

EXHIBIT C

1 affidavit is that he refused service. It has
2 nothing to do with those communications between
3 this gentleman and his client.

4 MR. GONZALEZ: I think they opened the
5 door, Judge, by this gentleman's line of
6 questioning to Mr. Manney. And my next series
7 of questions was going to be is this a
8 compilation of those e-mails between you and
9 Ms. Baum. And does it accurately portray those
10 e-mails between May of 2013 and January of
11 2014.

12 THE COURT: I'm going to sustain the
13 objection. Move on.

14 MR. GONZALEZ: I have no further questions
15 of this gentleman, Judge.

16 MR. KARR: Your Honor, may I inquire who
17 this person is?

18 THE COURT: Very good question.

19 Ma'am, who are you?

20 MR. GONZALEZ: My paralegal, Judge.

21 MS. SASSOWER: Your Honor, Elena Sassower.
22 I'm the author of the procedural history based
23 upon an independent review of the record.

24 MR. GONZALEZ: She's a friend of Ms. Baum,
25 a certified paralegal from New York. She's

1 been helping me out in this regard, Judge.

2 THE COURT: Is she your paralegal? Is
3 that what you said?

4 MR. GONZALEZ: In this case, she's my
5 paralegal, Judge. I've not officially taken
6 her in any other case, other than this. She
7 doesn't work for me, in my office. But she's
8 assisting me as far as being a paralegal in
9 this action, Your Honor.

10 THE COURT: Ma'am, if you're going to stay
11 at that table, you need to stay seated.
12 Mr. Gonzalez is the attorney of record. It's
13 his case.

14 MS. SASSOWER: Of course. I was just
15 passing him a note.

16 THE COURT: Mr. Karr, do you have anything
17 to recross?

18 MR. KARR: No, Your Honor.

19 THE COURT: Mr. Jacoby?

20 MR. JACOBY: Nothing, Your Honor.

21 THE COURT: Mr. Boise?

22 MR. BOISE: No, Your Honor.

23 THE COURT: Thank you, sir. You can step
24 down.

25 Mr. Gonzalez, any other witnesses today?

1 Q. Mr. Baum had passed away in June of 2012,
2 correct?

3 A. I believe that's correct, yes.

4 Q. Why did it take seven months to file that
5 petition for administration --

6 MR. KARR: Objection, Your Honor,
7 relevance.

8 THE COURT: Where is this going,
9 Mr. Gonzalez?

10 MR. GONZALEZ: Well, here he's saying that
11 Nina Baum caused this delay and as a result, he
12 wants this case to be dismissed as far as her
13 petition. And he wants to move this case along
14 when it doesn't sit well with -- what's good
15 for the goose is good for the gander. If he
16 took seven months to file the petition for
17 administration after Mr. Baum passed away. And
18 another four or five months to serve Ms. Baum,
19 it's not consistent with an argument, well,
20 Ms. Baum is causing delay when it takes them
21 basically nine months to serve her after the
22 decedent passed away.

23 THE COURT: Understood. I'm going to
24 sustain the objection. Move on.

25 MS. SASSOWER: Tino.

1 MR. GONZALEZ: One moment, Judge.

2 THE COURT: All right. Ma'am, hang on.

3 You're disruptive. You're interrupting. I've
4 had enough of it. You need to go behind the
5 bar, please.

6 BY MR. GONZALEZ:

7 Q. Now regarding an issue of service of
8 process, sir, do you have any evidence that
9 Ms. Baum, Nina -- Anneena Nina Gloria Baum did
10 anything to interfere or prohibit your client from
11 being served with the process in this cause?

12 A. Other than the allegations that I made in
13 the pleadings that we filed, which is that she
14 routinely hired -- she was firing her counsel as
15 deadlines approached.

16 And so, we were dealing with a situation
17 where we had a litigant who, when things were
18 approaching, the deadlines were approaching, we
19 were dealing with the switching of counsel. Which
20 is -- as it relates to the service itself and
21 whether or not she directly interfered with
22 service in a way where she told the process
23 server, no.

24 But David Baum's allegation in this case
25 was that her repeated hiring and firing of lawyers

1 Mr. Gonzalez?

2 MR. GONZALEZ: Judge, I'd call Regina
3 Bassone, Your Honor.

4 THE COURT: All right. Ma'am, you've been
5 instructed once to be behind the bar. Next
6 time you're out the door.

7 MS. SASSOWER: Of course, Your Honor. I'm
8 just --

9 THE COURT: No, no. It's time for you to
10 step back.

11 THE DEPUTY: Raise your right hand to be
12 sworn by the clerk.

13 MS. BASSONE: (Complies.)

14 THE CLERK: Do you swear or affirm the
15 testimony you give in this matter will be the
16 truth, the whole truth, and nothing but the
17 truth so help you God?

18 MS. BASSONE: Yes, I do.

19 THE CLERK: Thank you.

20 (Regina Velez Bassone sworn under oath.)

21 The following proceedings were had:

22 REGINA VELEZ BASSONE,
23 a witness herein, having been first duly sworn,
24 was examined and testified as follows:

25 DIRECT EXAMINATION