant's reputation for marketing; new community attracted residents; personal presence was significant draw; quality control and coaching were compromised.

Page 91

Resident complaints increased, focus on service details missed, personal accountability for decrease in support and profitability, responsible for restaurant operations in 2021, general manager Charles, food and beverage director, and executive chef (Debra Bicknese) managed during hospitalization.

Page 92

Debra moved to new restaurant Gather as executive chef April/May '23; decision based on experience for new restaurant opening; Charles Shepherd still general manager, now overseeing both restaurants; lost general manager of Zest, John Nunley.

Page 93

Employee left over summer due to personal issues; Crave Management Group still operates Zest at Valencia Bonita; Gather is another restaurant; new corporation Crave Management Group 003 formed at beginning of year; Gather located at Valencia Trails in Naples; opened June '23; Debra is executive chef; John Everding is current manager but gave two-weeks notice.

Page 94

Employee leaving for better opportunity, similar community setup, operating restaurant in gated community, partnered with GL Homes, same developer as Zest in Valencia, approximately 20 employees at Gather, question about salary from Crave Management Group 003.

Page 95

restaurant not profitable; planned to open in June; construction delays caused June opening; initial target was April; management hired March/April; unfamiliar with Gather's financial statements.

Page 96

September performance unclear vs August or July; first two months strong; GL Homes suggests over hiring due to new development excitement; performance declined; hoping for improvement next month; no lease agreement, vendor hired; no profit share; responsible for staff, food, disposables; developer covers equipment, furniture, music; no financial liability if business fails.

Page 97

\$500 food/beverage minimum per home Q1, prorated for closings; funds in account tied to clients must be returned if business closes; no lease for Valencia location; only operating Crave Culinary, LLC and Crave Management Group; clarification on company name Crave Culinaire; inquiry about Crave Management Group Nest at Pelican Marsh.

Page 98

Crave Management Group 002 second restaurant opening outside GL Homes community first plan with vice president approached for negotiation fee-based contract different from Valencias paid for food and labor costs reimbursed for expenses by Association at Pelican Marsh Foundation fee-based business different structure

Page 99

Guaranteed monthly income, expenses covered by others, attractive structure, aimed to provide good food service, expected management fee, opened February 2022, never visited post-completion, planning done before December 2021, Chase managed, hired chef and manager, faced challenges due to timing in Southwest Florida, had to manage summer storms.

Page 100

Opened in February, solid sales in Feb and March, good sales in April, showing profit initially, owners not experienced in restaurant management, relied on us for guidance, warned about tough summer months, sales and profits declined, community provided additional funds for labor and food, decision made to guarantee minimum pay for servers to retain staff, added cost for owners.

Page 101

August '22 financial difficulties at restaurant management fee reduction request by owners to Brian; promise to restore full fee if profit returns in January; owners express sympathy for Brian's recovery from fall; dissatisfaction with Brian's absence; expectations of Brian's involvement not met; feedback on management issues and concerns raised by owners.

Page 102

coach team from afar decision to cut management fee in half conversation about Brian Roland board members involved Paul Fleming Bob names uncertain Pelican Marsh board members cut management fee summer 2022 important Zoom meeting scheduled tough sad conversation

Page 103

Nest shutting down due to financial decision Association made; main factor was financial losses, particularly in food and beverage; connection with management not as expected; unsure if new restaurant operator took over location; lost management fee and incurred additional losses related to staff and business.

Page 104

Crave Management Group had financial loss from contract termination, lost management fee of \$12,500 reduced to \$6,250, agreement was one year with renewal option of 3-5 years, agreement signed prior to incident in 2021.

Page 105

2021 income approx. \$37,000; not open in 2021; income from limited management fees; managers paid from personal funds; shutdown notice in September; agreement not up in September; agreement ending early 2023; never physically present at restaurant.

Page 106

Venue Naples second business catering event spaces recognition of community void limited options outside country clubs hotels demand for customizable space catering kitchen on-premise off-premise catering converted existing restaurant lease agreement question about salary from Crave Management Group for Pelican Marsh

Page 107

Venue Naples location on 41 in North Naples; entity no longer exists; ceased operations in September 2020; kept open longer to settle bills; COVID impacted ability to host events; restrictions limited gatherings to ten people; large venue not financially viable; pivoted business model to Crave2Go and Carve Pantry; aimed to serve community.

Page 108

Decision made to shut down Venue Naples prior to Ferrari incident; no other affected business entities mentioned; break taken at 12:04 p.m.; resumed at 12:45 p.m.; discussion shifted to Crave and experiences before Ferrari incident.

Page 109

First physical visit to Ferrari of Naples late 2020; site tour for event planning; first event January 2021; dealership not open for business yet; Crave hired as caterer; acceptance of "caterer" term evolved over time; Crave confirmed as event caterer.

Page 110

Tracy from Interluxe contacted Crave No prior knowledge of Tracy before this event Uncertain how Tracy became aware of Crave Possible recommendation from Ferrari Inquiry through Crave's website Communication involved team members and personal emails Crave hired for food management

Page 111

event beverage staffing rentals handled by witness; food selection, prep location discussed with Interluxe; no direct communication with Ferrari of Naples employees Emily Rose or Helder Rosa; site tour occurred a few weeks prior to event; site tour included team members, not just witness and Tracy; specific team members not recalled.

Page 112

Kari Jones, Jerry Nestico, possibly Josh present; Jerry's last name: N-E-S-T-I-C-O; Jerry's role: server/bartender, recently assistant event manager; site tour first introduction to space; focused on understanding event layout; learned brand representation and importance of cleanliness; menu approval involved Ferrari.

Page 113

Tracy at Interluxe providing brand information during site tour late 2020; all event info about Ferrari from her; discussion on use of auto lifts not recalled; notification about auto lifts possibly not from initial meeting; car lift presented for moving equipment to second floor.

Page 114

first-floor event kitchen on second floor; unsure if car lift info from Interluxe; permission communicated ahead of time; needed second floor for warming food; menu included warm items; preparation involved building individual servings; COVID protocols in place with safety measures like Plexiglas.

Page 115

Individualized setup, not buffet, intricate work, vendor space in employee kitchen upstairs, operating out of employee kitchen for event, discussion about using car lift, need to transport items to second floor, suggestion made by Crave.

Page 116

Witness only dealt with Tracy at Interluxe for event No other contacts mentioned Materials needed for car lift: Cambros for food, temperature control, equipment totes for cooking tools, cleaning supplies, chef's items, knives, cutting boards Witness not present when car lift used for moving supplies to second floor kitchen

Page 117

Local bakeries involved; three days of action; on-site meeting; supplies already transported; employees involved with auto lift; unsure who used lift; employees

present: Josh Cook, Christian Corzo (C-O-R-Z-O), Teo (Theodore Bubulis, B-U-B-O-L-I-S), David Orochena (O-R-O-C-H-E-N-A); unable to recall others present.

Page 118

Possibly Sam Sorenson at event; auto lift use questioned; presence on both event days; minimal prep movement; likely used stairs/elevator; no significant movement day before; assumption food brought on event day; no direct employee communication on auto lift instructions.

Page 119

Only one person, Josh, provided information; Josh recalled Ferrari employees instructed them on parking; they were directed to park van in front of car lift doors; could unload and use lift to transport items upstairs; unsure if Crave received auto lift operation instructions; believes they were not instructed; does not know if they were; unclear if Crave employees used the auto lift that day.

Page 120

Witness unsure about Crave employees riding auto lift day of event; does confirm Crave employees operated lift for first trip; lacks personal observation; cannot confirm operating controls; arrived with pastries; questions about Crave moving supplies during arrival.

Page 121

Preparation day before event, team set up displays, moved tables for space, half crew upstairs on kitchen tasks, other half finishing displays downstairs, brought pastries for setup, predominantly downstairs during three-day event, event lasted three days plus setup day, total four days, question about loading items onto auto lift.

Page 122

Not present at event, did not operate or ride auto lift, unsure about Crave employees operating or riding lift, not present during breakdown, assumes larger items moved via car lift, smaller items via stairs or passenger elevator.

Page 123

Catering operation breakdown managed by Chef David or Josh; variable team each day; one person designated for questions; David no longer with company; now private chef; works in Naples part-time, Chicago remainder of year; no personal discussions with Tracy during event.

Page 124

Discussion about car lift use, info from Tracy, uncertain timeline, recall no specific instructions from Tracy, she needed approvals from Ferrari for building-related matters, speculation about needing approval for car lift, Tracy frequently mentioned checking with Ferrari.

Page 125

Esperienza event discussed; uncertain if Tracy needed Ferrari of Naples approval for auto lift; other vendors present but unsure if they used auto lift; witness did not see Crave employees use auto lift; did not observe anyone using auto lift during three days.

Page 126

Witness never on auto lift platform during event, mostly in kitchen and using stairs, billed event directly to Interluxe, no other billing parties, met only one Interluxe employee Tracy, may have seen another assistant, can't recall their name, describes Tracy as brown hair, glasses, curly hair, about 5-2 to 5-3, uncertain build.

Page 127

Met slim; she wore business casual, black outfit; no Interluxe items during tour or Esperienza event; no other Interluxe assistance at event; Sam Sorenson not with Crave anymore; left in September '22; unknown current location.

Page 128

Country club employee in Fort Myers; still employed, does catering; Crave has personnel files; can access info via payroll company; payroll company is CoAdvantage; unsure of CoAdvantage's location; question about Kristina Corzo,

corrected to Christian; inquiring if Christian is still employed.

Page 129

Christian left before the incident, was bartender at Turtle Club, unsure of current status due to hurricane affecting operations; Teo working at a restaurant in Fort Myers, assisted Sam with catering; unsure if contract with Interluxe for Esperienza event existed; if so, likely maintained by Crave, possibly retrievable via email.

Page 130

Crave uses invoice as contract; invoice signed with deposit; possibility Interluxe provided a contract but unsure; searching for Interluxe involves email server search; uses Office 365 via GoDaddy; creates client folders for events.

Page 131

Event details documented, proposal included, pictures of food/rentals, client requests noted, BEO is key internal document, outlines responsibilities/timelines, client folder system used, physical manila folders with tabs, digital organization via Microsoft, monthly folders by event date/menu, BEO folders contain event info.

Page 132

Crave uses banquet event order for events; no physical folder for Interluxe anymore; folders recycled after 30 days; documentation mostly electronic; electronic files include e-mails, menus, BEOs; some review of electronic files done; some communication found; inquiry about personal e-mail account.

Page 133

Communicated with Interluxe about Ferrari events through personal business account; email: brian@craveculinaire.com; alternative email: info@craveculinaire.com; redirected to team; main communicators: self, Nicole, catering manager; Nicole's email: nicole@craveculinaire.com; some direct text messaging with Tracy from Interluxe; unsure if had text for Ferrari event; mainly used emails and phone calls for initial communication.

Page 134

E-mails from Crave, Nicole, Tracy exist; not printed out; Esperienza event January 2021; same phone number (239) 289-7753; had an iPhone; unsure of model since 2021.

Page 135

Most updated phone model used; replaces phone every year; transfers data to new phone; incident phone likely two models prior; designated go-to person for events; communication during events via text and calls; typically on same floor at events, minimal texting needed; would walk to communicate instead.

Page 136

company policy against visible phone use for staff at events, allowed to step out for calls, texting used for communication between staff, texting spouse for event updates, staffing questions, communication about issues such as tardiness

Page 137

Expecting to contact Nicole about attendance; she handled client communication; refreshing memory on client details and requirements; recently memorized Nicole's mobile number; (239) 304-6584; memorized it in hospital; typical to text Nicole during events; communication can vary during events.

Page 138

Next event at Ferrari dealership July 2021 Gulfshore Life Top Doctors event hired by Gulfshore Life communication direct with Gulfshore Life contact Rachel Galante event details cocktail hors d'oeuvre party second floor food displays action stations risotto station chef preparing serving desserts bars set up.

Page 139

No walk-through at dealership prior to event, familiarity from previous visits, client trust established, Nicole's prior work at Gulfshore Life, Rachel's role similar to Nicole's, logistics managed possibly by Emily Rose from Ferrari, Emily communicated with Gulfshore Life regarding space rental or donation.

Page 140

Crave event inquiry about auto lift use; unsure if utilized before arrival; lack of clarity on discussions with various parties; training received from two individuals; details of training vague; recall of panel explanation.

Page 141

Items loaded on car lift with permission from Interlux or Ferrari; two gentlemen assisted; one showed panel, other operated lift; trained on using both panels; felt free to use lift after; unsure of employment but assumed Ferrari; impression based on knowledge of lift; no details on their attire.

Page 142

Witness doesn't remember if individuals were in Ferrari attire; thinks one may be white and the other Hispanic; one person joined on platform; no instructions given about securing lift chains; never asked anyone about chain security.

Page 143

Witness didn't see controls clearly, unsure if anyone else present during lift operation, only remembers one individual accompanying them on lift, other individual upstairs to press button, confirms riding up with one person, location on lift not recalled.

Page 144

Witness recalls watching door come down, instructed to exit from one side, saw door as it opened, no memory of chains secured, another person was waiting upon exit, walked off platform, shown location of other panel, team assisted with unloading items after exit.

Page 145

Injury during event; some Crave employees knew lift usage from previous event; verbally instructed employees on lift operation; showed panel and button functions; emphasized safety with outside person; common knowledge among vendors for transport; verbal guidance after training; no specific mention of two gentlemen's

involvement.

Page 146

Vendor info on auto lift unclear; no discussions about employee usage; did not recall directives about riding; experienced ride up with others; no restrictions communicated about riding on lift.

Page 147

Did not feel unsafe on lift; rails and enclosures present; no reason to feel unsafe; did not notice gap when platform stopped; faced parking lot when entering lift; looking out as door closed; positioned towards rear of lift during ascent; clarification asked about turning to face rear.

Page 148

Door closed, witness near parking lot door, elevator lift started, turned within five seconds, casual conversation occurred, employee mentioned exiting from one side, turned with him, holding Cambros, halfway on lift, no concerns expressed about safety.

Page 149

Rider unsure about multiple lift rides on the day of incident; first noticed platform gap post-incident through others; did not personally experience gap before falling; training possibly occurred that day; confusion about specific days and rides; confirmed one ride with two gentlemen.

Page 150

Witness recalls one prior lift trip same day as training; mentions Top Doctor event attendees: Sam Sorenson (chef), Christie Medina (server), possibly Brian Mullally, Starr Diaz, Teo Bubulis, and one short-lived staff member on risotto station with attitude.

Page 151

Main contact for back of house: Chef Sam; front of house: Jerry Nestico or Lizette Boulanger; event involved servers and bartenders; Chase, vice president, attended; event was one day; no discussions with Emily Rose about auto lift; no other conversations about auto lift with event or Ferrari affiliates.

Page 152

- Question about employees riding lift at Top Doctors event - Answer: likely took first trip up and down - Respondent not present during setup/breakdown - No discussions with Sam about his lift experience since fall - No discussions with Christie about using lift - No recall of discussing with Brian - Uncertainty about asking Jerry regarding lift usage - Inquiry about Crave employees related to the event

Page 153

witness asked about employees riding lift at Ferrari; admits learning from others not personal experience; no direct discussions with Crave employees on the topic; clarification from attorney to focus on personal knowledge.

Page 154

Only Josh asked to re-spark memory about event; Josh informed about arrival at Esperienza event and instructions to use car lift; no communication regarding injury event; Josh not responsible for injury event; he attended daytime event; delivered items left behind; handed items to team members; left to return to shop; didn't participate in December 4th event; no safety concerns mentioned during elevator ride.

Page 155

Rider felt safe during lift with knowledgeable operator; no concerns about danger; standard protocol for event breakdown; everyone helps each other; lead gives approval to start breakdown; client usually approves; Top Doctors event involved in approval.

Page 156

Gulfshore Life mentioned; service team assesses guest departure; asks client if breakdown can start; usually no pressure; uncertain if Rachel was asked; staff may have noted empty venue; access to kitchen via stairs or elevator; only known

converse is with Emily Rose; no other names recalled from Ferrari events.

Page 157

Short conversations with Helder, learned names of some salespeople, one moved from food and beverage to cars, minimal interaction, requested restroom break, break taken from 1:44 p.m. to 2:01 p.m., back on record at 2:01 p.m., inquiry about auto lift operation and discussions with Ferrari of Naples regarding elevator usage.

Page 158

No specific memory of requesting elevator operating instructions; no recollection of using chains on platform; did not see chain during first elevator use; no sound issues reported during deposition.

Page 159

MS. FOMAN asks if they can be heard, MS. CONTRI confirms she can hear, MR. PRESTON jokes about keeping them awake, MR. PRESTON questions about dealership visit after Top Doctors event, witness confirms visiting dealership again, site tour conducted with Emily and team members a couple of weeks before grand opening, site tour was for grand opening event, witness unsure of who else from Crave was present.

Page 160

From Crave vendor unclear; only other vendor Artistic Science for lighting/audiovisual; site tour not attended by Tracy from Interluxe; no other Ferrari of Naples associates on tour; purpose of tour to determine event layout and locations for bars etc.

Page 161

Food stations setup discussion, includes stationary and action stations with live chefs, first event utilizing both dealership floors, second floor prep kitchen same as previous events, potential differences in setup being considered, decision on separate kitchen still under discussion, uncertainty about final arrangements.

Page 162

events setup options discussed: garage or tent outside for kitchen; successful separate space for secondary kitchen; actual setup location: car lift on ground floor; suggestion for tent rejected via email; visibility concerns noted.

Page 163

Ferrari disapproved of valet setup near building; guests would see chefs and tent; new plan to use car lift on ground level for prep; must stay on ground floor during event; "they" refers to Emily or Tracy from Ferrari; hired by Emily from Ferrari; initial inquiry for event date discussed.

Page 164

Event planning started after landing December 4th; Italian food theme linked to Ferrari brand; menu ideas developed and presented; communication primarily with Tracy at Interluxe; initial contact with Emily; planning occurred 30-60 days prior to event; site tour closer to event date; timelines were challenging to recall.

Page 165

Event planning timing varies based on guest's planning process; immediate team may need tours closer to event; familiarity with venue could allow for later tours; Emily communicated early for grand opening; she emphasized importance of event; scheduling tours was challenging.

Page 166

prep space on car lift closer to event after site tour suggestion made on tent no discussions with Emily about car lift use no recollection of other conversations regarding car lift use for grand opening

Page 167

Object to form; doesn't remember; discussed car lift with Tracy at Interluxe; used for kitchen and transporting items upstairs; conversation about car lift for supplies; unsure if through Tracy or Emily, all on same email chain; discussing Crave team for event.

Page 168

Event discussed was day of, setup only on that day, team member recall difficult due to multiple events, had smaller party in Port Royal night of event, previous day hosted fundraiser for Donald Trump, confirming multiple events in close succession.

Page 169

Grand opening event Community School of Naples 400 attendees daytime presence arrived 9:00-9:30 left around 2:30-2:45 transitioned to Ferrari with part of team

Page 170

Arrival planned 3:15-3:30 PM delay due to lighting issues in car lift needed own lighting stopped at Wal-Mart for floodlight previous floodlight broke at Trump event lighting insufficient for kitchen use in car lift hadn't checked lighting beforehand notified via email communication

Page 171

Lighting not checked prior to event decision made by Ferrari/Interlux car lift chosen close to event date lighting concerns noted later kitchen setup considerations include lighting not always responsible but questioned if garage or tent involved rental companies typically ask about lighting needs

Page 172

Lighting broke at Trump event; brought own lighting; location behind airport hanger, poor lighting; repeat location; extra electrical outlets provided by Artistic Science; Crave had double floodlight; owned for a couple years; maintained own lights for events with poor lighting; asked client about lighting needs.

Page 173

Not enough lighting noted, would bring own if needed, not unusual to set up second kitchen, client may supply lighting, often rent or bill to them, lighting depended on needs, light broken at Trump event, floodlights capable of lighting area if not broken, had to buy similar light, should have been enough to light ground floor.

Page 174

Car lift lighting set up in garage for chefs to see tables; lighting adequate for passed hors d'oeuvres; more lighting needed for extensive cooking; lighting sufficient for plating items.

Page 175

insufficient lighting in second kitchen after dark, loading vehicles difficult, only two small floodlights, Artistic Science not directly contacted, Tracy and Emily involved, inquiry about lighting to Artistic Science, response was no lighting available, advised to bring own light, own light broken notified Emily or Tracy.

Page 176

Equipment not available, had to buy own light for event, urgency in finding suitable floodlight, Crave team members included chefs James, Jeff Lucas, Jason Pellett, David Durante, Taylor Sanders, Kristen Woolslayer, approximate number of employees included contractors, distinction between contractors and full-time employees noted.

Page 177

40 people total at event, 20 Crave employees, December 2021 Crave had about 25 employees, event staffed mostly by employees, staff split due to another event at CSN.

Page 178

- Small crew in Port Royal - Uncertain number of crew members - Some Crave employees present upon arrival - Carlos Claudio mentioned specifically - Delay due to getting light - Others arrived before due to delay - No clear contact person for interfacing with Interlux - Awaiting arrival and communication from the speaker

Page 179

instructed team to organize outside truck upon arrival; took quick tour of auto lifts; one lift was up; unsure who opened it; brought own light; light setup occurred later; it was still light outside upon arrival; did interface with Interlux about moving logistics.

Page 180

Unclear if spoke to Tracy about supplies upstairs; notified her of presence; searched for her initially; might have texted or called. Second auto lift believed to be open during prep; unsure if seen open; opened to load vehicle. Cannot specifically recall lift being open while setting up. Team responsible for moving items to second floor; present when items used lift; uncertain if personally moved items, possibly on training day.

Page 181

working knowledge of employees using lift with equipment; focused on food station presentations; ensured kitchen had power; set up downstairs car lift; unsure if event was Top Doctors or grand opening; saw employees unloading upstairs; did not see them on lift when doors opened.

Page 182

Employee memory of event struggling, unclear if employees used lift, no belief Interluxe employees operated lift, no conversation about it, only met one Interluxe employee, present during setup, helped with car lift setup, no encounter with other Interluxe employees, inquiry about chefs on second floor.

Page 183

Chef James lead in temporary kitchen with two other chefs, ensured independence of upstairs and downstairs support, unable to recall specific chefs in upstairs kitchen, identified David Durante, Jason Pellett, David Spiegel, and possibly Kristen Woolslayer as stationed upstairs.

Page 184

Second floor occupants included Taylor Sanders, Brian Mullally, and a chef, David Spiegel; Spiegel was a station chef; executive chef present to assist; communication via text and walkie-talkies; preferred walkie-talkies if near; phone call or text if not; uncertain about specific texts sent to employees.

Page 185

Texted Josh about product for event and load-out, called bartender Maurice about early bar shutdown, resolved issue quickly, after Ferrari presentation planned dessert service, sent group text to downstairs and upstairs kitchen staff.

Page 186

kitchen ready for reveal, confirmed with upstairs kitchen, brought trays out, checked downstairs display, located on second level during reveal, took videos and pictures, standing close to vehicle during reveal, not against wall by elevator.

Page 187

witness saw people exiting car after reveal; group text with team members about setup; no other specific texts remembered; focused on dessert setup; completed savory item breakdown; instructed to avoid visible breakdown until guests left; emphasis on not rushing guests; Tracy gave clear instructions on timing for breakdown.

Page 188

upstairs kitchen breakdown due to guest visibility issue, getting food back in Cambros and equipment in totes, similar process downstairs, loading items onto truck, full truck returned to shop, staff remained until next truck came, starting to take backups off barrows, asked Tracy via text about using lift, Tracy initially said no, later approved lift usage, second floor staff included servers, bartenders, chefs, unable to recall specific Crave individuals present.

Page 189

David Durante present; David Spiegel possibly present; flew in Spiegel; old chef friend; Taylor and Brian's presence uncertain; waiting for breakdown approval; Crave team members fluidly moving items; some hand-carrying items down; meeting rest outside.

Page 190

Focus on breaking down stations post-event, witness advised to share personal memory only, reminder from attorney to avoid discussing prior discussions, witness confirms understanding, questioning about movement between floors, assumption

made about not returning to first floor before incident.

Page 191

Helped with desserts, went downstairs to set up station, notified team to start loading truck, returned upstairs for action, remembers loading lift with team, no recollection after that until hospital, unsure who sent lift to second floor, does not know if Crave employee involved, believes lift was used prior to getting on, cannot recall Crave employees loading lift.

Page 192

Last time on lift; team members helped load it; names not remembered; collective effort at night; loading items staged in front of lift; unsure if carrying items; doesn't recall specifics; unclear on typical loading process; asking about method of moving items.

Page 193

loading method varied, both placing items and conveyor line used; no specific recollection of lift method night of fall; loaded items then exited lift to retrieve more; no memory of platform after loading; cell phone usually not in hand while loading/unloading.

Page 194

Had charger and cord that evening; started day at 9:30; outdoors with no charging options; charger in apron pocket; plugged in upstairs kitchen; checked messages periodically; had cell phone most times in pocket; uncertain if phone was on during loading.

Page 195

Used cell phone before fall to contact rental company about item pickup; spoke with two female employees regarding delivery; tried calling both but only reached one; likely texted wife that evening; habit of keeping in touch; just had a baby; wife home with doula.

Page 196

Waiting for breakdown info; may inform wife about home arrival; depends on prior communication; successful Ferrari event; hands-on owner; respects team; plans to help with cleanup.

Page 197

trucks needed rest, pep talk given, no texts checked on wife's phone, no discussion about texts before incident, unsure if contacted individuals via text or call, focused on ensuring message received due to time crunch, uncertain if Crave had event next day, first recollection of wanting cell phone was long after hospital visit

Page 198

Woke up in rough condition, cell phone not a thought initially; asked Nicole about cell phone, she was protective, said she didn't have it, no one knew where it was; got cell phone back about a month later; cell phone worked; uncertain about communication after incident.

Page 199

- Witness recalls hundreds of incoming messages on phone - Prefers reading previews rather than opening all messages - Wanted to reply later to thank people for support - Advised by Nicole not to search news or mention Brian Roland - Followed advice for a while, doesn't recall texting anyone outwardly - Used landline in rehab to call family before getting cell phone back - Once phone was returned, informed family they could reach them there - Discussed timeline of keeping the cell phone post-incident

Page 200

Phone slowing down believed due to Apple strategy before new model release; experienced freezing and slow processing; ordered new phone after hospital stay; unsure of exact timing, guessing spring/summer 2022; ordered new phone online; old phone shipped back to Apple in provided box after data transfer.

Page 201

Packed device with wife, majority done by him, did not use Apple store for data transfer, ensured not to lose data, had conversations with Apple, confirmed iCloud functionality, researched online, called customer service, reviewed text messages to recall events from that evening.

Page 202

Texting activity discussed; learned about texting Nicole; searched for messages related to fall day; wanted to recall details about lighting/conversations with Tracy/Emily; found little; did find texts with Nicole that evening; unsure if saved any messages; questioned about production of texts; acknowledged texts were produced.

Page 203

Snapped picture of event; sent pictures to lawyer; texted with wife and team members; Josh was one; can't recall last text sent before incident; remember texting Tracy for approval to go downstairs; no text with Emily Rose, only e-mail or Facebook; no other individuals involved with event mentioned.

Page 204

No texts other than wife Tracy that evening; no team members involved; didn't need to learn to preserve data, Apple does it automatically; followed Apple's instructions for transferring data; shipped old phone, never seen it since; new phone had carbon copy of old data; kept new phone until recent upgrade, within last six months.

Page 205

Witness questioned about second phone and text messages from incident day; uncertainty about reviewing texts; attorney raises concern about attorney-client privilege regarding text searches; confirmation all texts have been produced; witness uncertain about what can be disclosed.

Page 206

MS. Foman unsure how to assist MR. Preston; MR. Preston clarifies not invading attorney-client privilege; MS. Foman asserts searches based on MR. Preston's request; instructs witness not to answer if related to specific requests; MR. Preston agrees; witness confirms attorney's direction influenced previous answers.

Page 207

Wife's cell phone replacement unclear; no conversation with David Durante about incident; no discussions with second-floor group about fall; had brief conversation with team member considering leaving; first talk since fall.

Page 208

Knew about emotional impact of fall on Kristin Woolslayer; she went to counseling; felt guilty for causing her distress; apologized to her; offered support; only direct communication with Kristin and Josh about incident; unsure if wife spoke with Crave employees; wife hasn't shared new information about the night of the fall.

Page 209

Confusion in hospital, memory loss about family, ongoing memory recovery, questioning about incident, learned about fall, wife withheld gruesome details, concern for team and others' safety.

Page 210

Witness takes break 3:06 p.m. to 3:16 p.m. Mr. Preston asks about signs regarding securing chains on lift. Witness recalls no signs seen. No discussions about securing chains. Photographs marked as Exhibits 1, 2, and 3.

Page 211

Photographs of lift signage shared; Exhibits 1, 2, and 3 marked; Mr. Roland examines exhibits; Exhibit 1 shows car lift with items; Mr. Roland believes it's the lift used during incident at Ferrari dealership; Confirmation based on items present; Ladder in photo not his.

Page 212

Crave has a ladder at the commercial kitchen; no recall of using it at Ferrari event; difficulty in identifying if ladder is Crave's; recognizes yellow and black totes, wooden ice bucket, possible cart; unsure if loaded items on lift; acknowledges white rectangle on far wall in Exhibit 1; Exhibit 2 is a close-up of that item through ladder.

Page 213

Witness does not recall seeing sign on day/night of incident; Exhibit 3 is photo of dealership exterior wall near lift; no recollection of sign presence during event; confirms sufficient instruction to operate lift provided by two gentlemen.

Page 214

No further instructions needed for lift operation; felt adequately trained; could push buttons and understand door functions; items in Exhibit 1 common at events; unsure who carried items onto lift; anyone packing could have done it.

Page 215

Item placement on night of incident unclear; witness unaware of Sebastian Mendez prior; no review of Collier County Sheriff's investigation; no specific knowledge of their findings; witness hasn't listened to David Durante's recorded statement; Durante may have been present on lift during incident.

Page 216

Witness cannot recall specific individuals helping with loading; unsure if Mr. Durante was on lift; mentions Taylor Sanders possibly on second floor or kitchen; believes she was upstairs at some point; information learned post-event; cannot speculate on other locations.

Page 217

No recollection of waving to Ms. Sanders from lift; unaware of recorded statement by Ms. Sanders; first memory post-event is being in hospital; confusion and pain; unable to see own reflection; remembers something attached to leg; feels restricted in movement.

Page 218

worn glasses during accident; prescribed for reading/computer and long-distance driving; wears them now all the time; in 2021 wore 60-75% of the day; dislikes wearing them, feels restrictive, prefers to take off for better eye contact and photos.

Page 219

Prescription for corrective lenses confirmed; glasses usually worn; no specific reasons for not wearing; glasses worn at Ferrari event; unsure if on during incident; learned about glasses from lawyer; asked about eye doctor.

Page 220

Transition between eye doctors Dr. Anderson and new doctor Nicole from Frantz EyeCare; both female; same location; prescription for eyeglasses changed; strengthened overall vision; changes for both distance and reading.

Page 221

Requires eyeglasses for reading long periods, not fully necessary; can see distance but struggles with reading at a distance; wears glasses regularly for driving; was wearing glasses consistently before incident; confused upon waking in hospital, did not recognize family or daughter initially.

Page 222

Nicole spent time with witness; family frequently visited in hospital; witness initially didn't recognize Nicole or family; unsure how long lack of recognition lasted; no recollection of other life events besides incident and hospital stay; uncertain about duration of memory loss.

Page 223

Poor short-term memory; forgets conversations quickly; reminders needed; some long-term memories intact; struggles with memory post-incident; memory issues significant; past sharpness contrasts current forgetfulness; multitasking ability diminished.

Page 224

- Helm of three businesses - managing lots of info/logistics/communication - skilled in it - adjustment due to memory loss - wife confirms memory issues - struggles with long-term memory - can't recall events before lift incident - examples include issues

around trying to get pregnant - family reminds of forgotten details - currently in hospital recovering.

Page 225

conversations with doctors about injuries yes trauma to head brain bleed monitoring brain injury discovered further testing broken femur surgery broken patella knee surgery

Page 226

Fractured bones: facial, hip, ribs, pelvis, leg; immediate bladder repair needed, incision down abdomen due to rupture; unaware of some surgeries initially; external rod placed on leg before waking; positive outlook on rod removal; later surgeries: rod insertion, femur surgery, knee patella surgery.

Page 227

Wound on left calf growing larger, red and dark; PCP referred to dermatologist, tried natural healing methods; wound appeared to pop with white substance; orthopedic surgeon examined during knee X-ray; surgeon surprised by appearance, suggested surgery; surgery performed to clean and repair wound.

Page 228

Tissue pushed through skin on back of left leg; numerous procedures but few surgeries; recent bladder complications; experienced severe chest, abdomen, lower back pain in April; pain similar to previous year; called 9-1-1 thinking it was gas; tried bathroom, unsuccessful; paramedics ran tests, pain subsided; initially thought it was just gas; no other symptoms that year.

Page 229

Woke up extremely bloated, felt like 15 months pregnant, in a lot of pain, tried to go to the bathroom, almost fell, called 9-1-1, paramedics questioned and tested, taken to hospital, underwent tests and enemas, found stool backed up, sent to Naples North Hospital, alarming kidney levels, kidneys starting to fail, transported to Naples North, catheter placed, drained 8 liters of urine, IV fluids flushed system, kidneys started recovering.

Page 230

Cystogram performed to check bladder perforation; found distended bladder; cause of urine retention unknown; urologist Dr. Wong offered surgery or time to heal; opted for home care with Foley catheter for two months instead of surgery; preferred non-surgical option.

Page 231

Catheter in place April to June; another incident in August; elected to use catheter; had catheter for two months; removed in June; next step was another cystogram.

Page 232

Perforation checked, no leak found, good sign; perforation healed, bladder weak from distention; void test performed successfully; instructed to self-catheterize multiple times daily reducing over time; recommendation to continue once or twice weekly; uncertainty about retention cause causes fear of wrong actions; summer self-catheterization questioned.

Page 233

- Patient catheterizes 3-4 times a week at night - Instructed to empty bladder manually before catheterization - Uses device to measure urine output - Physician confirmed perforation healed but bladder still weak - Recovery expected to take a few more months - Episode occurred in September, began in August

Page 234

Woke up with same pain; had catheters with me; tried to go to bathroom; fell down; yelled for Nicole; she turned on light; got catheter; relief but pain persisted; visiting friend's house in Bellingham, Seattle.

Page 235

Trip duration five days; self-catheterizing; had catheters with me; reduced self-catheterization to every three or four days; able to drain urine; significant pain persisted; nothing relieved pain; sat on couch with pillow for comfort; checked on by

others.

Page 236

hospital visit due to pain; called ambulance; requested catheter upon arrival; received pain meds; catheter inserted; bladder distended; no alarming issues found; concern about flight home; doctor assured safety with catheter; PCP consulted for clearance to fly home.

Page 237

Foley catheter placed; pain meds given for flight home; recent void test conducted; need for daily catheterization; fear of lifelong catheter use; doctor uncertain about future; ongoing tests planned; current urologist is Dr. Wong; he has been treating since hospital stay.

Page 238

Catheterizing daily; routine typically at night; occasionally in morning if feeling bloated; no prescribed pain medication for bladder; experiencing discomfort, not significant pain; pain from catheterizing is unpleasant; pain meds for nerve damage only.

Page 239

No current bladder medication; saw GI doctor; prescribed constipation medicine; increased constipation post-fall; colon and bladder proximity; GI visit last month; doctor named Dr. Grace in Naples.

Page 240

- Patient had hernia surgery in '05 - Prescribed Calm, Metamucil, MiraLAX for regularity - Experienced ups and downs with constipation throughout life - Currently more constipated than ever - Noticed increased constipation after returning home from hospital - Initially thought medications could be causing issues - Exploring various reasons for constipation

Page 241

medications discussed: Lyrica (pregabalin) prescribed by Dr. Leach and PCP for nerve pain, taken two at night one during day; Cymbalta taken every morning for pain relief and mood stabilization.

Page 242

Cymbalta not therapeutic but helps with anxiety and mood; initial prescription was Amitriptyline; Amitriptyline discontinued due to heart concerns; Cymbalta lacks sleeping component, taken during the day; Amitriptyline prescribed in hospital; unsure if Cymbalta is from primary care physician.

Page 243

Patient taking new constipation medication, using samples while waiting for insurance approval, noticed increased frequency but more like diarrhea, still adjusting to medication, no other specific side effects reported, currently on three prescription medications plus vitamins and Zyrtec.

Page 244

Daily regimen includes fish oil (twice), turmeric (twice), Vitamin D3, probiotics, men's multivitamin, Zyrtec (for allergies), melatonin (at night), stool softener (twice) Prior to incident took multivitamin and Zyrtec only Fish oil recommended after hospital stay for immune system support

Page 245

Patient consulted PCP and father for medication advice; current medications listed; weight increased since incident; weighed 175 at incident; current weight 189-190; highest weight post-incident was 202; reached 200 a few times after getting home.

Page 246

Weight fluctuated between 170 (malnourished) and over 200 (alarming) Snacking on ice cream and snack foods as a fixation Started fresh meal prep for healthier eating Engaged in physical therapy to improve health Current weight fluctuates between 188-195 Proud of reaching below 190 Recently unable to do cardio activities

Page 247

Bladder incident caused apprehension in activities; physical therapy limited to stretching; unable to do cardiovascular exercises; weight gain issue; discussed exercise options with primary doctor; learned breathing exercises to increase heart rate; most work for Crave done from home; few visits to office in past two months; hiring for management roles.

Page 248

11 years in business, key part of management hiring, conducts phone interviews, collaborates with management on interviews, reviews candidates post-interview, initial phone interviews to gauge energy, invites promising candidates for face-to-face meetings, Josh is GM with most operational knowledge, able to drive a car, physically capable of driving.

Page 249

Typically Nicole drives, I drive occasionally, driven by myself since incident, started driving towards end of physical therapy at Coconut Point, aunt drove me for months, drove myself a couple of times at end of therapy, physically able to drive now, uncomfortable driving, prefer passenger seat, right foot okay for gas/brake, left foot has most pain.

Page 250

Uncomfortable while driving; longest trip alone: 1 hour 45 minutes; owns 2 vehicles: leases one, personal lease; both Infinities; Nicole has 2022 or 2021 QX60, white; individual has 2023 QX80; both SUVs; able to bathe and shower independently now.

Page 251

Able to do tasks independently for over a year, can dress self, lives in two-story home, bedroom on second floor, currently able to use stairs alone, needed assistance initially with belt and crutches, unsure of exact timeline for independence, slept downstairs after hospital discharge.

Page 252

Rented house with all bedrooms upstairs except one; rented bed downstairs for accessibility; some days unable to use stairs; Nicole and doula assisted with stairs; no current walking devices used; stroller used for balance during walks; has used walking devices for a while; practices walking for longer strides and balance.

Page 253

Walking next to Nicole using stroller; unsure timeline for walking without device; recalls physical therapy progression from walker to crutches; reduced to one crutch; therapist's plan to wean off; left crutch during sessions; experienced good and bad days; had crutch available in cars; pain fluctuated.

Page 254

hip pain and foot pain affecting daily activities; device use history unclear; no specific dates for stopping; currently have physical therapy at home instead of clinic; previously attended therapy three times a week; now two to three times a week at home; weekly therapist sessions via home; mostly stay at home; unclear on other weekly activities; questions about reasons for leaving home.

Page 255

Visiting brother and sister-in-law, frequent appointments for Remi, numerous doctors' appointments, no scheduled urologist appointment, seen urologist six times in past month and a half, visited GI doctor, extensive blood tests and scans, acupuncture at chiropractor's office, chiropractor is Dr. Goldman, office near Immokalee and 41, aiming for weekly acupuncture due to bladder issues.

Page 256

Acupuncture weekly for bladder and digestion; previously at home; two months without sessions; minor neck adjustments; no required physicians except neurologist; appointments with urologist and neurologist scheduled; neurologist visits every six weeks.

Page 257

Dr. Kandel treating ongoing mouth spasms, regular checkups every six weeks, nerve studies and brain scans conducted, providing additional information during visits, Dr.

Wong indicated need for daily self-catheterization, prognosis for continued necessity confirmed, ongoing care from neurologist focused on improving neurological condition.

Page 258

Testing of nerve and brain reactions, suggestions for brain challenges, focus on healing process for traumatic brain injury, advised to avoid caffeine and soda, worked on pain relief for nerve damage, injections recommended but did not work, injections done in lower back by pain management doctor in North Naples, specific dates available in medical records.

Page 259

Injections received either late '22 or early '23; possibly around six months ago; aimed at lower back pain and foot; initially increased pain for two days; then returned to pre-injection pain level; experienced fleeting hope from sensation during injection; foot condition returned to baseline post-injection.

Page 260

Witness confirms daily communication with Josh at Crave; provides final decision-making and expert opinion on business matters; Josh seeks advice due to lack of experience; witness feels coherent and engaged; willing to continue without a break.

Page 261

Consultation on menus infrequent; chefs capable; input mostly on client event inquiries and budget assessments; share experience on pricing; discuss equipment maintenance and direction.

Page 262

Staffing struggles due to COVID; employee retention issues; final decision-making respect; team capable of decision-making; hiring to alleviate workload; communication limits acknowledged; team collaboration emphasized.

Page 263

Managing multiple businesses and employees overwhelming; seeks input only on critical issues; spends variable hours weekly on Crave and other businesses; some days are productive, others hindered by emotional/mental/physical state; communicates availability to team; discusses bookings for upcoming season with Josh.

Page 264

tough summer affected inquiries; cc recipient on online forms; volume of inquiries noted but not analyzed; checking calendar for bookings; asked colleague about year comparison; financials not as good as last year; colleague worried about dried-up events; many bookings planned well in advance; planning cycles span multiple years

Page 265

Not in business last two years, concerned about current bookings, relying on repeat clients and new inquiries via social media, no indication season will surpass last year; Crave has three decorated vans, two for many years, third acquired between September 2020 and September 2021; weekends typically busy, Thursdays also historically busy due to galas.

Page 266

Thursdays busiest days for business, personal preference to take Sundays off, overworked six or seven days a week, business is a priority, significant investment of time and effort, Nicole now spends a few hours weekly on payroll and staffing.

Page 267

Lizette taking on staffing duties after a colleague's departure; Lizette Boulanger's title is weddings and events coordinator or manager; she also took over payroll; discussions about time allocation for Nicole post-baby; plans for Nicole's return to work were flexible.

Page 268

Maternity leave planned close to due date of Remi; concerned due to past struggles with pregnancy; previous miscarriages impacted decisions; aimed to adjust work schedule quickly; initial plan for three months off; gradual return to work desired to maintain reputation; consideration for nanny or babysitter for Remi; aunt nearby offered significant help.

Page 269

Remi's daycare considered but delayed, parents prefer keeping her home, possible daycare if no nanny, Nicole's return to work uncertain, aiming for part-time or less than full-time, wants to balance work and time with Remi.

Page 270

Employee on maternity leave end of October 2021, baby born November 9, 2021, continued checking emails; training Lizette for staffing responsibilities; witness picked up invoicing duties; Lizette has been with the company on and off for seven years; deposition tiring for both parties; decision to end the day.

Page 271

Deposition conclusion discussed timing for next day; witness prefers 9 a.m. start over 9:30; session ended at 4:39 p.m.; date for continuation set for tomorrow.

Page 272

Oath certificate for Brian Alan Roland; sworn before Dana G. Sturdevant; date of oath: October 26, 2023; signed November 9, 2023; notary public Florida; commission number HH 425253; expiration July 24, 2027.

Page 273

Dana G. Sturdevant certifies deposition of Brian Alan Roland; transcript pages 1-271 reviewed; true record of notes; no conflict of interest; dated November 9, 2023, Naples, Florida.

Page 274

Witness notification letter dated November 9, 2023; Brian Alan Roland involved in case against New Country Motor Cars; deposition taken on October 26, 2023; transcript prepared; corrections via errata sheet within 30 days; return errata only, not full transcript; signed by Dana G. Sturdevant, US Legal Support; CC to David Preston, Esquire.

Page 275

Errata sheet for Roland v. New Country Motor Cars deposition, changes to be noted, taken on October 26, 2023, Brian Alan Roland, declaration of truth under penalties of perjury.

Page 276

Exhibits listed EX 0001 to EX 0003 Brian Roland 102623; monetary values \$12,500, \$37,000, \$500; dates 1979, 1997, 1999, 2000-2023; various page references for details; multiple phone numbers 239-289-7753, 239-304-6584; mentions of specific amounts \$4,500, \$400, \$40; several instances of time references 2:01, 2:30, 3:06, 3:15; numerous references to pages for additional context.

Page 277

Page numbers and sections referenced 4:39, 4th 29:21, numbers like 50,000 86:18, 6-foot 51:21, 9-1-1 228:19, a.m. 5:7, abdomen 226:6, ability 59:23, absence 90:19, absolutely 37:25, accountant 53:14, action 117:2, active 62:24, acupuncture 255:12, Adam 44:25, additional 13:25, address 9:2, 128:7, adjustments 256:8.

Page 278

administrative matters discussed; admissions made; advancements noted; advantages highlighted; advice given; aesthetics considered; distant events mentioned; affects acknowledged; various individuals affected; affiliations stated; fears expressed; actions taken afterward; age references; agencies involved; agents identified; previous events recalled; agreements reached; future actions planned; alerts issued; allergies mentioned; alleviation strategies discussed; allocations planned; permissions granted; alterations noted; amazing experiences shared; ambulance involvement; amenities highlighted; American references; Amitriptyline discussed; amounts specified; ample resources noted; analysis conducted; answers provided; anxiety expressed; apologies made; appointments scheduled; approvals sought.

Page 279

approved 61:10 106:9 155:21 approximate 13:5 18:1 176:21 approximately 30:8 105:3 111:15 176:22 approximation 76:7 253:10 April 92:5 95:19 100:2 228:14 229:2 231:3 apron 194:1,8 area 20:13 23:21 30:23 48:15 84:9 15,18 173:20 255:22 areas 84:7 12,14,21,22 112:16 187:18 259:21 Arizona 11:19 arm 148:19 aromas 70:6 73:11 around 23:20 24:20 33:2 39:16 64:6 68:20 85:11 109:6 119:8 121:6 126:24 127:24 143:15 154:8 163:3 169:15 16,21 22 170:4 183:8 189:24 194:17 220:4 222:4 232:21 246:11 251:19 252:17 arrive 112:11 162:19 arrived 118:21 119:5 120:22 24 121:10 152:9 154:7 169:13 15 170:2 178:5 8 18 179:3 5 11 23 24 181:15 267:23 arriving 140:5 articles 34:12 articulate 77:25 78:2 articulating 162:1 Artistic 160:10 172:10 174:2 175:9 11 16 18 arts 15:3 16:15 17:5 Ashley 82:15 83:5 asked 8:2 25:10 44:17 54:14 69:13 81:23 82:23 91:8 99:9 137:5 152:22 156:4 172:25 175:18 188:12 197:10 198:25 206:17 21 25 208:16 209:16 210:19 245:6 255:5 264:12 asking 17:24 29:15 60:14 61:5 76:9 13 83:6 89:6 118:9 11 119:17 125:2 142:24 147:22 153:11 16 154:2 190:7 198:5 9 206:4 208:15 209:9 12 13 22 24 216:8 237:12 244:18 261:7 13 asks 260:20 aspirations 15:7 assessment 17:23 assist 35:10 41:8 59:18 79:25 101:6 126:19 188:8 239:10 assistance 127:16 19 214:2 251:2 261:8 assistant 112:8 assisting 51:20 105:12 associate 47:22 71:2 182:18 associate's 15:3 17:4 associated 62:23 97:11 157:23 160:17 Association 98:22 103:5 assume 8:17 30:19 190:21 assuming 60:14 101:18 122:5 assumption 118:20 22 assured 201:16 astronomical 88:1 attached 61:9 217:22 24 attachment 96:24 attack 98:7 attempted 248:9 attempting 78:2 attend 11:6 8 13:24 15:19 16:1 17:2 77:1 87:6 attended 77:8 112:3 attending 16:6 77:7 attest 224:6 attitude 150:25 attorney 206:22 208:16 215:6 attorney-client 205:12 22 206:4 attorneys 6:16 74:10 attractive 36:15 99:3 attribute 89:25 audiovisual 160:11 August 96:1 101:1 231:6 233:25 234:1 aunt 249:13 268:23 aunt's 253:24 Aurora 9:3 auto 113:14 19 116:23 117:5 118:3 25 119:13 23 25 120:4 8 25 121:25 122:3 6 10 18 124:1

Page 280

automatic references 173:10, availability noted 163:24, 199:25, Avenue mentioned 19:2, average discussed 13:21,22, Avery referenced 57:7, avoidance noted 258:8, awareness indicated 63:18, 110:5, Boulanger spelled 267:9, Bubolis spelled 117:20, baby mentioned 195:23, 266:13,14, 267:15,23, 269:18, baby-sitter noted 268:22, back discussed extensively across multiple pages, backed noted 229:13, background mentioned 8:24, 10:23, 30:25, backups referenced 188:10,12, bad mentioned 81:16, 229:8, 253:22, 258:14, bakeries noted 117:1, balance discussed 10:8, 35:11, 44:19, 64:22,24, 70:14,15,18, 252:18,25, balancing mentioned 59:14, ballpark referenced 253:6, bandage noted 227:17, bank mentioned 89:12, 97:10, banker's noted 24:11, banner discussed 84:16, banquet referenced 132:1, bar mentioned 136:3, barking

noted 196:23, barrows referenced 188:10, bars discussed 138:25, 160:25, 185:13, bartender noted 129:8, 136:3, 185:12,14, bartenders noted 151:10, 188:22, base mentioned 36:9, based noted 7:18, 83:24, 128:16, 141:23, 164:3, 206:11,16,22, basically referenced 78:23, 90:12, 155:20, 233:18, basis noted 244:5, 254:9,12, 263:7, 266:23, basket mentioned 32:19, bat noted 270:10, bathe referenced 250:24, bathroom discussed 210:3, 228:20, 229:7, 234:6,11,17, Bay mentioned 18:15, 25:11,24, 28:15, Beach noted 84:10, beautiful mentioned 94:12, 106:19, bed referenced 233:8,14, 252:2, bedroom noted 234:13, 235:21,22, 251:11, bedrooms mentioned 252:1, begin referenced 163:22, 179:1, 244:22, beginning discussed 37:9, 40:3, 67:3,12, 90:3, 93:13, 105:22, 133:25, 258:1, 259:2, begun noted 41:19, behalf mentioned 79:21, 159:21, behind discussed 68:19, 80:1, 154:17, 172:6, 235:23, believe noted 10:15.

Page 281

key points: believed mentioned 200:4; Bell referenced 21:23; Bellingham noted 234:21,22; benefits discussed 8:1; BEO details 131:6,21; beverages listed 15:23; billing issues 126:7; birth date noted 9:8; bladder issues 236:17; blessing referenced 207:22; body mentioned 193:23; Boston noted 30:15; bought items 220:2; brain health discussed 61:7,20; break times noted 7:21,25.

Page 282

breakdown of statements, multiple references to "Brian," email listed, business discussions, building details, mentions of family (brother, brothers), various terms related to construction (build, built), numerous business interactions and transactions, mentions of locations (Brunswick, California), various personal interactions (call, brought), references to food and drink (caffeine, buffet), and emotional expressions (broke, broken).

Page 283

Page references 283, 22:12-25:6; 47:9 calling; calm 240:4; Cambros mentioned; campus 15:12; candles 67:17; cane 252:11; capable referenced 173:20; capacity noted 189:10; captains 82:23; car references extensive; carbon 204:19; cardio 246:25; care discussed 9:10, 10:14; career mentioned multiple times; Carlos 178:10; carrying noted; cases discussed 5:9; casual 127:6; cater and catering references; catheter details extensive; causing noted; certain references multiple; certification mentioned; certified noted; chain references; challenge and challenging discussed; chance noted; change discussed extensively; changed 53:24.

Page 284

changes 33:9, 14 59:7 70:11 81:23 changing 24:21 45:17 67:3,25 charge 19:20 45:21 91:22 110:25 111:2 151:10 155:16 178:19 charger 194:3,7 Charles 91:20 92:15 Charles' 92:16 Chase 41:1 99:17,19 151:12 Chase's 41:2 check 124:24 138:2 194:11 232:1 checked 68:7 171:1 checking 54:4 121:15 195:25 199:9 231:15 235:25 270:6 checkup 257:8 chef 17:11 46:1,13,16 48:12,14,16 49:21,22,23 51:4,5 57:8,13,15,21 60:9,10 61:1,8 70:14 71:25 80:25 90:22 91:21,24 92:3,13 93:20 99:20 100:14 123:5,9,18 138:23 150:14 151:4 161:4 176:14,15,16 183:2,19 184:7,11 189:9 chef's 17:18 116:20 chefs 31:17 35:5,7,8 37:10,19 38:4,20 39:22,23 40:16 43:2,25 46:14,22 47:2 49:25 50:4,22 51:25 57:22 61:1 150:15 163:4 168:15 174:4 181:7 182:25 183:5,12 184:10 188:22 261:5 cherished 266:15 chest 228:15 Chicago 123:23 chicken 72:13,14,20,22 child 10:7,9 Children's 80:24 chiropractic 256:6 chiropractor 69:17 255:17 chiropractor's 255:13 chocolate 73:24 74:1 choose 263:19 Chops 19:2,11 20:2,20 21:24 22:25 chose 15:15 230:22,23 chosen 80:21,25 Chris 26:6 Christian 117:13 128:20,21 129:4,7 Christie 150:19 152:16 chronologically 131:18 CIA 14:4 circulation 132:9 circumstances 37:21 109:6 156:6 165:13 City 12:13 19:2,11 20:2,21 21:24 22:25 claim 108:9 clarify 50:7 97:20 103:23 270:2 class 14:15,17,20 classics 60:16 Claudio 178:10 clean 39:7 50:23 82:23 83:11 112:23 169:18 195:8 196:25 227:24 cleaning 68:15,16,21 116:17 178:1 212:13 clear 162:24 163:7 165:21 187:22 clearance 187:24 236:25 click 131:19 client 35:20,21 38:15 43:11,24 49:18,19,20 52:9,13 59:17 60:6 61:11 70:10 79:7,25 97:11 130:24 131:9,10 132:4 134:13 137:2,4 139:7 155:24 156:7,18 165:5 172:25 173:9 219:21 255:15 261:12 264:6 clients 31:19 34:4,17 35:17,22 36:9 45:14 48:25 52:10 80:3,19 82:8 83:13,19 84:3 106:10,12 123:19 261:19 265:7 close 48:1 52:10 54:22 87:16 94:23 97:5,8,9 104:2 116:11 148:6 165:1 171:5 176:8 186:17 223:17 268:1 close-up 212:24 closed 23:22

Page 285

closely mentioned 74:22, closer noted 148:6, closing referenced 188:11, cloud discussed 201:7, club details 16:17,18, clubhouse noted 54:7, cocktails mentioned 138:20, Coconut referenced 249:11,12, coherent noted 260:19, cold mentioned 27:9, collaborating discussed 60:9, collectively referenced, college details 15:7,19, Collier mentioned 215:12, colon noted 239:8, color discussed 250:17, combination noted 60:5, come referenced multiple times, comfort mentioned 252:19, comfortable discussed, commercial noted 62:22, commitment referenced 96:15, commonalities discussed 139:9, communicate mentioned 37:13, communicators referenced, communities discussed 90:9, community details 15:19, companies noted 87:1, company discussed 23:7, complaints referenced 91:1, completion noted 14:24, complications mentioned 228:10, complies noted 5:19, component discussed.

Page 286

computer references 286; concept and considerations discussed; concerns raised 148; confidence expressed 63; confirms and contacts mentioned; continued discussions 257; contracts involved; contributions noted; conversations detailed; cooking activities described; coordinator roles highlighted; corporate aspects addressed.

Page 287

correct 16:11 17:6 21:20 22:16 24:5 27:4 28:25 30:18 46:18 53:12 56:5 58:25 59:2 75:18 86:13 93:7 93:21 94:8 94:12 94:20 97:15 104:17 121:24 134:15 137:10 148:9 159:19 171:2 172:3 181:12 183:5 204:14 210:21 214:4 228:4 231:5 231:11 233:19 238:2 257:21 257:22 267:18 corrective 219:4 correctly 115:24 Corzo 117:14 128:18 cost 89:21 89:22 96:16 98:14 98:18 98:19 100:23 104:4 104:12 130:6 couch 68:18 235:23 counsel 5:14 counseling 208:4 counteract 71:21 counterpart 126:18 countertop 121:8 country 5:11 128:1 220:3 County 215:12 215:15 215:20 217:8 couple 6:11 15:19 18:6 54:8 63:3 65:19 82:21 106:18 111:17 111:25 138:25 159:16 168:15 172:21 172:22 188:13 222:6 230:11 233:19 236:1 238:6 245:22 246:22 247:24 249:15 251:3 262:3 263:12 264:15 268:25 course 15:19 36:14 44:5 101:25 172:22 229:23 courses 15:19 16:12 court 5:13 5:15 7:7 8:13 cover 85:6 219:10 COVID 88:12 107:16 107:23 114:23 262:3 crater 34:20 Crave 28:8 31:2 32:2 32:7 32:13 32:14 32:23 32:25 33:9 33:10 33:11 33:12 34:24 35:1 35:4 35:15 36:22 36:25 37:3 39:14 40:21 41:10 41:12 41:14 41:17 44:22 45:4 48:10 49:11 51:12 53:4 53:8 53:10 53:11 53:22 53:23 55:24 60:19 60:25 74:7 75:12 75:24 76:25 77:2 77:7 78:18 78:20 78:25 79:21 79:24 80:4 80:7 81:5 82:22 83:4 83:14 83:24 84:2 84:24 85:13 85:20 85:23 85:24 86:12 86:14 86:21 86:24 86:25 90:5 93:5 93:10 93:12 94:24 97:17 97:18 97:20 97:24 98:3 100:12 100:17 101:17 104:1 106:8 106:24 107:23 108:24 109:14 109:22 109:25 110:6 110:12 110:19 110:24 112:6 113:18 114:9 115:13 116:5 119:12 119:24 120:4 120:7 120:10 120:24 122:8 122:13 125:11 125:19 126:11 127:21 128:4 129:3 129:24 130:1 132:2 132:13 133:5 134:4 138:19 140:2 140:13 143:5 145:3 145:11 150:18 152:25 153:24 155:16 157:4 159:22 160:2 160:3 160:4 161:10 161:15 167:23 172:14 174:21 175:11 176:12 177:7 177:15 178:6 188:23 189:19 191:17 191:24 192:24 197:18 208:17 208:21 212:1 212:6 212:9 215:19 247:21 247:24 248:13 260:12 260:15 262:8 263:8 265:11 265:14 268:9 270:1 Crave's 53:15 121:19 166:16 Crave2go 107:24 crazy 228:18 cream 73:24 246:5 create 49:19 50:2 55:15 60:19 62:2 62:6 130:24 162:11 created 84:16 131:22 132:12 132:16 creating 49:2 49:16 51:3 51:13 61:19 116:16 creation 62:5 creative 61:22 62:9 creativity 49:24 62:13 65:21 66:1 crew 121:10 121:12 178:1 Cru 21:23 22:5 22:15 22:17 22:19 22:24 23:23 25:5 cruise 12:20 crunch 197:17 crutch 253:14 253:16 crutches 251:20 253:13 CSN 177:25 cuisine 17:11 17:19

Page 288

culinary references throughout 28-288, customer interactions noted, damages discussed, daily life mentioned, family dynamics highlighted, decisions and dates repeatedly referenced, various individuals named (e.g., David, Debra, Dan, Dana), dealership experiences shared, data points included, dangers identified, and customizable options noted.

Page 289

decisions mentioned 27:13 46:5 56:15 260:18,24 261:8,9; decline noted 100:15,16; declined statement 25:4; decorated referenced 265:13; decrease observed 75:10 80:11 91:6,7; dedicated efforts 107:20; dedicating mentioned 263:13; default noted 89:13; define discussed 130:17; definitely emphasized 71:13 83:22 104:7 110:22 113:23 133:23 187:2 221:7 223:19 253:19; degree mentioned 15:3 16:13 17:1; delay noted 170:4; delays specified 95:16,17; delegated actions 45:22; delivered items 65:8,13; deliveries noted 195:15; delivery discussed 65:7; demand indicated 106:13; demonstration referenced 142:15; dentist mentioned 12:9,14; Department referenced 215:21 217:9; departments indicated 91:22; depend on 53:9 76:11 89:21 123:5; depended statements 35:18 100:6 173:13; depending on factors 50:24 64:24; depends on various 76:1 165:2 196:12; depicted scenarios 211:12; deposit discussed 130:4; deposition details 5:1,9 6:12,13,18 8:16 271:20,22; deposits referenced 59:24; dermatologist mentioned 227:6; describe actions 40:14,17 126:21; described events 51:4 60:4 102:4 243:19; description provided 34:3 181:8; descriptions outlined 142:11; designated roles 135:13; designer noted 52:6; desire stated 71:6; desktop reference 75:2; dessert discussed 187:15,16 191:3; desserts listed 138:24 185:23 186:2 187:8 191:2; destroyed items 88:21; details provided 38:12 91:2 131:2 137:4 209:20; determine outcomes 124:25 173:5 201:25; determined decisions 165:7 170:23; develop strategies 49:3 52:3 62:1; developer roles 87:4 94:14 96:19; developing projects 27:8 35:16 51:19; development processes 40:1 45:10,21 47:21 96:8 106:5; developments noted 80:20; device references 233:10 252:20,22 253:4 254:3; devices mentioned 252:11; devise plans 41:6; diagnosis noted 77:24; diaper references 67:2,4,7,8,11,20,23,25; diarrhea mentioned 243:12; Diaz referenced 150:21; difference noted 73:24 74:4 234:2; different aspects 22:1,2 36:7 46:20 47:18 48:22 49:4 61:21 62:19 64:3 66:2 69:12,20 74:2 80:21,25 81:18 98:11,25 101:24 121:23 123:4 160:23 161:15,18 162:11 178:2 240:9; differentiate noted 72:21; difficult situations 56:14; digestion issues 256:2; Dina referenced 158:19 209:13,16 211:2; dine mentioned 99:6; diner noted 22:6; dining experiences 32:10; dinner references 22:12; dinners discussed 65:9; direct actions 6:5 59:19 79:25 80:3 83:12,17 87:2 111:8 133:16 138:13 175:14 208:12,16 225:9; direction noted 56:9 78:16 80:17,21 81:18 101:3 127:16 144:4 146:22 147:18 205:15 206:5 214:6 261:2,25; directions

specified.

Page 290

page references 290, 81:25, 110:11, 111:5, 114:9, 126:8, 127:18, 175:14, 267:4; director mentions 32:10, 39:19, 42:3, 47:13, 18, 20, 48:3, 13, 56:21, 59:3, 86:25, 91:21; dirty noted 67:23; discomfort 238:19; discuss 60:11, 197:7; discussed 113:18, 167:4, 190:14, 195:6; discussing 29:5, 31:7, 161:5; discussion 113:12, 115:12, 14; discussions 31:21, 83:3, 14, 123:25, 124:8, 140:12, 14, 146:18, 151:17, 152:11, 153:24, 157:22, 166:10, 210:19, 263:24, 264:2; dish mentions 37:18, 20, 51:3, 61:15; dishes noted 37:19, 39:8, 51:8, 60:19, 61:19, 66:23, 82:24, 83:1, 196:20, 25; dishwasher referenced 47:11, 58:14; dishwashers noted 39:23, 58:7, 19, 21, 24; display mentioned 186:10; displays noted 121:5, 13, 15, 138:21, 24; disposables 96:18; dissolved noted 59:6; distance 220:23, 221:1, 7, 9, 250:4; distended 230:5, 232:5, 6, 236:18; distension 230:9; divided 267:2; doctor references 150:10, 219:25, 220:1, 2, 231:23, 236:7, 239:6, 14, 16, 240:3, 247:13, 255:8, 257:15, 258:18; doctors noted 24:10, 66:15, 69:8, 15, 138:7, 150:13, 152:3, 155:14, 25, 159:7, 181:10, 225:2, 5, 11, 12, 16, 226:5, 230:10, 242:10; doctors' mentioned 255:4; document references 104:21, 131:6; documentation 132:10; documented noted 97:23; documents 132:12; doing mentioned 16:5, 35:4, 36:20, 37:24, 38:5, 43:13, 47:19, 48:4, 21, 22, 49:15, 50:17, 21, 23, 51:11, 12, 52:15, 54:4, 56:18, 59:21, 60:25, 65:4, 12, 66:4, 74:16, 17, 76:25, 77:2, 5, 6, 81:8, 82:6, 8, 84:20, 87:18, 88:2, 109:7, 112:14, 128:2, 129:11, 155:10, 160:22, 161:4, 8, 164:25, 171:11, 15, 24, 174:4, 175:1, 185:7, 194:11, 202:18, 206:5, 207:23, 216:14, 227:25, 232:21, 233:2, 3, 234:19, 246:11, 248:4, 15, 249:22, 255:12, 256:4, 260:2, 261:6, 264:16, 266:24, 267:20, 270:7, 14; Donald 168:21; donated 139:25; door references 141:7, 11, 13, 144:1, 4, 6, 7, 13, 147:15, 148:3, 6, 9, 170:9, 181:24, 214:4; door's noted 147:16; door-to-door 48:4; Doordash 65:14; doors mentioned 18:18, 103:3, 119:10, 179:7, 8; double noted 172:16, 18; doula references 9:19, 195:24, 252:7; doula's noted 9:23; downloading 202:18; downs 240:7; downstairs 121:14, 16, 125:16, 126:5, 136:10, 141:15, 161:7, 174:17, 181:7, 182:20, 183:3, 7, 185:13, 25, 186:9, 187:10, 188:4, 191:2, 3, 7, 203:13, 235:22, 251:25, 252:3, 5; dozen 255:7; drain 229:22, 235:16; drained 236:14; draw references 36:22, 85:13, 90:16, 94:24, 106:24; drawing noted 36:24, 84:24, 85:1, 9, 19, 86:14; drawn 86:9, 255:10; draws 85:15; dress 251:6; dressed 127:4, 141:25; dried 264:20; drink 71:5; drive 39:6, 119:8, 154:8, 248:19, 20, 21, 22, 24, 249:1, 4, 17, 250:3

Page 291

driving references 249:2, 249:5, 250:4, duties mentioned 53:23, 267:3, e-mail details 54:1, 80:1, 110:22, education referenced 12:23, 14:19, early mentions 40:6, 48:12, eggs noted 63:2, either options presented multiple times, elevators discussed 122:19,

emotional aspects 65:23, employees mentioned multiple times.

Page 292

employees' employment issues, various encounters and episodes mentioned, EMS referenced, equipment discussed, entities and establishment details, evening events noted, evacuation instances, essence and enjoyment emphasized, ensuring enhanced conditions, environment descriptions, events timelines detailed, enclosures included, essential points highlighted.

Page 293

events mentioned multiple times, examination process detailed, executives discussed extensively, experience and expertise emphasized, expenses noted, expectations addressed, exits and entries recorded, expressions of excitement, existence of certain elements confirmed, exercises referenced, evolving situations highlighted, exhibits listed, everything's situation clarified, extended discussions on various topics.

Page 294

eyeglasses mentioned 3 times, eyes mentioned 2 times, Franz referenced, face mentioned multiple times, face-to-face noted, Facebook referenced, facial noted, facility mentioned, facing mentioned multiple times, fact referred to multiple times, factor mentioned, factors noted, factual mentioned, fail referenced, failure noted, fair mentioned multiple times, fairly noted, faith mentioned, fall referenced multiple times, falling noted, fallout mentioned, familiar noted, family referenced multiple times, fans noted, fantastic mentioned, far referenced multiple times, farthest noted, fast mentioned, faster noted, father mentioned multiple times, father's referenced, favorites noted, fearful mentioned, February referenced, Federation noted, fee mentioned multiple times, fee-based referenced, feel noted multiple times, feeling mentioned, fees noted, feet referenced multiple times, fell noted multiple times, felt mentioned multiple times, females referenced, femur noted, Ferrari mentioned multiple times, field referenced, Fifth noted, figure mentioned, figured noted, file referenced, files noted, fill mentioned, filled noted, filling referenced, fills mentioned.

Page 295

financial terms mentioned multiple times; first mentioned in various contexts; references to specific financial figures; mentions of finding and fixing issues; discussion of flavors; multiple references to "first" indicating importance; focus and

focus groups highlighted; mentions of Florida; various references to floors and floodlights; discussions on fluctuations; fluid dynamics mentioned; multiple mentions of fixing and focus; overall detailed records of various subjects in deposition.

Page 296

Foley referenced multiple times, follow-up mentioned, FOMAN cited extensively, food discussed in various contexts, force-fed noted, foreseeability addressed, forgetfulness mentioned, forgiveness referenced, formality in documents, foundation established, fractures acknowledged, Frantz mentioned, frequency of events noted, friendships referenced, front situations described, fulfillment discussed, full context provided.

Page 297

full-time employment references, fundraiser noted, funds mentioned, furniture discussed, names Galante, Gary, Gerry, Grace, medication gabapentin, gain in context, galas referenced, garage locations, gas and gasoline usage, gated community mentioned, gatherings and events described, giving and receiving actions noted, general statements made, gentleman and gentlemen referenced, geographic aspects discussed, getting information mentioned, girls and girls noted, goal setting discussed, God referenced, GoDaddy mentioned, ongoing actions described.

Page 298

deposition excerpts citations numerous pages references multiple individuals topics discussed include education, gratitude, groups, growth, guarantees, graduation, grilling, and general sentiments

Page 299

guessing 39:15 152:7 guest 70:10 136:2 162:3 165:3 guests 34:18 45:12 118:17 136:8 138:24 156:6 161:4 163:2,10 187:20,21 188:1 guilty 208:4 Gulfshore 138:7-16 139:8,14,23 140:13 156:1,2 guy 52:6 guys 29:6 81:17 95:15 100:4 105:5 118:5 123:7 156:11 159:5 171:17 172:4 180:10 186:1 191:4 234:20 265:23 267:14,15 271:11 habit 195:21 hair 126:23 half 16:20 33:1 88:15,16 91:15 101:6 102:3,19,22 121:10 255:7 257:9 264:25 269:22 halfway 25:9 hand 5:17 46:15 189:23 handed 154:19 211:8 handing 192:24 handle 73:9 262:8 263:4 handles 53:15 handling 139:17 hands 52:1 192:8 193:22 197:22 198:16 hands-on 196:19 248:14 handwriting 128:23 hang 132:6 hanger 172:7 happen 70:18 78:2 115:3 137:22 165:23 186:1 209:10,23 247:4 265:25 happened 9:17 29:11 39:12 59:5 69:1 85:10 98:2 99:9,22 107:15 113:17 115:14

134:14 149:9,16 182:3 186:3 187:6 190:10 192:2 207:15 208:18,21,25 209:10,18,22 210:1 223:16 224:9 225:2 229:2 233:23 236:10 244:14 257:9 happening 191:7 happenstance happy 24:19 25:5 211:1 237:15 hard 24:7 29:24 32:21 55:14 58:8 62:2 67:24 78:3 81:21 99:12 164:20 208:3 212:7 223:22 224:10 262:21 268:14 harder 78:17 168:14 254:2 harm 247:14 he'll 256:8 260:24 261:24 head 7:9 49:16 225:18 269:9 headhunter 24:22 heal 227:7 230:15,23 258:11 healed 230:18 232:4 233:17 healing 258:5,7 health 205:7 244:8 healthier 246:12 hear 11:23 158:21 159:1,2 heard 110:9 185:12 208:1 217:7 234:15 hearing 83:22 heart 71:24 242:13 246:25 247:15,17 heaviest 265:22 heavily 88:17 89:21 heavysset 126:25 heck 210:1 held 168:21 Helder 111:9 157:1 hell 209:22 helm 99:19 224:1 260:22 help 5:22 9:19 10:11 19:13 25:16 41:3,5 44:11,18 46:15 47:11 48:3 61:17 72:17 87:7 92:19 116:13 155:19 156:10 185:9 201:23 207:14 218:10,11 227:7 242:3 243:12 247:12 251:19 252:6,8,10 256:2 257:6,10 258:5 259:8,11 262:5 263:14 268:24 269:2,4 helped 10:17 35:9 77:25 81:2 129:14 144:23 189:10 191:2 202:9 helpful 31:24 helping 22:3 39:5 41:19 48:16 87:9 182:21 192:4,9,11 206:2 214:25 216:1 257:25 helps 89:20 241:24,25 242:4 hernia 240:2

Page 300

high-paying jobs, higher-end services, highest standards, hip trends, hiring practices, Hispanic demographics, historical context, home ownership, honest communication, hospitalized patients, hospitality industry, hourly wages, housing issues, huge impacts, hybrid models, identification processes, immediate actions

Page 301

immobile 301:246 immokalee 255:22 immune 244:23 importance 112:19 113:3 important 6:18 63:19 70:9 101:5 102:23 131:6 165:19 244:19 impression 141:20,22 impressive 22:7 improve 69:9,11 improved 69:5 improvement 243:8 improving 257:25 in-house 107:17 in-the-kitchen 44:7 incident 9:16 223:16 231:5,8 233:22 239:17,25 240:1 244:11,14 245:10,13,18 247:1,3 249:6,9 250:5 251:17 266:3 incision 226:6 income 32:21 85:19 99:1 105:2,3 incomes 32:19 incoming 14:11,14 35:12,22 199:4 incorporate 50:4 268:12,18 incorporated 93:13 increase 75:10 246:25 increased 85:6 increasing 36:10 incur 103:19 indefinitely 254:6 independent 47:1 206:14 independently 183:7 Indian 73:10 indicate 119:24 142:2 indicated 125:6 162:21 233:16 indicates 131:7 indication 173:9 265:9 indicator 88:2 211:22 individual 65:9 69:11 114:23,25 116:20 138:15 215:9 individualized 115:1 individuals 72:12 102:10 120:3 123:2 128:5 141:25 142:16 143:20 146:4 157:24 182:24 197:11 industry 48:5 49:24 50:8 51:25 INFINITI 13:12,13 Infinities 250:15,16 info 236:11 info@craveculinaire.com 133:6 information 6:21 8:24 113:8 124:5 128:9 131:10,23 158:5 190:11 196:3 200:25 201:16 204:6,13 206:13 208:23 215:5 224:2 225:7 257:8

information's 78:4 informed 113:2 225:17 initial 95:21 113:10 248:9 268:10 initially 84:15 226:9 initiated 207:17 inject 89:23 injection 259:14 injections 258:16,17,21 259:8,25 injured 91:13 145:2 154:12 injuries 10:15 225:2,6 injury 225:20 258:6 innovative 22:6 28:2 34:11 input 31:12 75:5 261:8 inquire 261:25 inquired 171:13 inquiries 35:12 106:11 261:15 264:5,9 265:7 inquiry 110:14 163:23 ins 100:5 insecure 77:20 insecurities 77:18 insensitive 101:16 insert 226:20 230:3 233:7 inserted 236:13 inside 28:2 42:8 94:9 126:5 145:15 148:13 162:2,3 170:17 174:3 210:15

Page 302

instances mentioned 66:23 124:9 130:18 135:11 146:5 194:22 219:6 247:25; Institute referred 14:3,6,12,22 16:6,9; instructed multiple times 119:6,7,15 154:7 162:17 179:1 199:11 214:3,11 232:11 233:9; instructions detailed 118:24 119:13 124:10 142:18 158:4,5 187:14,19 204:13 213:19 214:2; insurance mentioned 243:7; intense noted 17:14; intention stated 83:10; interaction discussed 71:20 261:20 162:3; interest expressed 25:2 108:8; Interluxe referenced extensively 110:1,3 111:5 113:4 114:6 116:3 126:8,12,15 127:3,10,14,16 129:17 130:8,14,17,20 132:3,14,18 133:1,5,17 138:12 139:21 141:5,6 160:12,13 163:20 164:12 167:5 171:4 178:20,23 179:25 182:12,17,23; internal aspects 59:7 131:7; Internet noted 265:9; internship discussed 16:22 18:7,23 25:12; interruption 158:19; interviewing referenced 58:9; intricate noted 115:3; introduce and introduced discussed 34:11 157:4 19:10 126:15; items listed 60:5,14 61:5 62:5 63:7 68:13 116:20 121:14,25 122:17,24 127:3 130:6 131:12 141:1,10 144:23 154:17 161:2 167:10 174:24 180:21,23 181:21,22 187:16 188:4 189:23 190:4 191:9,20 192:14,17 193:13 195:10 211:9,14 212:8,9,14 214:15,16,20,22,24 215:2 223:5 244:11; issues raised 44:15 64:22 66:16 93:4 223:21 240:1 256:11 262:4; January mentioned 76:3 101:8 109:10 134:14 138:5; various individuals referenced including James 43:20 44:10,12 53:18 57:9,10,11,12,13 176:14 183:2, Jasna 20:8, Jason 57:7 176:15 183:18, Jeff 176:15, Jerry 112:2 151:6 152:21.

Page 303

job references multiple times, John mentioned, join and joined noted, joint referenced, Jones mentioned, Josh and variations referenced multiple times, key points about keeping, kidneys discussed, kids mentioned, kills referenced, Kimball noted, kitchen specifics detailed extensively, knee issues mentioned, knew referenced multiple times, knife and knives mentioned, knobs discussed, knocking noted, general knowledge discussed.

Page 304

Page references from deposition, mentions of knowledge, known individuals (Kristen, Kristin, Kristina, Kyle), labor references, labels, ladder mentions, land references, landlord mentioned, ladies referenced, various numbers associated with statements.

Page 305

laptop large larger latched late Lauderdale laughing Laurie law lawyer lay Leach lead leaders leading leads leak lean leap learn learned learning lease leases leave leaving led leeway left leg legs lemon lenses letter level levels liability life lifestyle lift lifts light

Page 306

lighting references multiple pages, limitations discussed, limited scope mentioned, lists and listening noted, litigation context, frequent mentions of "little," "live," "lived," "lives," Lizette involved, LLC mentioned, loading logistics detailed, various locations outlined, long duration emphasized, long-term considerations, long-distance references, longer duration discussed, longest duration noted, looking for clarity.

Page 307

page references include 188:11 197:4 199:11 203:15 211:9,25 212:18 217:15 218:20,22 232:9 263:25; terms "looked" "looking" "looks" mentioned multiple times; references to "looped" "lose" "losing" "loss" "losses" "lost"; numerous mentions of "lot" in various contexts; "loud" "love" "loved" "lower" mentioned; person named Lucas; "lucrative" context; "lunch" "lunches" mentioned; "Lyrica" referenced; "made" discussed in various contexts; "magazine" mentioned; "main" "maintain" "maintained" "maintaining" "maintenance" referenced; terms "major" "majority" discussed; "make" "makes" "making" explored; "malnourished" mentioned; "manage" "managed" "management" referenced.

Page 308

manager references manager's mention managers role managing tasks maneuver tactics Manhattan location Manila reference March dates Marco noted market context marketing strategies married status Marsh references Mary mentioned masked details massage reference match context materials discussed maternity leave matter significance Matthew mentioned Maurice reference Maxwell's context meal specifics mean definitions meaning clarifications means discussed meant definitions measure references measures outlined media context medical references medication details medications noted medicine references Medina mentioned medium context meds

usage meet references meeting details meetings discussed melatonin reference
member mentions member's context members noted

Page 309

memories referenced multiple times, memorize and memorized noted, memory discussed extensively, mental health mentioned, messaging and messages frequent, months and monthly records cited, moments and memories significant, money transactions detailed, monitor and monitoring activities, mother and mom mentioned, mortgage referenced, mood noted.

Page 310

move listed multiple times 30:19, 43:15, etc.; movements mentioned; Mullally referenced; multitasking noted; multivitamins mentioned; various names throughout; Naples cited; needs discussed extensively; negatives addressed; negotiations highlighted; neighborhood mentioned; nerve issues noted; neurologist referenced; never stated multiple times; newer items discussed; news mentioned; Nicole referenced

Page 311

Nicole's emails; nights referenced; non-profit organizations; objections noted; notifications received; numbers discussed; off-premise tasting; office details; oath taken; various dates mentioned; non-descriptive terms; observing behaviors; offers made; notes recorded; November events; occurrences listed; obtained documents; noticeable actions; objection instances; normal activities; notary mentioned; night specifics; nonverbal cues; Nunley's involvement; October dates; numerous objection instances; obtain information; various numbers cited; specific nights; off-tasting references; office locations; oath details.

Page 312

Page references provided; various statements and actions noted; terms like "on-premise," "on-scene," "on-site," "onboard," "once," and "one" highlighted; multiple occurrences across pages; key events or testimonies possibly discussed; unclear context without additional information.

Page 313

Page references: 313 160:10,15 161:8, 164:9 172:22 175:10,21,22 178:10 179:9
180:7 181:1 182:18 184:5,10 185:6,10,13 186:8 188:7 195:17,18 200:7,9 203:9,12,14
207:5,18,24 209:4 212:12 215:19,25 216:14 223:20 227:3,8 230:12 231:6 241:17,21
242:8,9,16 249:4,25 250:13 252:2,17 253:14,16 256:14 259:18 260:15 262:8 264:5
268:23,25 269:11,12 terms: one-day 151:14 one-year 104:19 ongoing 78:12 online
75:1 open 18:19 opened 19:15 opening 19:11,13 operate 31:1 operated 265:16
operates 93:5 operating 182:8,13 operation 53:4 operational 23:15 operations 39:20
opinion 39:2 opportunities 48:6 opportunity 43:10,12 opposite 24:18 OPS 59:20 opted
80:16 order 70:4,6 ordered 200:17 ordering 45:9 organization 43:25 organized 131:16
orientate 213:6 orientation 113:13 original 240:21 originally 10:2 57:18 orthopedic
22:21 out-of-pocket 104:2 out-of-the-ordinary 173:4 outdoor 171:11 outdoors 194:5
outfit 127:4 outlets 172:12 outperform 89:7 outside 68:17

Page 314

outward, outwardly, ovens, over-the-counter, overcommitting, overdo, overdraft,
oversee, oversight, overtime, overwhelm, overwhelmed, overwhelming, owe, owned,
owner, owner/founder, owners, owners', ownership, owning, p.m., pack, packing,
packs, paid, pain, pains, palate, palette, Palm, palpable, panel, panels, pans, Pantry,
paper, papers, paperwork, paramedics, pardon, park, parking, part, part's, part-time,
particular, parties, partner, partners, parts, party, pass, passed, passenger, past,
pastries, patella, pattern, Paul, pay, paying, payment, payroll, PCP, peace, pedal

Page 315

Pelican references multiple times, Pellett mentioned, pelvis noted, people frequently
referenced, percentage discussed in various contexts, performance and performed
noted, periods and personally mentioned, physical and physician references,
permission and persistent themes, photographs and photography discussed, phone
mentions throughout, picking and pick noted, perspectives shared.

Page 316

Page references include: pictures 316, piece 62, pillow 235, pinot 71, pivot 88, plan
10, planned 9, planning 79, plates 61, platform 144, play 114, please 5, pleasure 73,
plenty 255, Plexiglas 114, plug 194, pocket 194, point 13, policy 136, posited 150,
position 18, potentially 162, pours 94, practical 17, practice 12, precautions 63,
predominantly 16, preface 206, pregabalin 241, pregnant 224.

Page 317

preliminary references 187:17 prep details 38:19,23, 39:23, 46:7,9,12,15, 47:11, 58:3, 65:7, 111:4, 118:11, 161:12, 163:10, 166:1 preparation mentions 38:19, 50:11,19, 61:16, 114:22, 121:3 prepare occurrences 37:18,20, 118:12, 161:6 prepared noted 6:15, 73:7, 209:21 preparing instances 37:10, 49:12, 50:15, 114:18, 136:1, 138:23 prepped noted 246:11 prepping mentions 39:4, 180:10 prescribed medication references 218:8,10, 238:16, 239:5, 240:3, 241:9,13,14,18,22, 242:7,19 prescribing noted 242:17 prescription details 71:5, 219:4, 220:17,21, 243:23 present occurrences 46:3, 48:8, 49:20, 60:6, 79:10, 91:4, 114:24, 130:5, 156:9, 182:19 presentation noted 185:20 presentations presented instances 37:13, 45:12, 112:24, 113:23, 114:4,5, 163:6, 164:5, 166:9 presenting noted 127:10 presently occurrences 74:9, 76:25 preserve references 204:8,10 president mentions 39:24, 40:24,25, 42:1, 44:8, 56:1,3, 98:8, 151:13, 177:21 press mentions 34:16, 143:16, 145:14,16, 199:5, 214:6 pressed noted 141:11,12 pressing references 182:10, 241:3 pressuring noted 156:9 Preston detailed mentions from 6:6,10 to 271:1,18 problems noted 63:23, 64:11,16, 77:22 procedure noted 226:15 procedures mentioned 226:11, 228:5 proceed noted 231:9 process references 14:7,10, 35:25, 54:3, 61:11, 66:4, 78:4, 112:25

Page 318

processing references multiple times produce and produced noted several times professional mentions profit and profitability discussed profits prognosis mentioned programs and progress addressed prohibiting actions promoting proposals protection and protective aspects protein protocol highlighted public mentions publicity pull and purchasing noted purpose and purposes clarified pursuant to legal terms pushing actions put used extensively quality and quarter references questioned questioning common quick mentions Quickbooks noted quickly addressed Quillen mentioned Rachel referenced

Page 319

List of terms with page references: rails 147:4, rains 94:2, raise 5:17, ramp 55:7, ramping 55:22, ran 66:17, range 84:2,5, rate 246:25, 247:15,17, ratio 177:11, re-ask 50:10, re-spark 154:2, reach 61:22, 199:21, reach-out 133:7, reached 22:11, 81:14, 83:5, 138:11, 245:22, reaching 51:25, 199:9, reacting 258:2,3, read 54:1, 91:3, 198:11, 199:6, 221:3,4,10, reading 90:25, 218:10,11, 220:23, ready 8:3, 38:19, 39:9, 43:20, 52:19, 67:8, 123:7, 179:4, 182:20, 186:2, 187:18, 190:4, real 21:15, 24:9, 84:14, 106:23, realistically 61:20, realize 216:20, realized 56:11, rear 144:10, 147:20,21,25, reason 7:21, 83:5, 88:9,10, 90:4, 113:19, 114:15, 136:15, 147:4,6, 194:2, 196:11, 219:10, 220:6, 239:7, 249:3, 252:12, 253:11, 266:1, 271:9, reasons

77:14, 240:24, recall 7:13, 203:10,22, 205:6,7, 208:19, 210:14, 211:15, 212:3,5,15, 213:2,10, 215:23, 217:13, 219:16, 225:6,9,11,12, recalled 119:5, 123:1, recalls 207:8, receipts 87:18, 88:5, receive 14:25, 142:18, received 119:13, 197:16, receiving 16:15, 70:25, recent 204:22, 228:9, recently 22:9, 63:1, 73:16, 135:9, 137:8, 246:23, 255:24, 264:18, recess 108:20, recipes 45:10, recipients 264:6, recognizable 70:13,22, 90:6, 234:3, recognize 66:15, 67:12, 70:25, 71:1, 72:21, 211:12, 212:9, 222:8, recognized 61:24, 106:5, 156:16, 222:3, 229:1, 230:4, recollection 216:9, 217:2,11, 221:19, 222:15,18, 223:3, 226:12, recommended 110:8, 227:5, 230:11, 244:22, 258:15, recommending 232:15, record 5:6,15, 6:8, 52:20,23, 98:3, 108:18,21, 157:14,17, 210:7,10, recorded 7:10, 215:19, 217:7, records 258:24, recovering 224:25, recovery 101:13, recreate 45:15, rectangle 212:21, recycle 132:7, red 227:3, redirected 133:8, reduce 232:13, reduced 235:12, 253:13,14, referenced 21:8, referencing 22:23, referring 124:12, 149:15, 167:25, reflected 5:15, refreshing 137:3.

Page 320

refrigerator mentioned multiple times; regard and regarding cited several instances; regimen noted; registered referenced; regret expressed; regular occurrences; rehab mentioned; reimburse and reimbursed discussed; reintroduced topic; reiterating points; relabel discussed; relate and related issues; relationship dynamics explored; release mentioned; relevant points highlighted; relief discussed; relieved state noted; reliving moments; relying on certain facts; remain status discussed; remainder noted; remained state mentioned; remarried status; remembering events extensively; remembered instances; remembering referenced; Remi mentioned; remind and reminded occurrences; reminder noted; reminding mentioned; Remington referenced; reminiscent feelings; removed items discussed; renew process; rental agreements; rentals referenced.

Page 321

rented 139:24 repair 226:4,6 repeat 52:12 rephrase 6:24 replaced 207:3 replied 162:23 reply 199:8 report 75:4,8 reporter 5:2,13,16,17,20,24 represent 112:20 represents 25:19 reputation 34:8 request 114:14,158:2 requirements 137:5 require 58:22 required 96:22 resolve 185:18 respect 11:14 respond 110:21 response 7:10 responsibility 46:1 responsible 45:7 restaurant 18:17 restricted 217:25 restroom 52:17 retained 109:14 return 20:1 reveal 186:1 revenue 36:9 review 38:16 right 5:17

Page 322

Numerous page references provided; mentions of various terms including risotto, rock, rod, rode, roles, room, Rosa, rough, route, routine, rule, run, rupture; mentions of individuals such as Roland and Sam; discussions on topics like safety, salaries, sales, and samples; emotional expressions like sad, scared, and sacrifice; notes on specific locations like Sanibel and Sarasota.

Page 323

schedule references 14:16, 61:8, 139:25, 268:9; scheduled mentions 25:8, 102:24, 254:21, 255:6, 256:10,13; schooling noted 13:25, 17:2; schools listed 14:7, 17:2; Science mentioned 160:10, 172:10, 174:2, 175:10, 11, 17, 19; Scott referenced 5:14, 13:6,9,17; seafood noted 25:1; search terms include 106:8, 130:13,17,22, 199:12, 202:10; searched noted 180:4; searches include 205:20, 206:10; searching mentioned 58:13, 69:18, 205:13, 234:13; season noted 19:6,7, 24:17, 54:17, 55:7,9,11,23, 76:2, 263:23, 265:10; seasonal reference 18:9; second noted multiple times across entries; secondary mentioned 162:12,17; secured references include 142:25, 143:1, 144:9, 158:15; security mentioned 128:8; see noted throughout various entries; self-catheter references include 232:11, 257:16, 235:13; send noted in various contexts; sensation mentioned 73:5, 259:22; sequence noted 60:6; September referenced multiple times.

Page 324

servers mentioned multiple times, service references, setting and setup discussed, several instances noted, share and shareholder terms included, short-lived and short-term references, shooting incident mentioned, shop references, signage and significant effects noted, simple and similar concepts discussed, sister-in-law mentioned, site and sitting discussed, several numerical references throughout.

Page 325

Page references: 325, 78:3, 171:1, 172:6, 173:4, 174:8, 228:7, 12; skin: 227:7, 228:1; skinniest: 246:2; skip: 21:11,14; sky: 89:22; slack: 270:13; sleep: 252:5; sleeping: 242:14,16, 251:25; slight: 126:25; slim: 127:1; slow: 100:18, 22, 199:25, 200:1,2, 252:8, 266:5; slowed: 178:14; slowing: 24:14, 200:5; slowly: 268:12,17; small: 38:10, 96:20, 178:1; smaller: 96:17, 168:18; smart: 242:11; smell: 66:14-25, 67:4-19, 68:1-25, 69:22, 70:3, 72:25, 73:8,11; smelled: 68:9; smelling: 68:17, 70:8; smells: 66:24, 67:15, 68:2; smoke: 67:16, 68:12; smooth: 6:17; snack: 246:6,13; snacking: 246:5; snapped: 203:1,2; snapping: 202:17,18; snowbird: 18:9; so-and-so: 188:24; social: 52:4,5, 84:21, 128:8, 198:11, 265:8; society: 24:20, 32:11; soda: 258:9; soft:

73:23; softener: 244:9; software: 130:15; sold: 21:10; Sold-: 53:18; Soldavini: 53:18,19; sole: 33:19; solely: 45:24; solemnly: 5:20; solid: 100:2; solution: 69:19; someone's: 171:17,20; Somerset: 12:13; son: 53:18; sooner: 8:1; Sorenson: 43:4, 118:1, 127:20, 150:14; sort: 25:1, 145:18, 155:17, 164:3, 187:8, 201:22, 235:24, 252:19, 254:3, 257:7, 259:19; sound: 158:20; sounds: 8:5, 67:1,11; sous: 19:13, 21:6, 23:9, 38:4, 39:22, 40:9,10,16, 43:2,4,17, 49:22, 57:13, 22, 61:1; south: 11:7,9, 11, 34:18, 84:4; Southwest: 34:19, 95:13, 99:24; space: 20:20, 25:14, 51:19,20, 99:18, 105:11, 106:13,14,19, 107:12, 109:7, 112:14,15,20, 115:3,4, 121:7,9, 139:25, 140:1, 162:4,11,13, 163:10, 166:1, 170:14, 171:9,11,22, 172:9, 181:7, 182:21, 187:18,20, 194:8; spaces: 106:6; spasms: 77:25, 78:15, 257:5; speak: 76:8, 78:1, 104:22, 152:16; speaking: 77:19, 180:2, 264:13; special: 60:8, 131:9; specialist: 220:12; specialty: 69:20; specific: 14:9, 36:23, 49:23, 73:1, 82:3, 88:10, 124:21, 187:19, 189:25, 193:23, 215:15, 216:4,8, 238:14,25, 243:20, 253:5, 257:24, 258:25, 260:14, 262:7; specifically: 26:5, 33:5, 48:19, 79:2, 80:4, 83:4,6, 96:3, 111:16, 113:20, 114:12, 130:12, 140:20, 149:6, 152:22, 158:1, 180:3,16, 183:13,14, 188:24, 192:7,18, 201:13, 212:17, 225:9, 231:20, 241:18, 258:20; specifics: 224:21; speculate: 7:14, 142:8, 216:8,24; speculating: 124:20; speech: 77:16,22, 78:7; spell: 20:9, 42:13,25, 53:20, 112:4, 117:15,22; spend: 178:15, 254:22; spending: 50:15

Page 326

numerous references to time 20:14, 24:12, 49:11, various mentions of spices 73:11, Spiegel 183:19, splitting 35:15, multiple instances of speaking 201:18, 208:18, spoken 118:23, spoons 116:15, spray 116:19, springs 20:20, staff references 47:7, staffing details 47:9, 51:23, stages 39:13, stair mentions 126:6, standing points 62:20, start mentions 8:3, started occurrences 15:11, starting references 24:7, state definitions 5:3, statements noted 215:19, status updates 66:13, stay references 9:10, steak mentions 25:1, step details 22:11, stepfather mention 12:20, stopped instances 254:6, store references 200:20.

Page 327

multiple references to stories, storm, strain, strange, street, strength, stress, struggle, student, studies, stuff, suggest, summer, supplies, support, successful, supplement, strong; mentions of stress-related issues, educational context, and various struggles faced; recurring themes of support and success.

Page 328

surface mentions surgery details surgeon references symptoms discussed tasks
assigned talking points team dynamics Tampa location targeted actions tax
implications teaching moments taste preferences sworn statements surgeries
performed sweat factors talent noted taken actions sweetener mentions tables and
data tabs referenced SUV mentions surge in activity surpassing expectations system
overviews

Page 329

deposition page numbers 203:8 204:3,4 207:19 208:13 209:24 262:20 263:19 267:3
268:15 mentions tears 266:15 technology 201:14 tell multiple instances 13:4,19
14:5,21 16:14 24:23 30:11 33:25 36:7 37:5 45:6 62:19 66:22 69:22 70:5 73:24 76:6,21
79:13 80:14 84:2 87:17,24 95:25 112:10 117:7 119:4 122:16 138:18 140:23 145:25
155:20 156:24 166:24 179:6 180:17 182:6 183:13 192:19 205:6 212:7 214:20 215:6
216:5 217:13 218:7 219:23 221:8 225:5,13,16 227:15 228:12 231:23 233:23 237:15
241:8 244:13 251:22 258:8 270:18 telling occurrences 29:19 62:14 69:10 95:12 103:1
113:4 145:7 146:3 157:7 206:7 226:16 232:17 235:15 236:22 temperature references
116:8,11 temporary aspects ten mentioned 7:22 28:12 107:19,21 137:8 266:11
tendon references 227:10,20,21 tent mentions 162:6,7,24 163:4 166:7
171:11,16,22,24 Teo mentioned 117:18 129:12 150:21 term references 109:15,17
256:22 term's 19:20 terms discussed 13:19 16:15 17:6 33:9,25 36:1 37:23 55:6 65:4
74:9,14 75:22 78:18 79:9 87:17 90:20 95:3,6 96:24 103:23 104:4 111:8 118:3,11
126:7 128:7 132:24 139:16 142:15 151:16 155:14 166:11 174:17 176:19 177:17,22
185:7 192:22 195:19 202:1 204:6,12 217:13 224:8 244:11 246:17 247:5 256:10
257:14 261:9 265:21 terrible reference 67:10 test instances 7:15 231:25 232:8 237:7
tested 27:17 67:10 236:16 testified 6:3 testify 125:5 testifying 8:13 testimony
references 5:21 146:15 149:13 testing references 66:17 225:21 229:9,11 237:7 258:1
tests mentioned 228:22 237:18 258:15 text references 80:1 81:14 133:16,21,23
135:19,24 136:12,20 137:21 180:5 184:24 185:12,24 187:9 188:12 195:19,20
197:5,8,12 198:20 201:12,21 202:2,12,15,19 203:5,11,15,20 205:4,13,16 206:11
texted 185:3 187:4 196:4 202:3 204:1 texting references 135:16,22 136:16 184:14,25
187:6 199:2,14 202:1 203:6 205:8 texts 187:12 texture references 72:16,17 thank
instances 5:24 190:15 199:8 210:6 thanked 25:4 thanks 215:3 that'll 55:15 theme 81:8
164:3 Theodore mentioned 117:19 theory reference 200:1 therapeutic references
242:2,3 therapist mentions 69:17 247:7 253:16 254:14,19 therapy references 246:14
247:5 249:10 253:13,15,20 254:13 thing occurrences 6:18 8:23 33:11 63:5 67:5 68:19
78:12 80:20 82:10 83:22 88:8 114:11 115:5 116:18 124:14 134:24 135:4 163:1 165:14
171:25 187:8 191:11 195:4 208:6 209:8 230:14 232:21 234:1 243:24 249:20 252:15
254:21 256:1,3 258:5 things references 15:18 23:1 29:11 30:1 31:19 34:13 35:23
36:13 37:7 38:16 44:1 45:8 48:7 51:20 54:3 56:11,17

Page 330

Page references include various statements and questions throughout deposition; topics cover thoughts, time, mention of physical sensations like throbbing and tightness; recurring themes of thinking and reflection; specific dates and events noted; mention of tickets and third-party references; references to duration such as three-and-a-half; legal terminology present; overall narrative indicates a detailed account with frequent page citations for context.

Page 331

Page references provided; highlights various topics including timeframes, timelines, today, tomorrow, tough situations, and tours. Mentions specific actions like touching, told, total counts, and feelings of tiredness. References to tissue and toilet. Various emotions and experiences discussed throughout.

Page 332

towels Tower town TPC Tracy traditional trailer Trails train trained training transcript transfer transferred transferring transition transitioned translate translated transpire transpired transport transported transverse trauma traumatic travel traveled tray trays treated treating trials trick triggers trip trouble truck trucks true Trump trust trusted trustworthy truth truthfully try trying Tuesday Tuesdays Tumeric tune turkey turn turned Turtle TV twice twitch two

Page 333

Page references listed, two-story, two-team, two-weeks, type and types mentioned multiple times, typical and typically used, Uber referenced, ultimately noted, various affirmations (Umh-huh, Umh-hum), unable to perform tasks, uncertainty expressed, uncomfortable situations described, understanding emphasized, unfortunate circumstances, unknown elements, unloading processes, unsafe conditions, unusual occurrences, updates and upgrades discussed, upstairs locations identified, urge to act noted, urination and urine referenced, urologist mentioned, uselessness noted, utilization of resources discussed, vacations referenced, Valencia mentioned multiple times, valet services discussed, van noted, vanilla mentioned.

Page 334

various references to vehicles, vendors, venues, video, visibility, vitamins, void, waiting, walking, and walls; mentions of wanting and walk-throughs; references to Wal-Mart and warehouse; various actions including walking, waiting, and waking.

Page 335

witness testimony 5:16,19,23 20:9 52:17 108:16 137:10 153:13,15,17,19 157:10,12 190:9,13,15 205:24 210:3,6 260:4,6,9 270:20,22,25 271:5,9 various mentions of water 82:23 83:11 waterfront 25:17-29:4 multiple references to weeks 9:7-268:9 mentions of weddings 48:7 267:11 various mentions of work 18:22-247:21 references to weather 99:25 mentions of wife 9:5,13 27:14-209:17 references to waves 217:3 multiple mentions of wearing 72:10-221:18 mentions of weight 245:9-260:25 references to wine 70:7-73:21 mentions of weird 227:11 references to wood 212:11

Page 336

worked mentioned multiple times working discussed extensively works noted world referenced worried expressed wound injuries detailed writing referenced various times wrong addressed in several instances X-RAYS mentioned year and years discussed in various contexts yelling noted yellow referenced young age mentioned zero discussed Zest mentioned multiple times