

IN THE SUPREME COURT OF FLORIDA

Supreme Court Case No.: SC19-1545

CATHERINE ELIZABETH CZYZ,

Respondent/Appellant,

vs.

THE FLORIDA BAR ASSOCIATION,

Complainant/Appellee.

---

**APPENDIX (PART VI) TO RESPONDENT'S/APPELLANT'S  
AMENDED MOTION TO VACATE FINAL JUDGMENT  
OF JANUARY 6, 2022**

Catherine E. Czyz

PRO SE

931 Village Boulevard, Suite 905-242

West Palm Beach, FL 33409

CatherineXLIV@gmail.com

561-502-1542- direct

RECEIVED, 01/30/2023 03:42:26 PM, Clerk, Supreme Court

**APPENDIX (PART VI)**

1. EXHIBIT "N", ERIN BETH NEITZELT'S SECONDARY FACEBOOK ACCOUNT "AUNT SISSY" ON CATHERINE ELIZABETH CZYZ'S PRIVATE FACEBOOK ACCOUNT.
2. EXHIBIT "Ni", DEPOSITION OF MARGARET WALTERS.

RESPECTFULLY SUBMITTED,

*/s/ Catherine E. Czyz*

---

Catherine E. Czyz

Pro Se

USPS Mailing Address:

931 Village Boulevard, Suite 905-242

West Palm Beach, FL 33409

catherinexliv@gmail.com

561-502-1542- direct

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by e-courts on January 30, 2023

to:

Shanee L. Hinson, Esq. and

Tiffany Roddenberry, Esq. and

Kevin Cox, Esq. and/or the attorneys listed as counsel of  
record at this time.

By: \_\_\_/s/ *Catherine E. Czyz*\_\_\_\_\_

Catherine E. Czyz

Pro Se

931 Village Boulevard, Suite 905-242

West Palm Beach, FL 33409

catherinexliv@gmail.com

561-502-1542- direct

# EXHIBIT “N”

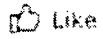


**Aunt Sissy**



Sep 7, 2010 · 🧑

It's Erin! Geesh, won't anyone add me?? LOL



Like



Comment

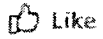


**Aunt Sissy**



Sep 7, 2010 · 🧑

Hey! This is a picture of Beethoven. :) Who else, other than me, would put a picture of Beethoven on their profile? lol :)



Like



Comment



**Aunt Sissy updated her profile picture.**



Sep 7, 2010 · 🧑



Aunt Sissy? Is this Erin? I recognize the logo...  
but see no reference of anyone I know for the  
profile.

7 Comments

Like

Comment



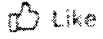
Aunt Sissy updated her profile picture. ...

Sep 7, 2010



Aunt Sissy? Is this Erin? I recognize the logo...  
but see no reference of anyone I know for the  
profile.

7 Comments



Like



Comment



Aunt Sissy updated her profile picture. ...


Sep 7, 2010





**Pam Ney** ▶ Aunt Sissy



Jun 20, 2012 · 

happy birthday!



Like




Comment

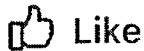


**Michelle Lukacsko Chini** ▶ Aunt Sissy



Apr 10, 2011 · 

aunt Sissy ... what happened to your other profile???? I better see you back on here!



Like




Comment

6 friends posted on Aunt's timeline



**Tricia Totterdale Kyer** ▶ Aunt Sissy

Sep 9, 2010 · 

Hi Aunt Sissy!!!! So happy to see you on FB!!!! ; -)




Like



Comment



**Scott Williams** ▶ Aunt Sissy

Sep 8, 2010 · 





# EXHIBIT "Nii"

1 IN THE CIRCUIT COURT OF THE 20TH JUDICIAL CIRCUIT  
2 IN AND FOR LEE COUNTY, FLORIDA

3 CASE NO.: 2018-CA-001244

4 SUB CASE NO.: 2019-CA-002440

5 ERIN BETH NEITZELT,  
6 Plaintiff,  
7 vs.

8 CATHERINE ELIZABETH CZYZ,  
9 THE CZYZ LAW FIRM, P.A., and  
10 THE CZYZ LAW FIRM, PLLC,  
Defendants.

---

11  
12 DEPOSITION OF MARGARET WALTERS  
13  
14

15 DATE TAKEN: Monday, November 4, 2019

16 TIME TAKEN: 3:12 p.m. to 4:50 p.m.

17 PLACE TAKEN: Boy Agnew Potanovic, PLLC  
4415 Metro Parkway  
Suite 110  
18 Fort Myers, Florida 33916  
19

20 REPORTED BY: Shannon A. McCann, CSR (NJ)  
21 Certified Shorthand Reporter  
22  
23  
24  
25

APPEARANCES:

HENDERSON, FRANKLIN, STARNES & HOLT, P.A.

BY: SCOTT E. ATWOOD, ESQUIRE  
1715 Monroe Street  
P.O. Box 280  
Fort Myers, Florida 33902  
(239) 344-1100  
Scott.atwood@henlaw.com  
Counsel for Plaintiff

THE CZYZ LAW FIRM, PLLC

BY: CATHERINE E. CZYZ, ESQUIRE  
931 Village Boulevard  
Suite 905-242  
West Palm Beach, Florida 33409  
(561) 502-1542  
Catherineczyz@icloud.com  
Counsel for Defendants

BOY AGNEW POTANOVIC, PLLC

BY: SUZANNE M. BOY, ESQUIRE  
4415 Metro Parkway  
Suite 110  
Fort Myers, Florida 33916  
(239) 208-6515  
Suzanne@bapfirm.com  
Counsel for Lee County School Board

I N D E X

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

WITNESS:	PAGE:
MARGARET WALTERS	
DIRECT EXAMINATION	4
BY MS. CZYZ	
CROSS-EXAMINATION	69
BY MR. ATWOOD	
REDIRECT EXAMINATION	70
BY MS. CZYZ	

E X H I B I T S

(No exhibits marked)

1 THEREUPON,

2 MARGARET WALTERS,

3 having first been duly sworn, was examined and  
4 testified as follows:

5 DIRECT EXAMINATION

6 BY MS. CZYZ:

7 Q. Hi. Good afternoon.

8 A. Hi. Good afternoon.

9 Q. I'm Catherine Czyz.

10 A. Hi.

11 Q. Hi. Have you ever given a deposition before?

12 A. I have not.

13 Q. I'm going to give a few instructions before we  
14 begin. Today, if you'd like to answer a question with  
15 yes or no, please answer yes or no, not yeah or nah, as  
16 the court reporter is taking down your testimony and  
17 sometimes these words look the same.

18 Also, please refrain from using hand gestures  
19 or, if you do, we're going to have to say you're making  
20 hand gestures to answer a question. The court reporter  
21 can't take down nods or shaking of the head as an answer.

22 Do you understand this?

23 A. I do.

24 Q. Could you please state your name for the record?

25 A. Margaret Walters.

1 Q. Do you have a middle name?

2 A. Eileen.

3 Q. Eileen?

4 A. Yes.

5 Q. And have you had any other last names other than  
6 Walters?

7 A. Yes.

8 Q. What were they.

9 A. Dooling, D-o-o-l-i-n-g.

10 Q. Any other last names?

11 A. And Hopewell, H-o-p-e-w-e-l-l.

12 Q. So is Walters your maiden name or is that a  
13 married name?

14 A. Married.

15 Q. And Dooling?

16 A. Ex marriage.

17 Q. And Hopewell?

18 A. Maiden.

19 Q. And what is your current place of employment?

20 A. Lee County School District.

21 Q. Which school do you work for?

22 A. North Fort Myers Academy for the Arts.

23 Q. And how long have you worked there?

24 A. Four years.

25 Q. And what is your position there?

1 A. Reading teacher.

2 Q. What grade do you teach?

3 A. Sixth, seventh and eighth grades.

4 Q. So this is a middle school?

5 A. It's a K through 8 school.

6 Q. Prior to working at -- I'm sorry, what's it  
7 called again?

8 A. North Fort Myers Academy for the Arts.

9 Q. North Fort Myers -- before working at North Fort  
10 Myers Academy for the Arts, where did you work?

11 A. I worked at Mariner Middle School.

12 Q. And how long did you work at Mariner Middle  
13 School?

14 A. Five years.

15 Q. And what was your position there?

16 A. Several. Reading teacher, special education  
17 case manager, special education push in teacher and --  
18 which means that I went into the classroom and supported  
19 children in individual education plans, and I also was a  
20 TV production teacher.

21 Q. And what is TV production teacher?

22 A. It is a teacher that shows kids how to put on a  
23 TV, like a morning TV show for the school. And we also  
24 did film production as well.

25 Q. When you're at Mariner Middle School, do they

1 teach with computers or do they teach with books?

2 A. Both.

3 Q. The five years that you worked there, which  
4 grades did you teach?

5 A. Sixth, seventh and eighth.

6 Q. Did you rotate?

7 A. Yes, I did.

8 Q. Did you rotate every year or did you just rotate  
9 per year, like one year you taught sixth and another year  
10 you taught eighth, or how did that work?

11 A. My first year I taught seventh grade. My second  
12 and third year I taught sixth, seventh and eighth. My  
13 fourth year I taught sixth grade. And my last year I  
14 taught seventh grade.

15 Q. We're here regarding a woman named Erin  
16 Neitzelt.

17 Did you work with her at Mariner Middle School?

18 A. I did.

19 Q. And when was that?

20 A. That was my last year, so that would have been  
21 four years -- not quite four years ago.

22 Q. Does August of 2015 to March of 2016 sound like  
23 the right time frame?

24 A. Yeah, it sounds like the right time frame,  
25 uh-huh.



1 Q. And --

2 A. Yes.

3 Q. -- you left the school in what year?

4 A. The end of that year.

5 Q. 2016?

6 A. Yes, because the end of this year will be my --  
7 ending my fourth year at my current school.

8 Q. Why did you leave?

9 A. I -- my daughter at the time was in fifth grade  
10 and she was really into art and dance. And that's the  
11 school that I'm at, is a performing arts school. And  
12 I -- my mom had passed away that year, and she was an  
13 artist and a musician, and I really felt lead to pursue  
14 my opportunities at that school.

15 Q. When did you first meet Erin Neitzelt?

16 A. August of 20 -- that first year, 2014.

17 Q. '15?

18 A. Yeah, 2015. Yes.

19 Q. Did you ever meet Erin Neitzelt before the  
20 beginning of the school year?

21 A. No, I did not.

22 Q. So you met her as a friend through work?

23 A. Yes.

24 Q. Are you friends?

25 A. Yes.

1 Q. Were you friends during work?

2 A. Yes.

3 Q. And how exactly did you come to meet her and  
4 befriend her at work?

5 A. We were in the same department. We both taught  
6 English. However, she was gifted teacher and I was  
7 primarily special education. But we both taught like  
8 English Language Arts.

9 Q. Special education, that's the children that have  
10 some deficits?

11 A. Have an individual education plan or did not do  
12 well on the FSA, the State -- the FSA is the Florida  
13 State Assessment.

14 Q. Now, there are also children at Mariner Middle  
15 School that have down syndrome; is that correct?

16 A. Only one -- that year, one child.

17 Q. Was that a child that you taught?

18 A. Yes.

19 Q. These gifted and special ed children, did  
20 sometimes they -- did they ever overlap classes?

21 A. Yes. And they could overlap in -- they could  
22 overlap in any class. Like I have -- it's against  
23 inclusion law to have all children in one class with an  
24 individual education plan. It has to be a balance. So  
25 you have general education students that do not have an

1 individual education plan and then you have some students  
2 that may be gifted and then you have students that have  
3 the individual education plan. So you have general ed  
4 students, students with individual -- students with  
5 individual education plans and then you can have a gifted  
6 in there as well.

7 Q. All right. So -- but your classes, you only  
8 taught special education, correct?

9 A. Primarily that was the most of my kids, but not  
10 all, like 50/50, because you can't have -- it's -- you  
11 can't have all special education students together. You  
12 have to have a mix.

13 Q. And conversely, you can't have all gifted  
14 students either, right?

15 A. It used to be that way, but it's not that way  
16 anymore. But the gifted students, to my understanding,  
17 in our school district, I'm not sure, gifted students  
18 have to have a teacher that's gifted -- that is endorsed  
19 in gifted education.

20 Q. And Erin Neitzelt was endorsed in gifted  
21 education, right?

22 A. To my knowledge, yes.

23 Q. And did she ever complain to you about having to  
24 teach children other than the gifted children?

25 A. No.

1 Q. Did she ever make any complaints to you about  
2 the children that she taught?

3 A. No. She really did know and she really did a  
4 good job finding activities for differentiation, meaning  
5 that you don't have all of the differentiation in the  
6 meaning of you don't have all of the same type of  
7 learner. Like she had quite a few gifted students in her  
8 classes, but she could have -- you can also be gifted and  
9 also have an IEP, an individual education plan. So you  
10 really do have to work a lot at -- and since she's  
11 teaching Reading and English at the same time, you have  
12 to look at their reading Lexile, which is their reading  
13 level, and then you have to differentiate instruction and  
14 give different instruction to different kiddos. Like  
15 three -- these three kids might be -- three kids might be  
16 working on a certain assignment and three different kids  
17 might be working on something. And Erin was very, very  
18 good at doing that and showed me a lot about doing that.

19 Q. All right. So she helped you with some of your  
20 children that you were teaching?

21 A. She didn't help me, but we shared ideas. We  
22 didn't help each other. Like she never came into my  
23 classroom, I never went into her classroom. So I never  
24 saw Erin teach.

25 Q. Did Erin ever tell you about the different types

1 of children she was teaching as far as some being gifted  
2 and some being not?

3 A. No, she did not.

4 Q. Did she ever tell you that there was any  
5 problems with her teaching as far as having to get  
6 mentored or having any kind of problems with teaching at  
7 the school?

8 A. Coming into the district, everybody, including  
9 myself -- if you come from out of state, you have to be  
10 in an Apples program. And it doesn't matter if you --  
11 it's -- everybody gets a mentor to help you with the  
12 grading system, to help you with setting up a Google  
13 classroom, for example, because not everybody has those  
14 things. So Erin was not an exception to that. That's  
15 district policy. Like I came here from Montana and I had  
16 to be in an Apples program, too, even though I've been  
17 teaching for, I don't know, 15, 16 years at that time.

18 Q. Did Erin tell you who her mentor assigned to her  
19 was?

20 A. Yes. Paula Hill.

21 Q. Did she ever tell you whether she thought Paula  
22 was helping or or not helping her?

23 A. She did. She said that she did not feel that  
24 Paula was doing her job to help her and she was having a  
25 hard time passing the ELA test for Florida to teach ELA.

1 Q. What's ELA?

2 A. English Language Arts. It's the equivalent to  
3 English.

4 Q. All right. So Erin had to pass a test to keep  
5 teaching and she wasn't doing well with it?

6 MS. BOY: Object to the form. You can answer  
7 unless I tell you not to, just so you know.

8 THE WITNESS: Okay. I'm sorry, what did you  
9 say?

10 MS. BOY: I said object to the form. You can  
11 answer unless I tell you not to.

12 BY MS. CZYZ:

13 Q. That's another instruction that I didn't give  
14 you. From time to time -- there are two other attorneys  
15 here. From time to time, one or both may object to the  
16 form of a question. And that's routine, but you'll still  
17 need to answer the question unless your attorney  
18 instructs you not to.

19 THE WITNESS: Did you instruct me not to?

20 MS. BOY: No. You'll know if I'm instructing  
21 you not to.

22 THE WITNESS: Thank you. So I had to take the  
23 test as well and I -- because I wanted to be English  
24 endorsed. In the State of Florida, if you have  
25 teaching background in whatever subject area, if you

1 want to take a test to be endorsed in a different  
2 area, you can. So I took my test, my EL -- English  
3 Language Arts test. I passed it the first time.  
4 Erin was having a hard time passing the test and  
5 Paula was not giving her proper instructions because  
6 Paula, to my knowledge, never took the test. She has  
7 a degree in it or something else. I don't know. I  
8 don't know what Paula's education background is.

9 So I told Erin what I did to study for the test,  
10 what I did to write the essay, things that they were  
11 look for in the essay, and Erin passed the test.

12 BY MS. CZYZ:

13 Q. So did she fail it once and then pass it again?

14 A. I believe so. To my knowledge, yes.

15 Q. Do you know when she did pass it?

16 A. Before December.

17 Q. Was there ever an instance where you were on the  
18 school tarmac with Paula Hill and Rachel Gould and Rachel  
19 Gould was talking about -- talking to Dean or Dr. Valesky  
20 about a teacher?

21 A. Can you please explain tarmac or what you said?

22 Q. Yeah. It's actually something I don't even know  
23 what she was talking about. But from my understanding of  
24 trying to grasp what this is, it must be like a black  
25 tarred area or some kind of area in front of the school

1 where there's some kind of different type of maybe  
2 concrete or something to that effect in front of the  
3 school where you stand out by the parking lot.

4 A. No. Absolutely not.

5 Q. There's no such area?

6 A. No.

7 Q. Is there any kind of egress area to the front of  
8 the school where teachers stand and talk?

9 A. Not the front of the school.

10 Q. It's in the back of the school?

11 A. There is a bus ramp in the back of the school.

12 Q. A bus ramp?

13 A. Yes. But we cannot talk because that is a ripe  
14 area for children to fight, so there's no talking going  
15 on there.

16 Q. But specifically, were you ever standing with  
17 Paula Hill and Rachel Gould and Rachel Gould said, I was  
18 talking to Dean Valesky about a teacher?

19 A. No.

20 Q. So you never overheard such a conversation?

21 A. No.

22 Q. So if Erin told me that you did overhear this  
23 conversation, that would be false?

24 A. Yes.

25 Q. Do you have any idea why Erin would tell me that



1 you said that to her?

2 MS. BOY: Object to the form.

3 THE WITNESS: Object? I'm sorry.

4 MS. BOY: Just ignore me unless I tell you not  
5 to answer.

6 BY MS. CZYZ:

7 Q. I'll say it again. Would you know why Erin  
8 would tell me that you said that to her?

9 A. Yes.

10 Q. Why?

11 A. Because Rachel went to a teacher, Kristen  
12 Stevens, and congratulated her on getting into the AP  
13 program at FGCU where the professor that you named, I  
14 can't pronounce --

15 Q. Valesky?

16 A. Valesky. And that was it. That's it. There  
17 was no Paula Hill. There was no -- nobody else there.  
18 That was the extent of the conversation.

19 Q. And who was there for that conversation? You  
20 and who else?

21 A. Myself and Rachel and Kristen. That's it.

22 Q. And Kristen, what's her last name?

23 A. Stevens.

24 Q. And this was with regard to her getting promoted  
25 to an assistant principal position?

1           A.    Not getting promoted but getting into the  
2 program.   So ed leadership program at FGCU.

3           Q.    Did Erin tell you that she wanted to be in this  
4 ed leadership program?

5           A.    Yes.

6           Q.    And what did she tell you about that?

7           A.    She said that she wanted to apply to be an  
8 associate principal and that she was doing -- finding out  
9 whatever she could through Human Resources in order to do  
10 that.

11          Q.    Did she tell you that she talked to Rachel Gould  
12 about it?

13          A.    Yes.

14          Q.    And what did she tell you Rachel said?

15          A.    She said, Why don't you give me some time to get  
16 to know you before you go ahead and apply for that  
17 position because you're new to Lee County.

18          Q.    Right.  So there's a process that has to go on  
19 before you can --

20          A.    Pretty much.  Yes.  Yes.

21          Q.    Here's another thing.  Let me finish a full  
22 question before you answer because sometimes I may start  
23 out with a question one way and it may go the other way.  
24 So let me finish the entire question before you answer.

25               All right?

1 A. Okay.

2 Q. What was the last question?

3 A. I'm sorry. Can I stop for a minute? My phone  
4 is on.

5 Q. You want to turn that off?

6 A. Yeah. Thank you.

7 (Whereupon the requested question was read.)

8 BY MS. CZYZ:

9 Q. So there's a process that has to go on before  
10 you become an assistant principal; is that correct?

11 A. Yes, uh-huh.

12 Q. And what is that process?

13 A. To my knowledge, because I'm not -- I don't have  
14 a degree in ed leadership and I don't know the complete  
15 process, but there's a pool. So you put your name in,  
16 and I'm assuming, because I don't know, a portfolio of  
17 your -- your background and you have to have -- you know,  
18 you have to have a degree in ed leadership and then it  
19 goes from there. And that's all I know about it.

20 Q. Did you know if Erin Neitzelt went to the  
21 principal pool?

22 A. I don't know that.

23 Q. Did she ever tell you she did?

24 A. No.

25 Q. It never came up in a conversation about being

1 in the principal pool?

2 A. No. I only knew about the AP, the associate  
3 principal.

4 Q. That she wanted to become one?

5 A. Uh-huh.

6 Q. Did you know that she was a principal before  
7 coming to the school?

8 A. Yes.

9 Q. So you talked about about her background with  
10 her?

11 A. Yes.

12 Q. And did she tell you why she decided to become a  
13 teacher at the school instead of going directly to be a  
14 principal?

15 A. She missed the classroom and she felt like she  
16 wanted to go back in the classroom before starting any  
17 sort of leadership.

18 Q. So she didn't tell you that there was any kind  
19 of rule that said she had to work at something else  
20 before becoming a principal?

21 A. No. She found that out when she was down here  
22 in Lee County.

23 Q. Found out what?

24 A. That you have to be in the district for a little  
25 while before you jump into the AP pool coming from out of

1 state.

2 Q. All right. So it was something she researched  
3 and knew about?

4 A. Uh-huh.

5 Q. Yes?

6 A. Yes. I'm sorry. Yes.

7 Q. While Erin was working at the school, did she  
8 ever tell you that she felt belittled or intimidated by  
9 Rachel Gould?

10 A. Yes.

11 Q. And what did she say?

12 A. She felt uncomfortable. Rachel had asked her at  
13 one time if -- what she drove, what kind of car she  
14 drove, and that made her feel uncomfortable.

15 Q. Was Erin Neitzelt in an auto accident at the  
16 beginning of the year?

17 A. I don't recall.

18 Q. Did she ever tell you that she was in an auto  
19 accident?

20 A. I don't recall.

21 Q. Did she tell you why Rachel Gould was asking her  
22 what kind of car she drove?

23 MS. BOY: Object to the form.

24 THE WITNESS: No, I don't recall.

25 BY MS. CZYZ:

1 Q. All right. Did you take any kind of medications  
2 before coming here today?

3 A. No, I did not.

4 Q. So nothing that would affect your memory that  
5 you ingested?

6 A. No. No, I did not.

7 Q. Is there anything else that she told you, that  
8 Erin Neitzelt told you about Rachel Gould as far as her  
9 being a boss or her boss?

10 A. Can you please explain more?

11 Q. All right. Is there anything that she told you  
12 that would have been negative as far as her feelings  
13 towards Rachel Gould as her boss?

14 A. I think that she -- she was trying to keep her  
15 from advancing because she doesn't understand kind of the  
16 way, like, for example, her getting into the AP pool.  
17 But that's everybody. That's not just Rachel.

18 If I had come down from Montana with a  
19 leadership -- with a leadership degree and said, Hey, I  
20 want to jump in and do this, chances are I wouldn't get a  
21 job because they don't know me, they don't know my  
22 leadership style, they don't my background, so they don't  
23 know me as a person. So I have to prove myself as a  
24 teacher first, see how they -- see how I perform and see  
25 how I can lead. So there's, like I said, a -- it's kind

1 of a journey, just -- I don't know anybody that just  
2 comes in and, snap, gets an AP job. It's hard.

3 Q. But you said that Erin felt that she was being  
4 held back by Rachel Gould but that these guidelines or  
5 procedures are used on everybody?

6 A. Yes. So I don't know why Rachel -- I don't know  
7 why Erin felt that way.

8 Q. Did you talk to Erin about these feelings?

9 A. Yeah, I did. And I said, Erin, this is Lee  
10 County. Like this isn't Rachel. This is Lee County.

11 Q. Did she accept your explanation?

12 MS. BOY: Object to the form.

13 THE WITNESS: I don't know. Like she didn't --  
14 we didn't really talk about it that much.

15 BY MS. CZYZ:

16 Q. When you talked -- this particular instance that  
17 we're talking about when you had this discourse with Erin  
18 about the procedures and it not being Rachel Gould  
19 holding her back, et cetera --

20 A. Right.

21 Q. -- when did this occur, this conversation?

22 A. I'd say maybe like October, November. And,  
23 again, this year was -- my year with Erin was very spotty  
24 because she left at spring break, my mom passed away in  
25 January of that year, and my mom was very, very sick, you

1 know, the time that I had met Erin. So if my answer  
2 seems spotty or I don't recall, it's a very bad year for  
3 me.

4 Q. I see. Let's see what we can find out.

5 Did Erin seem to be extremely dejected? Was she  
6 crying? Anything that would have been an extreme  
7 emotional reaction when she was talking about her belief  
8 in Rachel Gould holding her back?

9 A. No. I think she handled it -- I think she just  
10 kind of went with it and said, okay, I'll teach this year  
11 and see what happens next year.

12 Q. Right. Kind of an -- more like a happy-go-lucky  
13 attitude?

14 A. Very much, yeah. Erin was very much like that.

15 Q. Did she seem kind of bubbly on the outside?

16 A. Oh, yeah. Uh-huh. Very much so.

17 Q. Was she loquacious?

18 A. Can you please explain?

19 Q. Did she like to talk a lot?

20 A. Uh-huh, yes.

21 Q. She didn't seem like crazed on the outside or  
22 ever -- to your knowledge, did she ever do anything where  
23 she was like angry and throwing things?

24 A. Never, no. That would be really weird for me to  
25 see Erin do that.



1 Q. So seemed pretty composed to you --

2 A. Yes.

3 Q. -- during that time frame period from August of  
4 2015 until March of 2016 that you knew her in the school?

5 A. Yes.

6 Q. Did Erin ever tell you that she was getting  
7 therapy for emotional distress from her experiences with  
8 Rachel Gould?

9 A. No. She never ever talked about that.

10 Q. Did she ever send you any pictures of her  
11 cuticles all ripped off on all of her fingernails saying,  
12 This is how I feel now because of Rachel Gould?

13 A. No.

14 Q. Nothing like that?

15 A. No.

16 Q. If Erin sent me pictures of her cuticles all  
17 ripped off of every single finger on her hand and said,  
18 This is because of the emotional distress I'm getting  
19 from Rachel Gould and I showed this to my therapist,  
20 would that surprise you?

21 A. Yes.

22 Q. Yes?

23 A. Yes, yes. I'm sorry. Yes, yes.

24 Q. That sounds almost like a totally different  
25 person from who you saw at school, right?

1 A. Yes.

2 Q. Did Erin Neitzelt ever tell you she was going  
3 for therapy?

4 A. Never, uh-uh.

5 Q. But she did tell you that Rachel Gould belittled  
6 her?

7 A. No.

8 Q. I think that was your testimony before, was that  
9 she did feel belittled by her. What did she say how she  
10 felt exactly from Rachel Gould to you?

11 A. Just that she felt that she was keeping her from  
12 advancing. But belittled, I don't remember that word. I  
13 don't recall.

14 Q. Did she feel put down by her at all? Did she  
15 ever mention anything like that?

16 A. Like you said before, Erin is very bubbly. And  
17 Rachel, when you get to know her, is more bubbly. And  
18 maybe she just -- I don't know. I don't know the  
19 relationship between Erin and Rachel. I wasn't there to  
20 see it.

21 Q. Were you ever together with Rachel and Erin in  
22 the same room?

23 A. Never, uh-uh.

24 Q. And you never saw Erin's teaching style? You  
25 were never in her room?

1           A.    Never, no.  As I said before, I had three  
2 different jobs.  I didn't have time to be in anybody  
3 else's room other than the teachers that I was  
4 co-teaching with, television production, and teaching my  
5 own children.  And I also was a case manager and wrote  
6 individual education plans, so I didn't have time to go  
7 anywhere other than what my job detailed.

8           Q.    Did Erin ever tell you that she wanted to have  
9 cameras put in her classroom because of the children  
10 acting in a disorderly manner?

11          A.    No.

12          Q.    Did she ever tell you she wanted cameras in her  
13 room for any reason?

14          A.    No.

15          Q.    Did she ever talk to you and say that her  
16 children were difficult to manage?

17          A.    At times, yes.

18          Q.    What did she tell you about that?

19          A.    At times the children wouldn't listen -- like  
20 she said, she had to do something different.  And that's  
21 when she started making the differentiating lessons and  
22 she said that really helped, and that was the extent.

23          Q.    So she said that doing differentiated lessons  
24 helped her with her class?

25          A.    Yes.

1 Q. So to you she was indicating that her  
2 difficulties were lessening?

3 A. Her difficulties were lessening, yes.

4 Q. And when did she tell you that?

5 A. Probably like November.

6 Q. Did she seem happy working at the school?

7 A. Yeah, yeah. She was happy every -- yeah, every  
8 day. I didn't see -- remember her coming to school  
9 crying or upset.

10 Q. Was she there every day of school?

11 A. Every day? No.

12 Q. Was she supposed to be there every day of school  
13 to teach?

14 A. Yes.

15 Q. So why was she missing time from work?

16 MS. BOY: Object to the form.

17 BY MS. CZYZ:

18 Q. Was she missing time from work?

19 A. When she was ill. She had extreme laryngitis  
20 really bad and she missed like three or four days of  
21 work. That's it.

22 Q. And three or four days, that was just during  
23 that entire time frame from August of 2015 until March of  
24 2016?

25 A. That's what I recall.

1 Q. So not a big time period?

2 A. No.

3 Q. All right. So you saw her most of the time and  
4 she seemed like she was fine and happy?

5 A. Oh, yeah. She loved living here. She loved her  
6 job. She liked her kids. Yeah, uh-huh.

7 Q. Did she tell you why she moved to Florida?

8 A. Uh-uh. She didn't tell me.

9 Q. Did she say anything about wanting to retire in  
10 Florida?

11 A. Yes.

12 Q. And what did she say about that?

13 A. She said as soon as her husband was done with  
14 his career that they wanted to move down here and retire  
15 and live down here.

16 Q. When did she tell you that?

17 A. At some point during the year. I can't give you  
18 a specific month, but sometime during that year.

19 Q. All right. But she was already there, living  
20 there?

21 A. Uh-huh.

22 Q. So why would she say that they wanted to come  
23 down and retire?

24 A. Later on in their life. They had a house, so --  
25 like a vacation house, so they wanted time to come down

1 here whenever, and that when they were ready to retire,  
2 they would be coming back down here.

3 Q. Did she tell you she was intending to go back to  
4 Ohio?

5 A. She never talked about that.

6 Q. When she left her job, do you know if she was  
7 terminated or if she quit?

8 A. She quit.

9 Q. Do you know why?

10 A. She just felt like it was a really hardship. It  
11 was a pretty big hardship on her marriage to be away from  
12 her husband and that she just felt that she couldn't do  
13 it anymore and it was spring break and she left her stuff  
14 and -- and left. And that was the extent of her --  
15 that's what I know about her leaving.

16 Q. Did you ever meet her husband Scott Neitzelt?

17 A. Not that I recall.

18 Q. Have you ever met him at all?

19 A. I have not ever met him.

20 Q. Was he he ever at the school to give a lecture?

21 A. He was at the school to give a lecture in the  
22 science classroom, yes.

23 Q. Were you there that day?

24 A. I was, but I didn't get to meet him. I don't  
25 remember meeting him.

1 Q. All right. So when she quit her job, she didn't  
2 say anything about her head being on the chopping block  
3 for being terminated?

4 A. No, uh-uh.

5 Q. Do you know of any teachers who told her that  
6 her head was on the chopping block for being terminated?

7 A. Not to my knowledge.

8 Q. So if that's something that she stated to me,  
9 that wouldn't be a true statement?

10 MS. BOY: Object to the form.

11 THE WITNESS: Okay. Please -- please rephrase.

12 BY MS. CZYZ:

13 Q. If she told me -- if Erin Neitzelt told me that  
14 she knew she was going to be terminated because she  
15 talked to teachers at the school and they said her head  
16 was on the chopping block, that wouldn't be a true  
17 statement?

18 MS. BOY: Object to the form.

19 THE WITNESS: I don't know because I'm not those  
20 other teachers and I wasn't privy to that sort of  
21 conversation.

22 BY MS. CZYZ:

23 Q. So it's possible she could have talked to other  
24 teachers at the school and they said her head's on the  
25 chopping block?

1           A.    I don't really know how that would be because I  
2 don't know how the other teachers would know that.  
3 Rachel wouldn't have been -- she wouldn't have been open  
4 like that, like, oh, Erin's about to get fired or Erin's  
5 on the chopping block. That's not how I know Rachel.

6           Q.    Would there have been any secret meetings that  
7 Rachel or one of the other principals had about Erin  
8 Neitzelt where some of these other teachers would have  
9 attended to talk about terminating her?

10          A.    No. Absolutely not. If there was some  
11 discussion about Erin's termination, it would have been  
12 between Rachel and the associate principals. But not  
13 teachers, no. That's -- no. Rachel doesn't operate that  
14 way.

15          Q.    That would be some kind of gossip if something  
16 like that was said?

17          A.    Yes. And it's just not something that -- no.  
18 That's not something that happened.

19          Q.    Did Erin tell you she was gossiping with any of  
20 the other teachers about her work?

21          A.    She talked to a couple other teachers, yes.

22          Q.    Do you know who they were?

23          A.    Amy Johnson and Valerie -- and I can't remember  
24 her last name. I don't recall her last name.

25          Q.    And Amy Johnson, what does she teach?



1 A. The same -- English Language Arts.

2 Q. So Amy Johnson -- and then Valerie, what does  
3 she teach?

4 A. The same.

5 Q. The --

6 A. ELA.

7 Q. What grades?

8 A. Sixth grade.

9 Q. And Erin was teaching which grade?

10 A. Seventh.

11 Q. And what happened in this conversation with Amy  
12 Johnson and Valerie?

13 A. I wasn't there.

14 MS. BOY: Object to the form.

15 BY MS. CZYZ:

16 Q. But Erin told you that she spoke with these two  
17 women?

18 A. Uh-huh.

19 Q. Yes?

20 A. Yes. Sorry. Yes.

21 Q. And what did she say happened after she talked  
22 to them?

23 A. Nothing. Nothing happened.

24 Q. What did these women tell her?

25 MS. BOY: Object to the form.

1           THE WITNESS: I don't recall. This would have  
2           been like them -- I wouldn't say it's gossip. Just  
3           talking about teaching in Florida, teaching language  
4           arts, teaching kids. Gossip about, like, work  
5           environment, stuff like that, no, nothing like that.  
6           Like Erin would say, oh, I'm having lunch with Amy  
7           and Valerie today or we talked about, you know, a  
8           unit or -- because they taught out of the same  
9           curriculum, collections.

10           But as far as my definition of gossip, gossip is  
11           talking about other people or talking about other  
12           things -- you know, talking about other people.

13 BY MS. CZYZ:

14           Q. Well, let me say something like this  
15           specifically. Did Erin say, I talked to Amy Johnson and  
16           I heard that my head was on the chopping block?

17           A. No. That was never -- no. And I wouldn't have  
18           been privy to that information.

19           Q. Did Erin ever tell you that she thought people  
20           were having secret meetings about her?

21           A. No, she never told me that. And, I'm sorry, but  
22           this is weird.

23           Q. Do you know of any class action of black people  
24           against Lee County Schools?

25           A. I have no knowledge of that.

1 Q. Never heard about that class action?

2 A. No.

3 Q. Where they were also saying that there were  
4 private meetings about them?

5 MS. BOY: Object to the form.

6 THE WITNESS: I have -- I have no knowledge.

7 BY MS. CZYZ:

8 Q. Okay. Bonnie Gallo, do you know who this is?

9 A. Yes. She's one of my really good friends.

10 Q. And Bonnie's first name is what?

11 A. I got to think about it for a minute.

12 Q. Is it Bernadette?

13 A. Yes, I think it is, yes.

14 Q. So Bonnie is a nickname for Bernadette?

15 A. Yes.

16 Q. And Gallo, is that G-a-l-l-o?

17 A. Yes.

18 Q. Does she have another last name now?

19 A. No. That is her last name.

20 Q. And how long have you known Bonnie Gallo?

21 A. Nine years.

22 Q. And did she work at the school?

23 A. Yes.

24 Q. When I say "the school," I mean did she work at  
25 Mariner Middle School?

- 1           A.    Yes, she did.
- 2           Q.    And what was her position there?
- 3           A.    Special education self-contained teacher.
- 4           Q.    Can you describe what Bonnie Gallo looked like
- 5 when she worked at the school?
- 6           A.    She's 5'6", brunette. Can you explain exactly
- 7 what you want me to -- I don't know how else to --
- 8           Q.    Was she blonde at the time that she worked at
- 9 the school?
- 10          A.    I don't recall. I'm pretty sure it was brown
- 11 hair.
- 12          Q.    What kind of car did she drive?
- 13          A.    A Mustang.
- 14          Q.    Was it a Mustang convertible?
- 15          A.    Yes.
- 16          Q.    Do you know what color it was?
- 17          A.    Yellow.
- 18          Q.    What was her husband's occupation at the time?
- 19          A.    She's divorced.
- 20          Q.    She was married when she worked there, right?
- 21          A.    No.
- 22          Q.    What was her husband's occupation?
- 23          A.    Doctor.
- 24          Q.    Did she give off a look of being wealthy?
- 25          A.    No. No. She was very much for kids, special

1 needs kids and kids with economic issues and she just  
2 never has ever presented herself like -- I mean, she  
3 looks nice, but she doesn't look like she just walked out  
4 of Saks Fifth Avenue. You know, she's just not like  
5 that. That's not her.

6 Q. Okay. She's not dripping with diamonds?

7 A. No. God, I don't know any teacher that drips  
8 with diamonds.

9 Q. Well, Erin Neitzelt, did she have a diamond  
10 ring?

11 A. Yes, she did.

12 Q. And was it a big ring, a small ring?

13 A. It was a big ring.

14 Q. Maybe five karats?

15 A. I don't know. Relevancy, can I ask?

16 Q. It's something that Erin claimed in her lawsuit.

17 In fact, did you know of Erin Neitzelt having a  
18 lawsuit against Lee County Schools?

19 A. She told me about it.

20 Q. When did she tell you about it?

21 A. After she left, like quite a few months after  
22 she left. And I didn't know the particulars to it until  
23 I was helping my daughter, who's in college at the time,  
24 do some research. Then I found it online and there was a  
25 lot of discrepancies.

1 Q. What are the discrepancies that you saw?

2 A. Well, one of them, the huge one was that Rachel  
3 on the bus ramp telling people that, you know, she wasn't  
4 going to let Erin into -- or she was going to call Dr. --

5 Q. Valesky?

6 A. Valesky, yeah. Or talking about Erin to people  
7 about Dr. Valesky and her wanting to get into the  
8 doctorate program. That never happened.

9 Q. So that never happened? That's something that  
10 Erin made up?

11 A. Yeah.

12 MS. BOY: Object to the form.

13 THE WITNESS: Excuse me. Yes. That never  
14 happened.

15 BY MS. CZYZ:

16 Q. And when you saw this, did you talk to Erin  
17 about that?

18 A. Yes, I did.

19 Q. And what did she say?

20 A. She thought that she recalled that. And I said,  
21 You are wrong. That is not true.

22 Q. Did Erin tell you that she was in any auto  
23 accidents between the time that she started school,  
24 working at the school and between the time that she left  
25 the school?

1 A. I really don't -- I don't recall.

2 Q. Did she ever tell you she hit her head on  
3 anything?

4 A. Uh-uh.

5 Q. Any type of accidents where she may have hit her  
6 head that you know of?

7 A.. No, uh-uh.

8 Q. Did she ever tell you she was taking any kind of  
9 intoxicating medications that would affect her memory?

10 A. Intoxicating medication like -- I can't think of  
11 a medication that does that, so no. Erin didn't talk to  
12 me about those -- she didn't talk to me about medications  
13 she was taking or -- she didn't talk to me about those  
14 things.

15 Q. You were still talking -- strike that.  
16 Were you still talking to Erin Neitzelt after  
17 she left the school in March of 2016?

18 A. Off and on.

19 Q. For how long?

20 A. A few years. Like we were Facebook friends, and  
21 then she came down last year. We had lunch together.  
22 That was the first time we had ever had lunch together.  
23 Never been to her house. Like we were more school  
24 friends than outside of school friends, and that's when I  
25 talked to her about the death of my daughter.

1 Q. When was that lunch? Do you know?

2 A. Sometime last year. I don't recall what month.

3 It was just sometime last year.

4 Q. Did she tell you why she was here in Florida?

5 A. To check on her house.

6 Q. After she left the school, do you know where she  
7 went?

8 A. Back home to Ohio or West Virginia, one of the  
9 two.

10 Q. All right. So she wasn't still living in  
11 Florida after she quit her job?

12 A. I don't think so.

13 Q. If she put in a complaint to the court that she  
14 was still living in Lee County, Florida after she quit,  
15 that wouldn't be true, correct?

16 A. She could still be -- still have residence here  
17 and went back up to Ohio for a little while and came  
18 back. I don't know. I didn't talk to Erin a lot after  
19 she left the school, so I can't -- I can't testify to  
20 that. I don't know.

21 Q. After she left the school, did she ask you about  
22 Bonnie Gallo and talking to her for her case?

23 A. She did.

24 Q. What did she say?

25 A. She just said, Do you that Bonnie would talk to



1 me about, you know, my issues with Rachel? And I said,  
2 I'd have to talk to her first. And that was the end of  
3 that.

4 Q. And do you know when that was?

5 A. I don't recall. It would have to have been  
6 after she left the school because, like I said, there was  
7 a huge chunk of time where Erin and I didn't really talk  
8 due to not only did my mother pass but then my daughter  
9 started to get sick and I obtained custody of my  
10 granddaughter, so I pretty much lost contact with a lot  
11 of different people. So Erin and I didn't talk a lot.

12 Q. Did Erin ever tell you that she thought Rachel  
13 Gould was jealous of her?

14 A. I don't recall.

15 Q. Did she ever tell you -- strike that.

16 Did Erin tell you that she wanted to speak to  
17 Bonnie Gallo about a class action?

18 A. No. And I don't -- I don't understand -- can  
19 you please explain class action?

20 Q. Class action is a group of people who are  
21 similarly situated --

22 A. Oh, okay.

23 Q. -- and bring one action with all their claims  
24 together. So she didn't say anything about that prior to  
25 her desire to talk to Bonnie Gallo?

1 A. No, she didn't.

2 Q. When did Bonnie Gallo -- what year did Bonnie  
3 Gallo work at Mariner Middle School?

4 A. 2011 to 2013.

5 Q. You were friends with Bonnie then?

6 A. Yes.

7 Q. Do you know why Bonnie left the school?

8 A. Yes.

9 MS. BOY: Object to the form.

10 BY MS. CZYZ:

11 Q. Why did Bonnie leave the school?

12 MS. BOY: Object to the form.

13 THE WITNESS: Bonnie left the school to go to a  
14 high school position.

15 BY MS. CZYZ:

16 Q. So she quit?

17 A. Her position was eliminated at Mariner.

18 Q. When you say "her position was eliminated," what  
19 does that mean?

20 A. The program that she taught was no longer going  
21 to be at that school and she wasn't certified to teach --  
22 or she wasn't -- she wanted to teach life skills. So if  
23 life skills -- it's a program. Not every school has it.  
24 And so she wanted to teach life skills. So the position  
25 was eliminated at Mariner and Bonnie put in for a job at

1 Island Coast High School. And she got that job for life  
2 skills.

3 Q. Did Rachel Gould give Bonnie a letter saying  
4 that her position was no longer going to be available?

5 A. Yes.

6 MS. BOY: Object to the form.

7 THE WITNESS: She did.

8 BY MS. CZYZ:

9 Q. Did you see that letter?

10 A. No.

11 Q. How do you know about the letter?

12 A. Bonnie told me.

13 Q. Did Bonnie also tell you that somebody else took  
14 her position the next year?

15 A. She did not tell me that, but I still worked at  
16 the school and, yes, somebody else took the position.

17 Q. So it wasn't that the position was eliminated --

18 A. For that time it was. Every year a principal  
19 never knows what's going to be -- until they get their  
20 budget. So a lot of times people -- people may lose  
21 their job in May and the principal says, Well, hold on  
22 because my budget hasn't come out yet, so, you know, just  
23 be okay for right now and I may be calling you in a  
24 couple weeks and saying we got plenty, you got your job.  
25 That happens to employees that are new to the district.

1 I've been in the district for awhile and something like  
2 that happens, then you go into -- I can't remember the  
3 terminology right now but -- where positions open before  
4 they're open to the public. Like transfers, sort of say.  
5 So you can transfer to another school if your job -- if  
6 your program at your job or the population drops at your  
7 school. Then you can put in for a transfer.

8 So you still have a job, you just don't have a  
9 job at that school. But that's a job for employees that  
10 have been in the district for awhile. Because since  
11 Florida is a right-to-work state in that first year, you  
12 can be terminated for no reason at all. You don't have  
13 to have a reason, so -- after that, in the school  
14 district, to my knowledge, you have -- you know, you have  
15 more say. There's a little bit more work that has to be  
16 done if they're going to hire you.

17 Q. So did Bonnie Gallo ever say to you that she  
18 thought she was -- or her position was no longer in  
19 effect because of Rachel Gould having something against  
20 her?

21 A. No, no. That was budget, budgetary. She wasn't  
22 the only one.

23 Q. So Bonnie never thought that Rachel didn't like  
24 her because of the car she drove or the way she looked or  
25 that she was married to a doctor or any of her wealth or

1 anything like that?

2 A. Absolutely not.

3 Q. Okay. Today's the first time I met you,  
4 correct?

5 A. Yes.

6 Q. And I never talked to you -- well, I did talk to  
7 you one time before.

8 A. Uh-huh, yes.

9 Q. With your attorney present?

10 A. Yes.

11 Q. For a few minutes?

12 A. Correct.

13 Q. But we've never seen each other before, correct?

14 A. Correct.

15 Q. You know what Erin looks like, right?

16 A. Yeah.

17 Q. Do we resemble each other a little bit?

18 A. Other than both having blonde hair, no.

19 Q. But from a distance do you think somebody could  
20 mistake her for me?

21 A. No.

22 Q. Do you know how many times Erin Neitzelt's been  
23 married?

24 A. Twice, to my knowledge.

25 Q. Did she tell you about her other husbands?

1 A. Not much, no. Just maybe where they were from.

2 Q. Did she tell you about her net worth?

3 A. No, no. That never came up.

4 Q. So she never talked about having money or being  
5 wealthy?

6 A. Uh-uh.

7 Q. No?

8 A. No. I'm sorry. No. Correct.

9 Q. Did you ever wonder how she got to drive a  
10 Mercedes and have a house on Bokeelia Island?

11 A. Did I ever wonder? No. I knew her husband was  
12 in the coal business forever, so -- I mean, that's -- I  
13 can infer there's some money there, yes.

14 Q. From her current husband?

15 A. Yes.

16 Q. Did she ever talk about the money of her second  
17 husband?

18 A. I'm sorry. I need to go back. I only know  
19 about her second husband, Scott.

20 Q. Or her third husband Scott?

21 A. Yeah. I don't know about the other two then.

22 Q. Because her other names were Marnoney, Olexo and  
23 Malik.

24 A. And I don't know that.

25 Q. Did she ever say that she was married to a

1 wealthy person from Saint Clairsville with the last name  
2 Malik?

3 A. No. We never talked that deep about her passed  
4 marriages or passed -- I can't even tell you the name of  
5 the town she grew up in. I know the area, but -- sorry.  
6 That's all.

7 Q. When you saw her suing the school, were you  
8 surprised?

9 MS. BOY: Object to the form.

10 THE WITNESS: I was surprised.

11 BY MS. CZYZ:

12 Q. Why is that?

13 A. Because I didn't understand the whole picture.  
14 Like I said, I never saw or observed Erin teach. I never  
15 saw Rachel or Marla or anybody go into her classroom. I  
16 didn't -- I didn't know the whole picture until after she  
17 left.

18 Q. Do you know who Dr. Valesky is?

19 A. I don't know him personally, no.

20 Q. Did Erin ever tell you that she met with a  
21 Dr. Valesky for her school?

22 A. Yes.

23 Q. At university?

24 A. Yes.

25 Q. What did she tell you about that?

1           A.     She told me that she had applied to FGCU for  
2 their doctorate program, she went with a panel that he  
3 was on and that she had a great conversation with him.

4           Q.     And did she tell you what the end result of her  
5 application was to that school?

6           A.     That she was denied from the doctorate program.

7           Q.     And did she tell you why she was denied from the  
8 doctorate program?

9           A.     She just said that she got the letter and that  
10 through the lawsuit she said that Rachel had contacted  
11 him.

12          Q.     All right. So you're talking about in the  
13 lawsuit the allegation was that Rachel Gould contacted  
14 Dean Valesky?

15          A.     Yes.

16          Q.     But did Erin Neitzelt ever tell you at any time  
17 that she thought that Rachel Gould was out to get her and  
18 calling the Dean so that she wouldn't get into the school  
19 and she was blaming all of her problems on Rachel Gould?

20          A.     She did say that she felt Rachel had called him.  
21 She didn't know, but she felt that she did.

22          Q.     Did she ever tell you that she submitted her  
23 resume to the school for evaluation?

24          A.     Resume to FGCU?

25          Q.     Yes.



1 A. She didn't tell me about a resume.

2 Q. But she told you she applied to the school?

3 A. Yes.

4 Q. As part of her application, she gave a resume.

5 And I'm going to hand you what we marked as Exhibit 2  
6 already.

7 MS. CZYZ: Do you want to see it again?

8 MS. BOY: Which one is it, FGCU or -- no. I'm  
9 good. Resume.

10 THE WITNESS: Do you want me to look at it?

11 BY MS. CZYZ:

12 Q. Yeah. If you look at that, does that look like  
13 Erin's resume?

14 A. It does, yes.

15 Q. At the top here there's a stamp. Can you see  
16 what date that is?

17 A. Uh-huh.

18 Q. What is the date?

19 A. 11/4/19.

20 Q. I'm sorry. May I see --

21 A. Oh, I'm sorry. That's that date.

22 Q. Yeah, no. That's not the right date. The date  
23 stamped on the actual resume is what?

24 A. October 7, 2015.

25 Q. So on the third page she has something

1 highlighted there called "references."

2 A. Oh.

3 Q. And who's the first name that she lists that --  
4 who is the first name that Erin Neitzelt lists as a  
5 reference on her resume that she sent to the Gulf Coast  
6 University?

7 A. Rachel Gould.

8 Q. Rachel Gould.

9 A. She did not tell me that.

10 Q. Rachel Gould. So wouldn't it be logical that  
11 Dean Valesky or Dr. Valesky, actually, would be calling  
12 Rachel Gould as a reference?

13 A. She's the first one on there, yes.

14 Q. Right? That's something that Erin Neitzelt  
15 would know in her mind that Dr. Valesky is going to be  
16 calling Rachel Gould to find out about her as a  
17 reference, correct?

18 MS. BOY: Object to form.

19 MR. ATWOOD: Object to form. Sorry. I had to  
20 get one in.

21 THE WITNESS: Correct.

22 BY MS. CZYZ:

23 Q. So when Erin Neitzelt came to me to tell me that  
24 Rachel Gould was out to get her and holding her back from  
25 becoming a principal at the school and that she went so

1 far as to call Dean Valesky to badmouth her, Erin would  
2 have known from day one that she was telling me a false  
3 story about being -- suffering from employment problems  
4 because she listed Rachel Gould as a reference, right?

5 MS. BOY: Object to the form.

6 MR. ATWOOD: I'll second that.

7 THE WITNESS: She listed Rachel as a contact. I  
8 was not aware of that.

9 BY MS. CZYZ:

10 Q. All right. So you're surprised right now?

11 A. Very.

12 Q. Because this shows that Erin came to me and told  
13 me a lie?

14 MS. BOY: Object to the form.

15 MR. ATWOOD: Object to the form.

16 THE WITNESS: I don't know the conversation the  
17 two of you had.

18 BY MS. CZYZ:

19 Q. Well, you know in the actual complaint that she  
20 was saying that Rachel Gould picked up the phone and made  
21 a call to Dean Valesky or Dr. Valesky to badmouth her to  
22 hold her back from getting into this doctorate program,  
23 but she knew that that was a false claim --

24 MS. BOY: Object to the form.

25 MR. ATWOOD: Object to the form.

1 BY MS. CZYZ:

2 Q. -- right?

3 A. The evidence is there.

4 Q. So did Erin Neitzelt ever tell you why she was  
5 hiring me, Catherine Czyz, to represent her against the  
6 school?

7 A. She just felt that she had been wronged.

8 Q. Wronged?

9 A. Yes.

10 Q. Okay. Did she say what way she was wronged?

11 A. She just felt that she was held back from being  
12 an associate principal.

13 Q. But did she say, You know what, I think I feel  
14 like I was wronged and held back and I have some  
15 employment issues and I should probably call somebody  
16 around Lee County and find out what my recourse is, or I  
17 think I'll call somebody who's all the way over on West  
18 Palm Beach?

19 A. No, I don't recall that.

20 Q. Do you have any idea why Erin Neitzelt would  
21 have called me, Catherine Czyz, to represent her on an  
22 employment action that occurred over in Lee County?

23 MS. BOY: Object to the form.

24 THE WITNESS: I don't know other than that she  
25 does know you.

1 BY MS. CZYZ:

2 Q. Well, I'm asking you if she ever had a  
3 conversation with you about it.

4 A. Not about you. Not about a specific person, but  
5 that she was going to seek advice.

6 Q. Does that seem strange to you, that a person who  
7 is working in Lee County Schools would call somebody  
8 that's all the way over in West Palm Beach to represent  
9 her in a case against Lee County Schools?

10 MS. BOY: Object to the form.

11 THE WITNESS: Not if she knew you.

12 BY MS. CZYZ:

13 Q. So -- but she never told you for certain one way  
14 or the other why she contacted me?

15 A. No.

16 Q. Did she ever tell you that she contacted me  
17 about other cases?

18 A. Uh-uh, no.

19 Q. Did she ever bring up the name Catherine Czyz to  
20 you?

21 A. Not until later. Not until after, right before  
22 the -- right after, not before, after I had called her  
23 and talked to her about what I found online.

24 Q. And when you're saying what you found online,  
25 you mean the lawsuit against the school?

1 A. Uh-huh.

2 Q. And what did she say?

3 A. She said that you were her lawyer and that she  
4 grew up with you and that that's why she chose you to be  
5 her lawyer.

6 Q. Okay. Did she say that she knew that because  
7 she grew up with me that my family had money?

8 A. No. She never said anything about that.

9 Q. Did she say she knew I was Dr. Pellizzari's  
10 daughter?

11 A. No. That doesn't sound familiar to me at all.

12 Q. Did she ever tell you that she married Jack  
13 Malik's son, the famous attorney and judge from Saint  
14 Clairsville?

15 A. No. I had no idea. Like I said, I have no idea  
16 about her prior marriages.

17 Q. Did she ever tell that you she likes to make  
18 claims against people for money?

19 MS. BOY: Object to the form.

20 THE WITNESS: We never had that in-depth of  
21 conversations.

22 BY MS. CZYZ:

23 Q. Did she ever tell you that she got money from  
24 divorcing Mr. Malik?

25 A. No, uh-uh.

1 Q. Did she ever tell that you she gets -- extorts  
2 people for money because she has -- knows their families  
3 have money?

4 MS. BOY: Object to the form.

5 MR. ATWOOD: Object to the form.

6 THE WITNESS: No.

7 BY MS. CZYZ:

8 Q. But that's only something that she would know by  
9 growing up with people from that school, right?

10 MS. BOY: Object to the form.

11 THE WITNESS: Not necessarily. I grew up with a  
12 lot of people, and I can't say how they are as  
13 adults, only as how I knew them as children.

14 BY MS. CZYZ:

15 Q. But people who are attorneys usually have more  
16 money than people who are not attorneys, right?

17 MS. BOY: Object to the form.

18 MR. ATWOOD: Object as to factual statement.

19 THE WITNESS: No. And my ex-father-in-law is a  
20 lawyer, so --

21 BY MS. CZYZ:

22 Q. Did she say anything to you other than that she  
23 chose me because we went to school together?

24 A. That was her reasoning for choosing you. In  
25 fact, she said you guys were close friends and she was

1 choosing -- that's why we she was chose you.

2 Q. Oh, we were close friends?

3 A. Yes.

4 Q. How close were we?

5 MS. BOY: Object to the form.

6 THE WITNESS: That you grew up together and you  
7 were close.

8 BY MS. CZYZ:

9 Q. And what did we do together that made us close  
10 friends?

11 MS. BOY: Object to the form.

12 THE WITNESS: She didn't go into that. She just  
13 said you guys were close friends. You grew up in a  
14 small area, small town. I grew up in a small town.  
15 There's friends that I was close to, so I could -- I  
16 understood what she was talking about.

17 BY MS. CZYZ:

18 Q. Right. But, I mean, were we in the same click  
19 together? Did she mention anything about that?

20 A. Pictures, pictures of you guys together.

21 Q. Oh, there are pictures of us together?

22 A. Uh-huh.

23 Q. And where were these pictures taken?

24 MS. BOY: Object to form.

25 THE WITNESS: Throughout your childhood.



1 BY MS. CZYZ:

2 Q. So when did she show you these pictures?

3 A. She never showed them. She only talked about  
4 them.

5 Q. What did she tell you that we did together as  
6 children?

7 A. We didn't -- like I -- we didn't have in-depth  
8 conversations like that.

9 Q. Did she ever talk to you about my Facebook  
10 posts?

11 A. Never.

12 Q. Did she ever mention being Facebook friends with  
13 me, Catherine Czyz?

14 A. No.

15 Q. Did she ever talk to you about Rachel Gould's  
16 Facebook posts?

17 A. No.

18 Q. Did she ever tell you that she was doing any  
19 kind of online investigation of me, Catherine Czyz?

20 A. No.

21 Q. Did she ever tell you she was doing any online  
22 investigation of Rachel Gould?

23 A. No.

24 Q. Did she ever tell you that she hired a private  
25 investigator to investigate me or Rachel Gould?

1 A. No.

2 Q. Would that surprise you if she was doing her own  
3 investigations of us?

4 A. Yes, that would surprise me.

5 Q. This is Exhibit -- Composite Exhibit 4 from the  
6 last deposition, but we're going to use it again.

7 A. Oh, my God. No, that does not look like  
8 something Rachel -- Rachel could get fired for that. We  
9 have a very strict social media. Like, no. Rachel could  
10 definitely get fired for those things.

11 MS. BOY: I'm going to object to that.

12 BY MS. CZYZ:

13 Q. What I want you to do is -- I'm going to show  
14 you some pictures. Do you recognize this picture of this  
15 woman and this man?

16 A. Tell me relevancy. And it's two women.

17 Q. Oh, those are two women?

18 A. Yes.

19 Q. Yes, those are two women. Can you recognize  
20 who's in that picture?

21 A. Rachel and her daughter.

22 Q. And do you recognize this man? It says  
23 Madison's post.

24 A. Yeah. That's Rachel's husband.

25 Q. That's Rachel's husband. And do you

1 recognize --

2 MR. ATWOOD: There was a series of questions  
3 here about Facebook posts and all that sort of stuff,  
4 and I don't want to get into it too much here, but as  
5 far as the questioning if she's seen them, then it's  
6 worth asking questions. But if she hasn't, seen  
7 these documents that you're presenting, I'm not sure  
8 what relevancy there is to this -- to this line of  
9 questioning other than to harass my client and to --  
10 to try to be vexatious, to use a word.

11 I mean, we've already -- you've already talked  
12 in a separate deposition about the person with whom  
13 you thought they were posted there. If she hasn't  
14 seen them, I'm not sure that continuing the  
15 questioning is relevant. But, you know, Suzanne, you  
16 can make an objection.

17 MS. CZYZ: I'm going to object to you making a  
18 speaking objection when you're only allowed to object  
19 to form.

20 MS. BOY: And I'm going to object to the line of  
21 questioning as well. I'll instruct you not to answer  
22 if we get to that point.

23 MS. CZYZ: Are you going to instruct her not to  
24 answer anything regarding these pictures?

25 MS. BOY: I haven't decided yet. I'm concerned

1           because these are private -- you've established in  
2           the last deposition they were private posts, correct?  
3           And I'm concerned about that.

4           BY MS. CZYZ:

5           Q.     Are you surprised, in looking at these pictures,  
6           that Erin Neitzelt would be able to obtain these pictures  
7           from the private account?

8           A.     I am because I'm not friends with Rachel. I'm  
9           not friends with my administrators on Facebook. I don't  
10          -- that's not part of -- I don't -- no. It's not part of  
11          what I agree with.

12          Q.     Did she -- did Erin ever talk to you about  
13          Rachel having Canadian friends or relatives?

14          A.     No.

15          Q.     Did Erin ever tell you that Rachel Gould was  
16          posting something about a Canadian and she thought, in  
17          her mind, that this had some relevance to her realtor  
18          being Canadian and her buying a house there in Canada or  
19          moving to a new house for two weeks that she rented on a  
20          canal home from a TV personality and his wife who were  
21          from Canada?

22          A.     No.

23          Q.     Does any of that sound even remotely sensical?

24                 MS. BOY: Object to the form.

25                 THE WITNESS: No.

1 BY MS. CZYZ:

2 Q. Do you think Erin could have won her case  
3 against Lee County Schools?

4 MS. BOY: Object to the form.

5 THE WITNESS: I don't know all the facts on  
6 either side. I wasn't there. All that I can attest  
7 to is working with Erin. I never saw documents from  
8 Rachel or from any administration stating her  
9 incompetency, so I can't say. I can't give an  
10 opinion. I don't have enough information to give an  
11 opinion.

12 BY MS. CZYZ:

13 Q. Did Erin tell you that Rachel thought she was  
14 incompetent at her job?

15 A. She said that she felt, Rachel felt that she  
16 needed some more experience and she was mentoring her.  
17 Rachel gave her some great -- gave her a book by Kagan.  
18 And Kagan is a company that is widely known for classroom  
19 management. And I viewed that as a good thing, not as a  
20 bad thing.

21 Q. When you worked at Mariner Middle School, was  
22 there any protocol about e-mails and the content of them  
23 as far as not cursing or saying anything, using any kind  
24 of swear words?

25 A. That's school district. Absolutely. That's

1 school-wide. No, you shouldn't be doing that.

2 Q. I don't think I marked this before.

3 (Whereupon a discussion was held off the  
4 record.)

5 BY MS. CZYZ:

6 Q. I'm showing you what we premarked as 1-C from  
7 the other deposition of Rachel Gould.

8 A. Okay. So this is from Mitch to Erin.

9 Q. And then below --

10 A. Dear Mitch. So -- okay. So this is Erin  
11 talking to Mitch.

12 Q. Do you know the date on there from Erin to  
13 Mitch?

14 A. October 29th.

15 Q. There's a highlighted portion. What does she  
16 say there?

17 A. "Short of me cutting loose and going ape crap on  
18 them, the discipline for this class is not working."

19 Q. Is that an acceptable way to speak in an e-mail  
20 in the school?

21 MS. BOY: Object to the form.

22 THE WITNESS: No, absolutely no, that is not  
23 anything that I would ever put in an e-mail to an  
24 administrator, ever, ever, friends or not friends,  
25 ever.

1 BY MS. CZYZ:

2 Q. Are you surprised by that e-mail?

3 A. Yes. That shocks me.

4 Q. Is there a lot that's shocking you today?

5 A. Yes.

6 Q. Does this almost sound like a different person  
7 to you than the Erin you know?

8 A. Based on what have shown me, it is showing me  
9 another side of Erin.

10 Q. Did Erin ever tell you that she was going to do  
11 any kind of investigations on me, Catherine Czyz?

12 A. No.

13 Q. Going back to this e-mail, "going ape crap on  
14 them," what does that mean to you?

15 MS. BOY: Object to the form.

16 THE WITNESS: In formal terms or in informal  
17 terms?

18 MR. ATWOOD: I'm sorry. Did we ask -- are you  
19 admitting this into evidence? Are you trying to get  
20 this admitted?

21 BY MS. CZYZ:

22 Q. I'll ask the question again. To you, what does  
23 the phrase "going ape crap on them" mean?

24 MS. BOY: Object to the form.

25 THE WITNESS: She's frustrated.

1           MR. ATWOOD: Ms. Czyz, what I was asking is,  
2 before the court reporter cut us off, was -- the  
3 point was are you trying to enter that in as an  
4 exhibit? Because I haven't heard you try to  
5 authenticate that, one way or another, to see if  
6 she's even seen it before.

7           If you want to ask random questions, that's  
8 fine, but I'm not sure if she -- if she's seen it or  
9 not seen it.

10          MS. CZYZ: I'm going to object to you making a  
11 speaking objection.

12          MR. ATWOOD: It's not a speaking objection.  
13 It's a reasonable objection.

14          MS. CZYZ: You're only allowed to object to the  
15 form of the question. That's it. This is a  
16 deposition.

17          MR. ATWOOD: We'll just object to every form in  
18 the thing if you want to make -- every question is  
19 objectionable. Keep going.

20          MS. CZYZ: Well, you waived the ability to do  
21 that by not objecting at the right time.

22 BY MS. CZYZ:

23          Q. But "short of me cutting loose and going ape  
24 crap on them," does that sound like somebody who is going  
25 to do something crazy?



1 MS. BOY: Object to the form.

2 THE WITNESS: No.

3 BY MS. CZYZ:

4 Q. What does that sound like to you?

5 MS. BOY: Object to the form.

6 THE WITNESS: She's frustrated.

7 BY MS. CZYZ:

8 Q. And did Erin ever tell that you she was  
9 frustrated at work?

10 A. At times, yes.

11 Q. Did she tell that you she was doing anything  
12 proactive for her frustration?

13 A. Uh-huh.

14 Q. Did she do any kind of meditation, any kind of  
15 like sport event or anything like that to get  
16 frustrations out?

17 MS. BOY: Object to form.

18 THE WITNESS: She researched more about  
19 classroom management, researched more about  
20 differentiation. And when she did that, she limited  
21 the stress level of teaching in her classes and  
22 things got better.

23 BY MS. CZYZ:

24 Q. So, to your knowledge, when Erin quit her job,  
25 things were going better for her?

1 A. Yes, to my knowledge.

2 Q. So this whole lawsuit about her, you know,  
3 having all these discrimination problems related to  
4 Rachel Gould and her having all these claims against the  
5 school seems surprising to you, right?

6 MS. BOY: Object to the form.

7 THE WITNESS: Whatever happened between Rachel  
8 and Erin or any of the administration, I was not  
9 privy to. I didn't hear it. I didn't see it. I  
10 wasn't around it. I'm not management, so --

11 BY MS. CZYZ:

12 Q. Are you aware that Erin Neitzelt's suing me at  
13 this moment?

14 A. Yes.

15 Q. Did she ever talk to you about a lawsuit against  
16 me?

17 A. Yes.

18 Q. What did she tell you?

19 A. That you felt that she had tried to impersonate  
20 her and that you had overcharged her during the case  
21 between her and the school district.

22 Q. Okay.

23 A. And that is it. She didn't say anything more.

24 Q. Not that she felt that I did some kind of legal  
25 malpractice?

1 A. Yes, she did bring that up.

2 Q. And what did she say that was for?

3 A. She said 13 different reasons with the state bar  
4 of Florida.

5 Q. And she thinks that that's malpractice?

6 MS. BOY: Object to the form.

7 THE WITNESS: She thinks that that is  
8 malpractice, yes.

9 BY MS. CZYZ:

10 Q. Did she say anything else about the case other  
11 than what you just told me?

12 A. Which case?

13 Q. The case against me, Catherine Czyz and my law  
14 firms.

15 A. That's all.

16 Q. Did she say that she did any research or  
17 investigation of my husband, Dr. Czyz?

18 A. No, I don't know anything about you other than  
19 you're her lawyer and that you went to school with her.

20 Q. So no information about doing investigations on  
21 my husband as well?

22 A. No.

23 Q. Did she ever tell you that she worked for the  
24 Ohio State Patrol?

25 A. Yeah. Yes. I remember her telling me that,

1 yes.

2 Q. And what did she say she did there?

3 A. Just that she worked for them. I don't recall  
4 anything else.

5 Q. Did she say she used them to do any  
6 investigations or use their computers to do any  
7 investigations of her own?

8 A. No, no.

9 Q. Did she ever tell you who Bo Olexo is?

10 A. Is that her son?

11 Q. She has a son named Bo Olexo. But did she ever  
12 tell you about a husband named Rodney or Bo Olexo?

13 A. No.

14 Q. Did she ever tell you anything about where he  
15 would have worked?

16 A. No.

17 Q. Did she ever tell you she was a realtor?

18 A. Yes.

19 Q. And where was she a realtor at?

20 A. I believe Ohio.

21 Q. Did she do any realty work in Florida?

22 A. Not to my knowledge.

23 Q. Did she ever tell you she made money as a  
24 realtor?

25 A. Can you explain, please? Like --

1 Q. Did she ever tell you that she made a good  
2 salary as a realtor?

3 A. We didn't talk about -- again, we didn't talk  
4 about things like that.

5 Q. Did she ever tell you that she used her license  
6 as a realtor to look up the properties that I own,  
7 Catherine Czyz?

8 A. No.

9 Q. Did she ever tell you that she used her  
10 realtor's license to look up the properties that Rachel  
11 Gould owns?

12 A. No.

13 Q. Would that surprise you if she did those things?

14 MS. BOY: Object to the form.

15 THE WITNESS: Yes, that would surprise me. That  
16 seems weird to me, out of character for her.

17 BY MS. CZYZ:

18 Q. Well, she believed that Rachel Gould, in her  
19 complaint, was jealous of her because of her wealth and  
20 the things that she had and the clothes that she wore and  
21 the car that she drove and the type of woman that she  
22 was.

23 So investigating Rachel Gould and finding out  
24 that she had an \$80,000 home to try and prove her case,  
25 in her mind, does that seem a little weird to you?

1 MS. BOY: Object to the form.

2 THE WITNESS: It does seem weird. It's out of  
3 character for her. Yeah, that's weird.

4 Q. I don't have anything else.

5 MS. BOY: I don't have anything.

6 CROSS-EXAMINATION

7 BY MR. ATWOOD:

8 Q. Ms. Walters, did you say that the first time you  
9 spoke with Ms. Czyz was with your attorney a few weeks  
10 ago?

11 A. Yes, sir.

12 Q. Did she ever reach out to you before and talk to  
13 you?

14 A. No, sir.

15 Q. I don't think I have any more questions, but  
16 give me a minute or two.

17 MS. BOY: Let's go off for just a second.

18 (Whereupon a discussion was held off the  
19 record.)

20 BY MR. ATWOOD:

21 Q. Just one more, one or two more questions.

22 Ms. Walters, earlier you mentioned that you were  
23 not management.

24 A. Correct.

25 Q. Have you ever been management for Lee County

1 School District?

2 A. No. I do need to retract a minute. Not  
3 management, but I have overseen new teachers. But I'm  
4 not at Mariner.

5 Q. Okay.

6 A. But I wouldn't consider that management. That's  
7 more of a mentor. Like in the Apples program that I  
8 mentioned earlier, it's through that program. So that's  
9 still not -- by management I mean associate principals  
10 and principal.

11 Q. Okay.

12 A. Typically, if I may --

13 MS. BOY: Wait until there's a question pending.

14 MR. ATWOOD: I think that's it.

15 MS. CZYZ: I have one more question.

16 MR. ATWOOD: Sure.

17 REDIRECT EXAMINATION

18 BY MS. CZYZ:

19 Q. Mr. Atwood, who just asked you questions right  
20 now, have you ever met with him before today?

21 A. No, I never have.

22 Q. Did he ever speak to you on the telephone before  
23 today?

24 A. No.

25 Q. Is this the first time you're ever meeting

1 Mr. Atwood?

2 A. Yes.

3 Q. Is this the first time you're answering  
4 questions for Mr. Atwood?

5 A. Yes.

6 Q. He never contacted you any time ever between  
7 March of 2018 and now?

8 A. No. I have never seen him before and I have  
9 never talked to him.

10 Q. All right. That's it.

11 THE COURT REPORTER: On the record.

12 MS. BOY: We'll read if it's ordered. So what  
13 that means, Ms. Walters, is if this deposition is  
14 transcribed, you will have the opportunity to read it  
15 just to make sure there aren't any corrections that  
16 need to be made. So I'm advising you to take that  
17 opportunity and I will give it to you if it is  
18 transcribed.

19 THE WITNESS: Thank you.

20 THE COURT REPORTER: I'll take that as a read.

21 MS. BOY: It's a read.

22 THE COURT REPORTER: So who's ordering?

23 MS. CZYZ: What time is it? Can you tell me?

24 MS. BOY: 4:50.

25 MS. CZYZ: I'll order it.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

THE COURT REPORTER: Nobody else, okay.

MR. ATWOOD: I might. I don't know. I'll see.

It's fine.

(Whereupon the proceedings adjourned at 4:50  
p.m.)

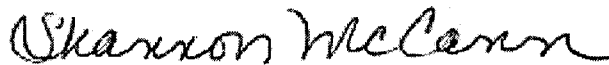
CERTIFICATE OF OATH

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

STATE OF FLORIDA)  
COUNTY OF LEE )

I, Shannon McCann, Shorthand Reporter and  
Notary Public, State of Florida, certify that Margaret  
Walters; personally appeared before me on the 4th day of  
November, 2019 and was duly sworn.

WITNESS my hand and official seal this 11th  
day of November, 2019.



---

Shannon McCann, Notary Public, State of Florida  
My Commission: GG 322810  
Expires: July 14, 2023

REPORTER'S DEPOSITION CERTIFICATE

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

STATE OF FLORIDA)  
COUNTY OF LEE)

I, Shannon McCann, CSR (NJ), certify that I was authorized to and did stenographically report the deposition of Margaret Walters; that a review of the transcript was requested and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 11th day of November, 2019.



---

Shannon McCann, CSR (NJ)



1 VERITEXT LEGAL SOLUTIONS  
2 One Biscayne Tower, Suite 2250  
3 2 South Biscayne Boulevard  
4 Miami, Florida 33131  
5 305-376-8800

6 11/14/2019

7 Suzanne M. Boy, Esquire  
8 Boy Agnew Potanovic, PLLC  
9 4415 Metro Parkway  
10 Suite 110  
11 Fort Myers, Florida 33916  
12 Suzanne@bapfirm.com

13 RE: Neitzelt vs. Czyz

14 Dear Ms. Boy:

15 With reference to the deposition of Margaret Walters taken  
16 on November 4, 2019 in connection with the above-captioned  
17 case, please be advised that the transcript of the  
18 deposition has been completed and is awaiting signature.

19 Please have your client read the transcript and complete  
20 the errata page. Upon completion, please send the signed  
21 errata to our office at Two South Biscayne Blvd., Ste.  
22 2250, Miami, FL, 33131, or email it to  
23 litsup-fla@veritext.com

24 If this is not taken care of, however, within the next 30  
25 days, we shall concluded that the reading and signing of  
the deposition has been waived and the original, which has  
already been forwarded to the ordering attorney, may be  
filed with the Clerk of the Court without further notice.

Sincerely,

Production Department  
Veritext Florida

<b>&amp;</b>	<b>3</b>	<b>academy</b> 5:22 6:8 6:10	<b>angry</b> 23:23
<b>&amp;</b> 2:2 75:6	<b>30</b> 76:16	<b>accept</b> 22:11	<b>answer</b> 4:14,15,20 4:21 13:6,11,17 16:5 17:22,24 23:1 58:21,24
<b>0</b>	<b>305-376-8800</b> 76:3	<b>acceptable</b> 61:19	<b>answering</b> 71:3
<b>001244</b> 1:2 75:3	<b>322810</b> 73:17	<b>accident</b> 20:15,19	<b>anybody</b> 22:1 26:2 46:15
<b>002440</b> 1:3 75:3	<b>33131</b> 76:2,15	<b>accidents</b> 37:23 38:5	<b>anymore</b> 10:16 29:13
<b>1</b>	<b>33409</b> 2:9	<b>account</b> 59:7	<b>ap</b> 16:12 19:2,25 21:16 22:2
<b>1</b> 61:6	<b>33902</b> 2:4	<b>acting</b> 26:10	<b>ape</b> 61:17 62:13,23 63:23
<b>11/14/2019</b> 76:4	<b>33916</b> 1:18 2:14 76:7	<b>action</b> 33:23 34:1 40:17,19,20,23 51:22 74:14,15	<b>appearances</b> 2:1
<b>11/4/19</b> 48:19	<b>344-1100</b> 2:5	<b>activities</b> 11:4	<b>appeared</b> 73:8
<b>11/4/2019</b> 75:4	<b>3:12</b> 1:15	<b>actual</b> 48:23 50:19	<b>apples</b> 12:10,16 70:7
<b>110</b> 1:17 2:14 76:7	<b>4</b>	<b>adjoined</b> 72:4	<b>application</b> 47:5 48:4
<b>11th</b> 73:10 74:17	<b>4</b> 1:14 3:3 57:5 76:11	<b>administration</b> 60:8 65:8	<b>applied</b> 47:1 48:2
<b>13</b> 66:3	<b>4415</b> 1:17 2:13 76:6	<b>administrator</b> 61:24	<b>apply</b> 17:7,16
<b>13548</b> 73:15 74:22	<b>4th</b> 73:8	<b>administrators</b> 59:9	<b>area</b> 13:25 14:2,25 14:25 15:5,7,14 46:5 55:14
<b>14</b> 73:18	<b>5</b>	<b>admitted</b> 62:20	<b>art</b> 8:10
<b>15</b> 8:17 12:17	<b>5'6</b> 35:6	<b>admitting</b> 62:19	<b>artist</b> 8:13
<b>16</b> 12:17	<b>50/50</b> 10:10	<b>adults</b> 54:13	<b>arts</b> 5:22 6:8,10 8:11 9:8 13:2 14:3 32:1 33:4
<b>1715</b> 2:3	<b>502-1542</b> 2:10	<b>advancing</b> 21:15 25:12	<b>asked</b> 20:12 70:19
<b>2</b>	<b>561</b> 2:10	<b>advice</b> 52:5	<b>asking</b> 20:21 52:2 58:6 63:1
<b>2</b> 48:5 76:2	<b>6</b>	<b>advised</b> 76:12	<b>assessment</b> 9:13
<b>20</b> 8:16	<b>69</b> 3:5	<b>advising</b> 71:16	<b>assigned</b> 12:18
<b>2011</b> 41:4	<b>7</b>	<b>affect</b> 21:4 38:9	<b>assignment</b> 11:16
<b>2013</b> 41:4	<b>7</b> 48:24	<b>afternoon</b> 4:7,8	<b>assistant</b> 16:25 18:10
<b>2014</b> 8:16	<b>70</b> 3:6	<b>agnew</b> 1:16 2:12 76:6	<b>associate</b> 17:8 19:2 31:12 51:12 70:9
<b>2015</b> 7:22 8:18 24:4 27:23 48:24	<b>8</b>	<b>ago</b> 7:21 69:10	
<b>2016</b> 7:22 8:5 24:4 27:24 38:17	<b>8</b> 6:5	<b>agree</b> 59:11	
<b>2018</b> 1:2 71:7 75:3	<b>80,000</b> 68:24	<b>ahead</b> 17:16	
<b>2019</b> 1:3,14 73:9,11 74:17 75:3 76:11	<b>9</b>	<b>allegation</b> 47:13	
<b>2023</b> 73:18	<b>905-242</b> 2:9	<b>allowed</b> 58:18 63:14	
<b>208-6515</b> 2:15	<b>931</b> 2:8	<b>amy</b> 31:23,25 32:2 32:11 33:6,15	
<b>20th</b> 1:1	<b>a</b>		
<b>2250</b> 76:1,15	<b>ability</b> 63:20		
<b>239</b> 2:5,15	<b>able</b> 59:6		
<b>280</b> 2:4	<b>absolutely</b> 15:4 31:10 44:2 60:25 61:22		
<b>29th</b> 61:14			

<p><b>assuming</b> 18:16  <b>attended</b> 31:9  <b>attest</b> 60:6  <b>attitude</b> 23:13  <b>attorney</b> 13:17              44:9 53:13 69:9              74:12,13 76:18  <b>attorneys</b> 13:14              54:15,16  <b>atwood</b> 2:3 3:5              49:19 50:6,15,25              54:5,18 58:2 62:18              63:1,12,17 69:7,20              70:14,16,19 71:1,4              72:2  <b>august</b> 7:22 8:16              24:3 27:23  <b>authenticate</b> 63:5  <b>authorized</b> 74:7  <b>auto</b> 20:15,18              37:22  <b>available</b> 42:4  <b>avenue</b> 36:4  <b>awaiting</b> 76:12  <b>aware</b> 50:8 65:12  <b>awhile</b> 43:1,10</p>	<p><b>bapfirm.com</b> 2:15              76:8  <b>bar</b> 66:3  <b>based</b> 62:8  <b>beach</b> 2:9 51:18              52:8  <b>becoming</b> 19:20              49:25  <b>befriend</b> 9:4  <b>beginning</b> 8:20              20:16  <b>belief</b> 23:7  <b>believe</b> 14:14 67:20  <b>believed</b> 68:18  <b>belittled</b> 20:8 25:5              25:9,12  <b>bernadette</b> 34:12              34:14  <b>beth</b> 1:5  <b>better</b> 64:22,25  <b>big</b> 28:1 29:11              36:12,13  <b>biscayne</b> 76:1,2,14  <b>bit</b> 43:15 44:17  <b>black</b> 14:24 33:23  <b>blaming</b> 47:19  <b>block</b> 30:2,6,16,25              31:5 33:16  <b>blonde</b> 35:8 44:18  <b>blvd</b> 76:14  <b>bo</b> 67:9,11,12  <b>board</b> 2:16  <b>bokeelia</b> 45:10  <b>bonnie</b> 34:8,14,20              35:4 39:22,25              40:17,25 41:2,2,5,7              41:11,13,25 42:3              42:12,13 43:17,23  <b>bonnie's</b> 34:10  <b>book</b> 60:17</p>	<p><b>books</b> 7:1  <b>boss</b> 21:9,9,13  <b>boulevard</b> 2:8 76:2  <b>box</b> 2:4  <b>boy</b> 1:16 2:12,13              13:6,10,20 16:2,4              20:23 22:12 27:16              30:10,18 32:14,25              34:5 37:12 41:9,12              42:6 46:9 48:8              49:18 50:5,14,24              51:23 52:10 53:19              54:4,10,17 55:5,11              55:24 57:11 58:20              58:25 59:24 60:4              61:21 62:15,24              64:1,5,17 65:6 66:6              68:14 69:1,5,17              70:13 71:12,21,24              76:5,6,10  <b>break</b> 22:24 29:13  <b>bring</b> 40:23 52:19              66:1  <b>brown</b> 35:10  <b>brunette</b> 35:6  <b>bubbly</b> 23:15 25:16              25:17  <b>budget</b> 42:20,22              43:21  <b>budgetary</b> 43:21  <b>bus</b> 15:11,12 37:3  <b>business</b> 45:12  <b>buying</b> 59:18</p>	<p><b>calling</b> 42:23 47:18              49:11,16  <b>cameras</b> 26:9,12  <b>canada</b> 59:18,21  <b>canadian</b> 59:13,16              59:18  <b>canal</b> 59:20  <b>captioned</b> 76:11  <b>car</b> 20:13,22 35:12              43:24 68:21  <b>care</b> 76:16  <b>career</b> 28:14  <b>case</b> 1:2,3 6:17 26:5              39:22 52:9 60:2              65:20 66:10,12,13              68:24 75:3,3 76:12  <b>cases</b> 52:17  <b>catherine</b> 1:8 2:8              4:9 51:5,21 52:19              56:13,19 62:11              66:13 68:7  <b>catherineczyk</b> 2:10  <b>certain</b> 11:16 52:13  <b>certificate</b> 73:1              74:1  <b>certified</b> 1:20 41:21  <b>certify</b> 73:7 74:6,11  <b>cetera</b> 22:19  <b>chances</b> 21:20  <b>changes</b> 75:2  <b>character</b> 68:16              69:3  <b>check</b> 39:5  <b>child</b> 9:16,17  <b>childhood</b> 55:25  <b>children</b> 6:19 9:9              9:14,19,23 10:24              10:24 11:2,20 12:1              15:14 26:5,9,16,19              54:13 56:6</p>
<p><b>b</b></p>	<p><b>b</b> 3:10</p>	<p><b>c</b></p>	<p><b>c</b> 61:6  <b>ca</b> 1:2,3 75:3,3  <b>call</b> 37:4 50:1,21              51:15,17 52:7  <b>called</b> 6:7 47:20              49:1 51:21 52:22</p>

<p><b>choosing</b> 54:24 55:1 <b>chopping</b> 30:2,6,16 30:25 31:5 33:16 <b>chose</b> 53:4 54:23 55:1 <b>chunk</b> 40:7 <b>circuit</b> 1:1,1 <b>claim</b> 50:23 <b>claimed</b> 36:16 <b>claims</b> 40:23 53:18 65:4 <b>clairsville</b> 46:1 53:14 <b>class</b> 9:22,23 26:24 33:23 34:1 40:17 40:19,20 61:18 <b>classes</b> 9:20 10:7 11:8 64:21 <b>classroom</b> 6:18 11:23,23 12:13 19:15,16 26:9 29:22 46:15 60:18 64:19 <b>clerk</b> 76:18 <b>click</b> 55:18 <b>client</b> 58:9 76:13 <b>close</b> 54:25 55:2,4,7 55:9,13,15 <b>clothes</b> 68:20 <b>coal</b> 45:12 <b>coast</b> 42:1 49:5 <b>collections</b> 33:9 <b>college</b> 36:23 <b>color</b> 35:16 <b>come</b> 9:3 12:9 21:18 28:22,25 42:22 <b>comes</b> 22:2 <b>coming</b> 12:8 19:7 19:25 21:2 27:8</p>	<p>29:2 <b>commission</b> 73:17 <b>company</b> 60:18 <b>complain</b> 10:23 <b>complaint</b> 39:13 50:19 68:19 <b>complaints</b> 11:1 <b>complete</b> 18:14 74:10 76:13 <b>completed</b> 76:12 <b>completion</b> 76:14 <b>composed</b> 24:1 <b>composite</b> 57:5 <b>computers</b> 7:1 67:6 <b>concerned</b> 58:25 59:3 <b>concluded</b> 76:17 <b>concrete</b> 15:2 <b>congratulated</b> 16:12 <b>connected</b> 74:14 <b>connection</b> 76:11 <b>consider</b> 70:6 <b>contact</b> 40:10 50:7 <b>contacted</b> 47:10,13 52:14,16 71:6 <b>contained</b> 35:3 <b>content</b> 60:22 <b>continuing</b> 58:14 <b>conversation</b> 15:20 15:23 16:18,19 18:25 22:21 30:21 32:11 47:3 50:16 52:3 <b>conversations</b> 53:21 56:8 <b>conversely</b> 10:13 <b>convertible</b> 35:14 <b>correct</b> 9:15 10:8 18:10 39:15 44:4 44:12,13,14 45:8</p>	<p>49:17,21 59:2 69:24 <b>correction</b> 75:6 <b>corrections</b> 71:15 <b>counsel</b> 2:6,11,16 74:12,14 <b>county</b> 1:1 2:16 5:20 17:17 19:22 22:10,10 33:24 36:18 39:14 51:16 51:22 52:7,9 60:3 69:25 73:4 74:4 <b>couple</b> 31:21 42:24 <b>court</b> 1:1 4:16,20 39:13 63:2 71:11 71:20,22 72:1 76:18 <b>crap</b> 61:17 62:13 62:23 63:24 <b>crazed</b> 23:21 <b>crazy</b> 63:25 <b>cross</b> 3:5 69:6 <b>crying</b> 23:6 27:9 <b>csr</b> 1:19 74:6,23 <b>current</b> 5:19 8:7 45:14 <b>curriculum</b> 33:9 <b>cursing</b> 60:23 <b>custody</b> 40:9 <b>cut</b> 63:2 <b>cuticles</b> 24:11,16 <b>cutting</b> 61:17 63:23 <b>czyz</b> 1:8,8,9 2:7,8 3:4,7 4:6,9 13:12 14:12 16:6 18:8 20:25 22:15 27:17 30:12,22 32:15 33:13 34:7 37:15 41:10,15 42:8 46:11 48:7,11 49:22 50:9,18 51:1</p>	<p>51:5,21 52:1,12,19 53:22 54:7,14,21 55:8,17 56:1,13,19 57:12 58:17,23 59:4 60:1,12 61:5 62:1,11,21 63:1,10 63:14,20,22 64:3,7 64:23 65:11 66:9 66:13,17 68:7,17 69:9 70:15,18 71:23,25 75:2 76:9</p> <p style="text-align: center;"><b>d</b></p> <p><b>d</b> 3:1 5:9 <b>dance</b> 8:10 <b>date</b> 1:14 48:16,18 48:21,22,22 61:12 75:4 <b>dated</b> 74:17 <b>daughter</b> 8:9 36:23 38:25 40:8 53:10 57:21 <b>day</b> 27:8,10,11,12 29:23 50:2 73:8,11 74:17 <b>days</b> 27:20,22 76:17 <b>dean</b> 14:19 15:18 47:14,18 49:11 50:1,21 <b>dear</b> 61:10 76:10 <b>death</b> 38:25 <b>december</b> 14:16 <b>decided</b> 19:12 58:25 <b>deep</b> 46:3 <b>defendants</b> 1:10 2:11 <b>deficits</b> 9:10 <b>definitely</b> 57:10 <b>definition</b> 33:10</p>
---	---	---	--



<p><b>degree</b> 14:7 18:14 18:18 21:19 <b>dejected</b> 23:5 <b>denied</b> 47:6,7 <b>department</b> 9:5 76:22 <b>deponent</b> 75:4 <b>deposition</b> 1:13 4:11 57:6 58:12 59:2 61:7 63:16 71:13 74:1,8 76:11 76:12,17 <b>depth</b> 53:20 56:7 <b>describe</b> 35:4 <b>desire</b> 40:25 <b>detailed</b> 26:7 <b>diamond</b> 36:9 <b>diamonds</b> 36:6,8 <b>different</b> 11:14,14 11:16,25 14:1 15:1 24:24 26:2,20 40:11 62:6 66:3 <b>differentiate</b> 11:13 <b>differentiated</b> 26:23 <b>differentiating</b> 26:21 <b>differentiation</b> 11:4,5 64:20 <b>difficult</b> 26:16 <b>difficulties</b> 27:2,3 <b>direct</b> 3:3 4:5 <b>directly</b> 19:13 <b>discipline</b> 61:18 <b>discourse</b> 22:17 <b>discrepancies</b> 36:25 37:1 <b>discrimination</b> 65:3 <b>discussion</b> 31:11 61:3 69:18</p>	<p><b>disorderly</b> 26:10 <b>distance</b> 44:19 <b>distress</b> 24:7,18 <b>district</b> 5:20 10:17 12:8,15 19:24 42:25 43:1,10,14 60:25 65:21 70:1 <b>divorced</b> 35:19 <b>divorcing</b> 53:24 <b>doctor</b> 35:23 43:25 <b>doctorate</b> 37:8 47:2 47:6,8 50:22 <b>documents</b> 58:7 60:7 <b>doing</b> 11:18,18 12:24 13:5 17:8 26:23 56:18,21 57:2 61:1 64:11 66:20 <b>dooling</b> 5:9,15 <b>dr</b> 14:19 37:4,7 46:18,21 49:11,15 50:21 53:9 66:17 <b>dripping</b> 36:6 <b>drips</b> 36:7 <b>drive</b> 35:12 45:9 <b>drops</b> 43:6 <b>drove</b> 20:13,14,22 43:24 68:21 <b>due</b> 40:8 <b>duly</b> 4:3 73:9</p>	<p>10:1,3,5,8,11,19,21 11:9 14:8 26:6 35:3 <b>effect</b> 15:2 43:19 <b>egress</b> 15:7 <b>eighth</b> 6:3 7:5,10 7:12 <b>eileen</b> 5:2,3 <b>either</b> 10:14 60:6 <b>el</b> 14:2 <b>ela</b> 12:25,25 13:1 32:6 <b>eliminated</b> 41:17 41:18,25 42:17 <b>elizabeth</b> 1:8 <b>else's</b> 26:3 <b>email</b> 76:15 <b>emotional</b> 23:7 24:7,18 <b>employee</b> 74:11,13 <b>employees</b> 42:25 43:9 <b>employment</b> 5:19 50:3 51:15,22 <b>endorsed</b> 10:18,20 13:24 14:1 <b>english</b> 9:6,8 11:11 13:2,3,23 14:2 32:1 <b>enter</b> 63:3 75:2 <b>entire</b> 17:24 27:23 <b>environment</b> 33:5 <b>equivalent</b> 13:2 <b>erin</b> 1:5 7:15 8:15 8:19 10:20 11:17 11:24,25 12:14,18 13:4 14:4,9,11 15:22,25 16:7 17:3 18:20 20:7,15 21:8 22:3,7,8,9,17,23 23:1,5,14,25 24:6 24:16 25:2,16,19 25:21 26:8 30:13</p>	<p>31:7,19 32:9,16 33:6,15,19 36:9,16 36:17 37:4,6,10,16 37:22 38:11,16 39:18 40:7,11,12 40:16 44:15,22 46:14,20 47:16 49:4,14,23 50:1,12 51:4,20 59:6,12,15 60:2,7,13 61:8,10 61:12 62:7,9,10 64:8,24 65:8,12 <b>erin's</b> 25:24 31:4,4 31:11 48:13 <b>errata</b> 75:1 76:14 76:14 <b>esquire</b> 2:3,8,13 76:5 <b>essay</b> 14:10,11 <b>established</b> 59:1 <b>et</b> 22:19 <b>evaluation</b> 47:23 <b>event</b> 64:15 <b>everybody</b> 12:8,11 12:13 21:17 22:5 <b>evidence</b> 51:3 62:19 <b>ex</b> 5:16 54:19 <b>exactly</b> 9:3 25:10 35:6 <b>examination</b> 3:3,5 3:6 4:5 69:6 70:17 <b>examined</b> 4:3 <b>example</b> 12:13 21:16 <b>exception</b> 12:14 <b>excuse</b> 37:13 <b>exhibit</b> 48:5 57:5,5 63:4 <b>exhibits</b> 3:11</p>
	<p><b>e</b></p>		
	<p><b>e</b> 2:3,8 3:1,10 5:11 5:11 60:22 61:19 61:23 62:2,13 <b>earlier</b> 69:22 70:8 <b>economic</b> 36:1 <b>ed</b> 9:19 10:3 17:2,4 18:14,18 <b>education</b> 6:16,17 6:19 9:7,9,11,24,25</p>		

<p><b>experience</b> 60:16  <b>experiences</b> 24:7  <b>expires</b> 73:18  <b>explain</b> 14:21              21:10 23:18 35:6              40:19 67:25  <b>explanation</b> 22:11  <b>extent</b> 16:18 26:22              29:14  <b>extorts</b> 54:1  <b>extreme</b> 23:6 27:19  <b>extremely</b> 23:5</p>	<p><b>fifth</b> 8:9 36:4  <b>fight</b> 15:14  <b>filed</b> 76:18  <b>film</b> 6:24  <b>financially</b> 74:14  <b>find</b> 23:4 49:16              51:16  <b>finding</b> 11:4 17:8              68:23  <b>fine</b> 28:4 63:8 72:3  <b>finger</b> 24:17  <b>fingernails</b> 24:11  <b>finish</b> 17:21,24  <b>fired</b> 31:4 57:8,10  <b>firm</b> 1:8,9 2:7  <b>firms</b> 66:14  <b>first</b> 4:3 7:11 8:15              8:16 14:3 21:24              34:10 38:22 40:2              43:11 44:3 49:3,4              49:13 69:8 70:25              71:3  <b>five</b> 6:14 7:3 36:14  <b>fl</b> 76:15  <b>fla</b> 76:15  <b>florida</b> 1:1,18 2:4,9              2:14 9:12 12:25              13:24 28:7,10 33:3              39:4,11,14 43:11              66:4 67:21 73:3,7              73:16 74:3 76:2,7              76:23  <b>follows</b> 4:4  <b>forever</b> 45:12  <b>form</b> 13:6,10,16              16:2 20:23 22:12              27:16 30:10,18              32:14,25 34:5              37:12 41:9,12 42:6              46:9 49:18,19 50:5              50:14,15,24,25</p>	<p>51:23 52:10 53:19          54:4,5,10,17 55:5          55:11,24 58:19          59:24 60:4 61:21          62:15,24 63:15,17          64:1,5,17 65:6 66:6          68:14 69:1  <b>formal</b> 62:16  <b>fort</b> 1:18 2:4,14              5:22 6:8,9,9 76:7  <b>forwarded</b> 76:18  <b>found</b> 19:21,23              36:24 52:23,24  <b>four</b> 5:24 7:21,21              27:20,22  <b>fourth</b> 7:13 8:7  <b>frame</b> 7:23,24 24:3              27:23  <b>franklin</b> 2:2  <b>friend</b> 8:22  <b>friends</b> 8:24 9:1              34:9 38:20,24,24              41:5 54:25 55:2,10              55:13,15 56:12              59:8,9,13 61:24,24  <b>front</b> 14:25 15:2,7              15:9  <b>frustrated</b> 62:25              64:6,9  <b>frustration</b> 64:12  <b>frustrations</b> 64:16  <b>fsa</b> 9:12,12  <b>full</b> 17:21  <b>further</b> 74:11              76:18</p>	<p><b>general</b> 9:25 10:3  <b>gestures</b> 4:18,20  <b>getting</b> 16:12,24              17:1,1 21:16 24:6              24:18 50:22  <b>gg</b> 73:17  <b>gifted</b> 9:6,19 10:2,5              10:13,16,17,18,19              10:20,24 11:7,8              12:1  <b>give</b> 4:13 11:14              13:13 17:15 28:17              29:20,21 35:24              42:3 60:9,10 69:16              71:17  <b>given</b> 4:11  <b>giving</b> 14:5  <b>go</b> 17:16,18,23 18:9              19:16 23:12 26:6              29:3 41:13 43:2              45:18 46:15 55:12              69:17  <b>god</b> 36:7 57:7  <b>goes</b> 18:19  <b>going</b> 4:13,19 15:14              19:13 25:2 30:14              37:4,4 41:20 42:4              42:19 43:16 48:5              49:15 52:5 57:6,11              57:13 58:17,20,23              61:17 62:10,13,13              62:23 63:10,19,23              63:24 64:25  <b>good</b> 4:7,8 11:4,18              34:9 48:9 60:19              68:1  <b>google</b> 12:12  <b>gossip</b> 31:15 33:2,4              33:10,10  <b>gossiping</b> 31:19</p>
<b>f</b>			
<p><b>facebook</b> 38:20              56:9,12,16 58:3              59:9  <b>fact</b> 36:17 54:25  <b>facts</b> 60:5  <b>factual</b> 54:18  <b>fail</b> 14:13  <b>false</b> 15:23 50:2,23  <b>familiar</b> 53:11  <b>families</b> 54:2  <b>family</b> 53:7  <b>famous</b> 53:13  <b>far</b> 12:1,5 21:8,12              33:10 50:1 58:5              60:23  <b>father</b> 54:19  <b>feel</b> 12:23 20:14              24:12 25:9,14              51:13  <b>feelings</b> 21:12 22:8  <b>felt</b> 8:13 19:15 20:8              20:12 22:3,7 25:10              25:11 29:10,12              47:20,21 51:7,11              60:15,15 65:19,24  <b>fgcu</b> 16:13 17:2              47:1,24 48:8</p>			
		<b>g</b>	
		<p><b>g</b> 5:9 34:16  <b>gallo</b> 34:8,16,20              35:4 39:22 40:17              40:25 41:2,3 43:17</p>	

<p><b>gould</b> 14:18,19 15:17,17 17:11 20:9,21 21:8,13 22:4,18 23:8 24:8 24:12,19 25:5,10 40:13 42:3 43:19 47:13,17,19 49:7,8 49:10,12,16,24 50:4,20 56:22,25 59:15 61:7 65:4 68:11,18,23 <b>gould's</b> 56:15 <b>grade</b> 6:2 7:11,13 7:14 8:9 32:8,9 <b>grades</b> 6:3 7:4 32:7 <b>grading</b> 12:12 <b>granddaughter</b> 40:10 <b>grasp</b> 14:24 <b>great</b> 47:3 60:17 <b>grew</b> 46:5 53:4,7 54:11 55:6,13,14 <b>group</b> 40:20 <b>growing</b> 54:9 <b>guidelines</b> 22:4 <b>gulf</b> 49:5 <b>guys</b> 54:25 55:13 55:20</p>	<p><b>harass</b> 58:9 <b>hard</b> 12:25 14:4 22:2 <b>hardship</b> 29:10,11 <b>head</b> 4:21 30:2,6,15 33:16 38:2,6 <b>head's</b> 30:24 <b>hear</b> 65:9 <b>heard</b> 33:16 34:1 63:4 <b>held</b> 22:4 51:11,14 61:3 69:18 <b>help</b> 11:21,22 12:11 12:12,24 <b>helped</b> 11:19 26:22 26:24 <b>helping</b> 12:22,22 36:23 <b>henderson</b> 2:2 <b>henlaw.com</b> 2:5 <b>hey</b> 21:19 <b>hi</b> 4:7,8,10,11 <b>high</b> 41:14 42:1 <b>highlighted</b> 49:1 61:15 <b>hill</b> 12:20 14:18 15:17 16:17 <b>hire</b> 43:16 <b>hired</b> 56:24 <b>hiring</b> 51:5 <b>hit</b> 38:2,5 <b>hold</b> 42:21 50:22 <b>holding</b> 22:19 23:8 49:24 <b>holt</b> 2:2 <b>home</b> 39:8 59:20 68:24 <b>hopewell</b> 5:11,17 <b>house</b> 28:24,25 38:23 39:5 45:10 59:18,19</p>	<p><b>huge</b> 37:2 40:7 <b>huh</b> 7:25 18:11 19:5 20:4 23:16,20 28:6,21 32:18 44:8 48:17 53:1 55:22 64:13 <b>human</b> 17:9 <b>husband</b> 28:13 29:12,16 45:11,14 45:17,19,20 57:24 57:25 66:17,21 67:12 <b>husband's</b> 35:18,22 <b>husbands</b> 44:25</p>	<p><b>instruction</b> 11:13 11:14 13:13 <b>instructions</b> 4:13 14:5 <b>instructs</b> 13:18 <b>intending</b> 29:3 <b>interested</b> 74:15 <b>intimidated</b> 20:8 <b>intoxicating</b> 38:9 38:10 <b>investigate</b> 56:25 <b>investigating</b> 68:23 <b>investigation</b> 56:19 56:22 66:17 <b>investigations</b> 57:3 62:11 66:20 67:6,7 <b>investigator</b> 56:25 <b>island</b> 42:1 45:10 <b>issues</b> 36:1 40:1 51:15</p>
<p><b>h</b></p>	<p><b>h</b> 3:10 5:11 <b>hair</b> 35:11 44:18 <b>hand</b> 4:18,20 24:17 48:5 73:10 <b>handled</b> 23:9 <b>happened</b> 31:18 32:11,21,23 37:8,9 37:14 65:7 <b>happens</b> 23:11 42:25 43:2 <b>happy</b> 23:12 27:6,7 28:4</p>	<p><b>i</b></p>	<p><b>j</b></p>
<p><b>icloud.com</b> 2:10 <b>idea</b> 15:25 51:20 53:15,15 <b>ideas</b> 11:21 <b>iep</b> 11:9 <b>ignore</b> 16:4 <b>impersonate</b> 65:19 <b>including</b> 12:8 <b>inclusion</b> 9:23 <b>incompetency</b> 60:9 <b>incompetent</b> 60:14 <b>indicating</b> 27:1 <b>individual</b> 6:19 9:11,24 10:1,3,4,5 11:9 26:6 <b>infer</b> 45:13 <b>informal</b> 62:16 <b>information</b> 33:18 60:10 66:20 <b>ingested</b> 21:5 <b>instance</b> 14:17 22:16 <b>instruct</b> 13:19 58:21,23 <b>instructing</b> 13:20</p>	<p><b>jack</b> 53:12 <b>january</b> 22:25 <b>jealous</b> 40:13 68:19 <b>job</b> 11:4 12:24 21:21 22:2 26:7 28:6 29:6 30:1 39:11 41:25 42:1 42:21,24 43:5,6,8,9 43:9 60:14 64:24 <b>jobs</b> 26:2 <b>johnson</b> 31:23,25 32:2,12 33:15 <b>journey</b> 22:1 <b>judge</b> 53:13 <b>judicial</b> 1:1 <b>july</b> 73:18 <b>jump</b> 19:25 21:20</p>		

<p><b>k</b></p> <p><b>k</b> 6:5</p> <p><b>kagan</b> 60:17,18</p> <p><b>karats</b> 36:14</p> <p><b>keep</b> 13:4 21:14 63:19</p> <p><b>keeping</b> 25:11</p> <p><b>kiddos</b> 11:14</p> <p><b>kids</b> 6:22 10:9 11:15,15,16 28:6 33:4 35:25 36:1,1</p> <p><b>kind</b> 12:6 14:25 15:1,7 19:18 20:13 20:22 21:1,15,25 23:10,12,15 31:15 35:12 38:8 56:19 60:23 62:11 64:14 64:14 65:24</p> <p><b>knew</b> 19:2 20:3 24:4 30:14 45:11 50:23 52:11 53:6,9 54:13</p> <p><b>know</b> 11:3 12:17 13:7,20 14:7,8,15 14:22 16:7 17:16 18:14,16,17,19,20 18:22 19:6 21:21 21:21,23 22:1,6,6 22:13 23:1 25:17 25:18,18 29:6,9,15 30:5,19 31:1,2,2,5 31:22 33:7,12,23 34:8 35:7,16 36:4,7 36:15,17,22 37:3 38:6 39:1,6,18,20 40:1,4 41:7 42:11 42:22 43:14 44:15 44:22 45:18,21,24 46:5,16,18,19 47:21 49:15 50:16 50:19 51:13,24,25</p>	<p>54:8 58:15 60:5 61:12 62:7 65:2 66:18 72:2</p> <p><b>knowledge</b> 10:22 14:6,14 18:13 23:22 30:7 33:25 34:6 43:14 44:24 64:24 65:1 67:22</p> <p><b>known</b> 34:20 50:2 60:18</p> <p><b>knows</b> 42:19 54:2</p> <p><b>kristen</b> 16:11,21,22</p>	<p>39:19,21 40:6 41:7 41:13 46:17</p> <p><b>legal</b> 65:24 76:1</p> <p><b>lessoning</b> 27:2,3</p> <p><b>lessons</b> 26:21,23</p> <p><b>letter</b> 42:3,9,11 47:9</p> <p><b>level</b> 11:13 64:21</p> <p><b>lexile</b> 11:12</p> <p><b>license</b> 68:5,10</p> <p><b>lie</b> 50:13</p> <p><b>life</b> 28:24 41:22,23 41:24 42:1</p> <p><b>liked</b> 28:6</p> <p><b>likes</b> 53:17</p> <p><b>limited</b> 64:20</p> <p><b>line</b> 58:8,20 75:6</p> <p><b>listed</b> 50:4,7</p> <p><b>listen</b> 26:19</p> <p><b>lists</b> 49:3,4</p> <p><b>litsup</b> 76:15</p> <p><b>little</b> 19:24 39:17 43:15 44:17 68:25</p> <p><b>live</b> 28:15</p> <p><b>living</b> 28:5,19 39:10,14</p> <p><b>logical</b> 49:10</p> <p><b>long</b> 5:23 6:12 34:20 38:19</p> <p><b>longer</b> 41:20 42:4 43:18</p> <p><b>look</b> 4:17 11:12 14:11 35:24 36:3 48:10,12,12 57:7 68:6,10</p> <p><b>looked</b> 35:4 43:24</p> <p><b>looking</b> 59:5</p> <p><b>looks</b> 36:3 44:15</p> <p><b>loose</b> 61:17 63:23</p> <p><b>loquacious</b> 23:17</p>	<p><b>lose</b> 42:20</p> <p><b>lost</b> 40:10</p> <p><b>lot</b> 11:10,18 15:3 23:19 36:25 39:18 40:10,11 42:20 54:12 62:4</p> <p><b>loved</b> 28:5,5</p> <p><b>lucky</b> 23:12</p> <p><b>lunch</b> 33:6 38:21 38:22 39:1</p>
	<p><b>I</b></p>		<p><b>m</b></p> <p><b>m</b> 2:13 76:5</p> <p><b>madison's</b> 57:23</p> <p><b>maiden</b> 5:12,18</p> <p><b>mail</b> 61:19,23 62:2 62:13</p> <p><b>mails</b> 60:22</p> <p><b>making</b> 4:19 26:21 58:17 63:10</p> <p><b>malik</b> 45:23 46:2 53:24</p> <p><b>malik's</b> 53:13</p> <p><b>malpractice</b> 65:25 66:5,8</p> <p><b>man</b> 57:15,22</p> <p><b>manage</b> 26:16</p> <p><b>management</b> 60:19 64:19 65:10 69:23 69:25 70:3,6,9</p> <p><b>manager</b> 6:17 26:5</p> <p><b>manner</b> 26:10</p> <p><b>march</b> 7:22 24:4 27:23 38:17 71:7</p> <p><b>margaret</b> 1:13 3:2 4:2,25 73:7 74:8 75:4 76:11</p> <p><b>mariner</b> 6:11,12,25 7:17 9:14 34:25 41:3,17,25 60:21 70:4</p>

<p><b>marked</b> 3:11 48:5 61:2 <b>marla</b> 46:15 <b>marnoney</b> 45:22 <b>marriage</b> 5:16 29:11 <b>marriages</b> 46:4 53:16 <b>married</b> 5:13,14 35:20 43:25 44:23 45:25 53:12 <b>matter</b> 12:10 <b>mccann</b> 1:19 73:6 73:16 74:6,23 <b>mean</b> 34:24 36:2 41:19 45:12 52:25 55:18 58:11 62:14 62:23 70:9 <b>meaning</b> 11:4,6 <b>means</b> 6:18 71:13 <b>media</b> 57:9 <b>medication</b> 38:10 38:11 <b>medications</b> 21:1 38:9,12 <b>meditation</b> 64:14 <b>meet</b> 8:15,19 9:3 29:16,24 <b>meeting</b> 29:25 70:25 <b>meetings</b> 31:6 33:20 34:4 <b>memory</b> 21:4 38:9 <b>mention</b> 25:15 55:19 56:12 <b>mentioned</b> 69:22 70:8 <b>mentor</b> 12:11,18 70:7 <b>mentored</b> 12:6</p>	<p><b>mentoring</b> 60:16 <b>mercedes</b> 45:10 <b>met</b> 8:22 23:1 29:18,19 44:3 46:20 70:20 <b>metro</b> 1:17 2:13 76:6 <b>miami</b> 76:2,15 <b>middle</b> 5:1 6:4,11 6:12,25 7:17 9:14 34:25 41:3 60:21 <b>mind</b> 49:15 59:17 68:25 <b>minute</b> 18:3 34:11 69:16 70:2 <b>minutes</b> 44:11 <b>missed</b> 19:15 27:20 <b>missing</b> 27:15,18 <b>mistake</b> 44:20 <b>mitch</b> 61:8,10,11 61:13 <b>mix</b> 10:12 <b>mom</b> 8:12 22:24,25 <b>moment</b> 65:13 <b>monday</b> 1:14 <b>money</b> 45:4,13,16 53:7,18,23 54:2,3 54:16 67:23 <b>monroe</b> 2:3 <b>montana</b> 12:15 21:18 <b>month</b> 28:18 39:2 <b>months</b> 36:21 <b>morning</b> 6:23 <b>mother</b> 40:8 <b>move</b> 28:14 <b>moved</b> 28:7 <b>moving</b> 59:19 <b>musician</b> 8:13 <b>mustang</b> 35:13,14</p>	<p><b>myers</b> 1:18 2:4,14 5:22 6:8,9,10 76:7</p> <p style="text-align: center;"><b>n</b></p> <p><b>n</b> 3:1 5:9 <b>nah</b> 4:15 <b>name</b> 4:24 5:1,12 5:13 16:22 18:15 31:24,24 34:10,18 34:19 46:1,4 49:3,4 52:19 <b>named</b> 7:15 16:13 67:11,12 <b>names</b> 5:5,10 45:22 <b>necessarily</b> 54:11 <b>need</b> 13:17 45:18 70:2 71:16 <b>needed</b> 60:16 <b>needs</b> 36:1 <b>negative</b> 21:12 <b>neitzelt</b> 1:5 7:16 8:15,19 10:20 18:20 20:15 21:8 25:2 29:16 30:13 31:8 36:9,17 38:16 47:16 49:4,14,23 51:4,20 59:6 75:2 76:9 <b>neitzelt's</b> 44:22 65:12 <b>net</b> 45:2 <b>never</b> 11:22,23,23 14:6 15:20 18:25 23:24 24:9 25:4,23 25:24,25 26:1 29:5 33:17,21 34:1 36:2 37:8,9,13 38:23 42:19 43:23 44:6 44:13 45:3,4 46:3 46:14,14 52:13 53:8,20 56:3,11 60:7 70:21 71:6,8,9</p>	<p><b>new</b> 17:17 42:25 59:19 70:3 <b>nice</b> 36:3 <b>nickname</b> 34:14 <b>nine</b> 34:21 <b>nj</b> 1:19 74:6,23 <b>nods</b> 4:21 <b>north</b> 5:22 6:8,9,9 <b>notary</b> 73:7,16 <b>notes</b> 74:10 <b>notice</b> 76:18 <b>november</b> 1:14 22:22 27:5 73:9,11 74:17 76:11</p> <p style="text-align: center;"><b>o</b></p> <p><b>o</b> 5:9,9,11 34:16 <b>oath</b> 73:1 <b>object</b> 13:6,10,15 16:2,3 20:23 22:12 27:16 30:10,18 32:14,25 34:5 37:12 41:9,12 42:6 46:9 49:18,19 50:5 50:14,15,24,25 51:23 52:10 53:19 54:4,5,10,17,18 55:5,11,24 57:11 58:17,18,20 59:24 60:4 61:21 62:15 62:24 63:10,14,17 64:1,5,17 65:6 66:6 68:14 69:1 <b>objecting</b> 63:21 <b>objection</b> 58:16,18 63:11,12,13 <b>objectionable</b> 63:19 <b>observed</b> 46:14 <b>obtain</b> 59:6 <b>obtained</b> 40:9</p>
--	---	---	---

<p><b>occupation</b> 35:18 35:22 <b>occur</b> 22:21 <b>occurred</b> 51:22 <b>october</b> 22:22 48:24 61:14 <b>office</b> 76:14 <b>official</b> 73:10 <b>oh</b> 23:16 28:5 31:4 33:6 40:22 48:21 49:2 55:2,21 57:7 57:17 <b>ohio</b> 29:4 39:8,17 66:24 67:20 <b>okay</b> 13:8 18:1 23:10 30:11 34:8 36:6 40:22 42:23 44:3 51:10 53:6 61:8,10 65:22 70:5 70:11 72:1 <b>olexo</b> 45:22 67:9,11 67:12 <b>once</b> 14:13 <b>online</b> 36:24 52:23 52:24 56:19,21 <b>open</b> 31:3 43:3,4 <b>operate</b> 31:13 <b>opinion</b> 60:10,11 <b>opportunities</b> 8:14 <b>opportunity</b> 71:14 71:17 <b>order</b> 17:9 71:25 <b>ordered</b> 71:12 <b>ordering</b> 71:22 76:18 <b>original</b> 76:17 <b>outside</b> 23:15,21 38:24 <b>overcharged</b> 65:20 <b>overhear</b> 15:22</p>	<p><b>overheard</b> 15:20 <b>overlap</b> 9:20,21,22 <b>overseen</b> 70:3 <b>owns</b> 68:11</p> <hr/> <p style="text-align: center;"><b>p</b></p> <hr/> <p><b>p</b> 5:11 <b>p.a.</b> 1:8 2:2 <b>p.m.</b> 1:15,15 72:5 <b>p.o.</b> 2:4 <b>page</b> 3:2 48:25 75:6 76:14 <b>palm</b> 2:9 51:18 52:8 <b>panel</b> 47:2 <b>parking</b> 15:3 <b>parkway</b> 1:17 2:13 76:6 <b>part</b> 48:4 59:10,10 <b>particular</b> 22:16 <b>particulars</b> 36:22 <b>parties</b> 74:12,13 <b>pass</b> 13:4 14:13,15 40:8 <b>passed</b> 8:12 14:3,11 22:24 46:3,4 <b>passing</b> 12:25 14:4 <b>patrol</b> 66:24 <b>paula</b> 12:20,21,24 14:5,6,18 15:17 16:17 <b>paula's</b> 14:8 <b>pellizzari's</b> 53:9 <b>pending</b> 70:13 <b>people</b> 33:11,12,19 33:23 37:3,6 40:11 40:20 42:20,20 53:18 54:2,9,12,15 54:16 <b>perform</b> 21:24 <b>performing</b> 8:11</p>	<p><b>period</b> 24:3 28:1 <b>person</b> 21:23 24:25 46:1 52:4,6 58:12 62:6 <b>personality</b> 59:20 <b>personally</b> 46:19 73:8 <b>phone</b> 18:3 50:20 <b>phrase</b> 62:23 <b>picked</b> 50:20 <b>picture</b> 46:13,16 57:14,20 <b>pictures</b> 24:10,16 55:20,20,21,23 56:2 57:14 58:24 59:5,6 <b>place</b> 1:16 5:19 <b>plaintiff</b> 1:6 2:6 <b>plan</b> 9:11,24 10:1,3 11:9 <b>plans</b> 6:19 10:5 26:6 <b>please</b> 4:15,18,24 14:21 21:10 23:18 30:11,11 40:19 67:25 76:12,13,14 <b>plenty</b> 42:24 <b>pllc</b> 1:9,16 2:7,12 76:6 <b>point</b> 28:17 58:22 63:3 <b>policy</b> 12:15 <b>pool</b> 18:15,21 19:1 19:25 21:16 <b>population</b> 43:6 <b>portfolio</b> 18:16 <b>portion</b> 61:15 <b>position</b> 5:25 6:15 16:25 17:17 35:2 41:14,17,18,24 42:4,14,16,17</p>	<p>43:18 <b>positions</b> 43:3 <b>possible</b> 30:23 <b>post</b> 57:23 <b>posted</b> 58:13 <b>posting</b> 59:16 <b>posts</b> 56:10,16 58:3 59:2 <b>potanovic</b> 1:16 2:12 76:6 <b>premarked</b> 61:6 <b>present</b> 44:9 <b>presented</b> 36:2 <b>presenting</b> 58:7 <b>pretty</b> 17:20 24:1 29:11 35:10 40:10 <b>primarily</b> 9:7 10:9 <b>principal</b> 16:25 17:8 18:10,21 19:1 19:3,6,14,20 42:18 42:21 49:25 51:12 70:10 <b>principals</b> 31:7,12 70:9 <b>prior</b> 6:6 40:24 53:16 <b>private</b> 34:4 56:24 59:1,2,7 <b>privy</b> 30:20 33:18 65:9 <b>proactive</b> 64:12 <b>probably</b> 27:5 51:15 <b>problems</b> 12:5,6 47:19 50:3 65:3 <b>procedures</b> 22:5,18 <b>proceedings</b> 72:4 <b>process</b> 17:18 18:9 18:12,15 <b>production</b> 6:20,21 6:24 26:4 76:22</p>
--	--	--	---

<p><b>professor</b> 16:13  <b>program</b> 12:10,16  16:13 17:2,2,4 37:8  41:20,23 43:6 47:2  47:6,8 50:22 70:7,8  <b>promoted</b> 16:24  17:1  <b>pronounce</b> 16:14  <b>proper</b> 14:5  <b>properties</b> 68:6,10  <b>protocol</b> 60:22  <b>prove</b> 21:23 68:24  <b>public</b> 43:4 73:7,16  <b>pursue</b> 8:13  <b>push</b> 6:17  <b>put</b> 6:22 18:15  25:14 26:9 39:13  41:25 43:7 61:23</p>	<p>25:17,19,21 31:3,5  31:7,12,13 37:2  40:1,12 42:3 43:19  43:23 46:15 47:10  47:13,17,19,20  49:7,8,10,12,16,24  50:4,7,20 56:15,22  56:25 57:8,8,9,21  59:8,13,15 60:8,13  60:15,17 61:7 65:4  65:7 68:10,18,23  <b>rachel's</b> 57:24,25  <b>ramp</b> 15:11,12 37:3  <b>random</b> 63:7  <b>reach</b> 69:12  <b>reaction</b> 23:7  <b>read</b> 18:7 71:12,14  71:20,21 76:13</p>	<p><b>recalled</b> 37:20  <b>recognize</b> 57:14,19  57:22 58:1  <b>record</b> 4:24 61:4  69:19 71:11 74:10  <b>recourse</b> 51:16  <b>redirect</b> 3:6 70:17  <b>reference</b> 49:5,12  49:17 50:4 76:11  <b>references</b> 49:1  <b>refrain</b> 4:18  <b>regard</b> 16:24  <b>regarding</b> 7:15  58:24  <b>related</b> 65:3  <b>relationship</b> 25:19  <b>relative</b> 74:11,13  <b>relatives</b> 59:13  <b>relevance</b> 59:17  <b>relevancy</b> 36:15  57:16 58:8  <b>relevant</b> 58:15  <b>remember</b> 25:12  27:8 29:25 31:23  43:2 66:25  <b>remotely</b> 59:23  <b>rented</b> 59:19  <b>rephrase</b> 30:11  <b>report</b> 74:7  <b>reported</b> 1:19  <b>reporter</b> 1:20 4:16  4:20 63:2 71:11,20  71:22 72:1 73:6  <b>reporter's</b> 74:1  <b>represent</b> 51:5,21  52:8  <b>requested</b> 18:7  74:9  <b>research</b> 36:24  66:16</p>	<p><b>researched</b> 20:2  64:18,19  <b>resemble</b> 44:17  <b>residence</b> 39:16  <b>resources</b> 17:9  <b>result</b> 47:4  <b>resume</b> 47:23,24  48:1,4,9,13,23 49:5  <b>retire</b> 28:9,14,23  29:1  <b>retract</b> 70:2  <b>review</b> 74:8  <b>right</b> 7:23,24 10:7  10:14,21 11:19  13:4 17:18,25 20:2  21:1,11 22:20  23:12 24:25 28:3  28:19 30:1 35:20  39:10 42:23 43:3  43:11 44:15 47:12  48:22 49:14 50:4  50:10,10 51:2  52:21,22 54:9,16  55:18 63:21 65:5  70:19 71:10  <b>ring</b> 36:10,12,12,13  <b>ripe</b> 15:13  <b>ripped</b> 24:11,17  <b>rodney</b> 67:12  <b>room</b> 25:22,25 26:3  26:13  <b>rotate</b> 7:6,8,8  <b>routine</b> 13:16  <b>rule</b> 19:19</p>
<p><b>q</b></p>			
<p><b>question</b> 4:14,20  13:16,17 17:22,23  17:24 18:2,7 62:22  63:15,18 70:13,15  <b>questioning</b> 58:5,9  58:15,21  <b>questions</b> 58:2,6  63:7 69:15,21  70:19 71:4  <b>quit</b> 29:7,8 30:1  39:11,14 41:16  64:24  <b>quite</b> 7:21 11:7  36:21</p>	<p><b>reading</b> 6:1,16  11:11,12,12 76:17  <b>ready</b> 29:1  <b>really</b> 8:10,13 11:3  11:3,10 22:14  23:24 26:22 27:20  29:10 31:1 34:9  38:1 40:7  <b>realtor</b> 59:17 67:17  67:19,24 68:2,6  <b>realtor's</b> 68:10  <b>realty</b> 67:21  <b>reason</b> 26:13 43:12  43:13 75:6  <b>reasonable</b> 63:13  <b>reasoning</b> 54:24  <b>reasons</b> 66:3  <b>recall</b> 20:17,20,24  23:2 25:13 27:25  29:17 31:24 33:1  35:10 38:1 39:2  40:5,14 51:19 67:3</p>	<p><b>relevance</b> 59:17  <b>relevancy</b> 36:15  57:16 58:8  <b>relevant</b> 58:15  <b>remember</b> 25:12  27:8 29:25 31:23  43:2 66:25  <b>remotely</b> 59:23  <b>rented</b> 59:19  <b>rephrase</b> 30:11  <b>report</b> 74:7  <b>reported</b> 1:19  <b>reporter</b> 1:20 4:16  4:20 63:2 71:11,20  71:22 72:1 73:6  <b>reporter's</b> 74:1  <b>represent</b> 51:5,21  52:8  <b>requested</b> 18:7  74:9  <b>research</b> 36:24  66:16</p>	<p><b>ring</b> 36:10,12,12,13  <b>ripe</b> 15:13  <b>ripped</b> 24:11,17  <b>rodney</b> 67:12  <b>room</b> 25:22,25 26:3  26:13  <b>rotate</b> 7:6,8,8  <b>routine</b> 13:16  <b>rule</b> 19:19</p>
<p><b>r</b></p>			
<p><b>rachel</b> 14:18,18  15:17,17 16:11,21  17:11,14 20:9,12  20:21 21:8,13,17  22:4,6,10,18 23:8  24:8,12,19 25:5,10</p>			<p style="text-align: center;"><b>s</b></p> <p><b>s</b> 3:10  <b>saint</b> 46:1 53:13  <b>saks</b> 36:4  <b>salary</b> 68:2  <b>saw</b> 11:24 24:25  25:24 28:3 37:1,16</p>

<p>46:7,14,15 60:7  <b>saying</b> 24:11 34:3  42:3,24 50:20  52:24 60:23  <b>says</b> 42:21 57:22  <b>school</b> 2:16 5:20,21  6:4,5,11,13,23,25  7:17 8:3,7,11,11,14  8:20 9:15 10:17  12:7 14:18,25 15:3  15:8,9,10,11 19:7  19:13 20:7 24:4,25  27:6,8,10,12 29:20  29:21 30:15,24  34:22,24,25 35:5,9  37:23,24,25 38:17  38:23,24 39:6,19  39:21 40:6 41:3,7  41:11,13,14,21,23  42:1,16 43:5,7,9,13  46:7,21 47:5,18,23  48:2 49:25 51:6  52:25 54:9,23  60:21,25 61:1,20  65:5,21 66:19 70:1  <b>schools</b> 33:24 36:18  52:7,9 60:3  <b>science</b> 29:22  <b>scott</b> 2:3 29:16  45:19,20  <b>scott.atwood</b> 2:5  <b>seal</b> 73:10  <b>second</b> 7:11 45:16  45:19 50:6 69:17  <b>secret</b> 31:6 33:20  <b>see</b> 21:24,24,24  23:4,4,11,25 25:20  27:8 42:9 48:7,15  48:20 63:5 65:9  72:2</p>	<p><b>seek</b> 52:5  <b>seen</b> 44:13 58:5,6  58:14 63:6,8,9 71:8  <b>self</b> 35:3  <b>send</b> 24:10 76:14  <b>sensical</b> 59:23  <b>sent</b> 24:16 49:5  <b>separate</b> 58:12  <b>series</b> 58:2  <b>setting</b> 12:12  <b>seventh</b> 6:3 7:5,11  7:12,14 32:10  <b>shaking</b> 4:21  <b>shannon</b> 1:19 73:6  73:16 74:6,23  <b>shared</b> 11:21  <b>sheet</b> 75:1  <b>shocking</b> 62:4  <b>shocks</b> 62:3  <b>short</b> 61:17 63:23  <b>shorthand</b> 1:20  73:6  <b>show</b> 6:23 56:2  57:13  <b>showed</b> 11:18  24:19 56:3  <b>showing</b> 61:6 62:8  <b>shown</b> 62:8  <b>shows</b> 6:22 50:12  <b>sick</b> 22:25 40:9  <b>side</b> 60:6 62:9  <b>signature</b> 73:15  74:22 76:12  <b>signed</b> 76:14  <b>signing</b> 76:17  <b>similarly</b> 40:21  <b>sincerely</b> 76:20  <b>single</b> 24:17  <b>sir</b> 69:11,14  <b>situated</b> 40:21</p>	<p><b>sixth</b> 6:3 7:5,9,12  7:13 32:8  <b>skills</b> 41:22,23,24  42:2  <b>small</b> 36:12 55:14  55:14,14  <b>snap</b> 22:2  <b>social</b> 57:9  <b>solutions</b> 76:1  <b>somebody</b> 42:13,16  44:19 51:15,17  52:7 63:24  <b>son</b> 53:13 67:10,11  <b>soon</b> 28:13  <b>sorry</b> 6:6 13:8 16:3  18:3 20:6 24:23  32:20 33:21 45:8  45:18 46:5 48:20  48:21 49:19 62:18  <b>sort</b> 19:17 30:20  43:4 58:3  <b>sound</b> 7:22 53:11  59:23 62:6 63:24  64:4  <b>sounds</b> 7:24 24:24  <b>south</b> 76:2,14  <b>speak</b> 40:16 61:19  70:22  <b>speaking</b> 58:18  63:11,12  <b>special</b> 6:16,17 9:7  9:9,19 10:8,11 35:3  35:25  <b>specific</b> 28:18 52:4  <b>specifically</b> 15:16  33:15  <b>spoke</b> 32:16 69:9  <b>sport</b> 64:15  <b>spotty</b> 22:23 23:2  <b>spring</b> 22:24 29:13</p>	<p><b>stamp</b> 48:15  <b>stamped</b> 48:23  <b>stand</b> 15:3,8  <b>standing</b> 15:16  <b>starnes</b> 2:2  <b>start</b> 17:22  <b>started</b> 26:21 37:23  40:9  <b>starting</b> 19:16  <b>state</b> 4:24 9:12,13  12:9 13:24 20:1  43:11 66:3,24 73:3  73:7,16 74:3  <b>stated</b> 30:8  <b>statement</b> 30:9,17  54:18  <b>stating</b> 60:8  <b>ste</b> 76:14  <b>stenographic</b> 74:10  <b>stenographically</b>  74:7  <b>stevens</b> 16:12,23  <b>stop</b> 18:3  <b>story</b> 50:3  <b>strange</b> 52:6  <b>street</b> 2:3  <b>stress</b> 64:21  <b>strict</b> 57:9  <b>strike</b> 38:15 40:15  <b>students</b> 9:25 10:1  10:2,4,4,4,11,14,16  10:17 11:7  <b>study</b> 14:9  <b>stuff</b> 29:13 33:5  58:3  <b>style</b> 21:22 25:24  <b>sub</b> 1:3 75:3  <b>subject</b> 13:25  <b>submitted</b> 47:22  <b>suffering</b> 50:3</p>
--	---	--	--



<p><b>suing</b> 46:7 65:12  <b>suite</b> 1:17 2:9,14  76:1,7  <b>supported</b> 6:18  <b>supposed</b> 27:12  <b>sure</b> 10:17 35:10  58:7,14 63:8 70:16  71:15  <b>surprise</b> 24:20 57:2  57:4 68:13,15  <b>surprised</b> 46:8,10  50:10 59:5 62:2  <b>surprising</b> 65:5  <b>suzanne</b> 2:13,15  58:15 76:5,8  <b>swear</b> 60:24  <b>sworn</b> 4:3 73:9  <b>syndrome</b> 9:15  <b>system</b> 12:12</p>	<p><b>talking</b> 14:19,19,23  15:14,18 22:17  23:7 33:3,11,11,12  37:6 38:15,16  39:22 47:12 55:16  61:11  <b>tarmac</b> 14:18,21  <b>tarred</b> 14:25  <b>taught</b> 7:9,10,11,12  7:13,14 9:5,7,17  10:8 11:2 33:8  41:20  <b>teach</b> 6:2 7:1,1,4  10:24 11:24 12:25  23:10 27:13 31:25  32:3 41:21,22,24  46:14  <b>teacher</b> 6:1,16,17  6:20,21,22 9:6  10:18 14:20 15:18  16:11 19:13 21:24  35:3 36:7  <b>teachers</b> 15:8 26:3  30:5,15,20,24 31:2  31:8,13,20,21 70:3  <b>teaching</b> 11:11,20  12:1,5,6,17 13:5,25  25:24 26:4,4 32:9  33:3,3,4 64:21  <b>telephone</b> 70:22  <b>television</b> 26:4  <b>tell</b> 11:25 12:4,18  12:21 13:7,11  15:25 16:4,8 17:3,6  17:11,14 18:23  19:12,18 20:8,18  20:21 24:6 25:2,5  26:8,12,18 27:4  28:7,8,16 29:3  31:19 32:24 33:19  36:20 37:22 38:2,8</p>	<p>39:4 40:12,15,16  42:13,15 44:25  45:2 46:4,20,25  47:4,7,16,22 48:1  49:9,23 51:4 52:16  53:12,17,23 54:1  56:5,18,21,24  57:16 59:15 60:13  62:10 64:8,11  65:18 66:23 67:9  67:12,14,17,23  68:1,5,9 71:23  <b>telling</b> 37:3 50:2  66:25  <b>terminated</b> 29:7  30:3,6,14 43:12  <b>terminating</b> 31:9  <b>termination</b> 31:11  <b>terminology</b> 43:3  <b>terms</b> 62:16,17  <b>test</b> 12:25 13:4,23  14:1,2,3,4,6,9,11  <b>testified</b> 4:4  <b>testify</b> 39:19  <b>testimony</b> 4:16  25:8  <b>thank</b> 13:22 18:6  71:19  <b>therapist</b> 24:19  <b>therapy</b> 24:7 25:3  <b>thing</b> 17:21 60:19  60:20 63:18  <b>things</b> 12:14 14:10  23:23 33:12 38:14  57:10 64:22,25  68:4,13,20  <b>think</b> 21:14 23:9,9  25:8 34:11,13  38:10 39:12 44:19  51:13,17 60:2 61:2  69:15 70:14</p>	<p><b>thinks</b> 66:5,7  <b>third</b> 7:12 45:20  48:25  <b>thought</b> 12:21  33:19 37:20 40:12  43:18,23 47:17  58:13 59:16 60:13  <b>three</b> 11:15,15,15  11:16 26:1 27:20  27:22  <b>throwing</b> 23:23  <b>time</b> 1:15 7:23,24  8:9 11:11 12:17,25  13:14,14,15,15  14:3,4 17:15 20:13  23:1 24:3 26:2,6  27:15,18,23 28:1,3  28:25 35:8,18  36:23 37:23,24  38:22 40:7 42:18  44:3,7 47:16 63:21  69:8 70:25 71:3,6  71:23  <b>times</b> 26:17,19  42:20 44:22 64:10  <b>today</b> 4:14 21:2  33:7 62:4 70:20,23  <b>today's</b> 44:3  <b>told</b> 14:9 15:22  21:7,8,11 30:5,13  30:13 32:16 33:21  36:19 42:12 47:1  48:2 50:12 52:13  66:11  <b>top</b> 48:15  <b>totally</b> 24:24  <b>tower</b> 76:1  <b>town</b> 46:5 55:14,14  <b>transcribed</b> 71:14  71:18</p>
<b>t</b>			
<p><b>t</b> 3:10  <b>take</b> 4:21 13:22  14:1 21:1 71:16,20  <b>taken</b> 1:14,15,16  55:23 76:11,16  <b>talk</b> 15:8,13 22:8  22:14 23:19 26:15  31:9 37:16 38:11  38:12,13 39:18,25  40:2,7,11,25 44:6  45:16 56:9,15  59:12 65:15 68:3,3  69:12  <b>talked</b> 17:11 19:9  22:16 24:9 29:5  30:15,23 31:21  32:21 33:7,15  38:25 44:6 45:4  46:3 52:23 56:3  58:11 71:9</p>			

<p><b>transcript</b> 74:9,9 75:2 76:12,13 <b>transfer</b> 43:5,7 <b>transfers</b> 43:4 <b>tried</b> 65:19 <b>true</b> 30:9,16 37:21 39:15 74:9 <b>try</b> 58:10 63:4 68:24 <b>trying</b> 14:24 21:14 62:19 63:3 <b>turn</b> 18:5 <b>tv</b> 6:20,21,23,23 59:20 <b>twice</b> 44:24 <b>two</b> 13:14 32:16 39:9 45:21 50:17 57:16,17,19 59:19 69:16,21 76:14 <b>type</b> 11:6 15:1 38:5 68:21 <b>types</b> 11:25 <b>typically</b> 70:12</p>	<p><b>university</b> 46:23 49:6 <b>upset</b> 27:9 <b>use</b> 57:6 58:10 67:6 <b>usually</b> 54:15</p> <p style="text-align: center;"><b>v</b></p> <p><b>vacation</b> 28:25 <b>valerie</b> 31:23 32:2 32:12 33:7 <b>valesky</b> 14:19 15:18 16:15,16 37:5,6,7 46:18,21 47:14 49:11,11,15 50:1,21,21 <b>veritext</b> 76:1,23 <b>veritext.com</b> 76:15 <b>vexatious</b> 58:10 <b>viewed</b> 60:19 <b>village</b> 2:8 <b>virginia</b> 39:8 <b>vs</b> 1:7 75:2 76:9</p>	<p>31:14 43:24 51:10 51:17 52:8,13 61:19 63:5 <b>we've</b> 44:13 58:11 <b>wealth</b> 43:25 68:19 <b>wealthy</b> 35:24 45:5 46:1 <b>weeks</b> 42:24 59:19 69:9 <b>weird</b> 23:24 33:22 68:16,25 69:2,3 <b>went</b> 6:18 11:23 16:11 18:20 23:10 39:7,17 47:2 49:25 54:23 66:19 <b>west</b> 2:9 39:8 51:17 52:8 <b>wide</b> 61:1 <b>widely</b> 60:18 <b>wife</b> 59:20 <b>witness</b> 3:2 13:8,19 13:22 16:3 20:24 22:13 30:11,19 33:1 34:6 37:13 41:13 42:7 46:10 48:10 49:21 50:7 50:16 51:24 52:11 53:20 54:6,11,19 55:6,12,25 59:25 60:5 61:22 62:16 62:25 64:2,6,18 65:7 66:7 68:15 69:2 71:19 73:10 <b>woman</b> 7:15 57:15 68:21 <b>women</b> 32:17,24 57:16,17,19 <b>won</b> 60:2 <b>wonder</b> 45:9,11 <b>word</b> 25:12 58:10</p>	<p><b>words</b> 4:17 60:24 <b>wore</b> 68:20 <b>work</b> 5:21 6:10,12 7:10,17 8:22 9:1,4 11:10 19:19 27:15 27:18,21 31:20 33:4 34:22,24 41:3 43:11,15 64:9 67:21 <b>worked</b> 5:23 6:11 7:3 35:5,8,20 42:15 60:21 66:23 67:3 67:15 <b>working</b> 6:6,9 11:16,17 20:7 27:6 37:24 52:7 60:7 61:18 <b>worth</b> 45:2 58:6 <b>write</b> 14:10 75:2 <b>wrong</b> 37:21 <b>wronged</b> 51:7,8,10 51:14 <b>wrote</b> 26:5</p>
<b>u</b>	<b>w</b>		<b>x</b>
<p><b>uh</b> 7:25 18:11 19:5 20:4 23:16,20 25:4 25:4,23,23 28:6,8,8 28:21 30:4,4 32:18 38:4,4,7,7 44:8 45:6,6 48:17 52:18 52:18 53:1,25,25 55:22 64:13 <b>uncomfortable</b> 20:12,14 <b>understand</b> 4:22 21:15 40:18 46:13 <b>understanding</b> 10:16 14:23 <b>understood</b> 55:16 <b>unit</b> 33:8</p>	<p><b>w</b> 5:11 <b>wait</b> 70:13 <b>waived</b> 63:20 76:17 <b>walked</b> 36:3 <b>walters</b> 1:13 3:2 4:2,25 5:6,12 69:8 69:22 71:13 73:8 74:8 75:4 76:11 <b>want</b> 14:1 18:5 21:20 35:7 48:7,10 57:13 58:4 63:7,18 <b>wanted</b> 13:23 17:3 17:7 19:4,16 26:8 26:12 28:14,22,25 40:16 41:22,24 <b>wanting</b> 28:9 37:7 <b>way</b> 10:15,15 17:23 17:23 21:16 22:7</p>		<p style="text-align: center;"><b>x</b></p> <p><b>x</b> 3:1,10</p> <p style="text-align: center;"><b>y</b></p> <p><b>yeah</b> 4:15 7:24 8:18 14:22 18:6 22:9 23:14,16 27:7,7,7 28:5,6 37:6,11 44:16 45:21 48:12 48:22 57:24 66:25 69:3 <b>year</b> 7:8,9,9,11 7:12,13,13,20 8:3,4 8:6,7,12,16,20 9:16 20:16 22:23,23,25 23:2,10,11 28:17 28:18 38:21 39:2,3 41:2 42:14,18</p>

43:11  
years 5:24 6:14 7:3  
7:21,21 12:17  
34:21 38:20  
yellow 35:17

FLORIDA RULES OF CIVIL PROCEDURE

Rule 1.310

(e) Witness Review. If the testimony is transcribed, the transcript shall be furnished to the witness for examination and shall be read to or by the witness unless the examination and reading are waived by the witness and by the parties. Any changes in form or substance that the witness wants to make shall be listed in writing by the officer with a statement of the reasons given by the witness for making the changes. The changes shall be attached to the transcript. It shall then be signed by the witness unless the parties waived the signing or the witness is ill, cannot be found, or refuses to sign. If the transcript is not signed by the witness within a reasonable time after it is furnished to the witness, the officer shall sign the transcript and state on the transcript the waiver, illness, absence of the witness, or refusal to sign with any reasons given therefor. The deposition may then be used as fully as though signed unless the court holds that the reasons given for the refusal to sign require rejection of

the deposition wholly or partly, on motion under  
rule 1.330(d)(4).

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES  
ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.  
THE ABOVE RULES ARE CURRENT AS OF APRIL 1,  
2019. PLEASE REFER TO THE APPLICABLE STATE RULES  
OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS  
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at [www.veritext.com](http://www.veritext.com).