

RECEIVED, 01/09/2020 01:32:36 PM, Clerk, Supreme Court

## **EXHIBIT 2**

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF FLORIDA

3 CASE NO. 17-24103-CIV-COOKE/GOODMAN

4  
5 TIKD SERVICES, LLC,  
6 Plaintiff,

7 vs.

8 THE FLORIDA BAR, MICHAEL J. HIGER,  
9 JOHN F. HARKNESS, LORI S. HOLCOMB,  
10 et al,

11 Defendants.

12 -----X

13  
14 2800 Ponce de Leon Boulevard  
15 Coral Gables, Florida  
16 Thursday, June 21, 2018  
17 9:17 a.m.

18  
19 DEPOSITION OF CHRISTOPHER RILEY

20  
21 Taken before IRENE L. ELLIOTT,  
22 Registered Professional Reporter and Notary  
23 Public in and for the State of Florida at Large,  
24 pursuant to Notice of Taking Deposition in the  
25 above cause.

1 client relationship with the customer over that  
2 matter, and once those two steps are complete, the  
3 card is charged.

4 And at that point, my understanding is  
5 we have created an obligation per our terms of  
6 service.

7 Q. So the customer provides their method of  
8 payment, a credit card or whatever it may be, but  
9 you don't charge that until the lawyer gets back to  
10 you and says I will take this case?

11 A. That, amongst the other things I said,  
12 yes, sir.

13 Q. How long does that process typically  
14 take from the customer uploading the photograph of  
15 the ticket to the lawyer either saying yes or no to  
16 that matter?

17 A. Completely depends on the lawyer and the  
18 practices. Obviously, for business reasons, we  
19 prefer that that be on the shorter side to the  
20 extent it's possible, but we also make sure to be  
21 respectful of the attorney and give them the time  
22 to approve it.

23 I don't know what the average duration  
24 is, but I think it's probably not uncommon for it  
25 to be a day or two.

1           Q.     When you go through the uploading of the  
2     ticket and the internal processes to review the  
3     ticket to determine if it's one that TIKD is  
4     interested in covering, is that completely an  
5     automated process or does a person look at it and  
6     make some recommendations?

7           A.     The process has changed over time as the  
8     technology has become more mature, but in almost  
9     all cases, a person looks at the ticket. Sometimes  
10    we use what's called OCR technology to read the  
11    ticket. In some cases maybe it's a handwritten  
12    ticket or the print is too faded.

13               And so in all cases, I believe it's  
14    still true today, a person looks at it to try to  
15    verify the information. It's not always possible.

16           Q.     And at the point where the lawyer has  
17    then agreed to take the case and you charge the  
18    credit card or debit card, et cetera, who is the  
19    contractual relationship between at that point?

20           A.     My understanding is the contractual  
21    relationship, once we charge the card in accordance  
22    with our terms of service, the terms of service are  
23    between TIKD Services, LLC and the customer.

24           Q.     And so when the payment is processed,  
25    who does the payment go to; does it to TIKD