

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 50-2023-CA-001841-XXXX MB

GEOFFREY T. MOTT, individually,
Plaintiff,

vs.

INLET PLAZA CONDOMINIUM ASSOCIATION, INC.,
a Florida corporation, et al.,

Defendants.

REMOTE DEPOSITION OF ALEXANDER SANDY BAPTIST
Pages 1 through 52

Thursday, April 3, 2025
10:08 a.m. to 11:08 a.m.
Miami, Florida

Stenographically Reported Remotely By:
GYPSY FERREIRA-MACIAS, FPR
Florida Professional Reporter

Alexander Sandy Baptist
April 03, 2025

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1	REMOTE APPEARANCES	1	INDEX OF PROCEEDINGS
2		2	Remote Deposition of Alexander Sandy Baptist
3	On Behalf of the Plaintiff:	3	Direct Examination by Mr. Liberty
4	NEXTERRA LAW	4	Certificate of Oath
5	1111 Lincoln Road	5	Certificate of Reporter
6	Suite 801	6	Read and Sign Letter
7	Miami Beach, FL 33139	7	Errata Sheet
8	Tel.: 954-929-0679	8	
9	Email: sliberty@nexterrallaw.com	9	
10	BY: STEVEN M. LIBERTY, ESQ.	10	
11		11	
12	On Behalf of the Defendant, Inlet Plaza	12	
13	Condominium Association:	13	
14	COLE, SCOTT & KISSANE, P.A.	14	
15	222 Lakeview Avenue	15	PLAINTIFF'S EXHIBIT
16	Suite 120	16	Marked Description
17	West Palm Beach, FL 33401	17	Comp. Exh 1 Notice and Pleadings
18	Tel.: 561-383-9226	18	
19	Email: anika.grant@csklegal.com	19	
20	BY: ANIKA C. GRANT, ESQ.	20	Reporter's Note: Plaintiff's Composite Exhibit No. 1
21		21	was retained by Steven M. Liberty, Esq.
22		22	
23		23	
24	Also Present: Ron Early	24	
25		25	

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1	Deposition of Alexander Sandy Baptist, taken remotely	1	Q. About how many times?
2	before Gypsy Ferreira-Macias, Florida Professional	2	A. Once.
3	Reporter and Notary Public in and for the State of	3	Q. Once. And what was the context of that
4	Florida at Large in the above cause.	4	deposition?
5	* * * *	5	A. Why is that relevant?
6	THE COURT REPORTER: Mr. Baptist, please	6	Q. Because I would like to know when you took a
7	raise your right hand to be sworn. Do you	7	deposition and what was the nature of it.
8	swear or affirm to tell the truth, the whole	8	A. I took the deposition in 1980.
9	truth, and nothing but the truth?	9	Q. Okay.
10	THE WITNESS: Yes.	10	A. It had to do with a real estate
11	THEREUPON,	11	transaction.
12	ALEXANDER SANDY BAPTIST,	12	Q. Were you the plaintiff or defendant in the
13	having been first duly sworn, was examined remotely	13	matter?
14	and testified as follows:	14	A. Defendant.
15	DIRECT EXAMINATION	15	Q. Okay. And what was the nature of that
16	BY MR. LIBERTY	16	lawsuit?
17	Q. Good morning, Mr. Baptist. My name is Steven	17	A. It was a real estate transaction dispute.
18	Liberty, and I am counsel for the plaintiff, Jeffrey	18	Q. Sure. But why were you being sued?
19	Mott, in this matter. Can you please state your name	19	A. I was the manager involved.
20	for the record?	20	Q. And were you -- obviously, there's
21	A. Alexander Sandy Baptist.	21	allegations besides the fact that you were just a
22	Q. And do you go by Sandy?	22	manager, so what were the allegations of the lawsuit,
23	A. I do.	23	the general nature of it?
24	Q. Okay. Have you ever been deposed before?	24	MS. GRANT: If you remember, you can
25	A. Yes.	25	answer. The general nature of it, he's

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<p>1 asking.</p> <p>2 THE WITNESS: A builder was suing us for</p> <p>3 not allowing him to build.</p> <p>4 BY MR. LIBERTY:</p> <p>5 Q. Okay. So since the last deposition was in</p> <p>6 1980, this will be more of a refresher since it's been</p> <p>7 a long time. Today I'm going to be asking you a</p> <p>8 series of questions and I'd just ask that you answer</p> <p>9 them as truthfully and honestly as possible; is that</p> <p>10 fair?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. You're doing a great job of it.</p> <p>13 Obviously, the court reporter is taking down</p> <p>14 everything we say, so I just ask that you let me</p> <p>15 finish my questions before you give your answers, but</p> <p>16 you're already doing a great job at that, so just</p> <p>17 stick with that; is that fair?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Sometimes I am known to speak fast, so</p> <p>20 if there's anything that I say that you don't</p> <p>21 understand or you don't understand one of my</p> <p>22 questions, just let me know and I'm happy to rephrase</p> <p>23 it; is that fair?</p> <p>24 A. Yes.</p> <p>25 Q. Where do you currently reside?</p>	<p>1 A. 6885 North Ocean Boulevard, Ocean Ridge,</p> <p>2 Florida, Unit 505.</p> <p>3 Q. And is that the Inlet Plaza Condominium?</p> <p>4 A. Yes.</p> <p>5 Q. And how long have you lived there?</p> <p>6 A. Twelve years.</p> <p>7 Q. Did you -- so you purchased the unit 12 years</p> <p>8 ago?</p> <p>9 A. Yes.</p> <p>10 Q. And before that, where did you live?</p> <p>11 A. Ontario, Canada.</p> <p>12 Q. Is that where you were born?</p> <p>13 A. I was born in Quebec.</p> <p>14 Q. And when were you born?</p> <p>15 A. 1950, October 11.</p> <p>16 Q. Can you tell me about your professional</p> <p>17 background?</p> <p>18 A. I am a certified public accountant. I</p> <p>19 received my certification in the province of Quebec,</p> <p>20 practiced in the province of Ontario, joined the</p> <p>21 client, and became vice president in charge of real</p> <p>22 estate transactions.</p> <p>23 Q. And do you still hold that position?</p> <p>24 A. No, I'm retired.</p> <p>25 Q. When was the last time you worked as a CPA?</p>
Page 8	Page 9
<p>1 A. 1983.</p> <p>2 Q. And then this vice president role, when did</p> <p>3 that end?</p> <p>4 A. 1995.</p> <p>5 Q. Okay. Besides CPA, do you hold any other</p> <p>6 licenses as far as, like, certifications or</p> <p>7 anything?</p> <p>8 A. I have a pilot's license.</p> <p>9 Q. Okay. Have you ever been arrested?</p> <p>10 A. No.</p> <p>11 Q. Ever charged with any crimes?</p> <p>12 A. No.</p> <p>13 Q. Ever accused of fraud or dishonesty?</p> <p>14 A. No.</p> <p>15 Q. Besides that one matter you talked about in</p> <p>16 the deposition, have you ever been a party defendant</p> <p>17 in any lawsuits?</p> <p>18 A. No.</p> <p>19 Q. And how did you prepare for today's</p> <p>20 deposition? If you spoke with you attorney, you can</p> <p>21 just say you spoke with your attorney. I don't want</p> <p>22 to hear about anything you discussed with your</p> <p>23 attorney, but if you can, how did you prepare for</p> <p>24 today?</p> <p>25 A. Spoke with my attorney.</p>	<p>1 Q. Did you do anything else?</p> <p>2 A. No.</p> <p>3 Q. Did you review anything?</p> <p>4 A. No, no.</p> <p>5 Q. I'm going to share my screen with you for a</p> <p>6 second. Have you seen this document before, this</p> <p>7 request for production?</p> <p>8 A. It's a little blurry.</p> <p>9 Q. Yeah, I'm not sure -- would zooming in</p> <p>10 help?</p> <p>11 A. Yeah.</p> <p>12 Q. Okay. Have you seen this document?</p> <p>13 A. I have to read it. You're flipping through</p> <p>14 it too quickly.</p> <p>15 Q. Okay.</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And did you review the document? And</p> <p>18 how did you receive it?</p> <p>19 A. I received it from my lawyer.</p> <p>20 Q. Okay. And what did you do when you received</p> <p>21 it?</p> <p>22 A. I read it and waited on instructions.</p> <p>23 Q. Okay. Did you gather any documents</p> <p>24 responsive to it?</p> <p>25 A. With the assistance of my lawyer.</p>

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1 Q. Okay. And you've provided those documents to
2 your lawyer?
3 A. Yes.
4 Q. Okay. Are you on the board for the Inlet
5 Condo Association?
6 A. I am.
7 Q. And how long have you been on the board?
8 A. Two years.
9 Q. Was there an election for you to become a
10 member of the board?
11 A. No.
12 Q. Were you appointed?
13 A. Yes.
14 Q. And were you appointed by a vote?
15 A. I can't remember.
16 Q. And what is your position on the board?
17 A. Up until yesterday, I was secretary. As of
18 yesterday, I became the treasurer.
19 Q. And what were your responsibilities as the
20 secretary?
21 A. Taking minutes.
22 Q. Anything else?
23 A. No.
24 Q. Do you have any training or education courses
25 pertaining to being a member of the board?

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1 A. Yes.
2 Q. Can you describe their approval process?
3 A. Not completely.
4 Q. Well, as completely as you can, what was the
5 process for their -- for their application and up to
6 their approval?
7 A. There was none involved in the Fath process.
8 Q. Okay.
9 A. From the Chubb process, I met them with other
10 members of the board in one of the condo units.
11 Q. So your involvement was just meeting them on
12 one occasion? There was no --
13 A. Correct.
14 Q. So you weren't part of any background
15 investigation into them or anything like that?
16 MS. GRANT: Form.
17 THE WITNESS: No.
18 BY MR. LIBERTY:
19 Q. Do you know if the board performed a
20 background investigation on any of them?
21 A. I'm not sure.
22 Q. Do you know anything that was done for those
23 two sets of buyers besides you meeting them?
24 MS. GRANT: Form.
25 THE WITNESS: I did not meet the Faths,

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1 A. Yes.
2 Q. What training and education would that be?
3 A. I think it's called board certification
4 training. It was an online course, and I think it's
5 the responsibility of all board members to take.
6 Q. And when did you take that?
7 A. Four months ago.
8 Q. Was that something you just decided to do or
9 you were asked to do by somebody?
10 A. I just decided to do it.
11 Q. Are there any policies or procedures at the
12 Inlet that they require it?
13 A. Not at the Inlet.
14 Q. Since you've been a member of the board,
15 about how many applications for approval have come --
16 have come up?
17 A. Applications for what?
18 Q. For a buyer under contract to get their
19 transaction approved and to become an owner of a unit
20 in the building?
21 A. Two, that I'm aware of.
22 Q. Do you recall the names of those buyers?
23 A. Steve and Patricia Chubb, Chris and Sara
24 Fath.
25 Q. Were they ultimately approved as buyers?

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1 however, I'm personal friends of theirs. I
2 met with the Chubbs.
3 BY MR. LIBERTY:
4 Q. Do you know if they were ever Googled by
5 anybody on the board?
6 A. I don't know.
7 Q. Was there any communications about any of
8 their background information shared amongst the
9 members of the board?
10 A. I saw the Chubb application.
11 Q. That's all?
12 A. Yes.
13 Q. Do you know if there was a vote on whether or
14 not to approve or deny their applications?
15 A. A vote by whom.
16 Q. By the board?
17 A. Not to my knowledge.
18 Q. How often does the board hold meetings?
19 A. On average, once a month.
20 Q. And are minutes kept of all meetings?
21 A. Yes.
22 Q. And how are the meetings noticed?
23 A. I think we send a note by email to owners,
24 and post the agenda in the elevator.
25 Q. And since you've been on the board, has there

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1 ever been attorneys present at the meeting?

2 A. Can't remember.

3 Q. So as far as the review process, can you --

4 for applicants -- I mean, I know you said you've only

5 had two come up, and all the part that you played in

6 it was meeting with one set of them, but you have no

7 knowledge of what else is supposed to happen or what

8 the policies are or what the application process is

9 for the board?

10 MS. GRANT: Form.

11 THE WITNESS: No.

12 BY MR. LIBERTY:

13 Q. And can you tell me what your obligations are

14 as a board member?

15 A. It's a pretty wide ranging question. I'm not

16 sure I understand it.

17 Q. What are your day-to-day responsibilities,

18 besides taking minutes, as a board member?

19 A. Well, just to take minutes, participate as an

20 owner in the board meetings. All owners are invited

21 to attend the board meetings. That's about it.

22 Q. Do you know if the board can deny a buyer for

23 any reason at all?

24 A. Say again, please.

25 Q. Do you know whether the board can deny a

Page 16

1 A. Ron Early, Ann McCarthy, Jim Mauze, and up

2 until the ETM, Doug Sabra.

3 Q. Did there ever come a point in time that you

4 learned Mr. Mott was under -- wait, scratch that.

5 Do you know David Gury?

6 A. No, I don't.

7 Q. You've never met him?

8 A. I've met him on Zoom at the board meetings,

9 that's all.

10 Q. Did there come a point in time that Mr. Mott

11 was under contract to buy unit 304?

12 MS. GRANT: Object to the form.

13 THE WITNESS: I don't -- I don't --

14 repeat the question. I'm not sure I

15 understand it.

16 BY MR. LIBERTY:

17 Q. Sure. Did there ever come a point in time

18 that you learned that Mr. Mott was under contract to

19 buy unit 304 at the Inlet?

20 MS. GRANT: Form.

21 THE WITNESS: Yes.

22 BY MR. LIBERTY:

23 Q. And how did you come to learn this and when

24 did you come to learn of this?

25 A. I can't remember.

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1 buyer for any reason at all?

2 MS. GRANT: Object to the form.

3 THE WITNESS: What are you saying?

4 MS. GRANT: I just objected to the form.

5 You can answer still, if you can.

6 THE WITNESS: Okay.

7 MS. GRANT: Did you hear the question?

8 THE WITNESS: Say it again, please,

9 Steve.

10 BY MR. LIBERTY:

11 Q. Sure. Can the board deny a buyer for any

12 reason?

13 A. I believe so.

14 Q. Okay. Could they deny because of race or

15 religion?

16 A. I don't know.

17 Q. Can they get denied because of disability?

18 A. I don't know.

19 Q. Do you think that a board, your board, can

20 discriminate against a buyer?

21 MS. GRANT: Form. Predicate.

22 THE WITNESS: I don't know. I can't

23 answer that question.

24 BY MR. LIBERTY:

25 Q. Who's on the board with you currently?

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1 Q. Did you learn that he was under contract to

2 buy unit 304 before or after you became a member of

3 the board?

4 A. After.

5 Q. So did you have any discussions with anybody

6 on the board or any residents related to Mr. Mott

7 before you became a member of the board?

8 A. No.

9 Q. Did you ever have any communications with

10 anyone related to Mr. Mott's application?

11 A. No.

12 Q. Did you ever learn that Mr. Mott's

13 application was denied?

14 A. Did I ever learn?

15 Q. Yeah.

16 A. When I became a board member.

17 Q. But before you became a board member, it was

18 never communicated to you as a resident about Mr.

19 Mott's denial?

20 A. No.

21 Q. Did you ever come to learn of the reason for

22 Mr. Mott's denial?

23 A. No.

24 Q. So you've never had any communications with

25 anybody on the board or any other residents regarding

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<p style="text-align: right;">Page 18</p> <p>1 the reason for Mr. Mott's denial?</p> <p>2 A. Can't remember having any discussions, no.</p> <p>3 Q. You were never curious as to why Mr. Mott was</p> <p>4 denied?</p> <p>5 A. No.</p> <p>6 Q. So the association and yourself are involved</p> <p>7 in a lawsuit regarding Mr. Mott's denial and you've</p> <p>8 never asked and you were never curious as to why he</p> <p>9 was denied to begin with?</p> <p>10 A. No.</p> <p>11 Q. And you've been on the board for two years</p> <p>12 now and there's been -- never has been a conversation</p> <p>13 with anybody on the board about Mr. Mott's denial and</p> <p>14 the reasoning behind it?</p> <p>15 A. Not in the board meetings.</p> <p>16 Q. Okay. What about outside of the board</p> <p>17 meetings?</p> <p>18 A. Not outside the board meetings.</p> <p>19 Q. So is that a no, then, there's never been any</p> <p>20 conversation whatsoever with any resident or board</p> <p>21 member related to Mr. Mott's denial and the reasoning</p> <p>22 behind it?</p> <p>23 MS. GRANT: And let me just object to</p> <p>24 just to make sure it's clear. He's not</p> <p>25 asking you to divulge information when</p>	<p style="text-align: right;">Page 19</p> <p>1 attorneys are present 'cause that would be</p> <p>2 privileged, and I'm instructing you not to</p> <p>3 answer any questions that relate to any</p> <p>4 privileged communication that you've had with</p> <p>5 counsel regarding Mr. Mott's denial. Just so</p> <p>6 it's clear, he's asking you outside of that.</p> <p>7 Do I have that right, you're not</p> <p>8 asking him --</p> <p>9 MR. LIBERTY: Yeah, no, no. No, I'm just</p> <p>10 asking -- no, no, I'm asking whether you, any</p> <p>11 of your board members -- any of the board</p> <p>12 members, any other residents, if there's ever</p> <p>13 come up a conversation regarding the</p> <p>14 reasoning behind Mr. Mott's denial?</p> <p>15 THE WITNESS: No.</p> <p>16 BY MR. LIBERTY:</p> <p>17 Q. So the full extent of your knowledge related</p> <p>18 to Mr. Mott's denial is that he was just denied, and</p> <p>19 you learned of that after you became a board member;</p> <p>20 is that correct?</p> <p>21 MS. GRANT: Object to form.</p> <p>22 THE WITNESS: Yes.</p> <p>23 BY MR. LIBERTY:</p> <p>24 Q. I'm going to share my screen again. Are you</p> <p>25 able to see my screen?</p>
<p style="text-align: right;">Page 20</p> <p>1 A. No.</p> <p>2 Q. How about now?</p> <p>3 A. Yeah.</p> <p>4 Q. Have you ever seen this document, a bar</p> <p>5 decision related to Mr. Mott?</p> <p>6 A. I can't see it clearly.</p> <p>7 Q. How about now?</p> <p>8 A. Okay.</p> <p>9 Q. Have you ever seen this document?</p> <p>10 A. I have no idea what it is.</p> <p>11 Q. Have you ever seen a document related to Mr.</p> <p>12 Mott's disbarment --</p> <p>13 A. No.</p> <p>14 Q. -- from -- no? Okay.</p> <p>15 A. No.</p> <p>16 Q. Have you ever discussed with anybody on the</p> <p>17 board or any residents, Mr. Mott's disbarment, or the</p> <p>18 circumstances of it?</p> <p>19 A. No.</p> <p>20 Q. Have you ever discussed with anybody on the</p> <p>21 board or any residents of the association regarding</p> <p>22 anything having to do with Mr. Mott's mental health?</p> <p>23 A. I guess I became aware of it in, I think it</p> <p>24 was May of 2024 when --</p> <p>25 MS. GRANT: He's not asking for</p>	<p style="text-align: right;">Page 21</p> <p>1 attorney-client privilege, just so it's</p> <p>2 clear.</p> <p>3 THE WITNESS: Pardon me?</p> <p>4 MS. GRANT: Outside of attorney-client</p> <p>5 privilege.</p> <p>6 THE WITNESS: Oh, well, no.</p> <p>7 MS. GRANT: So, again, he doesn't want to</p> <p>8 know anything that you've learned from any of</p> <p>9 your attorneys or by way of your attorneys.</p> <p>10 He's asking for your independent knowledge.</p> <p>11 THE WITNESS: Oh, no.</p> <p>12 BY MR. LIBERTY:</p> <p>13 Q. Did there ever come a point in time that you</p> <p>14 learned of Mr. Mott's disabilities?</p> <p>15 MS. GRANT: Object to the form.</p> <p>16 MR. LIBERTY: I'm not asking about the</p> <p>17 details of the conversation you had with your</p> <p>18 client.</p> <p>19 BY MR. LIBERTY:</p> <p>20 Q. I'm just asking if you ever became aware of</p> <p>21 Mr. Mott's disabilities.</p> <p>22 MS. GRANT: Form. Predicate.</p> <p>23 THE WITNESS: No.</p> <p>24 BY MR. LIBERTY:</p> <p>25 Q. Do you know if Mr. Mott is disabled?</p>

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1 A. No.

2 Q. Do you know if anybody on the board has had

3 any reservations about denying Mr. Mott?

4 A. Define reservations.

5 Q. Yeah. Do you know if anybody on the board

6 has had any concerns or raised any doubt as to whether

7 they should deny Mr. Mott?

8 A. I'm not aware of any, no.

9 Q. Okay. How about any residents, did they ever

10 express any concerns about the board denying Mr.

11 Mott?

12 A. No.

13 Q. Did the board or anyone else ever discuss

14 whether Mr. Mott's denial could be a violation of fair

15 housing laws?

16 MS. GRANT: Form.

17 THE WITNESS: I think that's kind of

18 privileged, isn't that? I don't want to

19 answer that.

20 MS. GRANT: If your answer has to divulge

21 attorney-client privileged information, then

22 outside of that, no. I'll let you answer.

23 THE WITNESS: No.

24 BY MR. LIBERTY:

25 Q. So if your answer is, to the question, yes,

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1 here on today of Mr. Mott versus the Inlet Plaza and

2 all of the individual board members?

3 A. Probably after I became a board member.

4 Q. So you don't recall the lawsuit itself ever

5 being discussed in meetings or in any other form to

6 residents?

7 A. No. Excuse me, it was mentioned at the board

8 meeting, but never discussed.

9 Q. So at board meetings, it was just brought up

10 that there exists a lawsuit, but the details of it

11 were never discussed?

12 A. Correct.

13 Q. So you said, when I brought up whether or not

14 you've -- when you came to be aware of the lawsuit,

15 you said which one, so I'm assuming you're aware that

16 there's multiple versions of the complaint?

17 A. Yes.

18 Q. And have you ever reviewed the complaint?

19 A. With the assistance of my lawyer.

20 Q. I don't want to discuss anything you

21 discussed with your attorney, but are you aware of the

22 allegations against the association?

23 A. Yes.

24 Q. Okay. And what is your personal

25 understanding of the allegations?

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1 you learned of something, but you had a conversation

2 with your attorney, I want you to just leave it at

3 yes, but it's information I discussed with my,

4 attorney, and leave it at that.

5 A. It's information that I discussed with our

6 attorneys.

7 Q. Okay. There came a point -- did there come a

8 point in time that you learned Mr. Mott and Mr. Gury

9 were challenging the association's non-approval of Mr.

10 Mott?

11 A. You spoke too fast for me there, Steve.

12 Q. Yep. Did there come a point in time that you

13 learned that Mr. Mott and Mr. Gury were challenging

14 the association's denial of Mr. Mott?

15 MS. GRANT: Form.

16 THE WITNESS: Yes.

17 BY MR. LIBERTY:

18 Q. When did you learn of this?

19 A. I can't remember when.

20 Q. Do you know how it was communicated to you?

21 A. No, I can't remember.

22 Q. When did you first learn of this lawsuit?

23 A. I think there are more than one. Which

24 lawsuit?

25 Q. Okay. Just in general, this case that we're

Page 25

1 A. My understanding is the first one, that he

2 was simply refused and -- or we refused his

3 application. The second one was the time -- he -- as

4 the -- the new lawsuit relating to accommodation.

5 Q. And what is your understanding of those

6 allegations?

7 A. That he was first refused in his application

8 and secondly, that he sued the association based on an

9 accommodation related to challenges that Mr. Mott

10 suffered from.

11 Q. Are you aware of the allegations regarding

12 discriminatory conduct?

13 A. No.

14 Q. So you haven't seen any versions of the

15 complaint regarding counts for discrimination?

16 A. I'm not sure what you mean by that.

17 Q. Sure. Are you aware that there are

18 allegations in this lawsuit related to the association

19 discriminating against Mr. Mott?

20 A. If that relates to the accommodation lawsuit,

21 that's something we discussed with our lawyers.

22 Q. Were the allegations of discrimination ever

23 mentioned and brought up and discussed with residents

24 at a board meeting?

25 A. No.

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<p style="text-align: right;">Page 26</p> <p>1 Q. Do you understand that you're being sued</p> <p>2 individually?</p> <p>3 A. Yes.</p> <p>4 Q. Do you understand the allegations against you</p> <p>5 individually?</p> <p>6 A. No.</p> <p>7 Q. Are you aware that Mr. Mott submitted a</p> <p>8 reasonable accommodation request to the association?</p> <p>9 MS. GRANT: Form.</p> <p>10 THE WITNESS: Yes.</p> <p>11 BY MR. MOTT:</p> <p>12 Q. When did you first become aware of this?</p> <p>13 A. I don't remember the exact date, but it was</p> <p>14 in, I think May sometime or June -- May or June 2024,</p> <p>15 jeez, I don't even remember the year. Actually, I</p> <p>16 think it was '24. Is that possible? Yeah, yeah, I</p> <p>17 think it was that.</p> <p>18 Q. And how was this request communicated to the</p> <p>19 board and to you?</p> <p>20 A. I think we received a letter from Mott's</p> <p>21 lawyer.</p> <p>22 Q. Was the letter shared with all of the</p> <p>23 residents?</p> <p>24 A. No.</p> <p>25 Q. Was anything about the letter shared with any</p>	<p style="text-align: right;">Page 27</p> <p>1 of the residents?</p> <p>2 A. No.</p> <p>3 Q. Does the board have a formal process for</p> <p>4 handling reasonable accommodation requests?</p> <p>5 A. Not to my knowledge.</p> <p>6 Q. Other than Mr. Mott -- well, since you've</p> <p>7 been on the board, has there ever been any other</p> <p>8 reasonable accommodation request?</p> <p>9 A. Not that I can remember.</p> <p>10 Q. I'm going to share my screen again.</p> <p>11 MR. LIBERTY: And, Anika, I'll just</p> <p>12 mark -- I'll just have -- I mean, there's</p> <p>13 going to be minimal exhibits. So I'm just</p> <p>14 going to include everything that -- all the</p> <p>15 documents just as a composite exhibit, if</p> <p>16 that's okay with you.</p> <p>17 MS. GRANT: I was just going to ask you</p> <p>18 that. So just so I understand, everything</p> <p>19 you've shown you're going to mark today?</p> <p>20 MR. LIBERTY: Yeah, I'll --</p> <p>21 MS. Grant: Should be the notice, the</p> <p>22 pleading.</p> <p>23 MR. LIBERTY: Yeah, there's going to</p> <p>24 be -- there will be a total of five</p> <p>25 documents.</p>
<p style="text-align: right;">Page 28</p> <p>1 MS. GRANT: Okay, that's fine.</p> <p>2 MR. LIBERTY: Okay.</p> <p>3 (Plaintiff's Composite Exhibit No. 1 was</p> <p>4 marked for identification, and retained by Steven M.</p> <p>5 Liberty, Esq.)</p> <p>6 BY MR. LIBERTY:</p> <p>7 Q. Have you seen this document before?</p> <p>8 A. Yes.</p> <p>9 Q. Can you tell me what this is?</p> <p>10 A. I have to read it again.</p> <p>11 Q. Sure.</p> <p>12 MS. GRANT: Can you maximize it, Steve,</p> <p>13 if possible.</p> <p>14 MR. LIBERTY: Yeah, let me see what I can</p> <p>15 do here.</p> <p>16 BY MR. LIBERTY:</p> <p>17 Q. Is that better?</p> <p>18 A. Yes, thank you.</p> <p>19 Q. Oops. You let me know when you need me to</p> <p>20 scroll and I'll scroll down.</p> <p>21 A. Okay, move on.</p> <p>22 Q. (Complies.)</p> <p>23 A. That's good. Okay. Move up, please.</p> <p>24 Q. (Complies.)</p> <p>25 A. Next page.</p>	<p style="text-align: right;">Page 29</p> <p>1 Q. (Complies.)</p> <p>2 A. Can you ask the question again, please.</p> <p>3 Q. Sure. Can you tell me what this document</p> <p>4 is?</p> <p>5 A. It's a letter from the lawyer representing</p> <p>6 Mr. Mott relating to a reasonable accommodation</p> <p>7 request.</p> <p>8 Q. Okay. And you received this and you reviewed</p> <p>9 this?</p> <p>10 A. I can't remember whether or not I actually</p> <p>11 received it. I think I may have received a copy from</p> <p>12 Ms. Grant.</p> <p>13 Q. Okay. And can you tell me what your personal</p> <p>14 understanding of the request is?</p> <p>15 MS. GRANT: Form.</p> <p>16 THE WITNESS: That he requires a</p> <p>17 reasonable accommodation, which I think means</p> <p>18 access to the condominium based upon mental</p> <p>19 disability.</p> <p>20 BY MR. LIBERTY:</p> <p>21 Q. Do you recall a letter from Mr. Mott's</p> <p>22 treating doctor, Robert Mendelsohn's accompanying</p> <p>23 letter?</p> <p>24 A. I mean, I should read it.</p> <p>25 Q. Sure. Here, I'm going to show you this</p>

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<p style="text-align: right;">Page 30</p> <p>1 document, dated May 29, 2024, and you let me know if</p> <p>2 you've seen this document.</p> <p>3 A. Yeah, I've seen it.</p> <p>4 Q. You've seen this document?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Can you tell me what this document</p> <p>7 is?</p> <p>8 A. I can't remember what it's all about, no.</p> <p>9 Just a letter from his doctor.</p> <p>10 Q. Okay. Did you receive it at the same time as</p> <p>11 the reasonable accommodation request?</p> <p>12 A. I can't remember whether or not I did.</p> <p>13 Q. Do you recall reviewing it?</p> <p>14 A. I scanned it, but I didn't read it in detail.</p> <p>15 Q. Did the board discuss the request at all?</p> <p>16 A. Possibly in an executive meeting, but not in</p> <p>17 a general meeting of the board.</p> <p>18 Q. What does that mean?</p> <p>19 A. We would have executive meetings after board</p> <p>20 meetings --</p> <p>21 Q. Okay.</p> <p>22 A. -- with just the board members involved.</p> <p>23 Q. Sure. Okay. So this letter and this request</p> <p>24 was never discussed with the residents at all?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 31</p> <p>1 Q. Okay. But it was discussed amongst the board</p> <p>2 members. Do you know when?</p> <p>3 A. No.</p> <p>4 Q. Do you know what -- what was discussed?</p> <p>5 MS. GRANT: Object to the form.</p> <p>6 Excluding privileged information.</p> <p>7 THE WITNESS: Can't remember.</p> <p>8 BY MR. LIBERTY:</p> <p>9 Q. You don't recall any communications</p> <p>10 whatsoever between the board members pertaining to</p> <p>11 this request?</p> <p>12 A. I don't recall the nature of the</p> <p>13 communication, no.</p> <p>14 Q. Okay. If there was a, I think you described</p> <p>15 it as an executive meeting, would there have been</p> <p>16 minutes of that?</p> <p>17 A. Yes.</p> <p>18 Q. Do you have, to your knowledge, any minutes</p> <p>19 discussing Mr. Mott's request?</p> <p>20 A. I prepared some of the minutes, not in its</p> <p>21 entirety. Mr. Early actually was responsible for the</p> <p>22 executive committee minutes.</p> <p>23 Q. Okay. So there was an executive meeting -- I</p> <p>24 just want to make sure I understand correctly. There</p> <p>25 was an executive meeting that discussed this request.</p>
<p style="text-align: right;">Page 32</p> <p>1 You don't recall the substance of what was discussed.</p> <p>2 Some of it was taken in minutes, but not all of it; is</p> <p>3 that correct?</p> <p>4 MS. GRANT: Object to the form.</p> <p>5 THE WITNESS: Yes.</p> <p>6 BY MR. LIBERTY:</p> <p>7 Q. Did the board consult with an attorney before</p> <p>8 making a decision on the request?</p> <p>9 A. What request are you referring to?</p> <p>10 Q. Request for reasonable accommodation?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And who did they consult with?</p> <p>13 A. Probably Anika.</p> <p>14 Q. Do you know when?</p> <p>15 A. No. I can't remember when.</p> <p>16 Q. Was an attorney opinion ever given related to</p> <p>17 the request?</p> <p>18 A. Yes.</p> <p>19 Q. Was it in writing?</p> <p>20 A. Yes.</p> <p>21 Q. Was it a letter or an email?</p> <p>22 A. Letter.</p> <p>23 Q. Okay. And what was the opinion?</p> <p>24 MS. GRANT: Object to the form. I'm</p> <p>25 instructing the witness not to answer based</p>	<p style="text-align: right;">Page 33</p> <p>1 on attorney-client privilege.</p> <p>2 MR. LIBERTY: Sure. You have raised</p> <p>3 previously an attorney -- reliance on</p> <p>4 attorney's opinion, and as a defense in this</p> <p>5 matter. Are you going to be waiving that</p> <p>6 now.</p> <p>7 MS. GRANT: I'm not going to be waiving</p> <p>8 it. We raised the advice of counsel defense</p> <p>9 as it relates to the disapproval of Mr.</p> <p>10 Mott's application. We did not waive the</p> <p>11 advice of counsel defense as it relates to</p> <p>12 the denial of a reasonable accommodation</p> <p>13 request. So that it's clear on the record,</p> <p>14 so --</p> <p>15 MR. LIBERTY: I absolutely want the</p> <p>16 record to be clear. Are you going to be</p> <p>17 waiving --</p> <p>18 MS. GRANT: I'm in the middle of clearing</p> <p>19 it. So the instruction to the witness is to</p> <p>20 not answer any questions that relate to any</p> <p>21 information requested as to any attorney's</p> <p>22 opinion or advice on the denial of the</p> <p>23 reasonable accommodation request. We filed</p> <p>24 an answer. We've not raised advice of</p> <p>25 counsel as it relates to reasonable</p>

<p style="text-align: right;">Page 34</p> <p>1 accommodation, but not waiving our original 2 advice of counsel defense as it relates to 3 the denial of the application. 4 MR. LIBERTY: Okay. So, for the record, 5 you have not filed an answer yet as to the 6 board members. My question is, are you going 7 to be waiving advice of counsel defense? If 8 not -- if you're not waiving it, that's fine. 9 If you're instructing him not to answer 10 then we will -- if you do raise an 11 affirmative defense, you do understand we're 12 going to bring them all back to discuss and 13 go over advice of counsel on these 14 questions. 15 MS. GRANT: Sorry, I thought I was clear. 16 Let me -- let me answer it again. 17 MR. LIBERTY: Sure. 18 MS. GRANT: We have asserted the advice 19 of counsel defense as it relates to our 20 denial of Mr. Mott's application. We are 21 not -- we are not waiving that defense. I 22 thought I had said. That's clear. 23 MR. LIBERTY: Okay. 24 MS. GRANT: As it relates to this new 25 allegation of discrimination that is the</p>	<p style="text-align: right;">Page 35</p> <p>1 board denial of Mr. Mott's -- or actually 2 there wasn't a denial, so let me -- let me 3 withdraw that. As it relates to the board's 4 response -- that's a better word, so thank 5 you for allowing me to clarify -- response to 6 Mr. Mott's request for a reasonable 7 accommodation, we have not asserted the 8 advice of counsel defense; therefore, I'm 9 instructing the witness not to divulge any 10 information as it relates to opinions, 11 discussions, or communications from any of 12 their attorneys on that issue. Hopefully 13 that's clear. 14 MR. LIBERTY: All right. No, crystal 15 clear. My question, though, is, are you 16 waiving advice of counsel defense as a 17 reasonable accommodation claim? 18 MS. GRANT: We haven't asserted it. 19 There's a pending motion to dismiss. 20 MR. LIBERTY: Okay. 21 MS. GRANT: So if we assert it, yes, you 22 get to bring them back on that, because I've 23 instructed him not to answer any privileged 24 questions. So I don't think we're going to 25 assert it on that, but we haven't answered.</p>
<p style="text-align: right;">Page 36</p> <p>1 What I'm hoping is that a motion to dismiss 2 will get granted and this will be a 3 non-issue. 4 But if we answer on the advice of counsel 5 defense comes up, since I instructed the 6 witness not to answer those questions, then 7 you can absolutely seek an order or an 8 agreement to bring the witnesses back, but 9 for now, he's not going to answer any 10 questions on -- 11 MR. LIBERTY: That's fine. Okay. I just 12 wanted the clarification. And now we're in 13 agreement and have the understanding that, if 14 it is asserted, we will come back on those 15 topics, if you -- if you assert advice of 16 counsel. We're in agreement to that, 17 correct? 18 MS. GRANT: If it is asserted as to 19 reasonable accommodation. 20 MR. LIBERTY: Correct. 21 MS. GRANT: Only as it relates to the 22 instruction that I've asked him not to answer 23 on privileged questions, sure. 24 MR. LIBERTY: Okay. All right. Fair 25 enough, thank you.</p>	<p style="text-align: right;">Page 37</p> <p>1 BY MR. LIBERTY: 2 Q. Did the board request any additional 3 documentation from Mr. Mott or his doctor pertaining 4 to his reasonable accommodation request? 5 A. Not to my knowledge. 6 Q. Why not? 7 MS. GRANT: Form. 8 THE WITNESS: I don't know. 9 BY MR. LIBERTY: 10 Q. Can you describe all the steps taken by the 11 board in reviewing considering Mr. Mott's request? 12 A. I think that's client-lawyer privilege or 13 whatever it's called. 14 Q. I'm not asking you about anything you talked 15 with your attorney. I'm saying what steps did the 16 board take in reviewing and considering Mr. Mott's 17 request? 18 MS. GRANT: Let me object. If the 19 witness is indicating that the steps that 20 were taken were based on advice of counsel or 21 opinion of counsel, then -- then yes, that 22 would be -- that would be privileged. 23 MR. LIBERTY: No. 24 MS. GRANT: If there were steps 25 independent of advice of counsel, then he can</p>

<p style="text-align: right;">Page 38</p> <p>1 answer, but if it's related to steps that 2 counsel advised them to take, then no, he's 3 accurate, that would be attorney-client 4 privilege. 5 MR. LIBERTY: Yeah, attorney-client 6 privilege would be your communications. If 7 you had a conversation and you told him to 8 take some action and he took that action, 9 that would not be attorney-client 10 privilege. 11 MS. GRANT: So if -- again, if we issued 12 an opinion for the board to take certain 13 steps, and those -- 14 MR. LIBERTY: And -- 15 MS. GRANT: And those communications are 16 going to be divulged in your answer, sir, I'm 17 going to instruct you not to answer. 18 THE COURT REPORTER: I'm sorry, I'm going 19 to ask you guys to please stop interrupting 20 each other. I can only take down one person 21 at a time. So can you please repeat your 22 objection? 23 MS. GRANT: I'm going to give the witness 24 an instruction. You can answer to the extent 25 that it doesn't divulge any communications</p>	<p style="text-align: right;">Page 39</p> <p>1 that you received from counsel. If 2 independent of that you can't answer, then 3 that would be your response, okay? You can 4 answer, so long as you're not divulging any 5 communication from counsel, if that makes 6 sense, if you're able to. 7 BY MR. LIBERTY: 8 Q. And for clarification for my question, I am 9 not asking about conversations you had with your 10 attorneys. What I'm asking you is what steps did the 11 board take. If the steps involve having a 12 conversation with my attorney, say I spoke to my 13 attorney, but I want to know what steps you and the 14 board took, not the conversations you've had with your 15 attorney, what steps you took. What did you do? 16 A. We talked to our lawyer. 17 Q. Nothing else? 18 A. No. 19 Q. Was a vote taken on whether to grant the 20 reasonable accommodation request? 21 MS. GRANT: Form. 22 THE WITNESS: No. 23 BY MR. LIBERTY: 24 Q. Was the request ultimately denied? 25 MS. GRANT: Form.</p>
<p style="text-align: right;">Page 40</p> <p>1 THE WITNESS: I have to rely on my lawyer 2 to respond to that. 3 BY MR. LIBERTY: 4 Q. Well, I'm not asking for any attorney-client 5 privilege or any communications. I just want to know 6 whether the request was ultimately denied. Did the 7 board decide to deny the request? 8 MS. GRANT: Object to the form. 9 THE WITNESS: I don't know the answer to 10 that. 11 BY MR. LIBERTY: 12 Q. Well, did you advise that the board approve 13 Mr. Mott's reasonable request for accommodation? 14 MS. GRANT: Form. 15 THE WITNESS: I haven't got an answer to 16 that. 17 BY MR. LIBERTY: 18 Q. So you're telling me that you have no idea 19 whether or not, as you sit here today under oath, 20 whether or not the association board approved his 21 request for a reasonable accommodation? 22 MS. GRANT: Form. Asked and answered. 23 THE WITNESS: I think that's lawyer 24 approval, isn't it? 25 MS. GRANT: If you don't know the answer</p>	<p style="text-align: right;">Page 41</p> <p>1 to that, then that's okay as well. 2 THE WITNESS: Okay. I don't know the 3 answer to that. 4 BY MR. LIBERTY: 5 Q. Do you recall issuing any type of approval to 6 Mr. Mott saying we are going to accept your request 7 for reasonable accommodation and grant you a 8 certificate of approval to purchase this condo; did 9 that ever happen? 10 A. No. 11 Q. Okay. Why not? 12 MS. GRANT: Form. Let me just object 13 that so long as it divulges any 14 attorney-client privileged communication, I'm 15 going to instruct him not to answer. 16 THE WITNESS: So it's with our lawyers. 17 BY MR. LIBERTY: 18 Q. So the reason why you denied or the reason 19 why you haven't approved his request is because the 20 lawyers told you not to? 21 MS. GRANT: Object to the form. 22 BY MR. LIBERTY: 23 Q. Or because the lawyers told you, sorry. 24 MS. GRANT: Do not answer that question 25 regarding what your lawyers may or may not</p>

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1 have told you to do.

2 BY MR. LIBERTY:

3 Q. So your decision -- so your non-approval of

4 the request, is that based solely on conversations you

5 had with your attorney?

6 MS. GRANT: Object to the form.

7 THE WITNESS: Can you rephrase the

8 question?

9 BY MR. LIBERTY:

10 Q. Sure. The board's decision to not approve

11 Mr. Mott's request for reasonable accommodation, was

12 that based upon anything besides conversations with

13 the board's attorneys?

14 MS. GRANT: Form.

15 THE WITNESS: No.

16 BY MR. LIBERTY:

17 Q. Did you personally think the board should

18 approve the request for accommodation?

19 MS. GRANT: Object to the form.

20 THE WITNESS: I wasn't asked to have an

21 opinion on that.

22 BY MR. LIBERTY:

23 Q. So you weren't asked to give an opinion on

24 the reasonable request request?

25 A. Not until we finish this -- the -- the

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1 Q. Okay. Did the board ever consider granting

2 the request with any conditions or alternative

3 accommodations?

4 A. No.

5 Q. Did the board discuss whether Mr. Mott's

6 mental health conditions impacted his ability to be a

7 good neighbor or a resident?

8 A. No.

9 Q. Were there any concerns raised about Mr. Mott

10 being a danger or a liability to the association at

11 all?

12 A. No.

13 Q. Did any board member suggest that allowing

14 someone with Mr. Mott's conditions would be

15 problematic for the community?

16 MS. GRANT: Form.

17 THE WITNESS: No.

18 BY MR. LIBERTY:

19 Q. Did the board consider how denying the

20 request might negatively impact Mr. Mott?

21 MS. GRANT: Form.

22 THE WITNESS: It was never discussed, I

23 don't think.

24 BY MR. LIBERTY:

25 Q. Did the board ever discuss or consider any

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1 lawyer's work on this.

2 Q. Did any -- again, I am not asking for any

3 communications with your counsel or any board member's

4 communication with counsel, but did any of the board

5 members amongst themselves express concerns regarding

6 the denial or not approving the request violate the

7 Fair Housing Act?

8 MS. GRANT: Object to the form.

9 THE WITNESS: Yes.

10 BY MR. LIBERTY:

11 Q. Who expressed concerns?

12 A. Members of the board.

13 Q. Which members?

14 A. Multiple.

15 Q. Multiple members?

16 A. Yes.

17 Q. And you don't remember which member?

18 A. Not specifically.

19 Q. Was one of them you?

20 A. Yes.

21 Q. And what concern did you have?

22 A. I felt it was an unreasonable request.

23 Q. What concerns did other board members have

24 related to violating the Fair Housing Act?

25 A. I can't speak for them.

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1 impacts or hardships granting the request would have

2 on the association?

3 A. No.

4 Q. Any financial burdens discussed?

5 A. No.

6 Q. Were there any administrative burdens

7 discussed?

8 A. No.

9 Q. Were any alterations to policies discussed?

10 A. No.

11 Q. Are you familiar with the Fair Housing Act

12 and its protections for individuals with

13 disabilities?

14 A. No.

15 Q. Did the board amongst themselves ever discuss

16 its legal obligations regarding reasonable

17 accommodations? I'm not talking about conversations

18 with your attorneys.

19 MS. GRANT: Form.

20 THE WITNESS: No.

21 BY MR. LIBERTY:


22 Q. Besides conversations you've had with your

23 attorneys, what steps did the board take to ensure

24 compliance with the Fair Housing Act as it pertains to

25 Mr. Mott's reasonable accommodation request?

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<p style="text-align: right;">Page 46</p> <p>1 MS. GRANT: Form. Asked and answered.</p> <p>2 THE WITNESS: Ask again, please, Steve.</p> <p>3 BY MR. LIBERTY:</p> <p>4 Q. Sure. What steps, besides conversations you</p> <p>5 had with your attorney, did the board take to ensure</p> <p>6 compliance with the Fair Housing Act as it pertains to</p> <p>7 Mr. Mott's request? Besides communicating with your</p> <p>8 attorney, I want to know, did you do anything else?</p> <p>9 Did the board members look at any HUD guidelines or</p> <p>10 any Googling? Did you guys perform any type of</p> <p>11 independent research related to compliance with the</p> <p>12 Fair Housing Act?</p> <p>13 A. I did not.</p> <p>14 Q. Do you know if anybody else did?</p> <p>15 A. Not to my knowledge.</p> <p>16 Q. I believe you answered this, but just to</p> <p>17 clarify, I believe your testimony earlier was that the</p> <p>18 board did not have any policies in place for</p> <p>19 responding to reasonable accommodation requests; is</p> <p>20 that correct?</p> <p>21 A. I'm not familiar with our board policies.</p> <p>22 Q. Okay.</p> <p>23 A. Sorry, with our -- with our association</p> <p>24 policies.</p> <p>25 Q. Were you aware that denying or if the</p>	<p style="text-align: right;">Page 47</p> <p>1 application was denied, the reason -- sorry, scratch</p> <p>2 that.</p> <p>3 Are you aware whether not approving the</p> <p>4 reasonable accommodation request would prevent Mr.</p> <p>5 Mott from obtaining housing?</p> <p>6 MS. GRANT: Form.</p> <p>7 THE WITNESS: Again repeat.</p> <p>8 BY MR. LIBERTY:</p> <p>9 Q. Sure. Were you aware if the board did not</p> <p>10 approve the reasonable accommodation request, it could</p> <p>11 prevent Mr. Mott from obtaining housing?</p> <p>12 MS. GRANT: Object to the form.</p> <p>13 THE WITNESS: Again, I didn't hear you</p> <p>14 properly, Steve.</p> <p>15 BY MR. LIBERTY:</p> <p>16 Q. Sure.</p> <p>17 A. Slower.</p> <p>18 Q. Sure. By not approving Mr. Mott's request,</p> <p>19 are you aware it would prevent Mr. Mott from obtaining</p> <p>20 housing?</p> <p>21 MS. GRANT: Form.</p> <p>22 THE WITNESS: No.</p> <p>23 BY MR. LIBERTY:</p> <p>24 Q. Do you have any regrets about how the</p> <p>25 reasonable accommodation request was handled?</p>
<p style="text-align: right;">Page 48</p> <p>1 A. No.</p> <p>2 Q. Could you be open to reconsidering the</p> <p>3 request if new information or clarification was</p> <p>4 provided?</p> <p>5 MS. GRANT: Form. Predicate.</p> <p>6 THE WITNESS: I can't answer that</p> <p>7 question, I don't know.</p> <p>8 BY MR. LIBERTY:</p> <p>9 Q. Is there any information or clarification</p> <p>10 that would be important or helpful to you that you</p> <p>11 didn't receive in considering the request?</p> <p>12 A. No.</p> <p>13 Q. Okay. I don't have any further questions.</p> <p>14 MS. GRANT: I don't have any questions.</p> <p>15 If it's ordered, we'll read.</p> <p>16 THE COURT REPORTER: Are you ordering a</p> <p>17 transcript, Mr. Liberty?</p> <p>18 MR. LIBERTY: We have a couple of these,</p> <p>19 so I'll let you know if we're going to order</p> <p>20 it or not.</p> <p>21 MS. GRANT: If they order, we'll take a</p> <p>22 copy.</p> <p>23 (The remote deposition was concluded at 11:08</p> <p>24 a.m.)</p> <p>25</p>	<p style="text-align: right;">Page 49</p> <p>1 CERTIFICATE OF OATH</p> <p>2 STATE OF FLORIDA)</p> <p>3) ss.</p> <p>4 COUNTY OF MIAMI-DADE)</p> <p>5 I, Gypsy Ferreira-Macias, Florida Professional</p> <p>6 Reporter, Notary Public, State of Florida, certify</p> <p>7 that Alexander Sandy Baptist appeared before me</p> <p>8 remotely on the 3rd day of April, 2025, and was duly</p> <p>9 sworn.</p> <p>10 Signed this 24th day of April, 2025.</p> <p>11</p> <p>12 </p> <p>13 Gypsy Ferreira-Macias, FPR</p> <p>14 Notary Public, State of Florida</p> <p>15 Commission No.: HH300716</p> <p>16 Exp.: December 13, 2026</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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1 CERTIFICATE OF REPORTER

2 STATE OF FLORIDA)

3) ss.

4 COUNTY OF MIAMI-DADE)

5 I, Gypsy Ferreira-Macias, Florida

6 Professional Reporter, certify that I was authorized

7 to and did stenographically report the remote

8 deposition of Alexander Sandy Baptist; that a review

9 of the transcript was requested; and that the

10 transcript is a true record of my stenographic notes.

11 I further certify that I am not a relative,


12 employee, attorney, or counsel of any of the parties,

13 nor am I a relative or employee of any of the parties'

14 attorneys or counsel connected with the action, nor am

15 I financially interested in the action.

16 Dated this 24th day of April, 2025.

17 

18 _____

19 Gypsy Ferreira-Macias, FPR

20 Florida Professional Reporter

21

22

23

24

25

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1 April 25, 2025

2

3

4 Mr. Alexander Sandy Baptist

5 c/o ANIKA C. GRANT, ESQ.

6 Cole, Scott & Kissane, P.A.

7 222 Lakeview Avenue

8 Suite 120

9 West Palm Beach, FL 33401

10

11 In Re: Geoffrey T. Mott vs. Inlet Plaza Condominium

12 Remote Deposition of Alexander Sandy Baptist,

13 taken on April 3, 2025

14 U.S. Legal Support Job No. 6831285-001

15 Dear Mr. Baptist,

16 The transcript of the above-referenced proceeding is

17 now available for your review.

18

19 Please call (305)373-8404 to schedule an appointment


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Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

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