

EXHIBIT F

1 also, from the entities themselves when I looked
2 them up, David Baum was listed as their registered
3 agent, at the house in Melbourne.

4 Q. All right. And after Ms. Baum retained
5 you, how was your level of communication with her?
6 Were you able to maintain communication with her
7 or was she noncommunicative between May of 2013
8 and November 2013?

9 A. Throughout the relationship until the very
10 end, we had good communication.

11 Q. And what participation did Ms. Baum,
12 Anneen Baum, have with your office in deciding how
13 to attempt to serve process on David Baum in these
14 matters?

15 A. She played no role in it, other than to
16 inquire frequently as to what's the status of
17 service. And I would just inform her that it's
18 with the process server. And as soon as it's
19 done, I'll let you know.

20 Q. Did Anneen Baum in any way hamper your
21 office in effecting -- attempting to effect
22 service of process on David Baum in these matters?

23 A. Nope.

24 Q. And, in fact, was she pretty -- would it
25 be fair to state that she's a fairly prolific

1 e-mailer?

2 A. And -- along with making phone calls, yes.

3 Q. Now during the course of you representing
4 Ms. Baum, did you ever become aware if she has
5 certain medical issues?

6 A. Yes.

7 Q. And what medical issues --

8 MR. KARR: Your Honor, I object. I don't
9 understand what this -- relevance, Your Honor.

10 THE COURT: Mr. Gonzalez?

11 MR. GONZALEZ: What it has to do with,
12 Judge, and the issue in the case law when it
13 relates to -- give me a second to get my
14 thoughts together, Judge.

15 One of the things the Court has to
16 consider when they make a determination that
17 service of process has not been effected and as
18 a result a party's action should be dismissed,
19 there's a case, Judge, called Kozel. I can't
20 give you the cite for now, but I've got a copy
21 of it. That's a supreme court case.

22 And what it basically says, Judge, is if a
23 party's participation exists which hampers or
24 limits their counsel's ability to effect
25 service of process, that's a very strong factor