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**Before the**
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| | |
|---|---|
| ***In re***<br><br>**DISTRIBUTION OF CABLE ROYALTY FUNDS** | **CONSOLIDATED DOCKET NO. 14-CRB-0010-CD/SD (2010-13)** |
| **DISTRIBUTION OF SATELLITE ROYALTY FUNDS** | |

# SETTLING DEVOTIONAL CLAIMANTS' FURTHER BRIEFING IN RESPONSE TO MULTIGROUP CLAIMANTS' RESPONSE TO ORDER TO SHOW CAUSE

## APPENDIX VOLUME 3

**Before the**
**COPYRIGHT ROYALTY JUDGES**
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| *In re*<br><br>**DISTRIBUTION OF CABLE ROYALTY FUNDS**<br><br>**DISTRIBUTION OF SATELLITE ROYALTY FUNDS** | **CONSOLIDATED DOCKET NO. 14-CRB-0010-CD/SD (2010-13)** |
|---|---|

**SETTLING DEVOTIONAL CLAIMANTS' FURTHER BRIEFING IN RESPONSE TO MULTIGROUP CLAIMANTS' RESPONSE TO ORDER TO SHOW CAUSE**

**APPENDIX**

**TABLE OF CONTENTS AND**
**DECLARATION OF MATTHEW J. MACLEAN**

I, Matthew J. MacLean, hereby state and declare as follows:

I am a litigation partner in the law firm Pillsbury Winthrop Shaw Pittman LLP. I represent the Settling Devotional Claimants ("SDC") in this matter.

The Appendix submitted herewith contains true and correct copies of the following documents, by page number:

**Volume 1**


| | |
|---|---|
| App. 1-7: | Order to Show Cause Why Multigroup Claimants Should Not Be Disqualified as an Agent to Receive Funds on Behalf of Claimants (Feb. 24, 2020) |
| App. 8: | Exhibit F from Multigroup Claimants' Response to Order to Show Cause - RESTRICTED (redacted in public version) |
| App. 9: | Exhibit G from Multigroup Claimants' Response to Order to Show Cause - RESTRICTED (redacted in public version) |
| App. 10: | Exhibit H from Multigroup Claimants' Response to Order to Show Cause - RESTRICTED (redacted in public version) |

App. 11-15: Declaration of Brian Boydston in Support of Multigroup Claimants' Response to Order to Show Cause (Feb. 28, 2020) – RESTRICTED (redacted in public version)

App. 16: Multigroup Claimants' Assumed Name Record (Bell Cnty. Tex. Jan. 20, 2015), produced by Multigroup Claimants

App. 17: Authorization and Transfer to Multigroup Claimants (Jan. 20, 2015), produced by Multigroup Claimants

App. 18-34: Multigroup Claimants' Opposition to (Second) Joint Motion to Strike Multigroup Claimants' Written Direct Statement and to Dismiss Multigroup Claimants from the Distribution Phase (Jan. 17, 2018)

App. 35-45: Multigroup Claimants' Opposition to MPAA Motion to Quash Discovery Requests of Multigroup Claimants (Jan. 29, 2018)

App. 46-71: Multigroup Claimants' Opposition to Settling Devotional Claimants' Motion to Quash Discovery Requests (Feb. 7, 2018)

App. 72-79: Multigroup Claimants' Reply in Support of Notice of Consent to 2010-13 Cable and Satellite Shares Proposed by Settling Devotional Claimants, and Motion for Entry of Distribution Order (July 13, 2018)

App. 80-128: Voluntary Petition for Individuals Filing for Bankruptcy, filed by Alfred Galaz and Lois Galaz (May 28, 2019), retrieved from Pacer.gov

App. 129-31: Certificate of Filing and Assumed Name Certificate of Worldwide Subsidy Group (Jan. 6, 2020), filed with Multigroup Claimants' Opposition to Settling Devotional Claimants' Motion for Order to Show Cause

App. 132-35: Alfred Galaz Declaration in Support of Multigroup Claimants' Opposition to Settling Devotional Claimants' Motion for Order to Show Cause (Jan. 9, 2020)

App. 136-38: Declaration of Eva-Marie Nye in Support of Settling Devotional Claimants' Reply in Support of Motion for Order to Show Cause Why Multigroup Claimants Should Not Be Disqualified as an Agent to Receive Funds on Behalf of Claimants (Jan. 14, 2020)

App. 139-40: Ex. A – Worldwide Subsidy Group Public Information Report (Sep. 13, 2016)

App. 141-42: Ex. B - Worldwide Subsidy Group Public Information Report (Sep. 11, 2017)

App. 143-45: Ex. C - Worldwide Subsidy Group Public Information Report (June 23, 2018)

App. 146: Declaration of Eva-Marie Nye in Support of Settling Devotional Claimants' Further Briefing in Response to Multigroup Claimants' Response to Order to Show Cause (Mar. 11, 2020)

App. 147-60: Attachment – Florida Secretary of State records for RTG, LLC

App. 161-229: Declaration of Ryan T. Galaz in Support of RTG, LLC's Request for Entry of Default Judgment, *RTG, LLC v. Jackson*, No. BC655159 (Cal. Super. Ct., L.A. July 19, 2017), retrieved from online docket

App. 230-87: Declaration of Ryan T. Galaz in Support of RTG, LLC's Request for Entry of Default Judgment, *RTG, LLC v. Jackson*, No. BC655159 (Cal. Super. Ct., L.A. Oct. 23, 2017), retrieved from online docket

App. 288-92: Declaration of Ryan T. Galaz in Support of RTG LLC's Opposition to Lisa Fodera's Motion for Partial Summary Judgment, *RTG, LLC v. Fodera*, No. 5:19-cv-87-DAE (W.D. Tex. Oct. 3, 2019) , retrieved from Pacer.gov

**Volume 2**

App. 293-96: Declaration of Michael Warley in Support of Settling Devotional Claimants' Further Briefing in Response to Multigroup Claimants' Response to Order to Show Cause (Mar. 12, 2020)

App. 297-98: Ex. 1 - Property Record Card – Lake Pancoast Property

App. 299-302: Ex. 2 - Warranty Deed to Worldwide Subsidy Group - Lake Pancoast Property (Apr. 5, 2012)

App. 303-05: Ex. 3 - LLC Certificate of Authority - Lake Pancoast Property (June 17, 2014)

App. 306-17: Ex. 4 - Mortgage - Lake Pancoast Property (June 17, 2014)

App. 318-19: Ex. 5 - Satisfaction of Mortgage - Lake Pancoast Property (Jan. 29, 2016)

App. 320-22: Ex. 6 - Certified Member Resolution and Incumbency Certificate - Lake Pancoast Property (Jan. 27, 2017)

App. 323-26: Ex. 7 - Quit Claim Deed to RTG - Lake Pancoast Property (Jan. 27, 2017)

App. 327-30: Ex. 8 - Property Record Card - Prairie Ave. Property

App. 331-33 Ex. 9 - Warranty Deed to RTG - Prairie Ave. Property (June 13, 2017)

App. 334-35: Ex. 10 - Notice of Commencement - Prairie Ave. Property (Aug. 15, 2017)

App. 336-37: Ex. 11 - Notice of Commencement - Prairie Ave. Property (Dec. 15, 2017)

App. 338-39: Ex. 12 - Declaration of Restrictive Covenant - Prairie Ave. Property (Apr. 10, 2019)

App. 340-41: Ex. 13 - Declaration of Restrictive Covenant - Prairie Ave. Property (Apr. 10, 2019)

App. 342-43: Ex. 14 - Notice of Commencement - Prairie Ave. Property (Apr. 18, 2019)

App. 344-45: Ex. 15 - Notice of Commencement - Prairie Ave. Property (May 9, 2019)

App. 346-47: Ex. 16 - Claim of Lien - Prairie Ave. Property (Apr. 18, 2019)

App. 348-53: Information, *United States v. Galaz*, Crim. No. 02-230 (D.D.C. May 30, 2002)

App. 354-63: Plea Agreement, *United States v. Galaz*, Crim. No. 02-230 (D.D.C. May 30, 2002)

App. 364-89: Memorandum Opinion and Order Following Preliminary Hearing on Validity of Claims, No. 2008-2 CRB CD 2000-03 (Phase II) (Mar. 21, 2013)

App. 390-414: Ruling and Order Regarding Claims, No. 2008-1 CRB CD 98-99 (Phase II) (June 18, 2014)

App. 415-502: Memorandum Opinion and Ruling on Validity and Categorization of Claims, Nos. 2012-6 CRB CD 2004-09 (Phase II), et al. (Mar. 13, 2015)

App. 503-25: Comments of Raul Galaz to Proposed Rule Regarding Violation of Standards of Conduct (May 22, 2017)

App. 526-27: Final Order of Distribution, No. 2008-02 CRB CD 2000-03 (Phase II) (Mar. 22, 2016)

App. 528-37: Order Directing Partial Distribution of Program Suppliers' Cable Royalties, Nos. 2012-6 CRB CD 2004-09 (Phase II), et al. (Nov. 9, 2016)

App. 538-46: Order Granting IPG's Motion for Final Distribution of 1999 Cable Royalties (Devotional Category), No. 2008-1 CRB CD 1998-99 (Phase II) (June 12, 2007)

App. 547-81: Declaration of Walter J. Kowalski (Oct. 9, 2014) (with exhibits)

App. 582-602: Transcript of Testimony of Walter J. Kowalski (Dec. 11, 2014)

App. 603-18: Collection of letters between counsel for Worldwide Subsidy Group, Public Broadcasting Service, and Bob Ross, Inc. (Feb. 7-Apr. 12, 2017), produced by counsel for Public Broadcasting Service (as to letters from Public Broadcasting Service) and by counsel for Bob Ross, Inc. (as to letters from Worldwide Subsidy Group and Bob Ross, Inc.)

App. 619-25: Report of Handwriting Examination by John Hargett (Mar. 13, 2020) – RESTRICTED (redacted in public version)

App. 626-29: Email between M. MacLean and B. Boydston (Feb. 28-Mar. 6, 2020) – RESTRICTED (pages removed in public version)

App. 630-34: Email between M. MacLean and B. Boydston (Mar. 11-12, 2020) – RESTRICTED (pages removed in public version)

**Volume 3**

App. 635-84: Transcript of Raul Galaz, No. 2008-1 CRB CD 1999 (Phase II) (May 5, 2014)

App. 636-754: Verified Deposition Transcript of Ryan Galaz, *RTG, LLC v. Fodera* (July 22, 2019), provided by Royal Lea, counsel for Lisa Katona Fodera

App. 755: Ex. 1 – Ryan Galaz handwriting exemplars

App. 756-91: Verified Deposition Transcript of Alfred Galaz, *RTG, LLC v. Fodera* (Dec. 12, 2019), provided by Royal Lea, counsel for Lisa Katona Fodera

App. 8-15, App. 619-34, and the redacted portions of pages 1-10, 12-15, and 17 of the public version of the SDC's Further Briefing in Response to Multigroup Claimants' Response to

Order to Show Cause are submitted as Restricted – Subject to Protective Orders in Docket No. 14-CRB-0010-CD/SD (2010-13) solely because they contain information that has been designated as Restricted by Multigroup Claimants in Exhibits F, G, and H of Multigroup Claimants' Response to Order to Show Cause.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed March 16, 2020, in Washington, District of Columbia.

*/s/ Matthew J. MacLean*
Matthew J. MacLean

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

| | |
|---|---|
| IN THE MATTER OF: | |
| Phase II Distribution of the 1998 and 1999 Cable Royalty Funds | Docket No. 2008-1<br>CRB CD 1999 (Phase II) |

Monday,
May 5, 2014

Room LM-403
Madison Building
Library of Congress
101 Independence Avenue, SE
Washington, D.C.

The above-entitled matter came on for hearing, pursuant to notice, at 9:30 a.m.

BEFORE: THE HONORABLE SUZANNE M. BARNETT

THE HONORABLE JESSE FEDER

THE HONORABLE DAVID R. STRICKLER

Copyright Royalty Judges

APPEARANCES:

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TABLE OF CONTENTS


| WITNESS | DIR | CROSS | REDIR | RECROSS |
|---|---|---|---|---|
| Raul C. Galaz | 25 | 243 | | |
| Chandra Winford | 142 | 161 | 173 | |
| Diane Moss | 190 | 204 | 218 | |

| EXHIBITS | | MARKED | REC'D |
|---|---|---|---|
| SDC | | | |
| 001 | Joint Claim 434 | 10 | 27 |
| 002 | Joint Claim 433 | 10 | 27 |
| 003 | Galaz guilty plea | 10 | 34 |
| 004 | Galaz plea agreement | 10 | 34 |
| 005 | victim impact statement | 10 | 47 |
| 006 | | 10 | 49 |
| 007 | Galaz reply brief | 10 | 54 |
| 008 | Galaz additional brief | 10 | 71 |
| 009 | IPG's revised responses to document requests | 10 | 64 |
| 010 | email chain | 10 | 92 |
| 011 | IPG's reply brief | 10 | 104 |
| 014 | IPG represented claimants | 10 | 112 |
| 015 | 2004-2009 cable claims | 10 | 116 |
| 016 | 1999-2009 satellite claims | 10 | 119 |
| 019 | settlement agreement | 10 | 130 |
| 020 | copyright royalty | 10 | 236 |
| 021 | Copyright Office search | 10 | 237 |
| 027 | representation agreement | 10 | 150 |
| 037 | Galaz email | 138 | 139 |
| 038 | Winford request | 144 | 159 |
| 039 | CD | 197 | 197 |
| 040 | Harbour request | 223 | 223 |
| 041 | Boydston email | 223 | 224 |
| 042 | Harbour deposition | 224 | 227 |
| 023 | Senate Finance Committee Report | | 241 |
| 022 | | | 242 |
| IPG | | | |
| 012 | representation agreement | 10 | 75 |
| 013 | finder's fee agreement | | 77 |

| | | | |
|---|---|---|---|
| 028 | | | 242 |
| 033 | email from Mr. Joe | 244 | 245 |
| 004 | Federal Register Notice response filing | | 274 |
| 005 | amended comments on the existence of controversies | | 274 |
| 006 | IPG Petition to Participate | | 276 |
| 014 | IPG and Creflo Dollar Ministries agreement | | 291 |

1 depositions and I want the record to be clear
2 that those were not discovery depositions for
3 which there is no authority in this proceeding
4 but it was a perpetuation deposition. Okay?
5 Mr. Galaz, if you could please stand and
6 raise your right hand?
7 WHEREUPON,
8 RAUL GALAZ
9 was called for examination by Counsel for the
10 Settling Devotional Claimants, having been
11 first duly sworn, assumed the witness stand,
12 was examined and testified as follows:
13 DIRECT EXAMINATION
14 BY MR. MACLEAN:
15 Q Good morning, Mr. Galaz.
16 A Good morning.
17 Q Could you please state your full
18 name?
19 A Raul Carl Galaz.
20 Q What is your employment?
21 A Worldwide Subsidy Group.
22 Q Is that the same thing as

1 Independent Producers Group?
2 A Correct. WSG doing business as
3 Independent Producers Group.
4 Q And can I call it IPG?
5 A Yes.
6 Q IPG is a claimant in this
7 proceeding?
8 A Correct.
9 Q Has filed claims --
10 A It's a participant and I think that
11 the issue is whether it's a claimant
12 independently or merely an agent to claimants.
13 Q Fair enough. Let's turn to SDC-P-
14 001.
15 A I'm sorry, which exhibit?
16 Q SDC-P-001. Is this Joint Claim 434
17 filed by IPG?
18 A Correct, for calendar year 1999.
19 Q If you turn to SDC-P-002 is this
20 Joint Claim 433 filed by IPG for calendar year
21 1999?
22 A Yes, it is. And just to clarify,

1 Q Is that a legal name of any entity
2 as of July 31, 2000?
3 A Yes.
4 Q What entity?
5 A Tracee Productions was a DBA, a
6 fictitious name for Francisco Diaz, an
7 individual in Los Angeles who had recorded a
8 fictitious business name statement with the
9 Los Angeles County Recorder. So it was a
10 legal entity.
11 Q Tracee Productions figured a
12 prominent role in your criminal conviction for
13 defrauding the Copyright Office and the MPAA
14 in connection with copyright royalty claims?
15 A That's correct.
16 Q You were sentenced in November of
17 2002 to 18 months in prison for that crime, is
18 that correct?
19 A That's correct.
20 Q Could you please turn to SDC-P-003?
21 A All right.
22 Q Is this the criminal information

1 from your guilty plea?
2 A It's the criminal information that
3 was filed against me.
4 Q If you turn to SDC-P-004 is this
5 your plea agreement in that case?
6 A Correct.
7 Q If you take a look at the final
8 page of the plea agreement is that your
9 signature above the name Raul Galaz?
10 A Yes.
11 Q Did you read this plea agreement
12 before you signed it?
13 A Yes.
14 Q Is everything in this plea
15 agreement accurate?
16 A I would say that while accurate,
17 inexact in some areas. Which was an issue
18 that was taken up with the U.S. Attorney's
19 Office.
20 Q If you take a look at paragraph 3
21 in this plea agreement you see it says, "The
22 defendant knowingly, voluntarily and

1 truthfully admits the facts contained in the
2 attached information as the factual basis for
3 plea. Is that right?"
4 A That's correct.
5 JUDGE BARNETT: Mr. Boydston's
6 objection to admissibility of 3 and 4.
7 MR. BOYDSTON: I have objections
8 to admissibility.
9 JUDGE BARNETT: Of Exhibits SDC-P-
10 003 and P-004.
11 MR. BOYDSTON: Well, Your Honor, I
12 think it's technically hearsay. At the same
13 time, it's a fact and it's a fact that's not
14 new to the panel. And so I don't mind counsel
15 asking about it. So I guess --
16 JUDGE BARNETT: 003 and 004 are
17 admitted.
18 (Whereupon, the documents
19 previously marked as Exhibit Nos. SDC-P-003
20 and 004 for the record were admitted into
21 evidence).
22 MR. MACLEAN: Turning back to SDC-

1 P-003. If you could turn to paragraph 7.
2 Here it says, "Beginning in or about July 1995
3 and continuing through in or about March 2001,
4 the exact dates being unknown, in the District
5 of Columbia and elsewhere, the defendant
6 devised and intended to devise a scheme of
7 artifice to defraud and to obtain money and
8 property from the Copyright Office and the
9 MPAA by means of materially false and
10 fraudulent pretenses, representations and
11 promises." Is that what it says?
12 A That's what it says.
13 Q Is that true?
14 A Well, it is accurate with one --
15 and this is sort of the inexactitude that we
16 were referring to. It says, "Through, in or
17 about March 2001." This was actually
18 something that specifically brought up to the
19 U.S. Attorney's Office. We didn't know what
20 they were referring to. We just didn't. And
21 it was like just take it.
22 I eventually talked to my attorney and

1 said it's not going to make any matter one way
2 or the other. We have no idea what that was
3 a reference to, March 2001.
4 So other than that I would say it was
5 correct beginning in or about July 1995.
6 Q Okay. And ending when? If at all.
7 A I'm sorry, what did you say?
8 MR. BOYDSTON: Objection,
9 argumentative.
10 JUDGE BARNETT: Overruled. Could
11 you ask the question again?
12 MR. MACLEAN: Ending when, if at
13 all?
14 THE WITNESS: Well, I would say that if
15 you're talking about this, the scheme and
16 artifice to defraud, then it probably makes
17 reference to the -- two different things. It
18 would refer to the false filings with the U.S.
19 Copyright Office which I think ended in July
20 97 and July 97 with the filing of the 1996
21 claim.
22 And then with regard to the Motion

1 Picture Association of America I'm not sure.
2 I would have to see when the last
3 correspondence was with them.
4 BY MR. MACLEAN:
5 Q Take a look at paragraph 8. "It
6 was the purpose of the scheme for Defendant
7 Raul C. Galaz to fraudulently obtain cable and
8 satellite retransmission royalties from the
9 Copyright Office and the MPAA by falsely
10 representing that fictitious business entities
11 were owners, agents of owners of copyrighted
12 programs and were entitled to receive royalty
13 fees, which fees Defendant Raul C. Galaz
14 converted to his own personal use." Do you
15 see that?
16 A Yes.
17 Q Is that true?
18 A Yes.
19 Q To what personal uses did you
20 convert the funds?
21 MR. BOYDSTON: Objection, Your
22 Honor. I think that's irrelevant. There's no

1 question that this all occurred. What the
2 money was spent on is really beyond the scope
3 of what we're looking at here.
4 The question is --
5 JUDGE BARNETT: I've got your
6 objection. Do you have a response?
7 MR. MACLEAN: Your Honor, our
8 argument is that the fraudulent scheme
9 continued through IPG and his use of the funds
10 is relevant to his motive to continue to
11 scheme through IPG.
12 JUDGE BARNETT: Sustained.
13 MR. MACLEAN: If you would take a
14 look at paragraph 10. One of these fictitious
15 business entities was Tracee Productions for
16 which you claimed the program Garfield &
17 Friends using the alias Bill Taylor. Is that
18 correct?
19 THE WITNESS: Correct.
20 BY MR. MACLEAN:
21 Q Does Bill Taylor exist?
22 A No.

1 Q I'm sorry?
2 A No.
3 Q Bill Taylor does not exist.
4 A Bill Taylor does not exist. He was
5 an alias for myself.
6 I have to change my prior answer. It
7 appears here that the last date would have
8 been July of 1998 because it was a 1997 filing
9 that was made. A few, several.
10 Q If you take a look at paragraph 13.
11 I'm sorry, strike that. Take a look at
12 paragraph 11. In paragraph 11, "It was
13 further a part of the scheme and artifice that
14 defendant Raul C. Galaz used various methods,
15 means and devices to misrepresent to the
16 Copyright Office and the MPAA that cable and
17 satellite retransmission royalties were due
18 and owing, including but not limited to" --
19 I'll take these one by one.
20 (A) the use of false aliases in
21 applications to and in correspondence with the
22 Copyright Office and the MPAA. Is that

1 correct?
2 A That's correct and the ones to the
3 Copyright Office are detailed above. In the
4 prior paragraph.
5 Q Okay. I apologize, I didn't mean
6 to interrupt. The use of a telephone
7 answering service in the name of a fictitious
8 business entities, is that correct?
9 A Yes. Not all entities, but one I
10 believe.
11 Q Which one?
12 A Tracee Productions. If I recall.
13 I, honestly I don't recall fully.
14 Q the rental of private mail
15 depositories in the name of fictitious
16 business entities for the purpose of receiving
17 correspondence from the Copyright Office and
18 the MPAA. Is that correct?
19 A Correct.
20 Q (D) the opening of accounts at
21 stock brokerage firms for Tracee Productions
22 using the alias Francisco Diaz. Is that

1 correct?
2 A That's correct.
3 Q So Francisco Diaz was an alias of
4 yours?
5 A For this purpose. But not for all
6 purposes. Francisco Diaz is a real
7 individual. He was interviewed by the FBI so
8 he is --
9 Q He's a real individual. You used
10 his name for Tracee Productions, is that
11 right?
12 A For this purpose. For this
13 purpose. He actually -- okay, I'll wait.
14 Q (E) the opening of additional stock
15 brokerage accounts under multiple false
16 aliases by transferring stolen proceeds,
17 correct?
18 A Correct.
19 Q (F) the opening of an offshore bank
20 account in Antigua in the name of Artist
21 Collections Group, a Bahamas corporation. Is
22 that correct?

1 A Correct.
2 Q (G) the transferring of $129,000 of
3 stolen proceeds to the Artist Collections
4 Group offshore bank account, correct?
5 A Correct.
6 Q And (H) arranging the retention of
7 an attorney to negotiate a settlement with the
8 original owners of the copyright royalty
9 rights to Garfield & Friends. Is that
10 correct?
11 A Correct.
12 Q And each of these subparagraphs
13 under paragraph 11 you did these things
14 described?
15 A Yes.
16 Q If you turn to paragraph 13, "It
17 was further a part of the scheme and artifice
18 that defendant Raul C. Galaz concealed and
19 perpetrated his scheme by testifying falsely
20 under oath at a statutorily convened Copyright
21 Arbitration Royalty Panel administrative
22 proceeding that, one, he was not Bill Taylor,

1 two, he did not have any involvement or
2 interest in companies he represented, in
3 particular, Tracee Productions and the other
4 companies identified in paragraph 10, and
5 three, he never filed a claim without
6 authorization."
7 Is that correct?
8 A Correct.
9 Q When was that Copyright Arbitration
10 Royalty Panel proceeding?
11 A I believe sometime in 2000. I'm
12 not certain.
13 Q In fact, you were Bill Taylor, is
14 that right?
15 A I was the --
16 MR. BOYDSTON: Objection, this
17 seems to misstate the testimony. I think he
18 said it's an alias.
19 THE WITNESS: And that's what I was
20 going to respond. It was the alias I was
21 using.
22 MR. MACLEAN: You used the alias

1 Bill Taylor.
2 THE WITNESS: Correct.
3 BY MR. MACLEAN:
4 Q In fact, you had involvements in
5 companies you claimed to represent including
6 Tracee Productions.
7 A Correct.
8 Q In fact, you filed claims without
9 authorization.
10 A Correct.
11 Q As it turned out during that
12 hearing which you testified falsely there was
13 an FBI agent in the hearing room listening to
14 your testimony. Is that right?
15 A Correct.
16 Q And IPG's claim 434 which includes
17 Tracee Productions was already on file at the
18 time of that hearing. Is that right?
19 A I have no idea. I don't recall the
20 date of the hearing, so.
21 Q I believe earlier you testified
22 that your fraud ended in about 1998. Isn't

1 that what you testified earlier?
2 A With regard to the filings with
3 U.S. Copyright Office that would be correct.
4 With regard to any correspondence with the
5 Motion Picture Association of America I don't
6 recall.
7 Q The schemes of the fraud went at
8 least as late as the Copyright Arbitration
9 Royalty Panel hearing at which you testified
10 falsely, is that correct?
11 A Well, no, that's not quite right.
12 Because the questions that were being asked
13 that I testified falsely to had to do with
14 issues that weren't actually before the
15 Copyright Office. We weren't making a claim
16 for Tracee Productions in those particular
17 proceedings.
18 Nonetheless, there was suspicion about
19 that and that's why the MPAA started asking
20 questions about it. It didn't have to do with
21 any claim that was being made in the 1997
22 cable proceedings.

1 So I wouldn't say that it had to do with
2 the fraud with regard to that other than with
3 respect to it being an incorrect statement on
4 my part having to go towards those other.
5 Maybe it was. I'm not sure how you
6 would characterize that. You probably would
7 characterize it as obviously a false
8 statement. But whether it was going towards
9 the claims that had been falsely filed before,
10 I'm not sure because we weren't prosecuting
11 those particular claims.
12 Q If it wasn't part of your scheme to
13 defraud why did you lie under oath in response
14 to those questions?
15 A Because I was taken off guard and
16 I just made a bad choice.
17 Q Was it to conceal your fraudulent
18 scheme?
19 A It was to conceal the fraudulent
20 scheme from the 1994 through 1997 claims that
21 had been filed.
22 Q Can you turn please to SDC-P-005?

1 Is this the victim impact statement filed by
2 the Register of Copyrights in your criminal
3 case?
4 A It appears to be.
5 Q I move SDC-P-005 into evidence.
6 MR. BOYDSTON: Your Honor, I think
7 it's hearsay. I'll object on those grounds.
8 MR. MACLEAN: Your Honor, we have
9 submitted a certified copy of this record.
10 JUDGE BARNETT: Objection is
11 overruled. Exhibit SDC-P-005 is admitted.
12 (Whereupon, the document
13 previously marked as Exhibit No. SDC-P-005 for
14 the record was admitted into evidence).
15 MR. MACLEAN: Turn to page 3,
16 please. If you take a look at the first
17 paragraph on page 3. The letter says, "The
18 ramifications of Mr. Galaz's crime extend
19 beyond the 1997 cable distribution proceeding.
20 Mr. Galaz or entities in which he has an
21 interest have filed cable and satellite claims
22 for the years 1998 through 2001. The Office

1 cannot accept these claims at face value as
2 the Office has no confidence in the veracity
3 of the information provided therein."
4 Do you see where it says that?
5 A Yes.
6 Q Do you see the next paragraph that
7 says, "Thus, before commencing proceedings to
8 distribute those funds the Office will need to
9 investigate the veracity of the provided
10 information. Such investigation will increase
11 the Library's administrative costs and will
12 delay the receipt of royalties by legitimate
13 copyright owners." Do you see that?
14 A Yes.
15 Q To your knowledge what
16 investigation has been conducted into the
17 veracity of IPG's claims for the year 1999?
18 A By the Copyright Office? I'm
19 asking by the Copyright Office? I have no
20 idea what they've done.
21 Q Has the Copyright Office taken any
22 action against you or IPG for claims filed for

1 1998 through 2001?
2 A No.
3 Q If I could ask you to turn to SDC-
4 P-006. I move -- we've again submitted a
5 certified copy of SDC-P-006 and ask to move it
6 into evidence at this time.
7 MR. BOYDSTON: No objection.
8 JUDGE BARNETT: Exhibit SDC-P-006
9 is admitted.
10 (Whereupon, the document
11 previously marked as Exhibit No. SDC-P-006 for
12 the record was admitted into evidence).
13 Q Mr. Galaz, is this a transcript of
14 your sentencing proceeding? Your sentencing
15 hearing?
16 A It appears to be from the face
17 page.
18 Q You were sentenced to, among other
19 things, 18 months in prison.
20 A Correct.
21 Q Is that right?
22 A That is correct.

1 Q You are the initial founder of IPG,
2 is that right?
3 A That is correct.
4 Q I think we've already covered, but
5 just to remind everybody IPG stands for
6 Independent Producers Group, is that right?
7 A That is correct.
8 Q Which is a DBA of Worldwide Subsidy
9 Group, LLC, is that right?
10 A Correct.
11 Q In advance of going to prison you
12 transferred or purported to transfer all of
13 your interest in IPG to Marian Oshita, is that
14 right?
15 A Correct.
16 Q That transfer was later rescinded
17 by the Superior Court in California, is that
18 right?
19 A That's correct.
20 Q In that proceeding your ex-wife,
21 Lisa Katona Galaz, was recognized as the sole
22 owner of IPG. Is that right?

1 MR. BOYDSTON: Objection, Your
2 Honor. That I think misstates the conclusion.
3 THE WITNESS: No, that's incorrect.
4 MR. MACLEAN: Okay, could you
5 explain?
6 JUDGE BARNETT: I guess the
7 objection is overruled since your client is
8 about to answer.
9 THE WITNESS: I'm sorry. It -- what you
10 characterized was incorrect. Lisa Katona was
11 not identified as the sole owner of WSG.
12 MR. MACLEAN: I apologize, I must
13 have misspoken. She was recognized as the
14 majority owner of IPG, is that right?
15 THE WITNESS: Correct.
16 BY MR. MACLEAN:
17 Q Who owns IPG? Who is the owner of
18 IPG today?
19 A Currently Denise Vernon and Ruth
20 Galaz.
21 Q I'm sorry?
22 A Denise Vernon who's not present.

1 She couldn't be present here because of the
2 rescheduling. And Ruth Galaz.
3 Q I'm sorry, I can't hear the second
4 name you're saying.
5 A My same last name Galaz, Ruth
6 Galaz.
7 Q Ruth Galaz.
8 A Correct.
9 Q Thank you. I apologize. And do
10 either of these individuals have any
11 relationship to you?
12 A Both. Denise Vernon as we've said
13 on the record before is my sister. Ruth Galaz
14 is my mother.
15 Q Are these the sole owners of IPG
16 today?
17 A Yes.
18 Q Turn to SDC-P-007. After serving
19 your sentence did you request the judge in
20 your criminal case to allow you to resume your
21 work with IPG?
22 A That sort of misstates certain

1 things. I had not completed my sentence. I
2 was actually still considered part of your
3 sentence when you're on supervised release.
4 I had appeared at 3-year supervised release
5 where I spoke regularly and monthly.
6 I do appear before a probation officer.
7 And in the course of that I requested to work
8 part-time for Worldwide Subsidy Group, IPG.
9 That individual said no for a variety of
10 reasons that I thought were rather specious
11 and directly contradicted the order of the
12 district judge. And so I filed a motion in
13 order to compel the probation officer to allow
14 me to do this part-time work.
15 Q So you filed this motion, it was
16 opposed, and then SDC-P-007 is your reply to
17 the opposition. Is that right?
18 A That's correct.
19 Q If you could take a look at the
20 second to last page of this brief you'll see
21 a signature with the name Raul C. Galaz. Did
22 you sign this?

1 A Yes.
2 Q So you were pro se at this point,
3 is that right?
4 A Correct.
5 MR. MACLEAN: Your Honor, I move
6 SDC-P-007 into evidence.
7 MR. BOYDSTON: No objection.
8 JUDGE BARNETT: 007 is admitted.
9 (Whereupon, the document
10 previously marked as Exhibit No. SDC-P-007 for
11 the record was admitted into evidence).
12 MR. MACLEAN: If you could take a
13 look at page 2 of this brief, take a look at
14 the last two sentences.
15 THE WITNESS: Of page 2?
16 BY MR. MACLEAN:
17 Q Yes, page 2 of the brief.
18 Actually, take a look at the second paragraph
19 of page 2. Third sentence. "At no time did
20 Galaz utilize or involve the entity Worldwide
21 Subsidy Group with his crime nor was this ever
22 alleged."

1 A I would have -- I definitely wrote
2 it but I'm just looking for -- I'm not finding
3 where you're looking.
4 Q Third sentence of the second
5 paragraph on page 2.
6 A "At no time did Galaz utilize or
7 involve the entity Worldwide Subsidy Group
8 with his crime nor was this ever alleged."
9 That's correct.
10 Q This is also what you repeatedly
11 told prosecutors and investigators, is that
12 right?
13 A And it's true.
14 Q You never told any of them that you
15 had filed a claim for Tracee Productions
16 through IPG in 1999, did you?
17 A Oh, absolutely. Everything was
18 revealed. They were very familiar with all of
19 the filings that had anything to do with
20 Tracee Productions. They absolutely knew.
21 Q You formed Tracee Productions -- I
22 say formed. You registered the fictitious

1 name Tracee Productions using an alias, is
2 that right?
3 A No. That's not correct. Francisco
4 Diaz is a real individual who was part and
5 parcel of my crime and he was actually the one
6 that filed -- I may have physically mailed it
7 in, I don't recall, but it's his name on the
8 fictitious business statement.
9 Q So what gave you the right to file
10 a claim on Tracee Productions' behalf?
11 A Because I was working with
12 Francisco. I'm not sure what you mean.
13 I mean I shouldn't have -- in the best
14 of all worlds I would have used my own name
15 but I didn't. I used an alias. And that was
16 the same thing that I got prosecuted for.
17 Q You filed Joint Claim 434 in 1999
18 knowing that Tracee Productions had no
19 truthful claim for copyright royalties in
20 those proceedings, didn't you?
21 A No, that's incorrect.
22 Q Did Tracee Productions own any

1 copyrights?
2 A Well, again this raises the issue
3 about agency versus assignment, but yes, it
4 had solicited rights from companies and
5 acquired rights from companies. So, it did
6 have rights. The issue was ultimately whether
7 or not Tracee Productions, any of the
8 programming that it controlled, whether it had
9 been distantly retransmitted. And it became
10 very evident very quickly that none of it had.
11 JUDGE STRICKLER: Excuse me, can I
12 just interrupt for just a moment? Mr. Galaz,
13 I believe you testified a moment ago, you said
14 that Mr. Diaz was part and parcel of your
15 crime? What did you mean by that?
16 THE WITNESS: There were several people
17 that were part and parcel in my crime.
18 JUDGE STRICKLER: I don't want to
19 know about them. I want to know about Mr.
20 Diaz. What did you mean by that?
21 THE WITNESS: Okay. He was aware of the
22 crime. He took part in various aspects. I

1 actually think even though I acknowledge
2 responsibility for it, I think he was actually
3 the one that signed some of the claims that
4 were submitted to the U.S. Copyright Office.
5 Honestly I don't even have any documents
6 and I'd probably have to look at documents
7 that no longer exist to figure out the full
8 extent of his involvement. But from my
9 recollection, I mean, he was involved.
10 JUDGE STRICKLER: So he was part
11 and parcel of the fraud that constituted your
12 crime.
13 THE WITNESS: That's correct.
14 JUDGE STRICKLER: Was he ever
15 indicted, do you know?
16 THE WITNESS: No.
17 JUDGE STRICKLER: No, you don't
18 know or --
19 THE WITNESS: No, I know he was not. No
20 other person was prosecuted except for myself.
21 MR. MACLEAN: Did you know of Mr.
22 Diaz's involvement in your crimes at the time

1 you filed Joint 434 for 1999?
2 THE WITNESS: His crime in connection
3 with 94 through 97?
4 BY MR. MACLEAN:
5 Q I'm asking whether you were aware.
6 Let me restate the question.
7 A Certainly.
8 Q At the time you filed Joint Claim
9 434 for claims in 1999 were you aware of Mr.
10 Diaz's involvement in your crimes?
11 A The crimes from 1994 to 1997. Yes,
12 I was -- he was thoroughly involved with those
13 at that point. So I was aware.
14 Q Tracee Productions owns no
15 compensable claims for 1999 in these
16 proceedings, is that right?
17 A Compensable? No, because nothing
18 was retransmitted.
19 Q No, they do not own --
20 A No. They had acquired rights. The
21 rights were to programs that weren't
22 ultimately compensable.

1 Q If you had succeeded in obtaining
2 royalty distributions for Tracee Productions
3 for 1999 IPG would have benefitted from those
4 distributions, is that right?
5 A I'm sorry, if? You'll need to
6 restate that.
7 Q If you had succeeded in obtaining
8 royalty distributions for Tracee Productions
9 for Tracee Productions for 1999.
10 A Okay.
11 Q Then IPG would have benefitted from
12 those distributions, is that right?
13 A Correct.
14 Q And you would have benefitted as
15 the owner of IPG and as a person behind Tracee
16 Productions, isn't that right?
17 A Well, it depends on the timing of
18 it. If you're talking about if they were --
19 if Tracee Productions were to benefit today
20 then I'd have to say no. If you were talking
21 about back then, then I would have to say yes
22 because I was a principal back then.

1 JUDGE FEDER: Excuse me, counsel.
2 Mr. Galaz, you said that it became apparent
3 that Tracee Productions had no compensable
4 claims from -- when did that become apparent?
5 THE WITNESS: I would say probably
6 within a year or two after that. The problem
7 was that when Tracee Productions had started
8 soliciting other parties then it was getting,
9 it was very inexact then.
10 And what we were doing, what I was doing
11 was looking at companies that had a lot of
12 notoriety for their works but there was no
13 analysis involved.
14 One thing that I learned very quickly is
15 that you can be the best name program in the
16 world and it generates no retransmission
17 royalties. So it was kind of just like going
18 out there and guessing at what might be
19 valuable or not?
20 JUDGE FEDER: Just to be a little
21 more specific, did that become apparent before
22 the July 2000 claim that you filed or after?

1 THE WITNESS: No. No. If it had become
2 apparent before Tracee Productions never would
3 have ended up on the list. There would have
4 been no reason to have them on the list.
5 There would have been no reason to have them
6 on the list.
7 JUDGE BARNETT: Not to put too
8 fine a point on it, but you said you learned
9 that there were no compensable programs within
10 a year or two after that.
11 THE WITNESS: Correct.
12 JUDGE BARNETT: What is that?
13 THE WITNESS: The July 2000 filing.
14 JUDGE BARNETT: After the filing?
15 THE WITNESS: Correct.
16 JUDGE BARNETT: Okay. Thank you.
17 THE WITNESS: And I'm saying year 2, the
18 reason I date it that way is because I know it
19 would have been, you know, at some point
20 before my crime came to light and so that's
21 really just how I'm kind of guesstimating.
22 JUDGE BARNETT: I just want to

1 know what "that" was. Go ahead.
2 MR. MACLEAN: Did you not conduct
3 an investigation prior to filing Joint Claim
4 434 as to which of these entities, if any, had
5 compensable program?
6 THE WITNESS: No, and we don't even to
7 this day because sometimes someone will have
8 a program that's been broadcast. But unless
9 you're actually going to go out and purchase
10 several hundred thousand dollars worth of data
11 for a given year you don't necessarily know
12 whether it's been retransmitted or not and
13 therefore generated the royalty.
14 BY MR. MACLEAN:
15 Q Could you please turn to SDC-P-009?
16 Is this IPG's revised responses to document
17 requests for Settling Devotional Claimants
18 pursuant to order of January 31, 2014?
19 A Yes.
20 Q And the order of January 31, 2014
21 was the order of the Copyright Royalty Board
22 requiring IPG to respond to certain of the

1 Settling Devotional Claimants' document
2 production requests?
3 A Correct. I think it was the
4 product of a motion to compel response, or
5 compel production to various document requests
6 that have been made by the SDC that IPG
7 objected to.
8 Q If you could turn to page 5.
9 Request number 11 at the bottom of the page.
10 Actually, you know, before I do that I'd like
11 to move for admission of SDC-P-009.
12 MR. BOYDSTON: No objection.
13 JUDGE BARNETT: Then it is
14 admitted.
15 (Whereupon, the document
16 previously marked as Exhibit No. SDC-P-009 for
17 the record was admitted into evidence).
18 MR. MACLEAN: And then request
19 number 11 we asked, "To the extent not
20 provided in connection with request 8 and 9
21 provide all documents relating to IPG's right
22 to represent Tracee Productions in connection

1 with the filing of the claim by Worldwide
2 Subsidy Group, WSG 1999 Joint Claim No. 434.
3 Do you see that?
4 THE WITNESS: Yes.
5 BY MR. MACLEAN:
6 Q And after your objection on the
7 following page you have a line that says,
8 "Additional response per judge's order. No
9 responsive documents exist." Is that right?
10 A That's correct.
11 Q So you had no representation
12 agreement with Tracee Productions.
13 A Well, it would have been
14 effectively between myself and myself. So, if
15 you're asking if there's a written document
16 that was a signed contract, I don't even
17 recall if we even signed one, or if I ever
18 signed one with myself.
19 Q If you had a representation
20 agreement it would have been between yourself
21 and yourself?
22 A Well, to the extent that I would

1 consider Tracee Productions an extension of
2 myself, then yes, I would have -- and I
3 consider IPG to be an extension of myself,
4 then it would have been a document that I
5 would have been the signatory on both sides
6 of. That's what I mean by a document between
7 myself and myself.
8 Q Didn't you say that Tracee
9 Productions was a fictitious name of Francisco
10 Diaz?
11 A Correct, but I was working with
12 Tracee Productions and I was soliciting
13 companies on behalf of Tracee Productions.
14 So, it wasn't just solely Francisco Diaz, it
15 was a fictitious business name statement filed
16 in his name but we were both working on it.
17 Q Let's take a look at -- now, you
18 have not submitted anything showing your
19 representation of Tracee Productions. But you
20 have submitted a number of exhibits in which
21 you and IPG did not claim Tracee Productions
22 for copyright royalties, is that right?

1 A Correct.
2 Q So, basically, sort of look at all
3 the times you didn't try to defraud the
4 Copyright Office. Is that your argument?
5 MR. BOYDSTON: Objection,
6 argumentative. We can make our own argument.
7 JUDGE BARNETT: Sustained.
8 MR. MACLEAN: If you take a look
9 at -- if you have the IPG exhibit binder in
10 front of you. If you take a look at IPG-P-
11 003.
12 THE WITNESS: Okay.
13 BY MR. MACLEAN:
14 Q This is IPG's comment on the
15 existence of controversies and notice of
16 intent to participate in phase II hearings in
17 this proceeding, is that right?
18 A Correct.
19 Q If you turn to the last page of the
20 document itself there's an exhibit here if you
21 turn to the second page of the document. You
22 signed it, correct?

1 A Yes.
2 Q This was filed on October 15, 2001.
3 Is that right?
4 A Correct.
5 Q This was after your false testimony
6 in your -- in the proceeding in which the FBI
7 agent was listening, is that right?
8 A I presume so. I don't recall the
9 exact date of the hearing.
10 Q This is filed after you were
11 caught. Isn't that right?
12 A Actually, I wasn't caught. I
13 wasn't caught. I admitted everything. I
14 found out that I was being investigated, I was
15 merely being investigated, and I came forward
16 to authorities before ever being contacted by
17 authorities.
18 Specifically, Francisco Diaz contacted
19 me and said that he had been contacted by
20 someone from the FBI who knocked on his door
21 to ask him questions and at that point I
22 decided that I wasn't going to involve anybody

1 else and made a personal decision to contact
2 authorities on my own accord and confess
3 everything.
4 Q Was that -- did you receive this
5 call from Francisco Diaz before or after
6 October 15, 2001?
7 A I don't recall.
8 Q Was it in March of 2001?
9 A I don't think so. And the only
10 reason I think so is I recall it being
11 summertime.
12 Q It was in summertime.
13 A That's my recollection so I would
14 date it sometime in the summer of 2001.
15 Q Summer of 2001. It wasn't summer
16 of 2002 because your criminal case was already
17 ongoing by that time.
18 A Correct.
19 Q So, in summer of 2001 would be
20 before October 15, 2001. Correct?
21 A Correct.
22 Q If we go back to SDC's exhibit

1 binder, we go to SDC-P-008 this is your
2 additional reply brief in support of motion
3 for clarification on ruling or alternatively
4 modification of judgment responding directly
5 to an amicus brief for the Motion Picture
6 Association of America. Is that correct?
7 A Yes.
8 Q If you turn to the -- there is an
9 attachment to this document. If you turn to
10 the last page of the brief itself which is
11 page 7 of the document the line above Raul C.
12 Galaz, is that your signature?
13 A Yes.
14 Q Did you write this brief?
15 A Yes.
16 MR. MACLEAN: Your Honor, I move
17 SDC-P-008 into evidence.
18 MR. BOYDSTON: No objection. I
19 thought it was entered already, but no
20 objection.
21 JUDGE BARNETT: 008 is admitted.
22 SDC-008.

1 (Whereupon, the document
2 previously marked as Exhibit No. SDC-P-008 for
3 the record was admitted into evidence).
4 MR. MACLEAN: And just for
5 clarification this is actually a different
6 document than SDC-007 which is the other reply
7 brief.
8 This rely offers further argument why
9 the court should not ban you from
10 participating in retransmission royalty
11 proceedings to IPG, is that right?
12 THE WITNESS: I presume so. The context
13 of it was that an annex brief was filed by the
14 MPAA and I was directing the court to its
15 attention to the order that had already been
16 issued addressing my further involvement where
17 the court had said that I am allowed to
18 continue participating subject to certain
19 conditions.
20 BY MR. MACLEAN:
21 Q So if you turn to page 5 of this
22 brief in the first full paragraph of page 5

1 I'm looking at the last full sentence which
2 starts a little more than halfway down in that
3 paragraph, starts with the words, "Business
4 competitors." Do you see that? Do you see
5 that sentence?
6 A Yes.
7 Q It says, "Business competitors" --
8 this is your argument, right? "Business
9 competitors have a strong financial motivation
10 for scrutinizing Galaz's activities and any
11 alleged improprieties will no doubt be brought
12 to the immediate attention of the Copyright
13 Office and other authorities.
14 "Concerns associated with the effect of
15 monitoring of Raul C. Galaz's retransmission
16 royalty yesterday by the probation office are
17 nullified because of the policing that will
18 occur and is already occurring by business
19 competitors of Worldwide Subsidy Group."
20 Is that right?
21 A That it says that?
22 Q Yes.

1 A Yes.
2 Q And this is your argument as to why
3 you should be permitted to work for IPG
4 following your sentence, is that right?
5 A That was on top -- that wasn't the
6 primary argument. The primary argument is
7 that the matter had already been addressed by
8 the court and the court had already issued an
9 order that as I said before had specifically
10 said that I could continue to participate in
11 this particular industry subject to certain
12 conditions which I've complied with.
13 This was in response to I think an
14 amicus brief that the MPAA filed that was
15 basically the sky is going to fall down if I'm
16 allowed to participate in these proceedings.
17 Q So this is part of your argument
18 though in response to that.
19 A Correct. Part of my argument.
20 Q Would you regard the Settling
21 Devotional Claimants as business competitors
22 of IPG?

1 A Yes. They are adverse parties
2 here.
3 Q So, by this argument it's
4 essentially our job and the Copyright Office's
5 job to figure out if you are committing fraud?
6 MR. BOYDSTON: Objection, Your
7 Honor. Argumentative. It says what it says.
8 They can make that argument to you.
9 JUDGE BARNETT: Sustained.
10 MR. MACLEAN: I'm going to ask you
11 to turn to SDC -- I'm sorry IPG, in the IPG
12 binder, IPG-P-012.
13 JUDGE BARNETT: Mr. MacLean, this
14 exhibit is filed under seal. Are you going to
15 be asking any substantive questions regarding
16 its contents?
17 MR. MACLEAN: I expect I will,
18 Your Honor.
19 JUDGE BARNETT: Anybody in the
20 courtroom who's not subject to the protective
21 order should please be excused.
22 MR. BOYDSTON: I know there are,

C E R T I F I C A T E

This is to certify that the foregoing transcript

In the matter of: Phase II Distribution of 1998 and 1999 Cable Royalty Funds

Before: Copyright Royalty Judges

Date: 05-05-2014

Place: Washington, D.C.

was duly recorded and accurately transcribed under my direction; further, that said transcript is a true and accurate record of the proceedings.

Neal R Gross

Court Reporter

Page 1

1 IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
2 SAN ANTONIO DIVISION
3
4 RTG, LLC, )
)
5 Plaintiff )
)
6 VS. )No. 5:19-CV-0087-DAE
)
7 LISA KATONA FODERA, )
)
8 Defendants )
9
10
11
12 VIDEOTAPED DEPOSITION OF
13 RYAN T. GALAZ
14
15 July 22, 2019
16 10:00 a.m.
17
18 1100 N.W. Loop 410, Suite 700
19 San Antonio, Texas
20
21
22
23 JOB NO.: 403888
24 YVETTE GALLARDO - CA CSR-12889
25

Page 2

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16
17 ALSO PRESENT: Lisa Katona Fodera
18
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20
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22
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Page 3

1 INDEX OF EXAMINATION
2 RYAN GALAZ
3 By Mr. Lea.....5
4
5 COURT REPORTER'S CERTIFICATE.....188
6
7
8
9
10
11
12
13
14
15 -oOo-
16
17
18
19
20
21
22
23
24
25

Page 4

1 INDEX TO EXHIBITS
2 Exh. 1 - Paper with signature.....5
3 Exh. 2 - LinkedIn profile.....5
4 Exh. 3 - Proposal.....13
5 Exh. 4 - Code meaning for perjury.....17
6 Exh. 5 - Document filed in court.....18
7 Exh. 6 - RTG documents.....40
8 Exh. 7, 8 - Email and copy of check.....50
9 Exh. 9 - Written set of questions.....65
10 Exh. 10 - Memo from Mr. Lea to Mr. White...67
11 Exh. 11 - RTG's request for documents.....68
12 Exh. 12 - Documents.....74
13 Exh. 13 - 9 pages of email.....81
14 Exh. 14 - Preliminary injunction.....112
15 Exh. 15 - Judgment.....116
16 Exh. 16 - Preliminary injunction.....122
17 Exh. 17 - Copy, R. Galaz' driver's license.124
18 Exh. 18 - Bill of Sale.....125
19 Exh. 19 - Quit Claim Deed.....154
20 Exh. 20 - Records from Secretary of State..156
21 Exh. 21, 22 - Document and Notice Commencement.159
22 Exh. 23 - Application for rental.....157
23 Exh. 24 - Declaration of Restrict Covenant.161
24 Exh. 25, 26 - Declaration and documents.....165
25 Exh. 27, 28 - Claim of Lien, Notice.....168

Page 5

1 VIDEOTAPED DEPOSITION OF RYAN GALAZ
2 July 22, 2019
3
4 (Exhibits No. 1 through 2 are marked.)
5 THE VIDEOGRAPHER: Today's date is July
6 22nd, 2019. The approximate time is 9:59 a.m.
7 Beginning media number one. We're on the record.
8 (The witness is duly sworn.)
9 RYAN GALAZ,
10 having been first duly sworn, testified as follows:
11 EXAMINATION
12 BY MR. LEA:
13 Q. Good morning, Mr. Gaiaz. My name is Royal
14 Lea. You and I met for the first time, just a few
15 minutes ago; is that correct?
16 **A. Correct.**
17 Q. You understand, Mr. Gaiaz, that we're here
18 for your deposition?
19 **A. Correct.**
20 Q. Do you understand that I'll be asking you
21 questions, and as best you can, under oath, subject
22 to the penalties of perjury and with the advice of
23 your lawyer, you're to answer those questions?
24 **A. Yes.**
25 Q. If I ask you something and you don't hear

Page 6

1 me because I haven't talked loudly enough, will you
2 tell me so that I can talk louder until you do hear
3 me?
4 **A. Yes.**
5 Q. If I ask you something and you don't
6 understand it because it didn't make sense to you,
7 will you tell me so that I can ask you -- try to
8 ask you again a different way?
9 **A. Yes.**
10 Q. At any time while I'm asking you questions,
11 Mr. Gaiaz, if you want to take a break, for any
12 reason, will you tell me, and if you do I'll
13 accommodate you and we'll take a break.
14 **A. Yes. Okay.**
15 Q. Have you ever given a deposition before?
16 **A. No.**
17 Q. Do you understand -- you have some
18 understanding of what we're doing today?
19 **A. Yes.**
20 Q. Okay. I want to begin Mr. Gaiaz, by
21 handing you what I've marked as Deposition Exhibit
22 No. 1; it's a blank sheet of paper, except for the
23 exhibit sticker on there. And I'd like for you with
24 a blue pen, if you would, and I've got one if you
25 don't, give me the three samples of your signature

Page 7

1 -- representative samples of your signature, please.
2 **A. Okay. (Witness complies.)**
3 Q. May I see that, please.
4 **A. Yes.**
5 Q. Do I understand this correctly, Mr. Gaiaz,
6 on here you've given me two samples of your
7 signature, and then your initials?
8 **A. Yes. Well, I've -- I've used my -- I**
9 **wasn't sure exactly what you were looking for --**
10 Q. Okay.
11 **A. -- so I was just thinking of different**
12 **ways I would write, or I guess initial In this**
13 **case, my signature.**
14 Q. Okay. So Exhibit 2 is in your handwriting
15 in blue ink --
16 **A. Uh-hum.**
17 Q. -- two examples -- representative examples
18 of your signature; and it also is -- there's a
19 third mark, or entry, up in the top left corner of
20 Deposition Exhibit 1, and that's a representative
21 sample, or example, of how you might initial
22 something --
23 **A. Correct.**
24 Q. -- is that correct?
25 **A. Yes.**

Page 8

1 Q. Mr. Galaz, I'm going to hand you what I
2 have marked as Deposition Exhibit No. 2. Will
3 you tell me if you recognize that?
4 **A. Yes.**
5 Q. What is it?
6 **A. It's my LinkedIn profile.**
7 Q. And you prepared it?
8 **A. Yes.**
9 Q. And you posted it on the LinkedIn website
10 or data base?
11 **A. Yes.**
12 Q. It's accurate?
13 **A. It's accurate.**
14 Q. And it's current?
15 **A. Yes, it's current.**
16 Q. Okay. The -- your initials are R.T.G.;
17 correct?
18 **A. Yes.**
19 Q. And those initials are the basis -- or
20 behind the RTG, LLC, that is the plaintiff in this
21 lawsuit?
22 **A. Yes.**
23 Q. You're the owner of RTG?
24 **A. Yes.**
25 Q. Are there any other owners of RTG?

Page 9

1 A. No.
2 Q. Have there ever been any other owners of
3 RTG?
4 A. No.
5 Q. How many employees does RTG have?
6 A. One. Myself.
7 Q. Okay. No other employees?
8 A. No.
9 Q. Has RTG ever had any employees other than
10 you?
11 A. No.
12 Q. Lisa Katona who is here with us today is
13 your mother; correct?
14 A. Yes.
15 Q. Raul Galaz is your father; yes?
16 A. Yes.
17 Q. Al or Alfredo Galaz is your grandfather?
18 A. Yes.
19 Q. Denise Vernon is your aunt?
20 A. Yes.
21 Q. On which side, your mother's or your
22 father's is Denise Vernon your aunt?
23 A. My father's.
24 Q. Evelyn Badihian, did I see that correctly?
25 A. Yes.

Page 10

1 Q. Is your aunt; yes?
2 A. Yes.
3 Q. On which side, your mother's or your
4 father's?
5 A. My father's.
6 Q. Why did you sue your mother in this case?
7 A. Why did I sue my mother?
8 Q. That -- yes.
9 A. Can you clarify that?
10 Q. Well, RTG is your company; yes?
11 A. Yes.
12 Q. RTG sued your mother; yes?
13 A. Yes.
14 Q. Are you the decision maker for RTG?
15 A. Yes.
16 Q. Why did you decide on behalf of RTG to sue
17 your mother?
18 A. Well, this came to -- Lisa not accepting
19 my ownership of the 50 percent ownership of the Ohio
20 Players. And that's why.
21 Q. Is that the only reason?
22 A. No, not initially.
23 Q. Are there other reasons why you filed the
24 lawsuit or -- or caused the lawsuit to be filed?
25 A. Yes, because Lisa had obtained money that

Page 11

1 my lawyers believed wasn't authorized.
2 Q. Okay. Are there -- that's two. I've
3 heard two reasons so far. The first I heard you
4 say was that she didn't recognize your ownership?
5 A. Correct.
6 Q. Then the second reason I heard you say,
7 was that she had received money that was
8 unauthorized?
9 A. Correct.
10 Q. Are there any other reasons?
11 A. Those are the two main points.
12 Q. I understand those are the two main points
13 but are there any lesser or subsidiary points?
14 A. Those are the main points, and I'm not --
15 I can't provide you the smaller points.
16 Q. Who on behalf of RTG could provide me with
17 the smaller points?
18 A. My lawyer.
19 Q. Okay. By smaller points, then, you mean
20 there might be technical legal things that you don't
21 know about, but in terms of the substance, those two
22 points are the two points you know about?
23 A. Yes.
24 Q. Did filing the lawsuit, Mr. Galaz, have
25 anything to do with being an effort to try to even

Page 12

1 the score between your mother and your father in
2 the litigation between them over the years?
3 A. No.
4 Q. Nothing?
5 A. No.
6 Q. What is your father's connection to this
7 lawsuit?
8 A. My father -- he's my father first-off. My
9 father has, along with my grandfather, and my
10 attorneys, have advised me on how to collect these
11 rights. That's primarily it.
12 Q. Is there any other way in which your
13 father has any connection or involvement in this
14 lawsuit?
15 A. No, other than just being a father and
16 providing me support when I need it.
17 Q. You made a proposal last week, Mr. Galaz,
18 in which your mother would have received some --
19 all of the disputed funds that are in the registry
20 of the Court, but your father would have received a
21 substantial credit for what was paid to your mother.
22 If the lawsuit isn't about settling the score
23 between them, why did you make that proposal?
24 A. Can you rephrase that again.
25 Q. Yes.

Page 13

1 A. **I'm sorry.**
2 Q. You made a proposal last week, didn't you?
3 A. **Yes.**
4 Q. As a part of that proposal, your mother was
5 to receive -- excuse me -- disputed money that the
6 court is holding, right?
7 A. **Yes.**
8 Q. As a part of that proposai, although your
9 mother was to receive that money, your father would
10 have received a substantial credit for the money
11 that your mother received, wouidn't he?
12 A. **As I understand it, the offer was to -- to**
13 **pay off the judgment that my mother had with my**
14 **father.**
15 (Exhibit No. 3 is marked.)
16 Q. (By Mr. Lea) Wouid you take a moment,
17 Mr. Gaiaz, and look at what I've marked as
18 Deposition Exhibit No. 3?
19 A. **Yes.**
20 Q. Tell me if you've seen that before.
21 A. **Yes.**
22 Q. That's the proposal you and I've been
23 talking about for a few minutes, isn't it?
24 A. **Yes.**
25 Q. And I want to focus -- I want you to take

Page 14

1 as long as you want, Mr. Gaiaz, to look at as much
2 of it as you want. I want to focus your attention
3 on the first two numbered items.
4 A. **Uh-hum.**
5 Q. And what I get out of those first two
6 numbered items, is that your mother would, under
7 this proposal, receive $164,000; and 75 percent of
8 that, or about $123,000 wouid have been credited to
9 what your father owes your mother?
10 A. **Yes.**
11 Q. Do i understand that correctly?
12 A. **Yes.**
13 Q. What I -- what I want to understand is,
14 what is the connection that your father has in this
15 lawsuit so that that proposai makes sense?
16 A. **This is our way of settling the differences**
17 **between my mother and my father, so that there isn't**
18 **any type of disagreement between my mother and I.**
19 Q. Okay. So, in part, there is a connection
20 between the lawsuit and your father, yes? And it's
21 reflected by this proposal, isn't it?
22 A. **The connection is to help my mother, that's**
23 **all.**
24 Q. Connection is to help your mother; yes?
25 A. **Yes.**

Page 15

1 Q. Your view is that this proposai giving your
2 father substantial credit for money that your father
3 would not be paying her, helps your mother?
4 A. **Yes.**
5 Q. Do I understand that correctly?
6 A. **Yes.**
7 Q. And I'm correct here that your father,
8 although he would be getting $123,000 of credit
9 under this proposal, would not actually be paying
10 those funds to your mother? Do I understand that
11 right?
12 A. **I misunderstood your question.**
13 Q. Okay.
14 A. **Can you repeat that?**
15 Q. Yeah. The $123,000 that are described in
16 Exhibit 2, am I correct, Mr. Galaz, that your father
17 under this proposai was not paying those funds to
18 your mother?
19 A. **No.**
20 Q. But your father was getting credit for
21 payment of those funds as if he had paid those funds
22 to your mother; yes?
23 A. **Yes.**
24 Q. And in your view of this proposai, that's a
25 good thing for your mother; yes?

Page 16

1 A. **Yes.**
2 Q. How old are you?
3 A. **26.**
4 Q. Where do you live?
5 A. **Boston, Massachusetts.**
6 Q. How long have you lived there?
7 A. **Four years.**
8 Q. How long have you lived in Florida?
9 A. **Two months.**
10 Q. For what 2-month period did you live in
11 Florida?
12 A. **During the transition from when I was**
13 **leaving college to working my full-time job.**
14 Q. So that was about four years ago?
15 A. **Correct.**
16 Q. About four years ago, you lived in Florida
17 for about two months?
18 A. **Yes.**
19 Q. And you haven't lived in Florida since
20 then. Correct?
21 A. **No.**
22 Q. And you weren't living in Florida in 2016
23 or '17; correct?
24 A. **Yes.**
25 Q. And you haven't lived in Florida at any

Page 17

1 time since 2016; correct?
2 **A. Yes.**
3 Q. At the beginning of the deposition,
4 Mr. Gaiaz, I asked you if you understood that you
5 were here today and subject to the penalties of
6 perjury. Do you remember that?
7 **A. Yes.**
8 (Exhibit No. 4 is marked.)
9 Q. (By Mr. Lea) Would you take a moment,
10 Mr. Galaz, and look at what I've marked as
11 Deposition Exhibit 4.
12 **A. (Witness complies.)**
13 Q. After you've looked at that, tell me when
14 you're ready to proceed.
15 **A. I read it.**
16 Q. Today is not the first time you've been
17 involved in a proceeding in litigation in which the
18 subject of perjury has come up, Is it?
19 **A. It is my first time.**
20 Q. It's your first time giving a deposition;
21 yes?
22 **A. Yes.**
23 Q. But it's not your first time subjecting
24 yourself to the penalties of perjury in a proceeding
25 in a lawsuit, is it?

Page 18

1 **A. I believe so.**
2 Q. You think today is the first time you've
3 subjected yourself to the penalties of perjury in
4 a lawsuit?
5 **A. I don't -- to be honest I don't understand**
6 **that term, or at least I haven't understood it until**
7 **today.**
8 Q. Okay. You understand it today, because I
9 have given you some material to review to understand
10 that term in Exhibit 4; correct?
11 **A. Yes.**
12 Q. Look with me, if you would --
13 MR. LEA: I'll mark this a little bit out
14 of order, but that's all right. We'll fix that in
15 a second.
16 (Exhibit No. 5 is marked.)
17 Q. (By Mr. Lea) Okay. What I've marked is
18 Deposition Exhibit 5, Mr. Gaiaz. And tell me if
19 you -- you recognize that.
20 **A. I recognize this.**
21 Q. What do you recognize it to be, Mr. Gaiaz?
22 **A. The document that was filed in Superior**
23 **Court of the State of California, for the County of**
24 **Los Angeles.**
25 Q. And --

Page 19

1 **A. Against Julian Jackson.**
2 Q. -- it's a document that was submitted to
3 the court in RTG's lawsuit against Julian Jackson,
4 isn't it?
5 **A. Yes.**
6 Q. And it's a document that you signed, isn't
7 it, Mr. Galaz?
8 **A. Yes.**
9 Q. You signed it on the one, two, three, four
10 -- fourth page, up near the top, right?
11 **A. Yes.**
12 Q. Is that your signature?
13 **A. That is my signature.**
14 Q. And when you signed this, you subjected
15 yourself to the penalties of perjury, didn't you?
16 **A. Yes.**
17 Q. Did you understand when you signed this,
18 that you were subjecting yourself to the penalties
19 of perjury?
20 **A. Yes.**
21 Q. So today isn't the first time that you've
22 been involved in a piece of litigation in which you
23 have subjected yourself to the penalty of perjury?
24 **A. Yes, that is true.**
25 Q. If you look at the second page of

Page 20

1 Deposition Exhibit 5, Mr. Galaz, in the one, two,
2 three -- third line of paragraph one, it says, "the
3 following facts are within my personal knowledge."
4 Do you see that?
5 **A. Yes.**
6 Q. And by that, Mr. Galaz, would you tell me
7 which facts you meant by "the following facts" when
8 you signed this under the penalty of perjury?
9 **A. This is a long document.**
10 Q. I understand that. And that's why I asked
11 you to tell me which of the following facts, after
12 that phrase in paragraph one of Deposition Exhibit
13 5, were the facts that you swore under penalty of
14 perjury were within your personal knowledge.
15 **A. As I've mentioned previously, there are**
16 **main points and then there are smaller points to the**
17 **fact that my lawyer has knowledge of all these**
18 **facts. I think the purpose was to show the fees**
19 **that were incurred by Jackson, either through what**
20 **had been paid to Jackson, in addition to fees that**
21 **were collected from, I guess, working with Jackson.**
22 **And that's it.**
23 Q. Let's -- let's do it this way. First,
24 just because of the rules of court, when I don't
25 think you've answered a question in a way that was

Page 21

1 responsive to what I have actually asked you,
2 sometimes you'll hear me say, objection, non-
3 responsive; but that's really for the Court, and
4 Mr. White and me -- we'll take that up later --
5 this is one of those occasions when I'm going to
6 say, objection, non-responsive.
7 Tell me what personal involvement you had
8 or have today, Mr. Galaz, in the business of Segundo
9 Suenos, LLC?
10 **A. I have no involvement in that business.**
11 Q. Okay. Have you ever had any involvement in
12 that business?
13 **A. No.**
14 Q. And to be really clear, or even clearer,
15 when you say you've had no involvement, you mean no
16 personal involvement; right?
17 **A. Yes.**
18 Q. You were never a member of Segundo Suenos;
19 true?
20 **A. True.**
21 Q. You were never an employee of Segundo
22 Suenos; true?
23 **A. True.**
24 Q. You were never any sort of representative
25 or contractor for Segundo Suenos, were you?

Page 22

1 **A. True.**
2 Q. You weren't the person who kept the books
3 and records of Segundo Suenos ever at any time,
4 were you?
5 **A. I was never the bookkeeper.**
6 Q. Okay. Were you -- when were you the
7 person, Mr. Galaz, who was responsible for keeping
8 the accounts or maintaining the accounts for Segundo
9 Suenos to know who owed money to Segundo Suenos?
10 **A. I was never the person to own or to manage**
11 **those accounts.**
12 Q. How is it, then, Mr. Galaz, that when you
13 signed this declaration on August 12th, 2017, you
14 had personal knowledge of the information that is
15 stated in paragraph two of your declaration, that
16 is Exhibit 5?
17 **A. That was information that was shared to me**
18 **by my lawyer and by my family.**
19 Q. Okay. I appreciate you telling me that,
20 but I -- I didn't mean to ask you for information
21 that you got from other people. What I mean -- what
22 I meant to ask you was, what personal knowledge did
23 you have about the information or facts that are
24 stated in paragraph two?
25 MR. WHITE: Objection. I think he answered

Page 23

1 the question.
2 Q. (By Mr. Lea) Go ahead. You can answer.
3 **A. As I stated before, the same thing.**
4 Q. So, what was your personal involvement in
5 the adversary proceeding that is referenced in
6 paragraph two of your declaration that is Exhibit 5?
7 **A. No involvement.**
8 Q. What is your personal involvement in the
9 facts or information was -- excuse me -- what was
10 your personal involvement, Mr. Galaz, in the facts
11 and information that are stated in paragraph three
12 of the declaration, that is Exhibit 5?
13 MR. WHITE: Objection. I think he answered
14 the question over the entire document. He --
15 MR. LEA: I haven't heard him say that.
16 **THE WITNESS: As I stated before, what Tray**
17 **was alluding to, no involvement. This was nothing I**
18 **was involved in.**
19 Q. (By Mr. Lea) Nothing in paragraph -- I'm
20 sorry. Let's go to Mr. White's point: is it fair to
21 say, Mr. Galaz, that you didn't have any involvement
22 yourself in any of the facts that are stated
23 anywhere in this declaration that is Exhibit 5, did
24 you?
25 **A. Exhibit 5?**

Page 24

1 Q. The declaration that's in your left hand.
2 **A. I had no involvement in the judgment.**
3 Q. Okay. So you're referring to paragraph
4 three?
5 **A. Five.**
6 Q. Five?
7 **A. Because it's stating the fees and the**
8 **judgment.**
9 Q. Okay. So what about paragraph three, what
10 personal involvement did you have in the facts or
11 information that are stated in paragraph three?
12 **A. I have know involvement in these facts.**
13 Q. Okay. Paragraph four?
14 **A. I had no involvement in those facts.**
15 Q. No involvement in the information or facts
16 that are stated in paragraph five; correct?
17 **A. Correct.**
18 Q. Now, if we go to paragraph six, what
19 personal involvement did you have in the facts or
20 information that are stated in paragraph six?
21 **A. I bought the rights --**
22 Q. Okay. So you have personal --
23 **A. -- for the claim.**
24 Q. You have personal information of what's
25 stated in the second sentence of paragraph six;

Page 25

1 true.
2 **A. Can you repeat that.**
3 Q. Yes, sir. Look with me, if you would, at
4 paragraph six, please --
5 **A. Okay.**
6 Q. -- on the third page of your declaration
7 that is Exhibit 5. Okay?
8 **A. Okay.**
9 Q. The two sentences there. I want to focus
10 with you first on the second sentence. You do have
11 involvement, you were involved in Alfred Galaz
12 transferring the rights that are referenced there to
13 your company RTG; correct?
14 **A. Yes.**
15 Q. So you were personally involved in that,
16 weren't you?
17 **A. Yes.**
18 Q. The first sentence where it refers to "in
19 January 2015, SSL," you understand that to be
20 Segundo Suenos; right?
21 **A. Yes.**
22 Q. Transferring its rights against Jackson to
23 Alfred Galaz. What involvement did you have in
24 that?
25 **A. No involvement.**

Page 26

1 Q. Okay. Now, for the information that is
2 stated in paragraphs two through six, at least the
3 first sentence of paragraph 6, would you tell us
4 the names of the people who gave you the
5 information?
6 MR. WHITE: Don't write on it.
7 **THE WITNESS: Oh.**
8 Q. (By Mr. Lea) Just say them out loud.
9 **A. Al Galaz; Raul Galaz; and Brian Boydston.**
10 Q. What information did Al Galaz give you?
11 **A. He informed me of the claim.**
12 Q. When did that happen?
13 **A. September 2016.**
14 Q. How did he inform you?
15 **A. He called me.**
16 Q. Okay. Before -- is that the first -- the
17 very first source of any knowledge or information
18 you had about the claim?
19 **A. Yes.**
20 Q. What else -- what other information in
21 paragraphs two through six in your declaration,
22 that is Exhibit 5, did Al Galaz give you?
23 **A. He didn't provide me any of this other**
24 **information.**
25 Q. Who did provide you with the other

Page 27

1 information?
2 **A. My lawyer, Frank Boydston.**
3 Q. And what was his source of the factual
4 information?
5 **A. I believe you can find this information**
6 **online. He found it there.**
7 Q. And, so, the -- well, did any of the
8 information come from your father?
9 **A. No.**
10 Q. None?
11 **A. (Shakes head in negative response.)**
12 Q. None of the information came from your
13 father?
14 **A. None of the information from paragraphs**
15 **two to six were directly provided to me from my**
16 **father.**
17 Q. Were they indirectly provided to you by
18 your father?
19 **A. Our family had a conversation, and that**
20 **was it. I wasn't provided any details on any of**
21 **the specifics of paragraphs two through six.**
22 Q. And when did your family have this
23 conversation?
24 **A. September of 2016.**
25 Q. And who in your family was participating

Page 28

1 in this conversation?
2 **A. My grandfather. My father.**
3 Q. And you?
4 **A. Yes.**
5 Q. The conversation was on the phone?
6 **A. Yes.**
7 Q. Was it the same conversation when your
8 grandfather told you about the claim, or was it a
9 different conversation?
10 **A. I don't recall.**
11 Q. Was it near in time to the conversation
12 when your --
13 **A. Yes.**
14 Q. Okay. Yes?
15 **A. Yes.**
16 Q. And whether it was one conversation or two,
17 I want you to tell me as much as you can about this
18 -- what -- you have characterized as a family
19 conversation with your grandfather Al, and perhaps
20 whether it was one conversation or two. You -- go
21 ahead and combine it and your father's participation
22 as well.
23 **A. My grandfather and my father informed me of**
24 **the claim, as I mentioned. And at the time I wanted**
25 **to make sure that this had no involvement with my**

Page 29

1 **mother at all; at the time I had a strong**
2 **relationship with my mother. And knowing that, I**
3 **chose to move forward with purchasing the claim.**
4 Q. Let's take your grandfather first. Tell me
5 everything you remember him saying in this familiy
6 conversation that was either one or two telephone
7 calls in September of 2016.
8 **A. I don't recall the specifics of the**
9 **conversation. And as I've noted before, he**
10 **specifically explained to me that there was a**
11 **claim that I could pursue.**
12 Q. A claim against who?
13 **A. Julian Jackson.**
14 Q. Now, in September of 2016, you were roughly
15 23 years old?
16 **A. (Nods an affirmative response.)**
17 Q. Yes?
18 **A. Yes.**
19 Q. And you had known your grandfather all of
20 your life that you can remember, right?
21 **A. Yes.**
22 Q. And, so, in that as much of your
23 23-year-old life at that time, on how many days
24 before that had your grandfather ever called you up
25 and presented to you the opportunity for you to

Page 30

1 acquire or take over any claim or right to sue
2 anyone on the whole, or had that ever happened
3 before?
4 **A. No.**
5 Q. So this must have been a pretty unusual
6 day?
7 **A. Yes.**
8 Q. And, yet, you don't remember what your --
9 any of the specifics of what your grandfather said?
10 **A. No. This is three years ago.**
11 Q. Since then, Mr. Galaz, have you had a lot
12 of telephone conversations with your grandfather in
13 which you and he talked about the idea of him
14 somehow moving off of himself and over to you the
15 right to sue anyone?
16 **A. Not from that point on.**
17 Q. Okay. So before that point, it had never
18 happened in your whole life. Right?
19 **A. Right.**
20 Q. And since then, in three years since then,
21 it's never happened, right?
22 **A. Correct.**
23 Q. And, but you don't remember anything
24 specifically that your grandfather said?
25 **A. Not other than what I already told you.**

Page 31

1 Q. Now, your grandfather apparently said
2 something about it wouldn't involve your mother in
3 any way; right?
4 **A. Correct.**
5 Q. How did that come up?
6 **A. Well, my childhood, going through this**
7 **between my mother and my father, I did not want to**
8 **get it involved with my mother.**
9 Q. Okay. Who -- in terms of identifying a
10 person, who brought up the -- in this conversation
11 with your grandfather, who brought up the topic of
12 your mother not being involved? You?
13 **A. I did.**
14 Q. Okay. Your grandfather said something
15 like, "Ryan, you could" -- "there's this opportunity
16 and you could sue Julian Jackson." Was it something
17 like that?
18 **A. Yes.**
19 Q. Did you know who Julian Jackson was?
20 **A. I had little to no understanding. I did**
21 **understand that he had been involved with my**
22 **parents in the past, but that was all I knew.**
23 Q. Okay. Did your grandfather explain to you
24 in that conversation more about how Julian Jackson
25 had been involved with your parents?

Page 32

1 **A. Not really.**
2 Q. Did your grandfather ever explain to you
3 after that, how Julian Jackson had been involved
4 with your parents?
5 MR. WHITE: Didn't you just ask that
6 question?
7 Q. (By Mr. Lea) After the -- you had a
8 conversation with your grandfather in September
9 of 2016; it's on the phone, right?
10 **A. Yes.**
11 Q. And in that conversation your grandfather
12 tells you about this opportunity where you could
13 acquire the right or the claim to go sue this guy
14 Julian Jackson, who you understood somehow had
15 been involved with your parents somehow in the
16 past; right?
17 **A. Yes.**
18 Q. In that conversation, your grandfather
19 didn't tell you how Jackson had been involved with
20 your parents in the past, did he?
21 **A. That is correct.**
22 Q. After that conversation, in the three years
23 since then, did your grandfather ever explain to you
24 how Jackson had been involved with your parents in
25 the past?

Page 33

1 **A. No, he did not.**
2 Q. Did your father ever explain to you how
3 Jackson had been involved with your parents in the
4 past?
5 **A. No. Well, he explained that -- his**
6 **involvement in the past, to the extent that there**
7 **was money that could be -- that was -- that could**
8 **be pursued as a claim. That was the extent of it.**
9 Q. Your -- that was your father's extent of
10 it?
11 **A. Yes.**
12 Q. And was that in this conversation on the
13 phone in September of 2016?
14 **A. Yes.**
15 Q. Was your -- and you were on the phone with
16 your grandfather. Were you also on the phone with
17 your father, or were you in person present with your
18 father?
19 **A. On the phone.**
20 Q. Okay. Were you expecting the call?
21 **A. No.**
22 Q. Out of the blue, who called, your father
23 or your grandfather?
24 **A. My grandfather.**
25 Q. Okay. They -- your grandfather called you

Page 34

1 out of the blue, and was your father already on the
2 line?
3 **A. I don't recall.**
4 Q. Okay. Do you have any recollection or
5 memory of how your father came to be on the call?
6 **A. No.**
7 Q. Okay. Before that point, Mr. Galaz, had
8 you or any company that you're involved in, ever
9 been involved in a lawsuit?
10 **A. No.**
11 Q. Before that, Mr. Galaz, did you know that
12 the right to sue somebody was something that one
13 person could sell or assign, or give to another, a
14 second person?
15 **A. I understood it at the time it was**
16 **presented to me.**
17 Q. Before it was presented to you, did you
18 know that was the thing?
19 **A. No.**
20 Q. Okay. What did you think?
21 **A. I thought this was a business opportunity.**
22 Q. It -- but it must have seemed like a
23 business opportunity that was pretty foreign to
24 anything in your life's experience, right?
25 **A. Yes.**

Page 35

1 Q. Because up until that point, you had no
2 experience at all buying or selling, or managing,
3 or tending to the right to sue anyone else, did you?
4 **A. Correct.**
5 Q. But you knew at the time that that was a
6 subject in which your father had some significant
7 involvement, didn't you?
8 **A. In the past?**
9 Q. Yes.
10 **A. But I had no knowledge of what exactly**
11 **happened.**
12 Q. Okay. But you did know before that phone
13 call, that the idea of lawsuits in general was
14 something with which your father was very familiar,
15 right?
16 **A. And my mother, too, yes.**
17 Q. And you knew before that phone call, that
18 the idea of transferring or assigning a lawsuit
19 against one person to another was something with
20 which your father had some experience, didn't you?
21 **A. Yes. And my lawyer, too.**
22 Q. How did your lawyer -- and -- and who was
23 your lawyer, by the way?
24 **A. Brian Boydston.**
25 Q. How did he come to be involved?

Page 36

1 **A. From my understanding, he's been involved**
2 **for a long time.**
3 Q. What do you mean by that?
4 **A. He's been familiar with this case and --**
5 **yeah.**
6 Q. With which case? The case of RTG, LLC,
7 versus Lisa Katona Fodera, or the case of the
8 Segundo Suenos litigation that involved Julian
9 Jackson?
10 **A. The secondary.**
11 Q. Okay. It was your understanding at about
12 the time of this phone call, in September 2016, that
13 the person who would come to be your lawyer, Brian
14 Boydston, had been involved for a long time with the
15 Segundo Suenos litigation that involved your mother,
16 your father, the company Segundo Suenos, and Julian
17 Jackson, and your grandfather Al. Right?
18 **A. I don't recall the amount of time that he**
19 **was involved, but I did understand that he had an**
20 **understanding of what has occurred.**
21 Q. How long did the conversation last? Do you
22 -- and, again, and for purposes of discussion, we're
23 combining into one topic what might have been two
24 separate conversations with your grandfather Al and
25 your father in September of 2016.

Page 37

1 A. **I don't recall the exact amount of time.**
2 Q. A lengthy conversation, or a relatively
3 short conversation?
4 A. **I don't recall.**
5 Q. Now, from that point in September of 2016,
6 at that point you thought it wasn't going to involve
7 your mother in any way, right?
8 A. **Correct.**
9 Q. When did you come to realize that it would
10 involve your mother in any way?
11 A. **The moment I called my mother to tell her**
12 **that I'd acquired the rights and -- yeah, that's it.**
13 Q. So that was September 24th, 2018, right?
14 A. **Yes.**
15 Q. Okay.
16 A. **Or, actually, I don't recall, but it was**
17 **around September.**
18 Q. Okay. And it was shortly before the first
19 time that as your lawyer, Mr. White, submitted
20 papers to the bankruptcy court here, right?
21 A. **Repeat that again.**
22 Q. Yes. Today, Mr. White -- Trey White is
23 your lawyer, right?
24 A. **Yes.**
25 Q. He's been your lawyer for, what, 18 months,

Page 38

1 roughly?
2 A. **I don't recall the exact amount of time.**
3 Q. There came to be a time, a first day, when
4 RTG first submitted paperwork to the Court informing
5 the Court of RTG's involvement in all this, right?
6 A. **Yes.**
7 Q. The phone call with your mother, which was
8 about the first time you learned of your mother's
9 involvement, was shortly before Mr. White submitted
10 those papers to the court for the first time,
11 notifying the court of RTG's involvement in all
12 this, true?
13 A. **Yes.**
14 Q. Now, you -- who created RTG?
15 A. **I created RTG.**
16 Q. Okay. Had you -- and RTG is an LLC, right?
17 A. **Yes.**
18 Q. Had you ever formed an LLC before that?
19 A. **That was my first time.**
20 Q. How did you know how to do it?
21 A. **I used Google, and searched how to create**
22 **an LLC.**
23 Q. Okay. Did your father have any involvement
24 in the creation of RTG?
25 A. **No.**

Page 39

1 Q. Anyone other than you have any involvement
2 in the creation of RTG?
3 A. **No one else.**
4 Q. How did -- and at the time you were living
5 in Massachusetts. Right?
6 A. **Yes.**
7 Q. And you had lived for two months in Florida
8 a couple of years earlier, but you hadn't really --
9 that was only for two months; you had not really
10 spent much of your entire life in Florida, had you?
11 A. **No.**
12 Q. How did Florida come to be the state where
13 RTG was set up?
14 A. **I had wanted to live in Latin America; I**
15 **also thought that living in Miami would be a great**
16 **place to live if I wanted to focus on Latin American**
17 **business. Ultimately it was a place where I wanted**
18 **to end up with my career. And that's why I chose**
19 **Florida.**
20 Q. At the time, where was your father living?
21 A. **Florida.**
22 Q. How long had your father been living in
23 Florida, roughly?
24 A. **I can't give you exactly the number of**
25 **years, but I would say around five years.**

Page 40

1 Q. Okay. That's where he lives today?
2 A. **Yes.**
3 Q. And he's lived there, at least as far as
4 you know, continuously since about the time you set
5 up RTG in Florida to today, right?
6 A. **Yes.**
7 (Exhibit No. 6 is marked.)
8 Q. (By Mr. Lea) Do you recognize Exhibit 6?
9 A. **Yes.**
10 Q. What is it?
11 A. **It's the formation documents related to**
12 **RTG.**
13 Q. And do you swear under penalty of perjury
14 that you didn't talk to your father about setting up
15 RTG?
16 A. **I did talk to my father, but I was fully**
17 **responsible for the creation of RTG, LLC.**
18 Q. Tell me everything that you remember about
19 talking to your father about creating RTG, LLC?
20 A. **Well, the main point on here, I think, was**
21 **that my father couldn't be involved in this at all.**
22 Q. Why?
23 A. **Because of his criminal history.**
24 Q. And whose idea was it that he couldn't be
25 involved at all because of his criminal history?

Page 41

1 Yours, or his?
2 **A. His.**
3 Q. That's what he told you, right?
4 **A. Exactly.**
5 Q. Did you ask him to be involved?
6 **A. No.**
7 Q. Did you want him to be involved?
8 **A. No.**
9 Q. And, so, how did it come to be, Mr. Galaz,
10 that his home address was the address for the
11 registered office on here?
12 **A. Because at the time that's where he was**
13 **living, and it was a location that I can form my**
14 **LLC at. I had no other locations at that time in**
15 **Florida.**
16 Q. And, so, his home is the place where RTG
17 was registered with the State of Florida as the
18 offices of RTG, right?
19 **A. His home at the time, yes.**
20 Q. Okay. His home today is 4531 Prairie
21 Avenue.
22 **A. No, it's not.**
23 Q. What is his home address today?
24 **A. I don't know his exact address.**
25 Q. But you know it's not 4531 Prairie;

Page 42

1 correct?
2 **A. Yes.**
3 Q. What do you think it is? What street is
4 it?
5 **A. I don't know.**
6 Q. It's in Florida?
7 **A. Yes. He lives with his girlfriend.**
8 Q. It's in Miami, the Miami area?
9 **A. No. He lives in Fort Lauderdale.**
10 Q. Okay. How did it come to be that your
11 aunt Evelyn Badihian was the registered agent?
12 **A. I wasn't sure at the time whether or not,**
13 **given his prior conviction, that he was allowed to**
14 **register as an agent. And since Evelyn is a family**
15 **member of mine, I had selected her to be the**
16 **registered agent.**
17 Q. Okay. And how long at the time you did
18 this, just roughly, did you think she had been
19 living in Florida?
20 **A. She hasn't been living in Florida.**
21 Q. No, I mean at this time. How long had she
22 been living in Florida?
23 **A. Not long.**
24 Q. At the time of Deposition Exhibit 6, when
25 you put her down as the registered agent for RTG,

Page 43

1 LLC, when you formed it in September of 2016, at
2 that time how long had she been living in Florida?
3 MR. WHITE: I think he's mixed up on
4 exhibit numbers.
5 **THE WITNESS: Exhibit --**
6 MR. WHITE: Exhibit 6 is this one.
7 **THE WITNESS: Oh, I got you.**
8 MR. WHITE: Sorry.
9 MR. LEA: That's all right.
10 **THE WITNESS: Exhibit 6?**
11 Q. (By Mr. Lea) Uh-hum.
12 **A. And then what -- where am I looking at?**
13 Q. The date. The date I get out of this is
14 September of 2016.
15 **A. Uh-hum.**
16 Q. Like, I see a September 19th, I see
17 September 12th. But roughly the month of September
18 2016, at that time how long had she been living in
19 Florida?
20 **A. She had not been living in Florida.**
21 Q. As far as you know, she's never lived in
22 Florida, right?
23 **A. Yes.**
24 Q. At this time she was living almost as far
25 away as a person can live in the United States from

Page 44

1 Florida; true?
2 **A. She was living in California.**
3 Q. Okay. And she had been living in
4 California, as far as you know, for years before
5 September 12th, 2016; right?
6 **A. Correct.**
7 Q. Is that her signature on page 2 of
8 Deposition Exhibit 6?
9 **A. Yes.**
10 Q. Did you see her sign it?
11 **A. She -- no, I was -- she was -- she signed**
12 **it in California.**
13 Q. And then somehow she got it to you?
14 **A. Yes.**
15 Q. How did she get it to you?
16 **A. I believe she had sent it to me through**
17 **the mail, or it could have been faxed. I don't**
18 **recall exactly how.**
19 Q. Okay. Do you know what a registered agent
20 is?
21 **A. Not exactly. I -- I understand it from**
22 **simplistic view.**
23 Q. Tell me the --
24 **A. it's someone who represents -- who acts --**
25 **can act on behalf of the company.**

Page 45

1 Q. Okay. So, if a person went to that address
2 in September, or October, November, or December of
3 2016, 2421 Lake Pancoast Drive, number 6A, knocked
4 on the door and asked for Evelyn Badihian, she
5 probably wouldn't be there, would she?
6 **A. She could have been, but she wasn't living**
7 **there.**
8 Q. But probably who would have been there?
9 **A. It -- I mean, at the time it could have**
10 **been -- well, when this was formed, it could have**
11 **been my father, but not now.**
12 Q. Okay. Probably it would have been your
13 father, not your Aunt Evelyn, right?
14 **A. At one point in time, yes.**
15 Q. Well, at the time you did Exhibit 6,
16 right?
17 **A. Yes.**
18 Q. Okay. Now, your Aunt Evelyn resigned as
19 the registered agent of RTG?
20 **A. No.**
21 Q. She didn't?
22 **A. No.**
23 Q. She's the registered agent of RTG today?
24 **A. Yes.**
25 Q. What is the business of RTG?

Page 46

1 **A. Collection of music, money -- or -- it is**
2 **the collection of money from the ownership of the**
3 **Ohio Players' rights.**
4 Q. Any other business of RTG?
5 **A. And real estate renovation.**
6 Q. Any other business collection of royalty
7 rights, real estate renovation, any other business
8 of RTG?
9 **A. That's all.**
10 Q. Okay. Now, did your father have any
11 participation or suggestion in the idea of having
12 your Aunt Evelyn be the registered agent?
13 **A. We talked about it, as it could not be**
14 **him.**
15 Q. Okay. And between you and him, who first
16 initiated out loud, mentioned the idea of her being
17 the registered agent?
18 **A. I don't recall. It probably could have**
19 **been me, though, because she's a family member.**
20 Q. Okay. But, I mean, you have other family
21 members; right?
22 **A. Yes. But she's a trustworthy family**
23 **member.**
24 Q. Your mom's a family member, right?
25 **A. Yes, but she's had conflicts with my**

Page 47

1 **father.**
2 Q. Okay. Is she trustworthy?
3 **A. I'm not sure.**
4 Q. Okay. In September of 2016, did you think
5 she was trustworthy?
6 **A. What date was that?**
7 Q. September of 2016.
8 **A. I'm not sure.**
9 Q. Okay. Now, the very first piece of
10 business that RTG did after it was created, was to
11 acquire the right to sue Julian Jackson from your
12 grandfather Al; right?
13 **A. That is correct.**
14 Q. So, am I correct, Mr. Galaz, that the very
15 first phone call with your grandfather and your
16 father -- it might have been two phone calls, but
17 that topic of your grandfather moving over to you
18 the right to sue Julian Jackson, when I look at the
19 date on Exhibit 6 and see September 12th, 2016,
20 that makes me think that you and your grandfather,
21 and your father must have talked before September
22 the 12th; is that right?
23 **A. I don't recall the exact time.**
24 Q. Well, were you thinking about setting up
25 RTG, LLC, before you talked to your father and

Page 48

1 your grandfather about you or your company
2 acquiring the right to sue Jackson?
3 **A. I was considering creating an LLC since**
4 **the time I had left college.**
5 Q. Uh-hum.
6 **A. I like to think I have an entrepreneurial**
7 **spirit, and I wanted to create my own company some**
8 **day.**
9 Q. Yes, but what I'm wondering, Mr. Galaz, is
10 the day you created the LLC, was it because this
11 idea of the claim against Julian Jackson had already
12 been floated and discussed?
13 **A. I don't recall if that were the case.**
14 Q. Okay. Well, what other circumstances or
15 events, what else was going on in your life that
16 would have prompted RTG to be created at about the
17 same time you were talking to your grandfather and
18 your father about suing Julian Jackson?
19 **A. Well, I had been working within the**
20 **technology industry for the past four years. I work**
21 **in -- at the time I had been selling software and**
22 **hardware, and to me having my own company, that**
23 **potentially could be a startup, was an idea that I**
24 **wanted to pursue.**
25 Q. Okay. So, I suggest to you that the reason

Page 49

1 you did it that day is because it was shortly after
2 you talked to your grandfather and your father about
3 pursuing the claim against Julian Jackson. That's
4 my suggestion to you. Can you think of any other
5 specific event or incident in your life that makes
6 my suggestion wrong, and you think it was actually
7 some other event?
8 **A. I think there are a variety of aspects that**
9 **ied to me creating the LLC.**
10 Q. Would you list them for me now, please.
11 **A. Yes. Like I said, creating a startup. It**
12 **could have been the -- the pursuant of -- the**
13 **pursuing the claim. And it could have been the**
14 **idea of working in real estate later on.**
15 Q. How long had you been thinking about
16 working in real estate later on?
17 **A. Throughout college.**
18 Q. Okay. And how long had you been thinking
19 about the idea of the startup?
20 **A. Over the past year or two.**
21 Q. Okay.
22 **A. Or even college, too.**
23 Q. Okay. So, we know that those are both
24 ideas that had been floating around out there for
25 some period of time; right?

Page 50

1 **A. Correct.**
2 Q. We know that you had the conversation with
3 your grandfather and your Al -- grandfather Al and
4 your father, somewhere right around the same time
5 as the day you created RTG, don't we?
6 **A. I don't -- I don't recall that being -- it**
7 **could have been around the same time, but I'm not**
8 **sure.**
9 Q. Well --
10 (Exhibit No. 7 is marked.)
11 Q. (By Mr. Lea) I'll hand you what I've
12 marked as Exhibit 7. And let me give you 8, too,
13 Mr. Galaz.
14 (Exhibit No. 8 is marked.)
15 Q. (By Mr. Lea) You recognize Deposition
16 Exhibits 7 and 8, don't you?
17 **A. Yes.**
18 Q. And you agree with me that 7 is an e-mail
19 that you received from your grandfather on September
20 the 29th, 2016?
21 **A. Yes.**
22 Q. Which is the very same month as the month
23 when RTG was created, isn't it?
24 **A. Yes.**
25 Q. Can we agree now that RTG was created at

Page 51

1 least in the same month when we know, from
2 Deposition Exhibit 7, that there was some
3 communication between you and your grandfather Al,
4 about the idea of him moving over to you the right
5 to sue Jackson?
6 **A. Yes.**
7 Q. Before Deposition Exhibit 7 -- that wasn't
8 a very good question, so let me start over.
9 The telephone conversation that you had
10 with your grandfather Al, and your father, about
11 the idea of him moving over to you the right to sue
12 Jackson, happened before he sent you this e-mail,
13 that is Deposition Exhibit 7, didn't it?
14 **A. Yes.**
15 Q. We know that because your grandfather says
16 in the e-mail, "As of our previous discussion",
17 right?
18 **A. Yes.**
19 Q. So that discussion almost certainly
20 happened before he sent you this e-mail, didn't
21 it?
22 **A. Yes.**
23 Q. Was it in the month of September?
24 **A. Yes, I believe so, or it was around that**
25 **time.**

Page 52

1 Q. All right. So, now, around that time in
2 the month of September, do you remember anything
3 at all that might have been the reason for why you
4 formed RTG, LLC, other than the conversation with
5 your grandfather Al, and your father, or the
6 possibilities that you might be involved in real
7 estate one day or might be involved in having a
8 startup one day?
9 **A. There were no other conversations outside**
10 **of that.**
11 Q. Now as you reflect on all that, Mr. Galaz,
12 is it pretty likely that your conversation with your
13 grandfather Al, and your father, happened shortly
14 before the date RTG was set up on September 12th or
15 19 of 2016?
16 **A. It could have been -- it could have been**
17 **around that time, yes.**
18 Q. What does your father put into -- in terms
19 of value or money, what does he put into RTG?
20 **A. He puts in support and advice at times.**
21 Q. What else?
22 **A. Advice.**
23 Q. I understood you to say that. And then I
24 thought I was asking you other than that, what else?
25 **A. I told you, he provides support and advice**

Page 53

1 **when I need it.**
2 Q. Okay. Anything other than that?
3 **A. No.**
4 Q. RTG owns some real estate, right?
5 **A. Yeah.**
6 Q. What is his involvement in -- in the real
7 estate that RTG owns coming to be inside RTG?
8 **A. He provides advice when it comes to**
9 **managing that estate.**
10 Q. You mean the real estate?
11 **A. Yes.**
12 Q. Okay. Well, one of the things that RTG
13 owns is the -- its registered office, the Lake
14 Pancoast condominium, right?
15 **A. Yes.**
16 Q. How did RTG acquire that?
17 **A. Repeat that question again.**
18 Q. Uh-hum. Today RTG owns as its registered
19 office, a condominium on Lake Pancoast No. 6A. The
20 address is 2421 Lake Pancoast Drive, No. 6A --
21 **A. Yes.**
22 Q. -- Miami Beach, Florida, 33140, right? How
23 did RTG come to own that?
24 **A. It was transferred to me.**
25 Q. I'm sorry?

Page 54

1 **A. It was transferred to me.**
2 Q. From Worldwide Subsidy Group, yes?
3 **A. Yes.**
4 Q. Which is another company that your father
5 and Brian Boydston, and your aunt Denise Vernon are
6 invoived in --
7 **A. Yes.**
8 Q. -- right? For the -- the value, the money,
9 the consideration for RTG to come to own that
10 condominium, what was the source of the funds, or
11 the value, or the consideration that went from RTG
12 to Worldwide Subsidy Group so that RTG could be the
13 owner?
14 **A. There was no money paid for that.**
15 Q. Okay. RTG took over the debt on it?
16 **A. No.**
17 Q. Worldwide Subsidy Group just gave it to
18 RTG?
19 **A. Yes, a company that has been operated by**
20 **my family, yes.**
21 Q. Okay. And it was the place where your
22 father was living before Worldwide Subsidy Group
23 just gave the condominium to RTG, right?
24 **A. When the condominium was transferred to**
25 **RTG, my father wasn't living in it then.**

Page 55

1 Q. It was transferred in -- some time in 2017?
2 **A. I believe around that time. I don't recall**
3 **the exact date.**
4 Q. Where -- where was your father living then?
5 **A. With his girlfriend, I think -- well, i --**
6 **to clarify, I -- in 2018, he's been living with his**
7 **girlfriend.**
8 Q. Okay. We'll come back to that.
9 **A. Yeah.**
10 MR. WHITE: Counsel, we've been going for
11 about an hour. Do you --
12 MR. LEA: Yeah, this is as good a time as
13 any.
14 MR. WHITE: Okay.
15 THE VIDEOGRAPHER: 11:04, end of media
16 one. We're off the record.
17 (Brief recess.)
18 THE VIDEOGRAPHER: The time is 11:14,
19 beginning media number two. We're on the record.
20 Q. (By Mr. Lea) Mr. Galaz, are you ready to
21 proceed?
22 **A. Yes.**
23 Q. About how much money has RTG, LLC obtained
24 from B.M.G. on the rights, the music of the Ohio
25 Players?

Page 56

1 **A. I can't -- I'm not familiar with the exact**
2 **amount. However, I would say it's $150,000 plus.**
3 Q. Okay. And how much from Bud Music?
4 **A. That amount.**
5 Q. Same amount. It's the same money?
6 **A. That's all we've collected.**
7 Q. Okay. When did RTG collect that?
8 **A. After we acquired the rights to the Ohio**
9 **Players.**
10 Q. Twice now you've said "After we acquired
11 the rights." Who did you mean by we?
12 **A. Brian Boydston and myself.**
13 Q. What has your father's involvement been
14 in communications with Bug, or BMG in collecting
15 money on the rights?
16 **A. He hasn't had any involvement in the**
17 **actual collection of the rights. He has told me**
18 **who to contact, and I have given over my account**
19 **information to that person to get -- to receive**
20 **money.**
21 Q. Your father hasn't had any involvement --
22 MR. WHITE: Counsel, I'm sorry. Your --
23 your client's conduct is very distracting to
24 everyone, having her --
25 MS. FODERA: Everybody?

Page 57

1 MR. WHITE: Everybody.
2 MS. FODERA: I can't move my head?
3 MR. WHITE: I'd ask that she just kind of
4 refrain from what it was.
5 Q. (By Mr. Lea) Tell me what involvement your
6 father has had?
7 **A. He has helped me find the person who --**
8 **who would be knowledgeable on these rights at Bug**
9 **Music, and get me in contact with them.**
10 Q. Has he had communication himself with
11 anyone at Bug, or BMG?
12 **A. I don't recall.**
13 Q. Do you know that he hasn't?
14 **A. I don't recall.**
15 Q. What -- what involvement has he had in
16 communications with BMI?
17 **A. I don't know.**
18 Q. And have you authorized him to have
19 communications with anyone at BMG or BMI?
20 **A. No.**
21 Q. Is it okay with you if he has?
22 **A. No.**
23 Q. How did Boydston -- Brian Boydston come to
24 be the lawyer for RTG?
25 **A. I explained it earlier, his familiarity**

Page 58

1 **with Lisa and their cases earlier.**
2 Q. Did you know him?
3 **A. Yes.**
4 Q. How long have you known him?
5 **A. He's been my father's lawyer and friend**
6 **for a while.**
7 Q. Like a couple of years? Or 20 years?
8 **A. I -- since college.**
9 Q. How did the paperwork, Exhibit 6, the
10 paperwork for setting up RTG --
11 **A. Yeah?**
12 Q. -- were you in Florida when you filled
13 that out?
14 **A. No, I was not.**
15 Q. You were in Massachusetts?
16 **A. Yes.**
17 Q. How did it get from Massachusetts to
18 Florida?
19 **A. I had sent it through the mail.**
20 Q. How did you get a copy of it back?
21 **A. I'm sorry?**
22 Q. You have a copy of it, don't you?
23 **A. Yes.**
24 Q. How did you get a copy of it back?
25 **A. I don't recall.**

Page 59

1 Q. Mr. Galaz, that's a copy of RTG's First
2 Amended Complaint in this lawsuit. Are you
3 familiar with that?
4 **A. Yes.**
5 Q. I want to ask you some questions about
6 that.
7 **A. Okay.**
8 Q. And I want you to take as much time as
9 you want to look through it, get familiar, or
10 refamiliarize yourself with it. When you're ready,
11 I want to ask you some questions about the
12 information that's in paragraphs 12 through 17,
13 first cause of action against defendant,
14 interference with contractor.
15 **A. Okay.**
16 Q. What are RTG's damages that it's suing
17 your mother for?
18 **A. The inability to collect money that is**
19 **currently held by the court registry from BMI.**
20 Q. In dollars, how much money are you suing
21 your mother for?
22 **A. I'm trying to assert my ownership of the**
23 **Ohio Players. And whatever comes from that, this**
24 **involvement here could also be part of that, too.**
25 Q. All right. Is there someone other than

Page 60

1 you, Mr. Galaz, who knows more about what RTG's
2 damages are, measured in dollars, than you?
3 **A. My lawyer.**
4 Q. Other than you and your lawyer?
5 **A. No.**
6 Q. Okay. So, I don't get to question your
7 lawyer, so it seems to me like you're the person
8 best placed for me to question on the dollar amount
9 for the damages that are referred to in paragraph
10 17 of the complaint. Approximately, in dollars,
11 how much are the damages?
12 **A. If you're talking about the prevention of**
13 **money to be collected from BMI, that would be 50**
14 **percent, plus lawyers' fees I assume, too, the**
15 **money that was currently being held by the Court**
16 **registry.**
17 Q. In dollars, how much are you suing your
18 mother for?
19 **A. I'm not -- that money -- that number can**
20 **-- can change, so there's not an exact value at this**
21 **time.**
22 Q. Approximately, in dollars, how much are
23 you suing your mother for?
24 **A. I'm suing my mother for the ownership, to**
25 **insure that -- I'm suing my mother to insure my**

Page 61

1 **ownership of the rights, which within what is**
2 **currently held by BMI is -- or, sorry -- by the**
3 **court registry is $150,000 plus. So 50 percent.**
4 Q. You're suing your mother for damages,
5 aren't you?
6 **A. Yes.**
7 Q. Okay. If you'll look at paragraphs 18
8 through 23. In paragraph 23 it refers, again, to
9 actual harm or damages. What is that, and how is
10 it different than what's referred to in paragraph
11 17?
12 **A. They're very similar, but ultimately this**
13 **is money that can be used and invested, and can**
14 **generate more money. And i'm suffering damages**
15 **by not receiving any money right now from BMI.**
16 Q. Okay. So, you told me about the
17 approximately half -- or half of approximately
18 $150,000. I've got that number in my head, about
19 $75,000.
20 **A. Yes.**
21 Q. About how much more is there in RTG's
22 damages in addition to that $75,000?
23 **A. I -- I don't know that value.**
24 Q. Who does?
25 **A. I don't know.**

Page 62

1 Q. You don't know who knows what RTG's damages
2 are?
3 **A. My lawyer would probably -- he can maybe**
4 **give an estimate, but that's a challenging number**
5 **to put together right on the spot.**
6 Q. When did you know that you were going to
7 come here for your deposition today?
8 **A. About a month ago, or so.**
9 Q. Okay. So you've had some time to prepare
10 and think about this, haven't you?
11 **A. Yes.**
12 Q. With that time spent thinking and preparing
13 for this, is it your testimony, Mr. Galaz, that you
14 just don't know, and you're the best person who
15 would know, other than your lawyer, what RTG's
16 damages are in addition to the $75,000?
17 **A. Yes.**
18 Q. Does RTG have a contract with BMI?
19 **A. Through the ownership of the royalties**
20 **there is a contract.**
21 Q. Do you have a copy of it?
22 **A. No.**
23 Q. Who does for -- for RTG?
24 **A. I don't know.**
25 Q. How do you know there is one?

Page 63

1 **A. Because it originated as an owner -- as a**
2 **contract between -- before it went to Julian, it was**
3 **with -- between BMI and I believe my father.**
4 Q. How do you know that?
5 **A. Because that's how money is being**
6 **collected.**
7 Q. How do you know that?
8 **A. Because Lisa is collecting money.**
9 Q. How do you know what Lisa collects?
10 **A. Because she is collecting money from BMI,**
11 **or was.**
12 Q. How do you know anything at all about a
13 contract between BMI and your father? Do you?
14 **A. I don't recall that actual document. I've**
15 **never seen that document.**
16 Q. How did you hear that there was a document
17 like that? Who told you that?
18 **A. My father, because it was with him.**
19 Q. So you discussed the information that's in
20 the complaint with your father, haven't you?
21 **A. I've spoken to my lawyers about this, and**
22 **have received advice, too, from my father.**
23 Q. I want to know about your conversations
24 with your father about this.
25 **A. Most of it was attorney/client privileged**

Page 64

1 **because it was between Brian Boydston and Trey, and**
2 **myself.**
3 Q. I want to know about the conversations
4 with your father, your conversations with your
5 father about the information that is in the
6 amended complaint?
7 **A. Specifically that -- those conversations**
8 **were still occurring with Trey.**
9 Q. Your father was on the -- has had phone
10 calls with you and Trey?
11 **A. And Brian Boydston.**
12 Q. When?
13 **A. A few times, and I don't recall the exact**
14 **dates, but all that was attorney/client privileged.**
15 Q. How many.
16 **A. I don't recall.**
17 Q. I want to go through the amended
18 complaint with you now, Mr. Galaz, and see if I
19 can understand and identify what some of the
20 topics are here in your amended complaint -- the
21 RTG amended complaint.
22 So, you agree with me, don't you, that one
23 of the topics that's referred to in the RTG amended
24 complaint is the BMI royalties; right?
25 **A. Yes.**

Page 65

1 Q. And Julian Jackson is referred to in the
2 RTG amended complaint, isn't it?
3 **A. Yes, paragraph six.**
4 Q. The RTG lawsuit against Julian Jackson
5 is referred to in the RTG amended complaint, isn't
6 it?
7 **A. Yes.**
8 (Exhibit No. 9 is marked.)
9 Q. I put here --
10 MR. LEA: Trey, there's a copy for you.
11 Q. (By Mr. Lea) Deposition Exhibit 9,
12 Mr. Gaiaz, is the set -- written set of questions
13 and information that RTG sent to your mother in
14 this lawsuit. Are you familiar with that?
15 **A. Repeat that again.**
16 Q. Why don't you take a moment and look at
17 number nine --
18 **A. Okay.**
19 Q. -- Deposition exhibit No. 9, and tell me
20 if you recognize it.
21 **A. Yes, it's the discovery questions.**
22 Q. You recognize it as RTG's discovery
23 questions, or requests to your mother, don't you?
24 **A. Yes.**
25 Q. You approved or authorized it being sent

Page 66

1 to me for your mother, didn't you?
2 **A. Yes.**
3 Q. And you participated in preparing it,
4 didn't you?
5 **A. Yes.**
6 Q. I want to ask you some questions now,
7 Mr. Gaiaz, about the requests for production that
8 are on pages 7 and 8 in Deposition Exhibit 9.
9 **A. Exhibit 9.**
10 Q. That one, the one that's in your hands.
11 **A. Uh-hum.**
12 Q. And I want to ask you about the requests
13 for production that begin on page 7, and continue
14 over to page 8. Tell me when you're ready to
15 proceed.
16 **A. I'm ready to proceed.**
17 Q. I want to ask you some questions now,
18 Mr. Galaz, about numbers two through nine. You
19 see those?
20 **A. Yes.**
21 Q. Those are asking for documents, in your
22 mind, Mr. Gaiaz, that are relevant or are not
23 relevant to the topics that are in this lawsuit?
24 **A. These are relevant.**
25 Q. You wouldn't have asked your mother for

Page 67

1 categories of information or documents that you
2 didn't think were relevant, would you?
3 **A. Correct.**
4 (Exhibit No. 10 is marked.)
5 Q. (By Mr. Lea) Mr. Gaiaz, have you seen
6 Deposition Exhibit 10 before today?
7 **A. Deposition Exhibit 10. Yes, I've seen**
8 **this e-mail.**
9 Q. Okay. You knew before you came here
10 today, that it was my contention on behalf of your
11 mother, that RTG needed to produce additional
12 information before the deposition today, didn't
13 you?
14 **A. Yes.**
15 Q. And you knew that it would be my position
16 that if RTG didn't produce that deposition -- that
17 material before the deposition today, I would ask
18 the Court to require you to come back, didn't you?
19 **A. Yes.**
20 Q. It's RTG's position in this lawsuit, isn't
21 it, Mr. Gaiaz, that your mother's requests to you
22 for information or communication about Julian
23 Jackson are not relevant in this lawsuit?
24 **A. Repeat that again.**
25 Q. Sure.

Page 68

1 (Exhibit No. 11 is marked.)
2 Q. (By Mr. Lea) Look with me, if you would,
3 Mr. Gaiaz, at Deposition Exhibit 11, and tell me
4 that you recognize that as RTG's responses to your
5 mother's request for documents and information in
6 this case?
7 **A. Yes.**
8 Q. You do?
9 **A. Yes.**
10 Q. Okay. So, you asked your mother for
11 information about her communications with Julian
12 Jackson, didn't you?
13 **A. Yes.**
14 Q. And you told me just a moment ago, that
15 the reason you asked for those is because you
16 thought they were relevant, right?
17 **A. Yes.**
18 Q. So, when your mother asked you for
19 information about communications your father had
20 with Julian Jackson, why aren't those relevant?
21 MR. WHITE: Objection. That's not what
22 the document says.
23 Q. (By Mr. Lea) Well, it says RTG objects
24 to this discovery request to the extent it seeks
25 information that is not relevant. How is that

Page 69

1 not relevant?
2 MR. WHITE: Could you finish the sentence,
3 please.
4 Q. (By Mr. Lea) To any parties claims or
5 defense. And it continues --
6 MR. WHITE: And --
7 Q. (By Mr. Lea) But it says it is not
8 relevant. So is it relevant in your mind,
9 Mr. Galaz?
10 **A. It could be relevant between Lisa and**
11 **-- and Julian, but not relevant to me and Julian.**
12 Q. Communications between RTG and Julian
13 Jackson are not relevant. That's your position?
14 **A. Repeat that again.**
15 Q. I want to understand why RTG has said
16 that information is not relevant in response to
17 request number one in Deposition Exhibit 11.
18 **A. I think I may be looking at the wrong**
19 **document at this point.**
20 Q. That one right there in your hands.
21 **A. Oh.**
22 Q. Look on the very first page.
23 **A. First page?**
24 Q. Uh-hum. Do you see request number one?
25 **A. Uh-hum.**

Page 70

1 Q. And underneath that, do you see response
2 to request number one?
3 **A. Yes.**
4 Q. And then the second line of the response,
5 do you see that is not relevant to any parties,
6 claims or defense?
7 **A. Yes. I mean, that was conversations I've**
8 **had with my lawyers. So that's why --**
9 Q. I'm going to ask you separately about
10 that. I want to focus with you right now on the
11 subjects that you think are relevant in this
12 lawsuit. Do you think Julian Jackson is a
13 relevant subject in this lawsuit?
14 **A. Yes. But with Lisa and Julian, not --**
15 Q. Well, what's the difference? How is
16 one relevant and not the other in your mind?
17 **A. I don't want to go into specifics between**
18 **Lisa and Julian. But ultimately, what was important**
19 **was the communication between Ai and Royal, and not**
20 **so much RTG and -- and Julian.**
21 Q. Has RTG had any communications with your
22 father that relate in any way to Julian Jackson?
23 **A. Yes.**
24 Q. Are there e-mails, or electronic or
25 printed documents that reflect those communications?

Page 71

1 **A. Yes, through our attorneys.**
2 Q. Is your father the sender or recipient of
3 any of those documents?
4 **A. Among our attorneys, yes.**
5 Q. How long would it take you to locate,
6 gather, and organize all of those documents if the
7 Court said you had to turn them over?
8 **A. It could take hours, or longer.**
9 Q. How many hours?
10 **A. I don't know.**
11 Q. Well, if we just limited it to e-mails, how
12 would you go about finding the e-mails? You would
13 do an electronic search, wouldn't you?
14 MR. WHITE: Counsel, I'm sorry, are we
15 talking about e-mails between attorney and -- or
16 are we talking about e-mails between RTG and --
17 Q. (By Mr. Lea) We're talking about any
18 e-mail at all. To find an e-mail you would do on
19 -- on -- that is an e-mail that you sent or
20 received. If you still have it, where would it
21 be?
22 **A. To clarify, between among who, though?**
23 Q. Any e-mail to start, any e-mail you ever
24 sent or received? Sent to anyone or received
25 from anyone.

Page 72

1 **A. Among who, though? It -- it still does**
2 **not clarify it for me.**
3 Q. if you're the sender or recipient of an
4 e-mail, and you want to know if you actually did
5 send or receive an e-mail, how do you search for
6 it?
7 **A. Go to the search bar.**
8 Q. And what do you do?
9 **A. Type in the name.**
10 Q. And then what happens?
11 **A. I would find that person's e-mail.**
12 Q. How long would that take?
13 **A. I can't -- I don't know.**
14 Q. How far back do you have e-mail?
15 **A. My e-mail? I don't know.**
16 Q. Does it go back to 2016?
17 **A. Yes. It goes back to probably high**
18 **school.**
19 Q. Okay. So if you wanted to know if you
20 had sent an e-mail to your father referring to
21 Julian Jackson, would you go through that process
22 you just described for me?
23 **A. Yes. But if it's attorney/client**
24 **privileged, that information can't be provided.**
25 Q. I -- I want you to try to focus with me

Page 73

1 and just answer the questions I'm asking you. Will
2 you do that?
3 **A. I am answering your questions.**
4 Q. I want to focus with you, Mr. Galaz, on the
5 amount of time and effort that would be involved in
6 finding an e-mail, regardless of who the sender or
7 recipient is. Do you understand the topic of that
8 question?
9 **A. Yes.**
10 Q. Do you agree with me, Mr. Galaz, that for
11 that topic, the identity or sender -- the identity
12 of the sender or recipient of the e-mail, has
13 nothing at all to do with how long it takes to find
14 it? Agreed?
15 **A. Not necessarily. You can have thousands**
16 **of e-mails, and it can take a lot of time to find**
17 **those e-mails.**
18 Q. Do you think you have thousands of e-mails
19 with your father with -- that you either sent to
20 him or received from him that refer to Julian
21 Jackson?
22 **A. No.**
23 Q. How many do you think you have?
24 **A. I don't know. Definitely not thousands.**
25 Q. Definitely not thousands. Fewer than 100?

Page 74

1 **A. I don't know.**
2 Q. Somewhere between 100 and 1,000?
3 **A. I don't -- I suppose. I don't know.**
4 Q. Do you think it would be difficult, in
5 terms of time involved or effort involved, for you
6 to locate them?
7 **A. It would be easy to locate the e-mails**
8 **between Trey, Brian, Raul, and myself, as they**
9 **are attorney/client privileged, and we track that.**
10 **And that has been provided to you, I believe.**
11 (Exhibit No. 12 is marked.)
12 Q. (By Mr. Lea) Mr. Galaz, would you look
13 with me at the item I've just handed you, as
14 Deposition exhibit 12, which I'll tell you are the
15 45 pages of documents that I have received from
16 RTG in response to discovery requests in this case.
17 Tell me when you're ready to answer a few questions
18 about that.
19 **A. Okay. Let me look through it.**
20 Q. I'll tell you, Mr. Galaz, those 45 pages
21 there together, in Deposition Exhibit 12, are the
22 only documents that I have received from RTG in
23 response to discovery requests in this case.
24 Do you think there are supposed to be
25 additional documents that I was supposed to have

Page 75

1 received but haven't?
2 **A. No.**
3 Q. Did you participate in assembling these
4 documents to be provided to me in this case?
5 **A. Yes.**
6 Q. Did you participate in the decision about
7 what would and wouldn't be produced?
8 **A. Yes.**
9 Q. And these are the only 45 pages that you
10 decided to turn over; correct?
11 **A. Yes.**
12 Q. Back to Deposition Exhibit 11, Mr. Galaz.
13 On the first page, down at the very last line, who
14 is that potential party to this litigation?
15 **A. I think this was just legal terminology**
16 **put together to identify that -- that this was**
17 **communication between our lawyers, and that was**
18 **protected. So it may not have specified a**
19 **specific person or individual.**
20 Q. Are you aware of any potential parties?
21 **A. No.**
22 Q. What is your father's -- where it says in
23 the course of Raul Galaz, acting on behalf of RTG
24 and it's referring to this lawsuit, how has your
25 father acted on behalf of RTG in this lawsuit?

Page 76

1 **A. He hasn't acted on behalf of RTG in this**
2 **lawsuit.**
3 Q. Why does it say that he has?
4 **A. Because he has acted on behalf in terms**
5 **of the ownership of the property, but not on --**
6 **he has never acted on my behalf in terms of the**
7 **rights discussed.**
8 Q. Whatever it means here, what -- how has
9 he had -- what communications has he had that
10 were in the course of him acting on behalf of
11 RTG?
12 **A. Communications could have been -- well,**
13 **if -- if it existed, which I don't have --**
14 Q. What does that mean you don't have?
15 **A. I don't have any exact communications that**
16 **he has here outside of what was attorney?client**
17 **privileged.**
18 Q. Oh, okay. But he's spoken on the phone
19 with you, right?
20 **A. Yes.**
21 Q. And -- and Trey White, right?
22 **A. Yes.**
23 Q. And Brian Boydston?
24 **A. Yes.**
25 Q. About RTG's -- about this lawsuit for RTG,

Page 77

1 right?
2 **A. Yes.**
3 Q. Back -- back to the potential party; it
4 refers to a common interest. Who does RTG have a
5 common interest with?
6 MR. WHITE: Objection. That's a legal
7 question.
8 Q. (By Mr. Lea) Go ahead. You can answer.
9 **A. I agree with Trey's statement.**
10 MR. LEA: Are you instructing him not to
11 answer?
12 MR. WHITE: I am not.
13 Q. (By Mr. Lea) Who is -- with whom does
14 RTG have a common interest in this lawsuit?
15 MR. WHITE: Same objection.
16 **THE WITNESS: That requires a judicial**
17 **decision, which I can't make right now.**
18 Q. (By Mr. Lea) What do you need to make it?
19 **A. It's based off of what everyone decides**
20 **on.**
21 Q. Okay. Are you able to tell me, Mr. Galaz,
22 who the person is or company with whom RTG has a
23 common interest in this litigation, as that
24 expression is used here in RTG's responses to
25 discovery requests?

Page 78

1 **A. Do I have a common interest with -- is**
2 **that what you're -- repeat what you were saying.**
3 Q. I read this, and I get from it that
4 there is a potential party to this litigation with
5 a common interest with RTG, and I want to know who
6 that is?
7 **A. I think that's to be decided upon.**
8 Q. By whom?
9 **A. The court.**
10 Q. The court is going to decide whether or
11 not there is somebody that has a common interest
12 with RTG?
13 **A. I believe so, yes.**
14 Q. Who -- who is on the list of potential
15 candidates? Your mother? Who else?
16 **A. Yes. And my father, as he is a 25**
17 **percent owner.**
18 Q. So is your father the potential party
19 to this litigation with a common interest?
20 **A. To clarify, I believe that term is**
21 **referring to the money that has been collected**
22 **by Lisa, and determining, based off of the Court's**
23 **decision on how they decide to move forward with**
24 **how funds get pushed out, it could potentially**
25 **be Raul, but I'm not sure.**

Page 79

1 Q. Who on behalf of RTG does know?
2 **A. I don't know.**
3 Q. There's a sentence on the next page,
4 Mr. Gaiaz, that begins "to the extent that", and it
5 continues several lines, and then it -- and then it
6 says, "or there are no responsive documents." And
7 it's referring to communications exclusively
8 between RTG and Raul Gaiaz. And, so, what I want
9 to know which is it, are there communications and
10 they are privileged, or is it that there are no
11 responsive documents?
12 **A. In an event that they're communications**
13 **as privileged, in the event that they are not**
14 **privileged, there are no responsive documents.**
15 Q. Are you saying that the only documents
16 there are, are privileged? Is that what you're
17 saying?
18 **A. When it comes to the ownership of the**
19 **rights, yes.**
20 Q. Okay.
21 MR. WHITE: Can we go off the record for
22 just a second?
23 MR. LEA: Sure.
24 THE VIDEOGRAPHER: 11:53, we're off the
25 record.

Page 80

1 (Brief recess.)
2 THE VIDEOGRAPHER: 11:54, we're back on
3 the record.
4 Q. (By Mr. Lea) Mr. Gaiaz, for the documents
5 that either are or reflect communications that
6 include you and your father, whether he is the
7 sender or recipient, or you're the sender or the
8 recipient, are they all e-mail? Is there anything
9 other than e-mail?
10 **A. Phone call.**
11 Q. But I want things that are memorialized,
12 in either printed or electronic form?
13 **A. No.**
14 Q. There are --
15 **A. There are no other documents.**
16 Q. Are there texts?
17 **A. No.**
18 Q. Are there any recorded voicemail messages?
19 **A. No.**
20 Q. Is there any instant messaging?
21 **A. Not with regard to the rights, no. I talk**
22 **to my father as anyone would talk to their father.**
23 Q. Okay. Are there any documents that contain
24 or reflect any communications that went between you
25 and your father, perhaps others, but at least you

Page 81

1 and your father of -- that have anything at all to
2 do with this case, other than e-mails?
3 **A. No.**
4 Q. Your e-mail address is galazryan@gmail.com?
5 **A. Yes, Gaiaz Ryan at gmail.com.**
6 (Exhibit No. 13 is marked.)
7 Q. (By Mr. Lea) Mr. Gaiaz, have you ever seen
8 what I've marked as Deposition Exhibit No. 13
9 before?
10 **A. I don't recall seeing this before.**
11 Q. Deposition Exhibit 13 is a collection;
12 it's 9 pages of e-mail, that includes e-mail to
13 and sent to, or received from your father, AnnMarie
14 Mori, and at least one to you. Right?
15 **A. Let me read through this. All right.**
16 Q. Let's start with -- well, let's do this:
17 Exhibit 13 is a collection of e-mails, isn't it?
18 **A. Yes.**
19 Q. Sent to or received from either your
20 father, AnnMarie Mori@troygould, and at least one
21 to you; correct?
22 **A. Yes, the first one to me.**
23 Q. You received the very first e-mail, that
24 is the first page, of Deposition Exhibit 13, didn't
25 you?

Page 82

1 **A. Yes, as it shows at the top.**
2 Q. Did your father discuss with you the topic
3 of these e-mails that he was sending back and forth
4 and receiving from BMI?
5 **A. Not really. I --**
6 Q. Yes or no?
7 **A. Well, it's -- we didn't talk about it that**
8 **much.**
9 Q. Did you --
10 **A. It was mentioned.**
11 Q. Well, tell me what was mentioned.
12 **A. It was mentioned that money wasn't being**
13 **paid through -- through BMI to the court registry**
14 **and there was someone else who was being paid that**
15 **money.**
16 Q. That was -- when you say that it was
17 mentioned in the past, you mean your father told
18 you so that RTG would know. Right?
19 **A. Yes.**
20 Q. Your father's e-mail address on these
21 e-mails, at least, is Raulgalaz1@aol.com?
22 **A. Yes.**
23 Q. Is -- does he -- did he use other e-mail
24 addresses in his communications that involve the
25 music rights?

Page 83

1 **A. No.**
2 Q. Only that e-mail address?
3 **A. Yes.**
4 Q. What is the litigation --
5 **A. Well, to clarify, I don't know that. I**
6 **don't know if that's his only e-mail.**
7 Q. Is he authorized -- was he authorized to
8 conduct these communications on behalf of RTG?
9 **A. No.**
10 Q. Did you reprimand him for doing this?
11 **A. I don't understand how I would reprimand**
12 **him for this.**
13 Q. Why did he share this information with
14 you? Because it involved RTG, right?
15 **A. I believe this was more of a matter between**
16 **him and BMI, and it didn't -- at the time I didn't**
17 **think that this included me or RTG, so --**
18 Q. So in the e-mail that's on page 5 --
19 **A. Uh-hum.**
20 Q. -- the one on January 30th, 2019, what
21 litigation was going on with regard to this
22 matter?
23 **A. To be honest, I wasn't involved in this**
24 **at ail, so I can't talk about it clearly.**
25 Q. However you can talk about it, you do know

Page 84

1 that there was litigation going on between RTG and
2 your mother involving the BMI royalties, and the
3 rights that we're talking about on January 30th,
4 2019, don't you?
5 **A. To clarify, RTG wasn't involved in this**
6 **discussion, other than being cc'd on the first**
7 **e-mail. That was a matter between my father and**
8 **BMI.**
9 Q. I understand you're telling me that.
10 That's not my question. I want to try to ask you
11 a different question. I want to ask you to confirm
12 for me that on January 30th of 2019, there was
13 litigation between RTG and your mother, that
14 involved the music rights we're talking about and
15 BMI's collection of the royalties on those rights,
16 wasn't there?
17 **A. Yes.**
18 Q. That is one piece of litigation your
19 father might have been referring to in this e-mail
20 that's on page 5 of Exhibit 13, right?
21 MR. WHITE: Are you asking him to
22 speculate as to what his father was doing? I'm
23 confused with what your question is, I'm sorry.
24 Q. (By Mr. Lea) I want you to make a list
25 for me of all of the pieces of litigation you know

Page 85

1 of that might fit the description in this e-mail
2 on page 5, just below the middle in Exhibit 13.
3 **A. I'm sorry, can you repeat that question,**
4 **again.**
5 Q. Sure. I want to try to understand what
6 this is, where it says there is litigation going
7 on. Do you see that?
8 **A. Which page is it?**
9 Q. On page 5 of Exhibit 13 --
10 **A. Okay.**
11 Q. -- an e-mail that begins about in the
12 middle of the page, from your father to AnnMarie
13 Mori, on Wednesday, January 30th, 2019, at 1:42
14 p.m. Do you see that e-mail?
15 **A. Yes.**
16 Q. Would you take a moment and read it,
17 and tell me when you're ready to answer some
18 questions about it?
19 **A. Okay.**
20 Q. Now, I'm going to suggest to you -- I am
21 suggesting to you Mr. Galaz, that at least one
22 piece of litigation that fits the description here
23 is RTG's litigation against your mother. Do you
24 understand that suggestion?
25 **A. Yes, but I -- I only have -- I was only**

Page 86

1 **included on the first e-mail. I wasn't included**
2 **on any of these conversations. So, how would I**
3 **have those documents?**
4 Q. I'm not asking you about documents. I'm
5 asking you if you can help me try to understand what
6 your father might be -- have been referring to in
7 this e-mail. Will you do that?
8 MR. WHITE: Objection; calls for the
9 witness to speculate.
10 **THE WITNESS: As I mentioned earlier, it**
11 **was about monies mis-paid.**
12 Q. (By Mr. Lea) Okay. And now my question
13 to you is: Are you aware of any litigation that
14 existed on Wednesday, January 30th of 2019, that
15 involved BMI's collections of the royalties on the
16 music rights we're talking about, other than RTG's
17 litigation against your mother?
18 **A. I'm not familiar with that matter.**
19 Q. With which matter?
20 **A. BMI and what you were just saying.**
21 Q. Okay. So let's put Exhibit 13 down.
22 **A. Okay.**
23 Q. Without reference to Exhibit 13 --
24 **A. Okay.**
25 Q. -- you know that on January 30th, 2019,

Page 87

1 there was litigation between RTG and your mother
2 that involved BMI's collection of royalties on the
3 music rights we're talking about, don't you?
4 **A. Yes.**
5 Q. Other than that piece of litigation, are
6 you aware of any other litigation that involved
7 BMI's collection of royalties on the Ohio Player
8 music?
9 **A. No.**
10 Q. Okay. Look with me, if you would,
11 Mr. Galaz, in Exhibit 11, RTG's responses to your
12 mother's discovery request. And I want to look
13 with you now at Request No. 4 in the response.
14 **A. Okay.**
15 Q. Please read the request and the response,
16 and tell me when you're ready to answer some
17 questions about that.
18 **A. (Witness complies.)**
19 Q. Are you ready to proceed?
20 **A. Yes.**
21 Q. When that response says that there are no
22 communications between Raul Galaz and BMI, no
23 responsive documents, that's not true, is it?
24 **A. I don't recall this e-mail, and if I did**
25 **know it, I would have provided it. But I also**

Page 88

1 **wasn't included on any of those follow-up e-mails**
2 **that Raul sent to BMI. So as far as communications**
3 **with BMI, this is everything.**
4 Q. I appreciate you telling me that. It's
5 not what I meant to you ask you, so let me try
6 again. RTG's response, these words on this page
7 where it says as regards communication between Raul
8 Galaz and BMI, there are no responsive documents,
9 that statement is false, isn't it?
10 MR. WHITE: Objection.
11 Q. (By Mr. Lea) Go ahead. You can answer.
12 **A. Not that I was aware of at that time.**
13 Q. I'm not asking you about a date or a time.
14 Today, as you sit here answering these questions
15 with me, you know that statement is false, don't
16 you?
17 **A. To clarify, at the time prior -- prior to**
18 **this being submitted, I wasn't aware of this. There**
19 **is this document now, yes.**
20 Q. Today you know that statement is false,
21 don't you?
22 **A. Yes, but there wasn't communications with**
23 **BMI and RTG.**
24 Q. There were communications between RTG and
25 your father, weren't there?

Page 89

1 **A. That were attorney/client privileged, yes.**
2 Q. Is it your position, Mr. Galaz, that many
3 of these communications in Deposition Exhibit 13
4 are subject to an attorney/client privilege?
5 **A. Not this, but we also objected to that,**
6 **too, so -- in terms of it not being relevant to**
7 **this situation.**
8 Q. Communications with BMI are relevant,
9 aren't they?
10 **A. Yes.**
11 Q. Okay. Communications with Bug, or BMG are
12 relevant, aren't they?
13 **A. Yes, but I haven't had any communications**
14 **with BMI.**
15 Q. Now only your father has had communications
16 with BMI, right?
17 **A. Yes.**
18 Q. Are there documents that reflect the money
19 that RTG has received from Bug, or BMG?
20 **A. Not that I can recall.**
21 Q. How did -- how did RTG receive the money?
22 **A. Direct deposit.**
23 Q. And so there's a bank statement that
24 reflects the deposit, isn't there?
25 **A. Yes.**

Page 90

1 Q. Are there any e-mails from you or anyone
2 else on behalf of RTG asking for payment of the
3 money?
4 **A. Yes.**
5 Q. Why hasn't RTG produced those documents?
6 **A. Because the discussion right now is in**
7 **terms of the validity of the transfer of the claim,**
8 **not what has been paid out to RTG.**
9 Q. Well, how do you know that's the
10 discussion right now?
11 **A. Because it sound like it.**
12 Q. Have you looked at all of your mother's
13 counterclaim against RTG?
14 **A. Yes.**
15 MR. WHITE: The counterclaim that was
16 filed last week?
17 MR. LEA: That one.
18 MR. WHITE: Prior to or subsequent to the
19 answers of the discovery?
20 MR. LEA: The one that was filed before and
21 after the e-mail in which I asked RTG to supplement
22 its responses and produce all of the documents that
23 it hadn't yet produced, that one.
24 Q. (By Mr. Lea) You know that your mother is
25 making a counterclaim against RTG that involves the

Page 91

1 BMG collections, don't you?
2 **A. Can you clarify which claim you're making?**
3 Q. Yeah. Mr. Galaz, I handed you a copy of
4 your mother's first amended complaint -- answer to
5 the first amended complaint and counterclaims in
6 this case. You're familiar with that, aren't you?
7 **A. Yes.**
8 Q. You know that, as an example, on page 18
9 in paragraph 42, there's a reference to your mother
10 asking for a judgment against RTG for the amount of
11 money it received along with other remedies to which
12 she is entitled. Do you see that?
13 **A. Paragraph 42?**
14 Q. Yes.
15 **A. Yes.**
16 Q. And we know now that RTG has received money
17 from BMG, Bug Music, right?
18 **A. Yes.**
19 Q. Do you understand that your mother is
20 asserting a counterclaim about that money in this
21 case?
22 **A. I see -- yeah, I see her counterclaim**
23 **here. Yes.**
24 Q. Do you agree that documents that involve
25 or relate to communications between RTG and BMG, or

Page 92

1 Bug Music are relevant?
2 **A. I personally don't, and my attorneys don't.**
3 Q. Okay. And -- and is that why RTG didn't
4 supplement or update, or provide any additional
5 documents last week, is because RTG contends that
6 the documents that are communications between RTG
7 and Bug Music are just not relevant?
8 **A. First off, that would require me to**
9 **speculate. There are multiple requests where we**
10 **did not provide responses to, so it could have been**
11 **because they were attorney/client privileged, or**
12 **because they were not relevant, or did not exist.**
13 Q. But we know now that they do -- there do
14 exist documents that are communications between
15 RTG and BMG, right?
16 **A. Yes.**
17 Q. And -- and we do know that you personally
18 communicated with BMG to ask for money. Was there
19 a lawyer involved in that communication?
20 **A. I don't recall.**
21 Q. But if there was, it would have been a
22 communication that also included BMG, right?
23 **A. You're asking me to speculate right now.**
24 **I don't know.**
25 Q. When you communicate with BMG, do you

Page 93

1 communicate with BMG?
2 **A. Yes.**
3 Q. And, so, if there is a document that
4 reflects a communication between you and BMG, if it
5 involved the lawyer, it would at least still involve
6 BMG, right?
7 **A. Yes.**
8 Q. Is it your position, Mr. Galaz, that your
9 communications directly with BMG are privileged,
10 even if they include your lawyer?
11 **A. No.**
12 Q. Okay. Does RTG have invoices or bills
13 from Brian Boydston's law firm for its work on
14 behalf of RTG?
15 **A. No. At least none that I can find.**
16 Q. No invoices or bills?
17 **A. He receives -- after I was -- Brian**
18 **informed me of what I needed to pay him after we**
19 **acquired the rights, and that's why I paid him.**
20 Q. How did he inform you of what you needed
21 to pay him?
22 **A. He called me.**
23 Q. He didn't send you a bill or an invoice?
24 **A. Not that I recall.**
25 Q. Have you looked?

Page 94

1 **A. Yes.**
2 Q. Look with me, if you would, Mr. Galaz, on
3 the page that is numbered 6 of 8, in Deposition
4 Exhibit 11, continuing in the --
5 **A. Yeah.**
6 Q. Down there at the bottom -- you can take
7 as much time, Mr. Galaz, to read as much of this
8 as you want. I want to ask you some questions
9 about the response to interrogatory number one
10 that is at the bottom of page 6 of 8.
11 **A. (Witness complies.) Okay. I read it.**
12 Q. The answer to the question about when you
13 first learned of the opportunity to acquire any
14 right, is September 29, 2016, or earlier. It says
15 the exact date is unknown. I want you to tell me
16 what RTG has done to investigate what the exact
17 date was.
18 **A. It's hard to tell because it was through**
19 **a phone call.**
20 Q. What has RTG done to investigate?
21 **A. I tried to look at my phone calls.**
22 Q. Did you find one?
23 **A. To verify, I don't think I -- you can't**
24 **even look back that far in terms of phone calls.**
25 Q. If you look at Interrogatory No. 2, do I

Page 95

1 understand the response to that to tell me, in
2 essence, that the earliest date could have been
3 as early as August 25th, 2014?
4 **A. No.**
5 Q. What's the significance of August 25th,
6 2014?
7 **A. That would require me to speculate, but I**
8 **believe that was when the claim was created and --**
9 Q. Is there any more you can tell me about
10 that?
11 **A. No, outside of that -- well, outside of**
12 **that, it states here, again, the time frame when I**
13 **learned of the right to acquire the claim.**
14 Q. And when you learned, was it some point
15 after August 25th, 2014, and before September 29,
16 2016?
17 **A. Yes, but it was around September 2016.**
18 Q. So, why did you include something about
19 2014 in your answer?
20 **A. I don't recall the exact reason, but I**
21 **think that was primarily to call out that was when**
22 **the claim became apparent. So it's just to give**
23 **somewhat of a time frame between 2014 and 2016, but**
24 **primarily focused on September 2016.**
25 Q. In response to Interrogatory No. 4, you

Page 96

1 have told me that the identity of the persons who
2 gave you any information about the value of the
3 rights of Julian Jackson is not relevant?
4 **A. This isn't relevant because I wasn't aware**
5 **of the value at that time.**
6 Q. Today I'm asking you to answer the
7 question. Will you answer the question today?
8 **A. Yes. Can you rephrase your question.**
9 Q. The question that is right here in black
10 and white in Interrogatory No. 4, on page 7 of 8,
11 in Deposition Exhibit 11, will you identify each
12 of the persons who gave you any information on or
13 relating to the value of the rights of Julian
14 Jackson in or to the music of the Ohio Players?
15 **A. The reason why that was objected to --**
16 Q. May I interrupt you? I'm not asking you
17 why you objected to it. I'm asking you if today
18 you will answer the question and identify those
19 persons.
20 **A. I found out once I communicated with --**
21 **after I set up my account with Bug Music, BMG.**
22 Q. Can you tell me the names of the persons?
23 **A. No one specifically told me the value.**
24 **It was the moment that I inputted my information,**
25 **my financial information and received the money**

Page 97

1 was when I knew the exact value.
2 Q. Okay. Before you knew the exact value,
3 can you identify for me the persons who gave you
4 any information at all about the potential value?
5 A. No.
6 Q. Why can't you identify those persons for
7 me?
8 A. Because no one knew the potential value.
9 Q. Did your father tell you he expected
10 there was money at Bug, or BMG?
11 A. No -- well, he -- he told me, as would
12 any owner of the Ohio Players would, that there was
13 money that was flowing through, but as to the value
14 of that money, nothing was relevant at that point
15 in time.
16 Q. I don't understand what you mean by
17 nothing was relevant. Money is relevant, isn't it?
18 A. Yeah, but the exact value wasn't anywhere
19 to be determined at that point in time.
20 Q. I -- I understand the exact value wasn't
21 to be determined,
22 A. Uh-hum.
23 Q. I want to know if your father shared with
24 you any information, any estimate, any approximation
25 even any guess of how much money might be at Bug, or

Page 98

1 BMG?
2 A. No.
3 Q. Ever?
4 A. He shared with me -- well, he informed me
5 of the flow of money, but he never gave me any
6 type of value associated with those rights.
7 Q. Did he tell you how much money your mother
8 had received from Bug?
9 A. Yes, because he had been tracking the
10 amount of money that had been collected by the Court
11 registry, and he could see the amount that Lisa was
12 filing to obtain.
13 Q. Did he tell you how much money your mother
14 had obtained from BMG?
15 A. No -- no exact value, no.
16 Q. Did -- did he give you any estimate or
17 approximation of the amount of money your mother
18 had obtained from BMG?
19 A. Not that I can recall right now, but the
20 talks of value came after he discovered the amount
21 of value that -- or the amount of money that Lisa
22 had been obtaining through the court registry.
23 Q. Is your father authorized to conduct any
24 business on behalf of RTG?
25 A. In terms of the Ohio Players, no.

Page 99

1 Q. In terms of anything?
2 A. In terms of the property, he -- he can act
3 on behalf of RTG.
4 Q. Which property?
5 A. 4531 Prairie Avenue.
6 Q. And the condominium?
7 A. I don't think so.
8 Q. Why is he limited or prevented from
9 acting on behalf of RTG in relation to the
10 condominium?
11 A. There wasn't a specific reason. The --
12 yeah, the duplex was being renovated.
13 Q. Let's take a short break.
14 THE VIDEOGRAPHER: 12:28. End of media
15 two. We're off the record.
16 (Brief recess.)
17 MR. LEA: Are you ready to proceed?
18 THE WITNESS: Yes.
19 THE VIDEOGRAPHER: Stand by, please. It's
20 12:35, beginning of media number three. We're on
21 the record.
22 Q. (By Mr. Lea) When do you think, Mr. Galaz,
23 is the first time that your mother should have
24 known anything at all about RTG acquiring anything
25 involving Julian Jackson from your grandfather Al?

Page 100

1 A. I don't know. The moment -- well,
2 actually, the moment that I acquired the rights.
3 Q. How should she have known that you
4 acquired the rights?
5 A. Me talking to her.
6 Q. Did you tell her?
7 A. I did.
8 Q. You told her on the day you acquired the
9 rights that you had acquired the rights?
10 A. No, I told her once they -- well, I told
11 her in, what was it, August.
12 Q. Of 2018?
13 A. Yes.
14 Q. Okay. Before that -- I may quibble with
15 you a little bit and say it's September, but
16 before that day in 2018, how do you think your
17 mother should have known that anything at all had
18 happened with the right that Segundo Suenos once
19 had to sue Julian Jackson?
20 A. I'm sorry, can you --
21 Q. I'll try.
22 A. -- rephrase that.
23 Q. Sure.
24 A. Or repeat that.
25 Q. The -- am I correct that the essence of

Page 101

1 RTG's lawsuit against Jackson, was that RTG was
2 suing on a right that Segundo Suenos once had?
3 Yes?
4 **A. Yes.**
5 Q. All right. RTG was saying that at a point
6 in time Jackson owed Segundo Suenos money?
7 **A. Yes.**
8 Q. And RTG was suing him for that money,
9 right?
10 **A. Yes.**
11 Q. How should your mother have known before
12 your phone call with her in August or September
13 of 2018 that RTG had acquired what previously had
14 been Segundo Suenos' right to sue Jackson?
15 **A. I think in -- I also believe that does**
16 **require -- well, I'm not -- I don't want to**
17 **speculate on that, so --**
18 Q. Can you think of any way that you think
19 your mother should have known that? If you can,
20 tell me. If you can't, tell me you can't.
21 **A. I -- I don't want to speculate on that.**
22 **So, I don't know.**
23 Q. Okay. I want you to tell me every way
24 that you know of that isn't speculation, that you
25 think your mother should have known that RTG at

Page 102

1 any point had acquired what previously had been
2 Segundo's right to sue Jackson?
3 **A. I think that if -- if I were to collect**
4 **money, then she should know that I'm collecting**
5 **money on behalf of Julian Jackson at that time.**
6 Q. Okay. When did you first collect money?
7 **A. In June 2018 after I collected -- or**
8 **after I obtained the rights to Julian Jackson --**
9 **Julian Jackson share. Sorry.**
10 Q. That would have been in 2018?
11 **A. Yes.**
12 Q. All right. Before that, how should your
13 mother have known that RTG, at any point, had
14 acquired what had previously been Segundo's right
15 to sue Jackson?
16 **A. I don't know. I don't know if she needed**
17 **to know.**
18 Q. All right. How should your mother have
19 known that your grandfather Al, at any point,
20 acquired what had been Segundo's right to sue
21 Jackson?
22 **A. I don't know.**
23 Q. How did your grandfather acquire what
24 previously had begun what had previously been
25 Segundo's right to sue Jackson?

Page 103

1 **A. I don't -- I don't know the specifics,**
2 **the legal proceedings between them back then.**
3 Q. I want to know everything you do know
4 about how your grandfather acquired what had
5 previously been Segundo's right to sue Julian
6 Jackson?
7 **A. That was through knowledge of Brian**
8 **Boydston and my lawyer, on -- so that knowledge**
9 **was on his behalf. I don't know specifically how**
10 **he obtained that right. And I'm referring to Al**
11 **Galaz.**
12 Q. Okay. Do you know anything that isn't
13 privileged about how your grandfather Al obtained
14 what had previously been Segundo's right to sue
15 Jackson?
16 **A. I don't know.**
17 Q. Why didn't someone tell your mother when
18 Segundo transferred the right to sue Jackson to
19 your grandfather?
20 **A. At the time no one thought that it was**
21 **required.**
22 Q. You weren't even involved, were you?
23 **A. When specifically?**
24 Q. In 2015, in your declaration that you
25 swore to in California, in the first paragraph,

Page 104

1 first sentence of paragraph six, in Deposition
2 Exhibit 5, you said in January 2015, SSL -- which
3 you understand to be Segundo Suenos, right --
4 **A. Yes.**
5 Q. -- transferred its rights against Jackson
6 to Alfred Galaz. You want -- you had no involvement
7 in that?
8 **A. No involvement.**
9 Q. So you had no involvement in the decision
10 not to inform your mother about that, did you?
11 **A. No involvement in that.**
12 Q. So, you don't know why anyone chose not
13 to tell your mother about that, do you?
14 **A. No.**
15 Q. Why did you choose not to tell your mother
16 about receiving the rights from your grandfather
17 in late September or early 2016?
18 **A. I personally -- I love my mom and I love my**
19 **dad, and I wanted to keep their lives separate from**
20 **each other, and as I -- as how I understood it,**
21 **this would not be involved with my mom in -- at the**
22 **time. That's why it did not need to be shared with**
23 **her, from my personal opinion.**
24 Q. When in your mind did it come to involve
25 your mom?

Page 105

1 A. **The moment that the filing came up back**
2 **in -- around this past August, I guess, when she**
3 **had done the filing to collect all money held in**
4 **the registry by BMI.**
5 Q. And is that what prompted you to the
6 decision that you needed to iitigate against your
7 mother?
8 A. **No.**
9 Q. What prompted you to the decision that
10 you needed to iitigate against your mother?
11 A. **Her refusal to accept my 50 percent**
12 **ownership of the rights.**
13 Q. When did she refuse to accept your 50
14 percent ownership of the rights?
15 A. **The day I told her.**
16 Q. Why did you call her to tell her that day?
17 A. **Because she was -- she was putting in an**
18 **order to collect all money withheld by the court**
19 **registry with BMI. And since 50 of that -- 50**
20 **percent of that should have gone to me, acting in**
21 **the -- the shoes of Julian Jackson, it was my**
22 **responsibility to inform her of that and work**
23 **something out with her.**
24 Q. How did you know she was trying to collect
25 all the money?

Page 106

1 A. **Because that's everything that was held**
2 **there at the time.**
3 Q. How did you learn that she was trying to
4 collect anything?
5 A. **It's public record.**
6 Q. Let me try again: How did you learn
7 yourself, personally, that she was trying to
8 collect anything?
9 A. **I can look that up on the Internet --**
10 Q. Did you --
11 A. **-- and on --**
12 Q. -- look that up?
13 A. **Yes, I did look it up.**
14 Q. When?
15 A. **Around that time.**
16 Q. Before or after you called your mother?
17 A. **Before.**
18 Q. And you saw something that said she was
19 trying to collect everything?
20 A. **Yes.**
21 Q. You saw something online that said that?
22 A. **Everything -- everything, yes.**
23 Q. Did you save that document?
24 A. **No.**
25 Q. But it's something you saw in the official

Page 107

1 records of the Court?
2 A. **It was a document online stating that she**
3 **was putting in that order to receive all money.**
4 Q. Yeah, and I want to be able to identify
5 what you were looking at, and then I'm wondering
6 where you saw it. Did you see it in the official
7 records of the Court?
8 A. **I believe that was -- that would cause me**
9 **to speculate, but, yes, I believe that's -- that**
10 **would be the place.**
11 Q. Okay. When you talked to your mother,
12 did she ask you how you had come to stand in
13 Jackson's shoes?
14 A. **She did.**
15 Q. What did you tell her?
16 A. **I told her that I pursued a claim that**
17 **was transferred to me by my grandfather, and I sued**
18 **Julian Jackson, and prevailed.**
19 Q. Did you tell her what claim it was that had
20 been transferred to you?
21 A. **Not specifically what claim.**
22 Q. Generally what claim did you tell her?
23 A. **Yes, I believe so. And -- yeah.**
24 Q. You told her that you had pursued a claim
25 that once had been belonged to Segundo Suenos?

Page 108

1 A. **Yes.**
2 Q. And had been transferred to your
3 grandfather, and then from him to RTG?
4 A. **Yes.**
5 Q. And that you had prevailed on that claim?
6 A. **Yes. We actually -- to clarify everything**
7 **we didn't go into specifics on that first call**
8 **because my mom all -- suddenly became defensive,**
9 **and thought I was against her, and then hung up on**
10 **me.**
11 Q. Why do you think she thought you were
12 against her?
13 A. **Because she thinks that associating with**
14 **my father is against her.**
15 Q. Well, suing her is against her, isn't it?
16 A. **I wasn't suing her at that time.**
17 Q. About how much longer after that before
18 you sued her?
19 A. **That was when we sued her in -- I think it**
20 **was -- I can't remember the exact time line, but in**
21 **January or February, after her surgery.**
22 Q. When did you know your mother was having
23 surgery?
24 A. **I believe that was -- I knew actually a**
25 **long -- much further back, maybe -- maybe -- well,**

Page 109

1 actually I can't -- I can't pinpoint the time
2 frame, but I didn't know of the exact date when she
3 was having the surgery. I knew she was having the
4 surgery, though.
5 Q. Did you know that when you talked to her
6 in August or September of 2018?
7 A. Yes, but she was actually debate -- oh,
8 she was debating whether or not she would have the
9 surgery, so I didn't even know it would occur.
10 Q. Did you know that surgery was something
11 she was contemplating?
12 A. Yes.
13 Q. When did you learn that your mother had
14 cancer?
15 A. March of 2018.
16 Q. What was your understanding at the time of
17 that phone call about the significance to her in
18 the -- having the income from the royalties?
19 A. Which -- which specific call? Are you --
20 are you referring to the call when i first called
21 her to inform her of my -- my ownership?
22 Q. Let's start with that one.
23 A. What was the significance of the call?
24 Q. Yes.
25 A. To explain to her that --

Page 110

1 Q. I'm sorry, let me -- I must have asked you
2 a bad question. I'm wondering if -- well, let me
3 do it this way: I suggest to you, that for her the
4 income from the royalties on the rights is a really
5 important source of income for her.
6 A. Uh-hum.
7 Q. Am I wrong about that?
8 A. No.
9 Q. And, so, you knew that was so when you
10 called her that first time to tell her that you
11 were going to be stepping in to claim some of the
12 royalties, didn't you?
13 A. Yes. The -- the royalties that should
14 have been going directly to Julian anyway, yes.
15 Q. What do you know today about the
16 injunctions the Court signed prohibiting any
17 transfer of Segundo's rights or claims to sue?
18 A. My knowledge is limited. I don't know
19 much at all. I wasn't involved in that case.
20 Q. But you swore in your declaration that
21 you had personal knowledge about the facts of the
22 case, didn't you?
23 A. That was put together by my lawyer, and
24 while it was stated that there was a preliminary
25 injunction, I had no understanding of what was

Page 111

1 entailed, because I never saw the actual
2 preliminary injunction document.
3 Q. But you're capable of going online and
4 reading things in the records of the Court, aren't
5 you?
6 A. Yes.
7 Q. So why didn't you -- and -- and you knew
8 when you signed that declaration, your declaration
9 referred to the judgment that's dated September 10
10 of 2010, doesn't it?
11 A. My lawyers insured that everything in there
12 was valid and there was nothing wrong with what I
13 was signing.
14 Q. How do you know that?
15 A. Because I took the advice of my lawyer.
16 Q. But that's two different things, isn't it,
17 one, taking the advice of your lawyer, and the
18 other, knowing that they're right? Those aren't
19 the same things, are they?
20 A. My lawyer's advice should be correct. So
21 I would assume those are two in the same.
22 Q. Okay. But today you've read the Court's
23 judgment and preliminary injunction, haven't you?
24 A. The specific document, no.
25 Q. Today you still haven't read the

Page 112

1 preliminary injunction?
2 A. No, because the advice of my lawyer that
3 I wasn't in violation of the -- the preliminary
4 injunction.
5 Q. Was your grandfather in violation of the
6 preliminary injunction when he assigned the claim
7 to you?
8 A. No.
9 MR. WHITE: Objection. Calls for a legal
10 conclusion.
11 Q. (By Mr. Lea) Go ahead. You can answer.
12 A. As Trey noted, that requires a legal
13 decision.
14 Q. All I want to know is what you know about
15 it.
16 A. I don't know about it.
17 Q. I'll help you get there.
18 MR. LEAH: We're at number 14?
19 (Exhibit No. 14 is marked.)
20 Q. (By Mr. Lea) Mr. Galaz, I've handed you
21 what is marked as Deposition Exhibit 14, and it's
22 a copy of the Bankruptcy court's preliminary
23 injunction, dated May 9, 2008. Would you take a
24 moment to look at that, and tell me when you're
25 ready to answer some questions about it.

Page 113

1 **A. Okay.**
2 Q. Is what RTG acquired from your grandfather
3 a claim that once belonged to Segundo Suenos?
4 **A. Yes.**
5 Q. Why isn't it described by this preliminary
6 injunction?
7 **A. I can't -- I don't know. I wasn't involved**
8 **in this.**
9 Q. I understand you weren't involved, but you
10 are capable of reading it today, aren't you?
11 **A. Yes.**
12 Q. Today, capable of reading the preliminary
13 injunction as you are, why don't you think that
14 what you acquired from your grandfather is covered
15 by this preliminary injunction?
16 **A. This is one piece of the entire case, and**
17 **unless I had a full understanding of the entire**
18 **case, I can't just look at this document and say I**
19 **violated anything.**
20 Q. I'm not asking you to say you violated
21 anything.
22 **A. Okay.**
23 Q. I'm asking you why today you believe that
24 what you acquired from your grandfather wasn't
25 covered by this?

Page 114

1 **A. My lawyer has the specifics on that, and**
2 **that's why I would depend on when he gave me that**
3 **advice to pursue this claim.**
4 Q. Okay. Other than what you would rely on
5 from your lawyer, are you capable of articulating
6 any explanation yourself of why what you acquired
7 from your grandfather isn't covered by the Exhibit
8 14, the preliminary injunction?
9 **A. I'm incapable of explaining that.**
10 Q. You knew, though, at least by the time
11 you signed the declaration that is Exhibit 3 in
12 the California litigation, that there was a
13 December 2010 judgment that referred to the
14 preliminary injunction? Yes?
15 **A. Yes.**
16 Q. And you knew that the December 10 --
17 november 12, 2010, judgment itself specifically
18 required that the rights, claims, litigation, and
19 all records thereof of Segundo Suenos, should be
20 turned over to your mother?
21 **A. I was not --**
22 MR. WHITE: Objection.
23 **THE WITNESS: -- aware of that.**
24 Q. (By Mr. Lea) But you were aware of the
25 November 12th, 2010, judgment, weren't you?

Page 115

1 **A. To the extent that my lawyer provided it**
2 **to me.**
3 Q. Well, did somebody provide it to you before
4 you signed that declaration?
5 **A. No.**
6 Q. Hum. A moment ago, Mr. Galaz, I referred
7 to your declaration that you signed in California
8 litigation as Deposition Exhibit 3, and I was wrong;
9 it's Deposition Exhibit 5. And if anything about my
10 error has confused you in any way, please tell me
11 and we'll try to go back and clean that up. But so
12 that we're clear now at least, I want to ask you
13 some questions about Deposition Exhibit 5, which is
14 your declaration that you signed in the California
15 litigation in which you sworn under penalty of
16 perjury that you had personal knowledge of a
17 judgment rendered on November 12th, 2010, in the
18 adversary proceeding in the Western District of
19 Texas. You swore that the judgment was Exhibit "A"
20 to your declaration. Was it?
21 **A. Since I'm not looking through the exhibits**
22 **right now, which one are you referring to?**
23 Q. The one that's in your hands --
24 **A. Okay.**
25 Q. -- Deposition Exhibit 5, the second page.

Page 116

1 Paragraph three refers to Exhibit "A". Do you see
2 that?
3 **A. Yes.**
4 Q. Exhibit "A" was the judgment, wasn't it?
5 **A. I'm not looking at the exhibits right now,**
6 **but -- so I can't confirm that.**
7 Q. Okay. But it's easy for somebody to confer
8 that -- confirm that, because anybody who wants, can
9 go to the records of the Court and obtain a copy of
10 it, right?
11 **A. Yes.**
12 Q. And if, in the records of the Court,
13 Exhibit "A" is that judgment, you must have had a
14 copy of the judgment when you signed the
15 declaration, right?
16 **A. Yes.**
17 (Exhibit No. 15 is marked.)
18 Q. (By Mr. Lea) Do you have Exhibit 15 handy
19 now?
20 **A. (No response.)**
21 Q. Exhibit 15 is the judgment, isn't it,
22 Mr. Galaz?
23 **A. Yes.**
24 Q. And you know that your company has a copy
25 of this judgment in its official books and records

Page 117

1 because you know that this copy of that judgment
2 came out of your company's records, don't you?
3 **A. Yes.**
4 Q. What reason do you have to think today,
5 as we sit here, Mr. Galaz, that this Deposition
6 Exhibit 15 is not the genuine article that is the
7 deposition -- the judgment that you referred to as
8 Exhibit "A" when you swore to your declaration in
9 California?
10 **A. The judgment was included in this document**
11 **here. So I'm not denying that.**
12 Q. Okay. This judgment says, doesn't it,
13 Mr. Galaz -- and you had it in your records at the
14 time you signed the declaration, doesn't it -- you
15 knew that the Court had ordered that all rights,
16 claims, litigation, and records thereof, were to
17 be turned over to Lisa Galaz and Julia Jackson.
18 Right?
19 **A. No.**
20 MR. WHITE: Objection.
21 Q. (By Mr. Lea) Look with me, if you would,
22 Mr. Galaz, at page 3. It's also numbered RTG005.
23 At the bottom of page 4, didn't the Court order
24 your father, Segundo Suenos, Alfredo Carlos Galaz,
25 and anyone acting in active concert with any of

Page 118

1 them, with knowledge of this preliminary injunction
2 not to dismiss, compromise, settle, sign, or in any
3 way prejudice any of the rights, claims, or
4 litigation of Segundo Suenos? And it continues,
5 but I'm going to stop there. Wasn't that the
6 Court's order?
7 MR. WHITE: Objection.
8 **THE WITNESS: This is information provided**
9 **by my lawyer, and his advice was to include this.**
10 **And I believe that was solely for the purpose of**
11 **identifying Julian as the 50 percent owner at the**
12 **time.**
13 Q. (By Mr. Lea) I'm sorry. I must have
14 asked a bad question. I want to try to ask
15 something a little different. If you -- do you
16 see the sentence on page 3 in Deposition Exhibit
17 15 that begins on the left margin, the rights,
18 claims, litigation, and all records thereof? Do
19 you see that?
20 **A. Which page did you say? Not page 3.**
21 Q. It's numbered 3; it's also numbered
22 RTG005.
23 **A. RTG005. Okay. What was your question**
24 **again?**
25 Q. Do you see the sentence that begins on

Page 119

1 the left margin, about in the middle of the page,
2 the rights, claims, litigation, and it continues?
3 Do you see that?
4 **A. Yes.**
5 Q. I want to know why is what you acquired
6 from your grandfather not described or covered by
7 that sentence?
8 **A. That type of determination was not**
9 **something that -- that was made by my lawyer.**
10 **Ultimately he provided me the advice that -- that**
11 **ultimately what I was acquiring was valid, and at**
12 **the time that was in violation of any type of**
13 **injunction or whatever.**
14 Q. I don't want you to tell me what your
15 lawyer told you. I want to know what you think
16 today, yourself, as you read those words to
17 yourself today, as you understand them, and as you
18 reflect on what it is you acquired from your
19 grandfather, how is what you acquired from your
20 grandfather not covered by that sentence in Exhibit
21 15?
22 **A. Given my lack of understanding of the**
23 **entire case, and also my lawyer's understanding of**
24 **that case, that's why I'm taking the stance I am**
25 **taking today.**

Page 120

1 Q. I don't understand what -- I still don't
2 know what your stance is today. How is it not
3 covered?
4 **A. The stance that has been provided by my**
5 **lawyer, and representing RTG as RTG was in violation**
6 **of any preliminary injunction.**
7 Q. What you acquired from your grandfather is
8 a claim that once belonged to Segundo Sueno, yes --
9 Segundo Suenos? Yes?
10 **A. Yes.**
11 Q. The claims of Segundo Suenos were to have
12 been turned over to your mother, according to
13 Exhibit 15? Yes?
14 MR. WHITE: Objection. You can answer
15 that.
16 **THE WITNESS: I'm not -- I'm not familiar**
17 **with what assets had to be transferred over, as I**
18 **-- I was not part of that discussion.**
19 Q. (By Mr. Lea) I -- I know that. As you
20 read it today, explain to me in your own
21 understanding and logic how what you acquired from
22 your grandfather is not covered by that sentence
23 in exhibit --
24 MR. WHITE: Objection. I think he has
25 answered this question.

Page 121

1 MR. LEA: I haven't heard it.
2 **THE WITNESS: I'll say it again: it's on**
3 **the basis of what my lawyer has advise me on. And**
4 **as I wasn't involved in this, I can't make the**
5 **determination of -- of that, other than what my**
6 **lawyer has advised me on.**
7 Q. (By Mr. Lea) Is it fair to say, then,
8 Mr. Gaiaz, that independently of whatever it is
9 your lawyer told you, you yourself are unable to
10 explain to me how what you acquired from your
11 grandfather is not covered by that sentence in
12 Deposition Exhibit 15? Do I have that right?
13 **A. With my limited knowledge of this past**
14 **case, I have to take the advice of my lawyer, and**
15 **that's -- that's my understanding of this.**
16 Q. Do you have any knowledge yourself or
17 understanding independent of what you obtained from
18 your lawyer?
19 **A. Yes, I have knowledge.**
20 Q. You have knowledge of what a claim is,
21 don't you?
22 **A. A claim is -- I -- I can't -- I'm not going**
23 **to speculate on legal terms I don't understand**
24 **fully, other than being able to pursue some type of**
25 **money.**

Page 122

1 Q. I mean, you know that what you got from
2 your grandfather regarding Julian Jackson is a
3 claim. Right?
4 **A. Yes.**
5 Q. And so how in your understanding of what a
6 claim is, is what you acquired from your grandfather
7 not described by that sentence in paragraph 15, just
8 using your knowledge of what a claim is?
9 **A. Based off of my legal advice provided to**
10 **me, I don't think that is covered in that -- yeah.**
11 Q. Okay. And I don't want to know what the
12 legal advice was. Independent, aside from the
13 legal advice, are you yourself able to articulate
14 to me any explanation of how it's not covered by
15 that paragraph in Exhibit 15?
16 **A. I can't articulate that, no.**
17 Q. All right.
18 (Exhibit No. 16 is marked.)
19 Q. (By Mr. Lea) Exhibit 16, have you seen
20 this?
21 **A. Yes, sir.**
22 Q. Did Exhibit 16 happen, Mr. Gaiaz, before
23 or after Segundo Suenos did whatever transfer he
24 did to your grandfather of what had previously been
25 the Segundo Suenos right to sue Julian Jackson?

Page 123

1 **A. So, you're asking me did this occur before**
2 **the transfer of the claim to RTG? Is that your**
3 **question?**
4 Q. No, it's not my question. My question is:
5 In paragraph six in your declaration --
6 **A. Uh-hum.**
7 Q. -- in the first sentence, you swore that
8 you had personal knowledge that in January 2015,
9 SSL transferred its rights against Jackson to
10 Alfred Gaiaz.
11 **A. I don't think that was stated to say that**
12 **I knew about this in 2015.**
13 Q. I'm just telling you what it says. And
14 you're welcome to look at it. You have a copy of
15 Deposition Exhibit 5 there in front of you.
16 **A. And which -- where are you looking at**
17 **specifically, what page?**
18 Q. I think it's the third page, paragraph
19 six.
20 **A. So, on this page it -- yes, it does say**
21 **that Segundo Suenos transferred the claim to Al**
22 **Galaz.**
23 Q. In January 2015?
24 **A. Yes, but I didn't have knowledge of that**
25 **in 2015.**

Page 124

1 Q. Did it happen before or after Deposition
2 Exhibit 16?
3 **A. That would make -- that would require me**
4 **to speculate, as I wasn't involved in this.**
5 Q. What have you done to investigate that?
6 **A. I haven't done any investigating, because**
7 **I've relied on the information my lawyer has**
8 **provided me.**
9 Q. And you haven't done -- undertaken yourself
10 -- even though you're able, apparently to look at
11 the public records of the court, you haven't done
12 anything yourself to investigate that?
13 **A. Okay.**
14 Q. Why not?
15 **A. Because I rely on the advice of people**
16 **who support me.**
17 Q. And those people are?
18 **A. My father, Brian, Trey, my grandfather.**
19 (Exhibit No. 17 is marked.)
20 Q. (By Mr. Lea) Deposition Exhibit 17 is a
21 copy of your driver's license; yes?
22 **A. Yes.**
23 Q. Did your mother give you some money in
24 2017?
25 **A. Yes, she did.**

Page 125

1 Q. How much?
2 **A. $10,000.**
3 Q. Why?
4 **A. Because her husband at the time, I had**
5 **reached out to him for advice around finding a**
6 **truck. He -- he then went forward and purchased a**
7 **truck on my behalf without my permission; and then**
8 **my mom chose to go forward with saying, "You can**
9 **have $10,000 as long as you go forward with his**
10 **purchase."**
11 Q. Did you not want the truck?
12 **A. I did. I thought it was a great -- I**
13 **thought it was a great gift, and I think that any**
14 **mother should provide that to their son, if they**
15 **can.**
16 Q. You do think it was --
17 **A. I did.**
18 Q. -- a good deal?
19 **A. I thought it was a great thing, yes.**
20 Q. Okay.
21 (Deposition Exhibit No. 18 is marked.)
22 Q. (By Mr. Lea) Do you recognize Deposition
23 Exhibit 18?
24 **A. Yes.**
25 Q. Is that your signature?

Page 126

1 **A. Yes.**
2 Q. You signed it?
3 **A. Yes.**
4 Q. Before or after your mother's husband had
5 purchased the truck?
6 **A. This was before -- well, this -- actually,**
7 **yeah, this was after, I believe, he purchased the**
8 **truck.**
9 Q. So if it was after the purchase -- he
10 purchased the truck, I'm confused, how come you
11 didn't buy the truck from him?
12 **A. I -- because he was operating --**
13 Q. You know what, it was a bad question. I
14 apologize for that.
15 Do you think that -- that your mother's
16 husband is C & W Auto Sales in Irving, Texas?
17 **A. He, at the time -- and I don't understand**
18 **exactly how he paid them, but he purchased -- or**
19 **had another company purchase this car on his**
20 **behalf, under the condition that I would buy the**
21 **car from this company here. So if -- if his name**
22 **wasn't on the biil of sale, then it was just a**
23 **transaction that happened in parallel with her**
24 **husband Maurice.**
25 Q. Did you get title to the truck?

Page 127

1 **A. Yes.**
2 Q. Is Maurice's name on the title anywhere?
3 **A. No, as it shouldn't be.**
4 Q. Okay. Are you suggesting to the judge or
5 the jury in any way that your mother or Maurice did
6 anything at all that you didn't want to happen in
7 relation to this truck?
8 **A. Yes, I am.**
9 Q. Tell me what that is.
10 **A. As I stated earlier, I inquired about the**
11 **average price of this truck. I even had a**
12 **conversation with my mom about this because I was**
13 **upset, because he went ahead and bought the truck**
14 **without my final permission. He didn't personally**
15 **buy the truck with his own money, but he arranged**
16 **the purchase of the truck with whatever company he**
17 **supported at that time.**
18 Q. Are you saying that his money, or your
19 mother's money, or someone's money other than you,
20 changed hands in the purchase of this truck before
21 it became your truck?
22 **A. My mom gave me money.**
23 Q. Who bought the truck before you did?
24 **A. Apparently this C & W Auto Sales company**
25 **did.**

Page 128

1 Q. And -- and what relation does your
2 mother's husband Maurice have with C & W Auto
3 sales?
4 **A. He worked with them through a partnership**
5 **with his company, to have that company renovate or**
6 **repair the car and resale it. He specifically**
7 **worked in the area of purchasing damaged vehicles,**
8 **and then working with auto shops, such as C & W**
9 **Auto Sales, to then resale that -- retail that to**
10 **someone else. So I'm not aware of his partnership**
11 **with C & W Auto Sales at that time, but he had no**
12 **-- there's nothing in his name.**
13 Q. What connection does Maurice Fodera have
14 with C & W Auto Sales, that you know about?
15 **A. His work partnership with them, sending**
16 **cars to their auto shop to have them repair it,**
17 **and then have them re-sold.**
18 Q. You know that?
19 **A. That was my understanding of it at the**
20 **time.**
21 Q. Do you know that today?
22 **A. I don't know.**
23 Q. In any event, your mother gave you about
24 $10,000 -- or $10,000 exactly in 2017; yes?
25 **A. Yes.**

Page 129

1 Q. Is that $10,000 reflected anywhere here on
2 Deposition Exhibit 18?
3 **A. Deposition 18.**
4 Q. The one you just had. It -- it's
5 underneath the --
6 **A. No, it's not because i took a loan out on**
7 **this.**
8 Q. Okay. And, so, the $10,000 that your
9 mother gave you, did not go into the transaction
10 for the purchase of the truck?
11 **A. Right here, i deposited it into my own**
12 **account. And after that I went to a credit union**
13 **to get a ioan against that truck.**
14 Q. Okay. The $10,000 that your mother gave
15 you and you deposited into your account, those
16 dollars did or did not go into your purchase of
17 the truck?
18 **A. I was using -- weli, to say that -- well,**
19 **I deposited this money in my account, so I -- yes.**
20 Q. How did you use the $10,000 in your
21 purchase of the truck that is described in Exhibit
22 18?
23 **A. I took a loan out for $17,000.**
24 Q. Was it a loan with monthly payment notes
25 on it?

Page 130

1 **A. Yes.**
2 Q. Okay. Did the -- the cash payment here
3 apparently was $3,000 and not $10,000; right?
4 **A. Yes, and that's -- yes, that's correct.**
5 Q. All right. Did the $10,000 -- did the
6 3,000 out of the $10,000 go to that $3,000 down
7 payment?
8 **A. This is what it's referring to: It's the**
9 **3,000 that was -- 3,000 out of the 10,000 was**
10 **paid here.**
11 Q. Okay. What did you do with the other
12 $7,000?
13 **A. I saved it.**
14 Q. Okay. You didn't use it in the purchase
15 of the truck, right?
16 **A. No.**
17 Q. When did you pay Brian Boydston legal
18 fees for his work for your company, in doing
19 whatever It is he did with Jackson?
20 **A. After I acquired the rights --**
21 Q. When --
22 **A. -- in 2018, June --**
23 Q. Did --
24 **A. -- through public auction.**
25 Q. Did you use some or any part of the money

Page 131

1 that your mother gave you, well, the $7,000 that
2 was left to pay Boydston?
3 **A. No. I had significant funds at that time**
4 **to pay for my fees to Boydston.**
5 Q. Did you use any part of the $7,000 to pay
6 money at the auction?
7 **A. No.**
8 Q. Because you didn't actually pay money at
9 the auction, did you?
10 **A. No. Brian Boydston was -- purchased that**
11 **on RTG's behalf, as he was my lawyer at that time.**
12 Q. Brian Boydston didn't pay dollars out of
13 anyone's pocket to acquire the rights, did he?
14 **A. No, but I -- well, I paid Brian Boydston**
15 **the cost -- well, he -- he purchased those rights**
16 **on RTG's behalf.**
17 Q. I'm trying to figure out what the source
18 of the funds was for that purchase at the auction.
19 Did you write a check?
20 **A. I did write a check to Brian at the same**
21 **time when he had acquired the rights on RTG's**
22 **behalf.**
23 Q. RTG bid judgment dollars; it didn't pay
24 cash, correct?
25 **A. Yes, that's true actually, yes.**

Page 132

1 Q. RTG didn't write a check or pay currency,
2 or use any funds in its acquisition of the rights
3 at the auction, did it?
4 **A. I'm trying to think. I need to look back**
5 **at that, but RTG paid with their own -- with its**
6 **own funds for the rights.**
7 Q. At the auction in California -- well,
8 first, let's do this: You didn't attend the
9 auction in California, did you?
10 **A. No. I don't live in California.**
11 Q. There was an auction on the Jackson's
12 property, and the reason there was an auction is
13 because RTG had the judgment against Jackson,
14 right? It was a Sheriff's sale?
15 **A. Yes.**
16 Q. At that Sheriff's sale, how many people
17 other than RTG bid? Do you know?
18 **A. I believe four.**
19 Q. RTG was bidding judgment dollars; it
20 didn't bid cash, did it?
21 **A. I need to verify those details again. I**
22 **don't recall at this time.**
23 Q. Would you go back, Mr. Galaz, and find
24 exhibit -- Exhibit 7 and 8 in the stack.
25 **A. Sure. Exhibit 7, okay. I have it. Okay.**

Page 133

1 Q. In discovery, Mr. Gaiaz, I asked RTG to
2 provide the assignment that it obtained from your
3 grandfather. And we've got them here. If you
4 want to look, we'll look at them. RTG's answer
5 is that Exhibit 7 is the document; is that right?
6 **A. Yes.**
7 Q. Where in Exhibit 7 does it say anything
8 about assignment?
9 **A. I'm not sure. I don't see -- it was**
10 **inferred to him through a conversation. And**
11 **through this was just to validate that we had an**
12 **agreement.**
13 Q. Okay. Am I correct that there is no
14 document that is an assignment from your grandfather
15 to RTG?
16 **A. This is as close as we can get to an**
17 **assignment. So, no, this is our assignment.**
18 Q. This is the assignment, document number
19 one? RTG001 --
20 **A. Yes.**
21 Q. -- is the assignment? Okay. is there an
22 assignment from Segundo Suenos to your grandfather?
23 **A. Not that I'm aware of.**
24 Q. Have you asked?
25 **A. No.**

Page 134

1 Q. Before I asked you right now, today, is
2 that the first time you had thought about it?
3 **A. Yes.**
4 Q. How do you know that you got anything?
5 **A. How do I know that I got anything? I --**
6 **can you clarify that question --**
7 Q. Sure, yeah.
8 **A. -- because i don't understand it.**
9 Q. Sure. Yeah. You told me just a second
10 ago that this document RTG001, is the piece of
11 paper that is the assignment from your grandfather
12 to RTG, right? How -- is the -- but there isn't
13 even a piece of paper that is an assignment from
14 Segundo Suenos to your grandfather; is that right?
15 **A. I don't -- I'm not aware of that document.**
16 Q. Okay. If there isn't a document, how did
17 RTG get anything?
18 **A. How did --**
19 Q. Well, how did your grandfather have
20 anything to give RTG?
21 **A. He provided me his trust, that he was**
22 **transferring me a claim that I could pursue.**
23 Q. How did he have it to transfer? By what
24 mechanism?
25 **A. By communication, through speaking to me**

Page 135

1 **and allowing me to obtain this claim.**
2 Q. Yeah, no, I got that. Let's go back to
3 Deposition Exhibit 5, remember, your declaration,
4 in paragraph six.
5 **A. Exhibit 5, paragraph six.**
6 Q. Uh-hum.
7 **A. I should really just order these. It's in**
8 **there.**
9 MR. WHITE: It looks like this.
10 Q. (By Mr. Lea) It's this one.
11 **A. Oh, that one. Thank you. Appreciate it.**
12 **Okay. Paragraph six. Okay.**
13 Q. The first sentence, and I know you were
14 not personally involved; you've told me that.
15 **A. Yes.**
16 Q. How does anyone know it actually happened?
17 **A. Because my lawyer conveyed that message to**
18 **me. And I communicated with my family, who had**
19 **informed me of this claim.**
20 Q. Who in your family told you that it
21 happened?
22 **A. My grandfather, and my father.**
23 Q. What did they tell you?
24 **A. That there was a claim that I could pursue.**
25 Q. What did they tell you about Segundo Suenos

Page 136

1 transferring it to your grandfather?
2 **A. Nothing in particular.**
3 Q. Anything at all in general?
4 **A. Not that I can recall.**
5 Q. All right. So, if a judge or a jury wants
6 to know what record RTG has of that event happening
7 in January 2015, Segundo Suenos transferring its
8 rights against Jackson to Alfred Gaiaz, the best
9 you can say is you're not -- as the representative
10 of RTG, you have no idea that there is any record
11 or memorialization of that ever happening, do you?
12 **A. Well, there is the e-mail that Al Gaiaz**
13 **sent to Julian Jackson talking about the pursuing**
14 **-- or pursuing the claim against him. So I would**
15 **think that would be a document.**
16 Q. By -- is there a document by which
17 Segundo Suenos transferred anything to your
18 grandfather? Have you ever seen such a document?
19 **A. The e-mail states -- in Al's e-mail, it**
20 **states that it was transferred from Segundo**
21 **Suenos to himself. So that's a document that's**
22 **available.**
23 Q. It says it has happened, right?
24 **A. Yes.**
25 Q. I want to know is there a document that

Page 137

1 says how and when?
2 **A. Not that I'm aware of.**
3 Q. Okay. Exhibit 8, is from your personal
4 bank account?
5 **A. (No response.)**
6 Q. Yes?
7 **A. Yes.**
8 Q. But RTG existed on October 3rd, 2016,
9 didn't it?
10 **A. Yes.**
11 Q. Why didn't RTG pay money to your
12 grandfather? Why did it come from you personally?
13 **A. Because RTG had no funds at that point in**
14 **time.**
15 Q. How did RTG not have any funds at that
16 point in time?
17 **A. It wasn't an operating business at that**
18 **time.**
19 Q. What was it?
20 **A. It was an LLC.**
21 Q. It was a business.
22 **A. Yes, but there was no operations under**
23 **that business.**
24 Q. And there was no cash in the business
25 either, was there?

Page 138

1 **A. No.**
2 Q. When did the claim get from Ryan Galaz, the
3 person, to RTG?
4 **A. It didn't go from R -- Ryan Gaiaz to RTG.**
5 **It went from Al Galaz to RTG on October 3rd.**
6 Q. What is -- is there a document or a record
7 or anything that shows that?
8 **A. The e-mail that Al Galaz sent to me should**
9 **show that.**
10 Q. Where in Al Galaz's e-mail does he say
11 anything at all about RTG?
12 **A. Well, the execution of this occurred on**
13 **October -- well, October 3rd, so that's how that**
14 **-- this specific date has been determined as the**
15 **transfer date.**
16 Q. Where did your grandfather Al say anything
17 at all about doing anything with RTG?
18 **A. When did he say anything about doing**
19 **anything with RTG?**
20 Q. Uh-hum, that's my question.
21 **A. When he first brought it up to me.**
22 Q. I'm looking at the e-mail he sent you,
23 the one that is Deposition Exhibit 7. He says
24 "Ryan" --
25 **A. Uh-hum.**

Page 139

1 Q. -- "as of our previous discussion and
2 your willingness." It doesn't say anything at
3 all about RTG , does it?
4 **A. Yes, but the claim was transferred to RTG.**
5 Q. How and when?
6 **A. October 3rd. Even though this is funds I**
7 **paid for through my own money, this was a**
8 **representation of RTG.**
9 Q. You -- and you're referring to Exhibit 8?
10 **A. Yes.**
11 Q. Is there a document by which you, Ryan
12 Galaz, executed, signed anything saying, "I, Ryan
13 Gaiaz, am using these funds on behalf of RTG, and
14 I transfer this right to RTG"? Anything at all
15 like that?
16 **A. Other than the documents that my lawyer**
17 **has provided, there hasn't been any other documents.**
18 Q. Okay. And I don't think there is anything
19 like that in the document that your lawyer has
20 provided, which is why I asked you the question.
21 Exhibit 12, Mr. Gaiaz, is the stack of
22 lawyers' -- stack of documents that I got from your
23 lawyer. We talked about this earlier.
24 **A. Yes.**
25 Q. This is everything you've given me.

Page 140

1 **A. Okay.**
2 Q. Is there anything in here referring to
3 you, or anyone else, transferring any right to sue
4 anybody to RTG?
5 **A. It wasn't -- as far as I can recall, I'm**
6 **not sure. But I know that with myself, that that**
7 **claim wasn't with me individually; that was with**
8 **RTG, who I also am the sole owner of.**
9 Q. So -- so what I want you to do, Mr. Gaiaz
10 -- oh, I'm sorry. I've got a red pen, and I want
11 you to take my red pen and mark the words in
12 Deposition Exhibit 12 that -- because I can't find
13 them; I don't know where they are -- show the words
14 that involve you getting the right to sue Jackson
15 from you, and your personal bank account, and the
16 e-mail that your grandfather sent you personally
17 to RTG.
18 **A. So you want me -- can you repeat that,**
19 **what you want me to do specifically?**
20 Q. I want you to tell me is there a document
21 -- or tell me there isn't one -- that constitutes
22 a transfer from you personally to RTG. If there
23 isn't one, just tell me there isn't one.
24 **A. Not that I'm aware of, but I -- I don't**
25 **recollect me having to send any type of document**

Page 141

1 to myself, if I'm the owner of RTG.
2 Q. There isn't a document like that, is
3 there?
4 **A. Not -- not that -- I don't know.**
5 Q. Who does know on behalf of RTG?
6 **A. I don't know.**
7 Q. Well, who's in a position to know other
8 than you, Mr. Galaz?
9 **A. I don't know.**
10 Q. Doesn't that mean there isn't a document?
11 **A. Potentially, but I don't know.**
12 Q. Well, what do you need to do -- know to
13 look at that? How can you answer that question
14 for me?
15 **A. I'm not sure. I don't know.**
16 Q. What electronic devices have you used to
17 send or receive e-mail to and from your father
18 that bare on any of this, the rights, the -- suing
19 Julian Jackson, the BMI royalties, suing your
20 mother?
21 **A. To send documents, my computer.**
22 Q. Which -- I want to be able to identify
23 that computer.
24 **A. My personal computer.**
25 Q. What is your personal computer?

Page 142

1 **A. My personal computer. What -- what**
2 **specifically are you looking for in my personal**
3 **computer?**
4 Q. Are you aware, Mr. Galaz, of the brand of
5 that personal computer?
6 **A. Yes.**
7 Q. What is it?
8 **A. Apple.**
9 Q. How long have you had it?
10 **A. Six years, maybe.**
11 Q. Okay. Is it -- well, what kind of Apple?
12 **A. It's a laptop.**
13 Q. Is it a -- what is that, Mac Book? What
14 is it called? It has a name.
15 **A. It's a Mac -- i don't know the exact name**
16 **of it.**
17 Q. Okay. But you've had it about six years?
18 **A. Yes.**
19 Q. And it's the only one you've used to send
20 or receive e-mails to or from your father that bare
21 on anything at all we are talking about in this
22 case?
23 **A. I believe so, yes.**
24 Q. What about a mobile phone? Do you have a
25 Smart phone that you've used to send or receive

Page 143

1 e-mails?
2 **A. Yes.**
3 Q. What -- describe your phone for me.
4 **A. An I-phone.**
5 Q. How long have you had it?
6 **A. Two years -- three years.**
7 Q. Going back -- can you -- can you put in
8 sequence of events, or relation of time when you
9 acquired that phone? For example, did you have
10 it when you called your mother?
11 **A. Yes.**
12 Q. Okay. Did you have it when you acquired
13 the rights from your grandfather?
14 **A. I don't know.**
15 Q. Okay.
16 MR. LEA: Let's take a quick beak.
17 THE VIDEOGRAPHER: 1:40. End of media
18 three. We're off the record.
19 (Brief recess.)
20 MR. LEA: Whenever you guys are ready.
21 THE VIDEOGRAPHER: 1:49. Beginning media
22 number four. We're on the record.
23 Q. (By Mr. Lea) Are you ready to proceed,
24 Mr. Galaz?
25 **A. Yes.**

Page 144

1 Q. What did you do to prepare for the
2 deposition today?
3 **A. I spoke to Trey. Trey sent me a document**
4 **just -- to inform me of the process. I talked to**
5 **my father, too.**
6 Q. When?
7 **A. This past week.**
8 Q. Who else was on the phone?
9 **A. I just talked to my father.**
10 Q. Who else was on the phone?
11 **A. No one else.**
12 Q. What did your father say?
13 **A. I talked to him about certain points.**
14 **I talked to Trey about certain points, too. And**
15 **we -- actually, it was all attorney/client**
16 **privileged; we jumped on a call together with Brian.**
17 Q. I want to -- there was a period when you
18 were on the phone, along with your father? Yes?
19 **A. Yes.**
20 Q. Tell me about what your father said in that
21 part of the call.
22 **A. I had asked him how this process typically**
23 **occurs, and the type of questions you would ask me.**
24 **And that's practically it.**
25 Q. And he said?

Page 145

1 A. I don't recall the exact questions, but
2 everything you've asked me pretty much sums up
3 what I expected you to ask me.
4 Q. But I was asking you about what your
5 father said, not about what you expected.
6 A. I don't recall exactly what he said.
7 Q. Generally.
8 A. Generally? Okay. To make an exact
9 statement, he said that you will ask questions
10 regarding my ownership, the transfer, and --
11 Q. What else did he say?
12 A. -- my involvement. That's it. And I
13 had the same conversation with Trey, too, so --
14 Q. Okay.
15 A. -- nothing unique.
16 Q. Now, how many other times have you had
17 conversations with your father that related in any
18 way to this case, and Trey, or Brian Boydston, or
19 another lawyer, just not on the call?
20 A. I -- that's a huge task to ask. I can't
21 really recall an exact number or even give you an
22 estimate. I -- I could be talking to him about
23 personal matters and, you know, I -- to say "I've
24 got this going on right now."
25 Q. Is it fair to say, Mr. Galaz, that there

Page 146

1 have been telephone conversations between you and
2 your father about this case, or the rights, or
3 Julian Jackson, or the litigation against your
4 mother, or the litigation against Julian Jackson?
5 A. Yes.
6 Q. Where there was no lawyer involved in the
7 call?
8 A. Yes.
9 Q. You don't know how many of those
10 conversations there have been, but you're confident
11 there have been conversations like that?
12 A. Yes.
13 Q. As you sit here today, you are or are not
14 able to relate the substance of any of those
15 conversations to us?
16 A. I can. I mean, I -- I can, but not
17 specifically.
18 Q. Generally, would you?
19 A. Generally, what I currently have planned
20 right now, this deposition. I've related to him
21 that I need to provide responses to counterclaims.
22 That's it.
23 Q. That's all you remember about conversations
24 you've had with your father in which there wasn't a
25 lawyer involved that had anything at all to do with

Page 147

1 royalties suing Julian Jackson, suing your mother,
2 any of the other topics that are involved in this
3 case?
4 A. Yeah.
5 Q. Now, you told me, Mr. Galaz, that one
6 occasion when your mother disputed, or didn't
7 recognize RTG's ownership of the rights, was that
8 phone call that happened in August or September of
9 2018?
10 A. Yes.
11 Q. Are there others?
12 A. Not that I can recall right now.
13 Q. The --
14 A. I think -- actually, I think we may have
15 had one other conversation outside of that, but
16 that's basically it.
17 Q. What has your mother done willfully and
18 intentionally to interfere with RTG's contract with
19 BMI, willfully and intentionally?
20 A. Can you restate the last part? You said
21 whose contract with BMI?
22 Q. RTG's contract with BMI. What has your
23 mother done willfully and intentionally to interfere
24 with that contract?
25 A. She has prevented the receiving -- or the

Page 148

1 distribution of money from the bankruptcy court, as
2 she's going against my claim -- or sorry, my
3 ownership of the Ohio Players.
4 Q. Has she done anything that didn't happen
5 in the court process?
6 A. She's fighting my -- she's fighting my
7 ownership of the Ohio Players.
8 Q. And one place, at least where she's doing
9 that is in court, right?
10 A. Yes.
11 Q. Is there any other place where she's doing
12 it outside of court?
13 A. Not that I can recall right now.
14 Q. When you say she's -- her actions in this
15 regard were willful and intentional, do you mean
16 her actions in court were willful and intentional?
17 Or do you mean her actions somewhere else?
18 A. In court.
19 Q. And only in court?
20 A. And only in court.
21 Q. You also say that her interference with
22 RTG's ability to contract with BMI, you say
23 "Defendant Fodera's acts have interfered with
24 plaintiff RTG's ability to contract with BMI and
25 have prevented the relationship from occurring."

Page 149

1 **A. Yes.**
2 Q. Who at BMI have you talked to about
3 contracting with BMI?
4 **A. I have not spoken to anyone at BMI.**
5 Q. Who at BMI have you e-mailed about
6 contracting with BMI?
7 **A. I haven't e-mailed anyone at BMI.**
8 Q. Who at BMI have you communicated with in
9 any way about RTG contracting with BMI?
10 **A. I have not communicated with anyone at**
11 **BMI.**
12 Q. Okay. What has RTG done to investigate
13 or test, or find out, if there could be a
14 relationship with BMI?
15 **A. Well, the relationship BMI has is with**
16 **the Court, as that's a court mandate. So I can't**
17 **do anything at this point in time.**
18 Q. Well, you -- sir, you've sued your mother
19 in part saying that she's prevented a relationship
20 from BMI -- with BMI from occurring?
21 **A. Yes.**
22 Q. When you say that in your court papers,
23 are you talking about anything she's done, other
24 than what she's done in court?
25 **A. No, that's referring to what she's doing**

Page 150

1 **in court.**
2 Q. Okay. And what you -- you say she's --
3 her actions are intentional and wrongful?
4 **A. Yes.**
5 Q. Tell me what she's done that's wrongful.
6 **A. She's denying my ownership of what I**
7 **purchased.**
8 Q. From all the paperwork we've seen,
9 Mr. Galaz, can you see at all the idea for how she
10 would think that the claims and rights of Segundo
11 Suenos were to have come to her, and not anyone
12 else?
13 **A. I don't see that.**
14 Q. You don't see that at all? That's crazy
15 as far as you're concerned; is that right?
16 **A. Yes.**
17 Q. Has anyone on behalf of RTG ever
18 authorized your father to sign anything as a
19 member of RTG?
20 **A. No.**
21 Q. Why would your father sign something as
22 a member of RTG?
23 **A. He would never have signed that.**
24 Q. Has your father ever said that he
25 encouraged you to acquire the rights to go after

Page 151

1 Jackson?
2 **A. Encouraged me?**
3 Q. Yes.
4 **A. He and my grandfather both gave me the**
5 **opportunity. So they told me it was a valid**
6 **business opportunity. So, yes, they encouraged**
7 **me.**
8 Q. When your father acts on behalf of RTG,
9 you've told me he's not an employee. How would you
10 characterize his role or relationship with RTG?
11 MR. WHITE: Objection.
12 Q. (By Mr. Lea) Go ahead.
13 **A. He provides me advice. And whenever a**
14 **contract needs to be signed on behalf of RTG, he**
15 **would sign that.**
16 Q. And when he signs a contract on behalf
17 of RTG, what is his role or relationship?
18 **A. He's not a member or an agent.**
19 Q. What is he?
20 **A. He's a supporting person.**
21 Q. Supporting person. Does he have authority
22 as a supporting person to bind RTG to whatever it
23 is he signs?
24 **A. Only when it pertains to the 4531 property.**
25 Q. When --

Page 152

1 **A. Nothing else.**
2 Q. When he signs something on behalf -- or
3 relating to the 4531 property, does he have the
4 ability to bind RTG?
5 **A. To contract, yes.**
6 Q. And -- and is that because you've given
7 him that authority?
8 **A. Yes.**
9 Q. And what is that authority? Doesn't that
10 make him an agent?
11 **A. No.**
12 Q. What --
13 **A. Well, how do you define an agent?**
14 Q. Somebody who has the authority to conduct
15 business on behalf of somebody else.
16 **A. In terms of -- well, in that -- in that**
17 **definition, he is an agent for the property, but he**
18 **is an agent of RTG as a whole.**
19 Q. Okay. What about the Lake Pancoast
20 property, is he an agent in that regard?
21 **A. I don't believe so.**
22 Q. And is there anyone other than you who
23 would know?
24 **A. No.**
25 Q. So, when you say I don't believe so, you

Page 153

1 actually mean no he's not?
2 **A. Correct. Or that I just don't remember.**
3 Q. Does that mean it's possible that you have
4 given him authority to act on behalf the Pancoast
5 property and just don't remember it?
6 **A. That's possible, yes.**
7 Q. Who's responsible for paying the taxes on
8 the Pancoast property?
9 **A. I am responsible.**
10 Q. So you're familiar with the value of the
11 property?
12 **A. Yes.**
13 Q. Approximately what is the value of the
14 property?
15 **A. Around 900,000.**
16 Q. That's the Prairie property, isn't it?
17 **A. Yes.**
18 Q. I was asking you about the Pancoast
19 property.
20 **A. I don't know.**
21 Q. How did RTG get the $900,000 to buy the
22 Prairie property?
23 **A. A loan.**
24 Q. From?
25 **A. WSG.**

Page 154

1 Q. Which is the company that your father works
2 with, with Boydston and Denise Vernon?
3 **A. Yes.**
4 Q. Is there a mortgage recorded in the public
5 records on the Prairie property?
6 **A. No.**
7 Q. It's an unsecured loan, isn't it?
8 **A. Yes.**
9 Q. Did you sign the loan agreement?
10 **A. I don't recall, but I would assume so, yes.**
11 Q. Is there a written document, a loan
12 agreement?
13 **A. I would need to look into that. I'm not**
14 **sure.**
15 Q. You don't know if there is a written
16 agreement for a $900,000 loan to your company RTG?
17 **A. Between my family and me, I'm not sure.**
18 Q. Okay. The deed from WSG to RTG for the
19 Lake Pancoast property is a Quit Claim Deed. Why
20 is that?
21 **A. Repeat that again.**
22 Q. Uh-hum.
23 MR. WHITE: I think we're on 19?
24 MR. LEA: Yes.
25 (Exhibit No. 19 is marked.)

Page 155

1 Q. (By Mr. Lea) Exhibit 19 is the deed from
2 WSG to RTG for the Lake Pancoast property, isn't it?
3 **A. Which -- which document -- or what -- what**
4 **page are you looking at?**
5 Q. The whole document, document -- well, let's
6 -- so let's back up. Fair point. Exhibit 19 is
7 three pages, isn't it?
8 **A. Yes.**
9 Q. It says that the -- toward the top of the
10 first page, that it's a Quit Claim Deed, right?
11 **A. Uh-hum.**
12 Q. And the property address, this is the Quit
13 Claim Deed for the Lake Pancoast drive property --
14 **A. Uh-hum.**
15 Q. Isn't it? Yes?
16 **A. Yes.**
17 Q. This is how RTG came to be the owner of
18 the Lake Pancoast Drive condominium from WSG,
19 right?
20 **A. Yes.**
21 Q. Now, before this deed happened, what did
22 you do to investigate what WSG was? Anything?
23 **A. No. I -- at the advice of my family, to**
24 **transfer this over to me.**
25 Q. Who in your family?

Page 156

1 **A. My grandparents, who are old, and wanted**
2 **to pass this over to me.**
3 Q. But WSG owned it, not your grandparents,
4 right?
5 **A. Yes.**
6 Q. And, Mr. Galaz, when I look in the Texas
7 state records of what WSG is, I see that the
8 governing people in WSG are Denise Vernon and
9 Brian Boydston. I don't see anything about your
10 grandparents; is that right?
11 **A. I'm not -- well, I'm not familiar with**
12 **that document.**
13 (Exhibit No. 20 is marked.)
14 Q. (By Mr. Lea) Take a moment to look at what
15 I've marked as Deposition Exhibit No. 20, which I'll
16 tell you is a summary from the records of the Texas
17 Secretary of State on information known, Worldwide
18 Subsidy group.
19 **A. Okay.**
20 Q. Which is the same Worldwide Subsidy Group
21 from which RTG came to be the owner of the Lake
22 Pancoast Drive Condominium, isn't it?
23 **A. Yes.**
24 Q. I don't see anything in the records of the
25 Texas Secretary of State about your grandparents

Page 157

1 being involved in WSG. Why is it that you think
2 your grandparents are involved?
3 **A. Because that was what was conveyed to me,**
4 **by my grandparents.**
5 Q. Is your father trying to rent the Lake
6 Pancoast property?
7 **A. Yes.**
8 Q. So he is authorized to conduct business
9 for the Lake Pancoast property as well as the
10 Prairie property, isn't he?
11 **A. I need to take a step back right there.**
12 **I -- I misspoke. He -- I'm trying to rent that**
13 **property, and he's trying to help me out. But he**
14 **doesn't have -- from -- from what I remember right**
15 **now, he doesn't have the authority to do that.**
16 (Exhibit No. 23 is marked.)
17 Q. (By Mr. Lea) Exhibit 23, Mr. Galaz, is
18 something I found on the Internet referring to
19 your father as the contact person for a rental
20 application, or a viewing of the Lake Pancoast
21 property as a rental property; is that right? Is
22 your father the contact person for arranging a
23 viewing for --
24 **A. Yes.**
25 Q. -- a potential rental of the property?

Page 158

1 **A. Yes.**
2 Q. How many viewings or showings of the
3 property have you conducted?
4 **A. I personally haven't conducted any because**
5 **I live in Boston.**
6 Q. You're not planning on conducting any, are
7 you?
8 **A. No.**
9 Q. If the Lake Pancoast property gets rented,
10 it's going to be because your father makes that
11 happen, not you, right?
12 **A. Well, he's -- he assists me with arranging**
13 **meetings. And then I execute the contract for them.**
14 MR. WHITE: Did we skip 21 and 22?
15 MR. LEA: We may -- I bet we did.
16 MR. WHITE: I was just making sure I'm not
17 missing something.
18 MR. LEA: Let's see. I probably did. I'll
19 go back and fill those in. Oh, 19 -- 19 was the
20 deed.
21 MR. WHITE: Uh-hum.
22 MR. LEA: And --
23 MR. WHITE: We've got 20. We need 21 and
24 22.
25 MR. LEA: Okay. 21 and 22. Do you want to

Page 159

1 make that 22? 21?
2 MR. WHITE: It's up to you.
3 (Exhibits 21 and 22 are marked.)
4 Q. (By Mr. Lea) Okay. I was asking you
5 earlier, Mr. Galaz, about your Aunt Evelyn resigning
6 as the registered agent of RTG, and you told me that
7 hadn't happened?
8 **A. Correct.**
9 Q. Isn't it true that she resigned as the
10 registered agent?
11 **A. I said she did not resign.**
12 Q. Don't the records of the Secretary of the
13 -- not the Secretary of State, it's the Division
14 of Corporations in Florida, reflect that she did.
15 Isn't that what --
16 **A. Oh, yes. My apologies. This Terracorp,**
17 **yes, had been hired to act as an agent so then they**
18 **could receive all legal documents on behalf of RTG.**
19 **That's why that had changed from Evelyn Badihian to**
20 **Terracorp.**
21 Q. So she is or isn't the registered agent?
22 **A. She's not the registered agent. I was**
23 **confused earlier.**
24 Q. Twice?
25 **A. However many times I was confused about the**

Page 160

1 **agent aspect. But it's Terracorp.**
2 Q. Did you sign Deposition Exhibit 21?
3 **A. Yes.**
4 Q. Is that your signature on the one, two,
5 three -- third page?
6 **A. Yes, that's it.**
7 Q. How many documents do you think you've
8 signed on behalf of RTG?
9 **A. Over 10, plus.**
10 Q. Okay. Do you think that the transaction
11 where RTG got the Lake Pancoast Drive property from
12 WSG was an arm's length transaction?
13 MR. WHITE: Objection.
14 Q. (By Mr. Lea) Go ahead, you can answer.
15 **A. How do you define arm's length?**
16 Q. A willing buyer and a willing seller under
17 no compulsion either to buy or sell to the other.
18 **A. Yes.**
19 Q. Okay. Is there any relation between the
20 parties?
21 **A. I -- I don't know, other than family.**
22 Q. Can you characterize the level of your
23 father's involvement in WSG?
24 **A. Yes, he acts as a consultant on behalf of**
25 **WSG.**

Page 161

1 Q. in terms of the volume of percentage of
2 work that happens inside WSG, how much of that is
3 your father?
4 **A. If you were to talk about Brian and --**
5 **Brian Boydston and my father, Raul, 20 percent; and**
6 **Brian, 80 percent.**
7 Q. Okay.
8 **A. And., actually, that is speculating, too,**
9 **because I don't know, in fact.**
10 Q. All right. Now, why did WSG make a
11 $900,000 unsecured loan to RTG?
12 **A. Because I wanted to get involved in the**
13 **real estate business, and that was a way to create**
14 **a new business for RTG and create recurring income.**
15 Q. Did -- other than the Prairie property,
16 did RTG have anything like $900,000 of assets to
17 support or justify a loan like that?
18 **A. No.**
19 MR. WHITE: We've got 21 and 22. We need
20 to skip 23 now. You already have 23.
21 MR. LEA: Oh, okay.
22 (Exhibit No. 24 is marked.)
23 Q. (By Mr. Lea) Okay. All right. After
24 acquiring the Prairie Avenue property, RTG has put
25 a substantial amount of money in the property,

Page 162

1 hasn't it?
2 **A. Correct.**
3 Q. About $500,000?
4 **A. And you're referring to the Prairie Ave.?**
5 Q. Prairie Avenue.
6 **A. Okay, yes -- or I can't -- the exact**
7 **number isn't -- I don't know the exact number, but**
8 **yes, a few hundred thousand dollars.**
9 Q. Okay. Where did RTG get that money?
10 **A. It got that money from paying -- with the**
11 **money that I collected from my ownership of the Ohio**
12 **Players.**
13 Q. That's about $150,000?
14 **A. Yeah. It could be closer to $200,000 now.**
15 Q. Okay. The rest of the money that RTG has
16 put into the Prairie Avenue property, where did it
17 come from?
18 **A. I'm not sure right now. I --**
19 Q. Okay. Exhibit 22, is that your father's
20 signature, Raul Galaz?
21 **A. Yes, that is.**
22 Q. As a member of RTG?
23 **A. Yes.**
24 Q. Is that true?
25 **A. That is not true.**

Page 163

1 Q. Why did your father sign as a member of
2 RTG?
3 **A. He actually did not. This was an instance**
4 **where this -- he had a power of attorney to sign on**
5 **my behalf, and they had ultimately changed this**
6 **from RTG to Raul Galaz as a member. So we confirmed**
7 **that, too.**
8 Q. So --
9 **A. This was an incorrect filing.**
10 Q. Oh, okay. So the document's just wrong?
11 **A. Correct.**
12 Q. Your father has a power of attorney --
13 **A. Yes.**
14 Q. -- to sign on your behalf?
15 **A. Yes.**
16 Q. In his role for RTG?
17 **A. Yes -- or -- well, no, in his role for --**
18 **this is -- in his role in -- yes, in his role in**
19 **4531 Lake Pancoast Drive.**
20 Q. But that's RTG, isn't it?
21 **A. Yes.**
22 Q. So there is a document that exists
23 appointing your father to conduct business on
24 behalf of RTG, isn't there?
25 **A. On behalf of the business related to 4531,**

Page 164

1 **yes.**
2 Q. Okay. Now, you weren't surprised just a
3 moment ago when I asked you about this document,
4 were you, Deposition Exhibit 22?
5 **A. No.**
6 Q. That's part of what you prepared for
7 before you came to the deposition today?
8 **A. I was aware of this when this happened.**
9 Q. How did you become aware of it?
10 **A. Because it was a public filing.**
11 Q. And does that mean that you searched the
12 public filings?
13 **A. Yes.**
14 Q. When?
15 **A. I can't remember the exact date.**
16 Q. Recently?
17 **A. I can't remember -- no, not exactly.**
18 Q. Why?
19 **A. Because I brought this up at the time that**
20 **it came up and not recent.**
21 Q. Why -- why did you search the public
22 filings on your own company RTG?
23 **A. Because I wanted to see what showed up.**
24 Q. Why?
25 **A. For my own interest.**

Page 165

1 Q. I'm sorry?
2 **A. For my own interest.**
3 Q. What interested you about that? I mean,
4 you would know, wouldn't you?
5 **A. Yes.**
6 Q. Exhibit 24 is a Declaration of Restrictive
7 Covenant that your father signed on behalf of RTG,
8 isn't it?
9 **A. Yes.**
10 Q. And that's his signature on behalf of RTG?
11 **A. Yes.**
12 Q. That's what your father means when he
13 writes OBO, on behalf of?
14 **A. Yes.**
15 Q. Exhibit 25 is another document that your
16 father signed on behalf of RTG?
17 **A. Yes.**
18 Q. For additional work on the Prairie Avenue
19 property?
20 **A. Uh-hum.**
21 Q. Who does the bookkeeping for RTG?
22 **A. I do.**
23 Q. And, so, as part of the bookkeeping for
24 RTG, is there a record or a ledger, some kind of
25 journal where you keep track of how much money

Page 166

1 RTG has spent on this Prairie Avenue?
2 **A. Yes.**
3 Q. And so a few minutes ago when I asked
4 you about whether it was right around $500,000
5 and I think I remember you saying you didn't know
6 exactly?
7 **A. Yes.**
8 Q. And then you told me that you thought
9 that it covered it with the money that you got from
10 BMG Bug Music, which initially you said was about
11 $150,000; and then you thought it might be a little
12 more than that. But as you think about those two
13 things, the total that's come in and the total that
14 RTG has spent, is there a discrepancy there?
15 **A. Where do you come up with the number**
16 **500,000?**
17 Q. I got it, Mr. Galaz, out of this lien
18 claim against RTG.
19 **A. What exhibit is that?**
20 Q. I'm fixing to give it to you right here.
21 (Exhibit No. 27 is marked.)
22 Q. (By Mr. Lea) 27, for $491,000.
23 **A. Correct.**
24 Q. I'm sorry?
25 **A. Correct. Yes.**

Page 167

1 Q. So is that number right?
2 **A. Yes.**
3 Q. Okay. So I was in the ballpark when I
4 said about $500,000; right?
5 **A. Uh-hum.**
6 Q. That's a yes?
7 **A. Yes.**
8 Q. And then when you were telling me that
9 about 150 initially, and then maybe you said more
10 than that, you'd come -- that you'd gotten from
11 BMG, you haven't gotten anywhere close to $500,000
12 from BMG, have you?
13 **A. Correct, yes.**
14 Q. And RTG doesn't have any cash-in flow from
15 any other source other than BMG, does it?
16 **A. It has ownership. It has renters, 4531.**
17 Q. Okay.
18 **A. And 124 hasn't been paid as noted by the**
19 **claim of the lien.**
20 Q. Let's do the math real quick. So it looks
21 to me, Mr. Galaz, like there's still more than a
22 200,000 -- maybe $250,000 discrepancy between the
23 amount that RTG has spent, and the amount that's
24 come in. What -- am I right about that?
25 **A. Repeat that again.**

Page 168

1 Q. It looks to me like there's about at
2 least $250,000 in difference --
3 **A. Uh-hum.**
4 Q. -- between the in-flows and the outflows.
5 What's the explanation for that discrepancy?
6 **A. I'm not sure. I need to go back to my**
7 **bookkeeping.**
8 (Exhibit No. 28 is marked.)
9 Q. (By Mr. Lea) Exhibit 28 is another
10 document that your father had signed on behalf of
11 RTG?
12 **A. Okay.**
13 Q. Yes?
14 **A. Yes.**
15 Q. Now, this one somebody initially wrote in
16 manager. And then somebody scratched that out.
17 What do you know about that?
18 **A. That's incorrect. He has his name titled**
19 **representative.**
20 Q. Somebody below that wrote in manager,
21 right?
22 **A. Yes. And it says power of attorney right**
23 **beside it.**
24 Q. Okay. How would anyone come to think that
25 your father had acted as a manager, or would be

Page 169

1 acting as a manager?
2 **A. I don't know. It was crossed out and**
3 **re-spelled as power of attorney.**
4 Q. Between you and your father, who do you
5 think has signed more documents on behalf of RTG?
6 **A. In terms of --**
7 Q. Total documents signed on behalf of RTG.
8 **A. I don't -- I can't recall that exact**
9 **number.**
10 Q. You --
11 **A. I can't give that estimate either because**
12 **I don't know.**
13 Q. Okay. Do you understand I wasn't asking
14 you for an exact number? I was just asking you to
15 compare one lesser, or one greater.
16 **A. Yeah, I don't know. And I think, you**
17 **know, these are documents where he had to sign**
18 **them on my behalf so -- I would say me more.**
19 Q. Okay. And your basis for saying that would
20 be what?
21 **A. Speculation.**
22 Q. Okay. Is RTG involved in any litigation
23 other than this lawsuit?
24 **A. No.**
25 Q. Since RTG was born, has it been involved

Page 170

1 in any litigation other than this lawsuit?
2 **A. No.**
3 Q. How did you learn, Mr. Galaz, that the
4 Segundo Suenos litigation had ended finally?
5 **A. Through my grandfather and my father.**
6 Q. When did they tell you that?
7 **A. Well, I wasn't fully aware of the**
8 **litigation, but when the claim was presented to me,**
9 **that's when I assume I would -- I found out.**
10 Q. But the litigation wasn't ended yet.
11 **A. I wasn't familiar with the litigation in**
12 **its entirety.**
13 Q. Well, I understand you weren't familiar
14 with it in its entirety. My question is, was there
15 a time when you came to learn that the litigation
16 was over?
17 **A. No.**
18 Q. As far as you know, sitting here today,
19 the Segundo Suenos litigation is still continuing?
20 **A. I was under the impression when I received**
21 **the claim that it was over.**
22 Q. What gave you that impression?
23 **A. The fact that maybe the claim was being**
24 **presented to me for that reason.**
25 Q. If -- if you didn't think the litigation

Page 171

1 was over, would that have made a difference to you?
2 **A. If the transfer of the claim is valid, I**
3 **don't think it would have made any difference at**
4 **all.**
5 Q. So it didn't matter to you that the
6 litigation was or wasn't over?
7 **A. No.**
8 Q. You didn't do anything to investigate the
9 status of the investigation before you took the
10 claim?
11 **A. No, I took the advice of my family and my**
12 **lawyer to pursue the claim.**
13 Q. Okay. You understand I'm not asking you
14 about the advice of anybody. I'm asking you about
15 you yourself did nothing to investigate the status
16 of the litigation; is that true?
17 **A. Right.**
18 Q. What's the very first thing that you did
19 -- let's start over. On August 3rd you paid your
20 grandfather the $5,000; right?
21 **A. August 3rd?**
22 Q. That's the day -- we have your bank
23 statement here; it's Exhibit 8, I think?
24 **A. Yeah.**
25 MR. WHITE: I think it's correct.

Page 172

1 **THE WITNESS: That's correct, yes. It was**
2 **October 3rd.**
3 Q. (By Mr. Lea) What's the very next thing
4 that happened, in -- in terms of the rights? What
5 did you do with them yourself?
6 **A. We filed suit against Julian Jackson --**
7 Q. When?
8 **A. -- around -- It was January or February of**
9 **2017.**
10 Q. What happened in between August 3rd and --
11 **A. October 3rd?**
12 Q. Uh-hum. What was going on there?
13 **A. Brian Boydston had prepared the case**
14 **against Royal, and I was, for the most part, not**
15 **involved.**
16 Q. So almost a year went by?
17 **A. No.**
18 Q. More than a year?
19 **A. No. Because the transfer occurred in**
20 **October, and we pursued the claim in January,**
21 **February, the next -- that next calendar year.**
22 Q. Oh, here it is. It's actually March.
23 Look with me, if you would, at Exhibit 5.
24 **A. Okay.**
25 Q. Look on the front page.

Page 173

1 **A. Okay.**
2 Q. Do you see just to the right of the middle
3 where it says complaint filed March 23rd?
4 **A. Uh-hum.**
5 Q. So what happened between October 3rd of
6 2016 and March 23rd of 2017?
7 **A. What happened between -- you said October**
8 **the 3rd and -- and what was that second date?**
9 Q. October 3rd is the date of the transfer,
10 according to your bank statement.
11 **A. Correct.**
12 Q. And March 23rd, 2017, according to Exhibit
13 5 is the day when RTG filed its complaint against
14 Jackson.
15 **A. Uh-hum.**
16 Q. What happened in between?
17 **A. Nothing happened in between.**
18 Q. Okay. In between those two dates, did you
19 yourself do anything personally to investigate or
20 analyze what it is you had purchased?
21 **A. No.**
22 Q. How did you arrive at the $5,000 amount
23 that you would pay your grandfather?
24 **A. The claim against Julian was by no means a**
25 **guarantee that we would receive that amount. So the**

Page 174

1 **$5,000 was an estimate, assuming that there was no**
2 **claim -- there was no guarantee we would get that**
3 **money, so ultimately the transfer was only at**
4 **$5,000.**
5 Q. Who arrived at that number?
6 **A. I did.**
7 Q. Was it negotiated?
8 **A. Discuss between my grandfather and I.**
9 Q. Did he want more than 5,000?
10 **A. No.**
11 Q. So it wasn't as if it went back forth, him
12 wanting more money and you willing to pay less?
13 $5,000 is just what it was, right?
14 **A. Correct.**
15 Q. How did you know there was no guarantee
16 that you would get anything? Who told you that?
17 **A. My grandfather, my father; my attorney.**
18 Q. You knew that Jackson owned at least the
19 rights to 50 percent of the rights to the music;
20 right?
21 **A. Yes.**
22 Q. And -- and who told you that there was any
23 doubt or question about Jackson's ownership of that
24 50 percent?
25 MR. WHITE: Objection.

Page 175

1 MR. LEA: Go ahead. You can answer.
2 **THE WITNESS: Repeat. I don't understand**
3 **your question.**
4 Q. (By Mr. Lea) All right. I probably asked
5 a bad question. I understood you to tell me just a
6 second ago, Mr. Gaiaz, that you knew that Jackson
7 owned 50 percent of the rights?
8 **A. Uh-hum.**
9 Q. And I should put a point on that: You
10 knew that before you acquired anything from your
11 grandfather, didn't you?
12 **A. Actually -- well, I wasn't very familiar**
13 **with what he owned at the time. The only -- the**
14 **goal was to recuperate the money that we were suing**
15 **him for; it had nothing to do with the Ohio Players**
16 **at that point in time. That wasn't the mind sent --**
17 **mindset at that time.**
18 Q. There was no discussion about the benefits
19 that would come out of suing Jackson?
20 **A. There may have been, but I don't recognize**
21 **-- that wasn't the main goal about it. The main**
22 **goal was to obtain the money that we were suing him**
23 **for.**
24 Q. And wasn't the rights an asset that was a
25 reason for expecting that you would be able to

Page 176

1 obtain the money?
2 **A. Can you repeat that question again. I'm**
3 **a --**
4 Q. Sure.
5 **A. -- little bit confused.**
6 Q. You -- you knew from the beginning that if
7 you sued Jackson to recover Segundo Suenos' money,
8 one reason that you could expect to get paid, is
9 that Jackson owned 50 percent of the rights?
10 Didn't you know that?
11 **A. No.**
12 Q. When did you learn that Jackson owned 50
13 percent of the rights?
14 **A. I don't recall the date, but I can say that**
15 **by the time that the prove-up declaration was filed**
16 **I had some awareness that there was 50 percent**
17 **ownership.**
18 Q. Well, your father and your grandfather knew
19 that from the very first day they talked to you
20 about it, didn't they?
21 **A. I'm assuming they would, yes.**
22 Q. And, so, they knew on the first day they
23 were encouraging you to do this, that Jackson's
24 50 percent interest in the rights would be a way
25 that you would -- RTG would get paid, didn't they?

Page 177

1 **A. They may have known, but that doesn't mean**
2 **I did know.**
3 Q. But it means Boydston knew, doesn't it?
4 **A. Yes.**
5 Q. And, so, everyone else in your family as
6 you have said, knew that Jackson's 50 percent
7 interest in the rights was a way, probably the way
8 RTG was going to come out of this?
9 **A. It was never viewed as the way. There was**
10 **no -- the fact that we were going to have to sue**
11 **Julian didn't mean that we had any guaranty to his**
12 **money; and then secondly, the rights went up on a**
13 **public auction. There was no guaranty at that**
14 **point in time that we were going to get those**
15 **rights.**
16 Q. Well, you were either going to get the
17 rights or get paid the amount of the judgment with
18 somebody else bidding, right?
19 **A. There was no guarantee. It's a public**
20 **auction.**
21 Q. At which either other people would bid
22 cash, or RTG would bid its judgment dollars. How
23 were you not going to get paid?
24 **A. If that wasn't -- if we weren't going to**
25 **get money from the Ohio Players, it would have**

Page 178

1 **been, you know, something else, and I'm not sure**
2 **what it would be.**
3 Q. Can you identify anything other than
4 Jackson's 50 percent interest in the rights to the
5 music of the Ohio Players that was ever what you
6 expected as the source for getting paid?
7 **A. We expected him to pay the amount that we**
8 **won against him, rather than have to go after his**
9 **assets. For that reason I'm not familiar with any**
10 **other assets he owns, other than the Ohio Players.**
11 Q. All right. The one asset you did know
12 about was his rights to the Ohio Players?
13 **A. Yes.**
14 Q. Okay. Let me -- I'm going to take a quick
15 break.
16 THE VIDEOGRAPHER: It's 2:41, end of media
17 four. We're off the record.
18 (Brief recess.)
19 THE VIDEOGRAPHER: It's 2:49, beginning
20 media five. We're on the record.
21 Q. (By Mr. Lea) Are you ready to proceed,
22 Mr. Galaz?
23 **A. Yes.**
24 Q. When did you first come to know that your
25 grandfather had any role or involvement in the

Page 179

1 Segundo Suenos' litigation, that involved your
2 mother and your father?
3 **A. I can't recall a specific time.**
4 Q. Generally. Is that something you've
5 known -- did you know that when you talked to
6 your grandfather about him transferring the
7 rights against Jackson to you?
8 **A. I -- I knew he was a member in the past,**
9 **but I knew nothing about their company. Most of**
10 **their business occurred while I was growing up.**
11 Q. Did you know that your grandfather was
12 the owner of Segundo Suenos?
13 **A. Yes.**
14 Q. When did you know that?
15 **A. I don't know.**
16 Q. Did you know it before that phone call?
17 **A. Yes, but I wasn't familiar with their**
18 **business at all.**
19 Q. Did you invite your mother to support you
20 or help you bid at the auction of the rights?
21 **A. No.**
22 Q. Why not?
23 **A. Because I didn't need to include her.**
24 Q. Why didn't you -- why wouldn't financial
25 support going into an auction have been a helpful

Page 180

1 thing for you?
2 **A. Because I had my own financial support**
3 **from my own -- my own work.**
4 Q. What funds did you have available to you
5 to bid at the auction?
6 **A. The money that I made from my business --**
7 **or from my own work in my company over the past**
8 **four years.**
9 Q. Okay. You mean your savings from your
10 job --
11 **A. My savings, yes.**
12 Q. -- at Oracle?
13 **A. Yes.**
14 Q. Okay. With that, Mr. Galaz, why was it
15 helpful for you to have an additional $10,000 from
16 your mother in the purchase of a truck?
17 **A. At the time when I needed financial support**
18 **it was helpful, but I worked in sales. And if**
19 **you're familiar with sales, they are different time**
20 **periods when you get paid more. I was also promoted**
21 **at that time, too, and started making more money.**
22 **So I was financially stable and had my own savings**
23 **by that point.**
24 Q. Okay. All right. What did Segundo Suenos
25 own in 2015, other than the rights against Julian

Page 181

1 Jackson?
2 **A. I don't know.**
3 Q. What did your grandfather own other than
4 the right to sue Jackson?
5 **A. I don't know.**
6 Q. And you didn't ask either of those
7 questions before you chose to acquire the rights
8 from your grandfather?
9 **A. No.**
10 Q. Your mother's counterclaim alleges that
11 it's your father's pattern, custom, and habit to use
12 a family member to own an entity that he actually
13 controls. Do you deny that?
14 **A. He has used family members in the past.**
15 Q. Why?
16 **A. You should ask him that.**
17 Q. Well, you know, don't you, that one of
18 the reasons at least is because he owes the
19 Government money that he'd rather not pay?
20 MR. WHITE: Objection.
21 Q. (By Mr. Lea) You know that, don't you?
22 **A. I don't know the specific reasons for how**
23 **he sets up -- how he works with my family.**
24 Q. But you don't deny that he has in the past
25 used family members as the nominal or ostensible

Page 182

1 owners of entities that he's actually very actively
2 involved in, don't you?
3 **A. I don't know how he is. I don't know -- I**
4 **wasn't there to experience it. I don't know his**
5 **involvement.**
6 Q. Do you deny it?
7 **A. I can't make any -- I can't -- I can't say**
8 **yes or no to that because I don't know.**
9 Q. Okay. If you had to say he is or isn't
10 significantly involved in the business of RTG, what
11 would you say?
12 **A. I wouldn't say either. I would -- well, I**
13 **would just say that he supports me when I need him**
14 **and that's basically it.**
15 Q. And is there any remuneration or financial
16 benefit for your father in the support that he
17 provides?
18 **A. None.**
19 Q. None. Does RTG make payments on the money
20 it borrowed from WSG?
21 **A. No.**
22 Q. So what's in it for WSG?
23 **A. I can't tell you that.**
24 Q. Other than the real estate, and the claim
25 of owning Jackson's 50 percent interest and the

Page 183

1 rights to the music of the Ohio Players, does RTG
2 own anything else at all?
3 **A. No.**
4 Q. Does RTG have a bank account?
5 **A. Yes.**
6 Q. You told me earlier that you had no
7 communications at all with BMI; right?
8 **A. Yes.**
9 Q. And, so, if your father has had any
10 communications at all with BMI that involved RTG,
11 your father has had more communications than you
12 have with BMI --
13 **A. Yes.**
14 Q. -- is that right? Okay. Other than a
15 lawyer, Mr. Galaz, did anyone suggest to you that
16 it would be beneficial or helpful for RTG if there
17 weren't written assignment documents?
18 **A. If it were other than -- than a lawyer**
19 **that -- can you repeat the question, because I**
20 **didn't understand the last part.**
21 Q. Sure. We looked earlier at Deposition
22 Exhibit No. 7, which is the e-mail exchange between
23 you and your grandfather Al.
24 **A. Uh-hum.**
25 Q. And we agreed, I think, that it doesn't

Page 184

1 exactly say anything in it about an assignment; the
2 word assignment isn't there. And I think you said
3 something like "it's as close as there is to an
4 assignment"?
5 **A. Yes.**
6 Q. And then we observed that you at least
7 don't know about there being an assignment from
8 Segundo Suenos to your grandfather Al. Do you
9 remember those discussions?
10 **A. Yes.**
11 Q. All right. Now, my question is I'm trying
12 to -- I'm wondering why is it -- strikes me as odd,
13 why is it that there isn't an explicit written
14 assignment document? And that prompted me to ask
15 you, did anyone other than a lawyer -- because I'm
16 not asking you about a privileged communication --
17 **A. Uh-hum.**
18 Q. -- anyone other than a lawyer suggest to
19 you that it would be beneficial or useful if there
20 weren't an explicit written assignment?
21 **A. No.**
22 Q. Your declaration, Mr. Galaz, Exhibit 5,
23 did you type that?
24 **A. Did I type that?**
25 Q. Yes, sir. That's my question.

Page 185

1 **A. My lawyer typed that.**
2 Q. How? How did your lawyer know what you
3 personally knew?
4 **A. What -- this was you said Exhibit 5.**
5 Q. That -- you've got your hand on it, your
6 left hand.
7 **A. Yes, uh-hum. What specifically?**
8 Q. Well, it's -- as I understand it, you in
9 written words, relating your evidence of what you
10 know, so how did your lawyer know what you knew?
11 **A. Because I shared this information to him.**
12 Q. So you told your lawyer that you did
13 personally know about all that stuff?
14 **A. I'm looking at this right here, and he**
15 **was familiar with the judgment and it was primarily**
16 **my lawyer who put this together.**
17 Q. I understand that.
18 **A. Yeah.**
19 Q. But -- but we --
20 **A. I didn't write this. He wrote this.**
21 Q. I understand that, too, and we discussed
22 earlier how -- when it says you had personal
23 knowledge of a lot of that stuff, you actually
24 didn't. And I'm wondering how that came to be?
25 **A. Well, I did have knowledge of the money**

Page 186

1 **that was transferred to Julian and --**
2 Q. Let me --
3 **A. -- my understanding of --**
4 Q. -- stop you there.
5 **A. -- the actual case between Lisa, Raul, and**
6 **Julian, that's what I was not familiar with.**
7 Q. How did you personally know about anything
8 that was transferred to Julian Jackson?
9 **A. Because of documents and conversations**
10 **between my lawyer, and my family.**
11 Q. You didn't personally yourself participate
12 in anything being transferred to Julian Jackson,
13 did you?
14 **A. No.**
15 Q. You didn't personally witness or observe
16 anyone else transferring anything to Julian
17 Jackson, did you?
18 **A. No.**
19 Q. You had no personal involvement in any
20 transfer of anything to Julian Jackson, did you?
21 **A. No.**
22 Q. And, so, how did it come to be that there
23 is this sworn testimony that you did have personal
24 knowledge of those events, when you're telling us
25 now you didn't?

Page 187

1 **A. My lawyer --**
2 MR. WHITE: Objection.
3 Q. (By Mr. Lea) Go ahead.
4 **A. My lawyer told me that.**
5 Q. Okay. And you think that's personal
6 knowledge?
7 **A. Yes. Someone that's personal.**
8 Q. Okay. You graduated from college 2015?
9 '16?
10 **A. '15.**
11 Q. 2015? You have never personally yourself
12 as a plaintiff or a defendant been involved in a
13 lawsuit; true?
14 **A. True.**
15 MR. LEA: I adjourn -- pass the witness
16 and adjourn. I don't agree that it's over, but I
17 pass the witness and adjourn.
18 MR. WHITE: I'll reserve my questions for
19 trial.
20 THE VIDEOGRAPHER: It's 3:03, end of media
21 five. We're off the record.
22 THE COURT REPORTER: Do you want a copy?
23 MR. WHITE: Yes, and send it to me for
24 signature.
25 (Deposition concluded at 3:03 p.m.)

Page 188

1 COURT REPORTER'S CERTIFICATE
2 I, YVETTE GALLARDO, a Notary Public for
3 the State of Texas, No. 5195157, and a Certified
4 Shorthand Reporter, licensed in California, certify;
5 That the foregoing deposition of RYAN
6 GALAZ, was had before me at the time and place
7 therein set.
8 That the testimony of the witness, the
9 questions propounded, and all objections and
10 statements made at the time of the examination
11 were recorded stenographically by me and were
12 thereafter transcribed;
13 That the foregoing is a true and correct
14 transcript of my shorthand notes so taken.
15 I further certify that I am not a relative
16 or employee of any attorney of the parties, nor
17 financially interested in the action.
18 I declare under penalty of perjury under
19 the laws of Texas, that the foregoing is true
20 and correct.
21 Dated this 6TH day of August, 2019.
22 Yvette Gallardo
23 YVETTE GALLARDO, CA-CSR No. 12889
24 Notary Public # 5195157
Expiration: 4-1-23
25

$

**$10,000** 125:2,9 128:24 129:1,8,14, 20 130:3,5,6 180:15

**$123,000** 14:8 15:8,15

**$150,000** 56:2 61:3,18 162:13 166:11

**$164,000** 14:7

**$17,000** 129:23

**$200,000** 162:14

**$250,000** 167:22 168:2

**$3,000** 130:3,6

**$491,000** 166:22

**$5,000** 171:20 173:22 174:1,4,13

**$500,000** 162:3 166:4 167:4,11

**$7,000** 130:12 131:1,5

**$75,000** 61:19,22 62:16

**$900,000** 153:21 154:16 161:11,16

1

**1** 5:4 6:22 7:20

**1,000** 74:2

**10** 67:4,6,7 111:9 114:16 160:9

**10,000** 130:9

**100** 73:25 74:2

**11** 68:1,3 69:17 75:12 87:11 94:4 96:11

**11:04** 55:15

**11:14** 55:18

**11:53** 79:24

**11:54** 80:2

**12** 59:12 74:11,14,21 114:17 139:21 140:12

**124** 167:18

**12:28** 99:14

**12:35** 99:20

**12th** 22:13 43:17 44:5 47:19,22 52:14 114:25 115:17

**13** 81:6,8,11,17,24 84:20 85:2,9 86:21,23 89:3

**14** 112:18,19,21 114:8

**15** 116:17,18,21 117:6 118:17 119:21 120:13 121:12 122:7,15 187:10

**150** 167:9

**16** 122:18,19,22 124:2 187:9

**17** 16:23 59:12 60:10 61:11 124:19, 20

**18** 37:25 61:7 91:8 125:21,23 129:2, 3,22

**19** 52:15 154:23,25 155:1,6 158:19

**19th** 43:16

**1:40** 143:17

**1:42** 85:13

**1:49** 143:21

2

**2** 5:4 7:14 8:2 15:16 44:7 94:25

**2-month** 16:10

**20** 58:7 156:13,15 158:23 161:5

**200,000** 167:22

**2008** 112:23

**2010** 111:10 114:13,17,25 115:17

**2014** 95:3,6,15,19,23

**2015** 25:19 103:24 104:2 123:8,12, 23,25 136:7 180:25 187:8,11

**2016** 16:22 17:1 26:13 27:24 29:7,14 32:9 33:13 36:12,25 37:5 43:1,14,18 44:5 45:3 47:4,7,19 50:20 52:15 72:16 94:14 95:16,17,23,24 104:17 137:8 173:6

**2017** 22:13 55:1 124:24 128:24 172:9 173:6,12

**2018** 37:13 55:6 100:12,16 101:13 102:7,10 109:6,15 130:22 147:9

**2019** 5:2,6 83:20 84:4,12 85:13 86:14,25

**21** 158:14,23,25 159:1,3 160:2 161:19

**22** 5:2 158:14,24,25 159:1,3 161:19 162:19 164:4

**22nd** 5:6

**23** 29:15 61:8 157:16,17 161:20

**23-year-old** 29:23

**23rd** 173:3,6,12

**24** 161:22 165:6

**2421** 45:3 53:20

**24th** 37:13

**25** 78:16 165:15

**25th** 95:3,5,15

**26** 16:3

**27** 166:21,22

**28** 168:8,9

**29** 94:14 95:15

**29th** 50:20

**2:41** 178:16

**2:49** 178:19

3

**3** 13:15,18 114:11 115:8 117:22 118:16,20,21

**3,000** 130:6,9

**30th** 83:20 84:3,12 85:13 86:14,25

**33140** 53:22

**3:03** 187:20,25

**3rd** 137:8 138:5,13 139:6 171:19,21 172:2,10,11 173:5,8,9

4

**4** 17:8,11 18:10 87:13 95:25 96:10 117:23

**42** 91:9,13

**45** 74:15,20 75:9

**4531** 41:20,25 99:5 151:24 152:3 163:19,25 167:16

5

**5** 18:16,18 20:1,13 22:16 23:6,12,23, 25 25:7 26:22 83:18 84:20 85:2,9 104:2 115:9,13,25 123:15 135:3,5 172:23 173:13 184:22 185:4

**5,000** 174:9

**50** 10:19 60:13 61:3 105:11,13,19 118:11 174:19,24 175:7 176:9,12,16, 24 177:6 178:4 182:25

**500,000** 166:16

## 6

**6** 26:3 40:7,8 42:24 43:6,10 44:8 45:15 47:19 58:9 94:3,10

**6A** 45:3 53:19,20

## 7

**7** 50:10,12,16,18 51:2,7,13 66:8,13 96:10 132:24,25 133:5,7 138:23 183:22

**75** 14:7

## 8

**8** 50:12,14,16 66:8,14 94:3,10 96:10 132:24 137:3 139:9 171:23

**80** 161:6

## 9

**9** 65:8,11,19 66:8,9 81:12 112:23

**900,000** 153:15

**9:59** 5:6

## A

**a.m.** 5:6

**ability** 148:22,24 152:4

**accept** 105:11,13

**accepting** 10:18

**accommodate** 6:13

**account** 56:18 96:21 129:12,15,19 137:4 140:15 183:4

**accounts** 22:8,11

**accurate** 8:12,13

**acquire** 30:1 32:13 47:11 53:16 94:13 95:13 102:23 131:13 150:25 181:7

**acquired** 37:12 56:8,10 93:19 100:2,4,8,9 101:13 102:1,14,20 103:4 113:2,14,24 114:6 119:5,18,19 120:7, 21 121:10 122:6 130:20 131:21 143:9,12 175:10

**acquiring** 48:2 99:24 119:11 161:24

**acquisition** 132:2

**act** 44:25 99:2 153:4 159:17

**acted** 75:25 76:1,4,6 168:25

**acting** 75:23 76:10 99:9 105:20 117:25 169:1

**action** 59:13

**actions** 148:14,16,17 150:3

**active** 117:25

**actively** 182:1

**acts** 44:24 148:23 151:8 160:24

**actual** 56:17 61:9 63:14 111:1 186:5

**addition** 20:20 61:22 62:16

**additional** 67:11 74:25 92:4 165:18 180:15

**address** 41:10,23,24 45:1 53:20 81:4 82:20 83:2 155:12

**addresses** 82:24

**adjourn** 187:15,16,17

**adversary** 23:5 115:18

**advice** 5:22 52:20,22,25 53:8 63:22 111:15,17,20 112:2 114:3 118:9 119:10 121:14 122:9,12,13 124:15 125:5 151:13 155:23 171:11,14

**advise** 121:3

**advised** 12:10 121:6

**affirmative** 29:16

**agent** 42:11,14,16,25 44:19 45:19, 23 46:12,17 151:18 152:10,13,17,18, 20 159:6,10,17,21,22 160:1

**agree** 50:18,25 64:22 73:10 77:9 91:24 187:16

**agreed** 73:14 183:25

**agreement** 133:12 154:9,12,16

**ahead** 23:2 28:21 77:8 88:11 112:11 127:13 151:12 160:14 175:1 187:3

**Al's** 136:19

**Alfred** 25:11,23 104:6 123:10 136:8

**Alfredo** 9:17 117:24

**alleges** 181:10

**allowed** 42:13

**allowing** 135:1

**alluding** 23:17

**amended** 59:2 64:6,17,20,21,23 65:2,5 91:4,5

**America** 39:14

**American** 39:16

**amount** 36:18 37:1 38:2 56:2,4,5 60:8 73:5 91:10 98:10,11,17,20,21 161:25 167:23 173:22,25 177:17 178:7

**analyze** 173:20

**Angeles** 18:24

**Annmarie** 81:13,20 85:12

**answering** 73:3 88:14

**answers** 90:19

**anyone's** 131:13

**apologies** 159:16

**apologize** 126:14

**apparent** 95:22

**apparently** 31:1 124:10 127:24 130:3

**Apple** 142:8,11

**application** 157:20

**appointing** 163:23

**approved** 65:25

**approximate** 5:6

**approximately** 60:10,22 61:17 153:13

**approximation** 97:24 98:17

**area** 42:8 128:7

**arm's** 160:12,15

**arranged** 127:15

**arranging** 157:22 158:12

**arrive** 173:22

**arrived** 174:5

**article** 117:6

**articulate** 122:13,16

**articulating** 114:5

**aspect** 160:1

**aspects** 49:8

**assembling** 75:3

**assert** 59:22

**asserting** 91:20

**asset** 175:24 178:11

**assets** 120:17 161:16 178:9,10

**assign** 34:13
**assigned** 112:6
**assigning** 35:18
**assignment** 133:2,8,14,17,18,21, 22 134:11,13 183:17 184:1,2,4,7,14, 20
**assists** 158:12
**associating** 108:13
**assume** 60:14 111:21 154:10 170:9
**assuming** 174:1 176:21
**attend** 132:8
**attention** 14:2
**attorney** 71:15 163:4,12 168:22 169:3 174:17
**attorney/client** 63:25 64:14 72:23 74:9 89:1,4 92:11 144:15
**attorney?client** 76:16
**attorneys** 12:10 71:1,4 92:2
**auction** 130:24 131:6,9,18 132:3,7, 9,11,12 177:13,20 179:20,25 180:5
**August** 22:13 95:3,5,15 100:11 101:12 105:2 109:6 147:8 171:19,21 172:10
**aunt** 9:19,22 10:1 42:11 45:13,18 46:12 54:5 159:5
**authority** 151:21 152:7,9,14 153:4 157:15
**authorized** 11:1 57:18 65:25 83:7 98:23 150:18 157:8
**auto** 126:16 127:24 128:2,8,9,11,14, 16
**Ave** 162:4
**Avenue** 41:21 99:5 161:24 162:5,16 165:18 166:1
**average** 127:11
**aware** 75:20 86:13 87:6 88:12,18 96:4 114:23,24 128:10 133:23 134:15 137:2 140:24 142:4 164:8,9 170:7
**awareness** 176:16

B

**B.M.G.** 55:24
**back** 55:8 58:20,24 67:18 72:14,16, 17 75:12 77:3 80:2 82:3 94:24 103:2 105:1 108:25 115:11 132:4,23 135:2 143:7 155:6 157:11 158:19 168:6 174:11
**bad** 110:2 118:14 126:13 175:5
**Badihian** 9:24 42:11 45:4 159:19
**ballpark** 167:3
**bank** 89:23 137:4 140:15 171:22 173:10 183:4
**bankruptcy** 37:20 112:22 148:1
**bar** 72:7
**bare** 141:18 142:20
**base** 8:10
**based** 77:19 78:22 122:9
**basically** 147:16 182:14
**basis** 8:19 121:3 169:19
**Beach** 53:22
**beak** 143:16
**begin** 6:20 66:13
**beginning** 5:7 17:3 55:19 99:20 143:21 176:6 178:19
**begins** 79:4 85:11 118:17,25
**begun** 102:24
**behalf** 10:16 11:16 44:25 67:10 75:23,25 76:1,4,6,10 79:1 83:8 90:2 93:14 98:24 99:3,9 102:5 103:9 125:7 126:20 131:11,16,22 139:13 141:5 150:17 151:8,14,16 152:2,15 153:4 159:18 160:8,24 163:5,14,24,25 165:7,10,13,16 168:10 169:5,7,18
**believed** 11:1
**belonged** 107:25 113:3 120:8
**beneficial** 183:16 184:19
**benefit** 182:16
**benefits** 175:18
**bet** 158:15
**bid** 131:23 132:17,20 177:21,22 179:20 180:5
**bidding** 132:19 177:18
**bill** 93:23 126:22
**bills** 93:12,16
**bind** 151:22 152:4
**bit** 18:13 100:15 176:5
**black** 96:9
**blank** 6:22
**blue** 6:24 7:15 33:22 34:1
**BMG** 56:14 57:11,19 89:11,19 91:1, 17,25 92:15,18,22,25 93:1,4,6,9 96:21 97:10 98:1,14,18 166:10 167:11,12,15
**BMI** 57:16,19 59:19 60:13 61:2,15 62:18 63:3,10,13 64:24 82:4,13 83:16 84:2,8 86:20 87:22 88:2,3,8,23 89:8, 14,16 105:4,19 141:19 147:19,21,22 148:22,24 149:2,3,4,5,6,7,8,9,11,14, 15,20 183:7,10,12
**BMI's** 84:15 86:15 87:2,7
**Book** 142:13
**bookkeeper** 22:5
**bookkeeping** 165:21,23 168:7
**books** 22:2 116:25
**born** 169:25
**borrowed** 182:20
**Boston** 16:5 158:5
**bottom** 94:6,10 117:23
**bought** 24:21 127:13,23
**Boydston** 26:9 27:2 35:24 36:14 54:5 56:12 57:23 64:1,11 76:23 103:8 130:17 131:2,4,10,12,14 145:18 154:2 156:9 161:5 172:13 177:3
**Boydston's** 93:13
**brand** 142:4
**break** 6:11,13 99:13 178:15
**Brian** 26:9 35:24 36:13 54:5 56:12 57:23 64:1,11 74:8 76:23 93:13,17 103:7 124:18 130:17 131:10,12,14,20 144:16 145:18 156:9 161:4,5,6 172:13
**brought** 31:10,11 138:21 164:19
**Bud** 56:3
**Bug** 56:14 57:8,11 89:11,19 91:17 92:1,7 96:21 97:10,25 98:8 166:10
**business** 21:8,10,12 34:21,23 39:17 45:25 46:4,6,7 47:10 98:24 137:17,21,23,24 151:6 152:15 157:8 161:13,14 163:23,25 179:10,18 180:6 182:10
**buy** 126:11,20 127:15 153:21 160:17
**buyer** 160:16
**buying** 35:2

## C


**calendar** 172:21

**California** 18:23 44:2,4,12 103:25 114:12 115:7,14 117:9 132:7,9,10

**call** 33:20 34:5 35:13,17 36:12 38:7 47:15 80:10 94:19 95:21 101:12 105:16 108:7 109:17,19,20,23 144:16,21 145:19 146:7 147:8 179:16

**called** 26:15 29:24 33:22,25 37:11 93:22 106:16 109:20 110:10 142:14 143:10

**calls** 29:7 47:16 64:10 86:8 94:21,24 112:9

**cancer** 109:14

**candidates** 78:15

**capable** 111:3 113:10,12 114:5

**car** 126:19,21 128:6

**career** 39:18

**Carlos** 117:24

**cars** 128:16

**case** 7:13 10:6 36:4,6,7 48:13 68:6 74:16,23 75:4 81:2 91:6,21 110:19,22 113:16,18 119:23,24 121:14 142:22 145:18 146:2 147:3 172:13 186:5

**cases** 58:1

**cash** 130:2 131:24 132:20 137:24 177:22

**cash-in** 167:14

**categories** 67:1

**caused** 10:24

**cc'd** 84:6

**challenging** 62:4

**change** 60:20

**changed** 127:20 159:19 163:5

**characterize** 151:10 160:22

**characterized** 28:18

**check** 131:19,20 132:1

**childhood** 31:6

**choose** 104:15

**chose** 29:3 39:18 104:12 125:8 181:7

**circumstances** 48:14

**claim** 24:23 26:11,18 28:8,24 29:3, 11,12 30:1 32:13 33:8 48:11 49:3,13 90:7 91:2 95:8,13,22 107:16,19,21, 22,24 108:5 110:11 112:6 113:3 114:3 120:8 121:20,22 122:3,6,8 123:2,21 134:22 135:1,19,24 136:14 138:2 139:4 140:7 148:2 154:19 155:10,13 166:18 167:19 170:8,21,23 171:2,10,12 172:20 173:24 174:2 182:24

**claims** 69:4 70:6 110:17 114:18 117:16 118:3,18 119:2 120:11 150:10

**clarify** 10:9 55:6 71:22 72:2 78:20 83:5 84:5 88:17 91:2 108:6 134:6

**clean** 115:11

**clear** 21:14 115:12

**clearer** 21:14

**client's** 56:23

**close** 133:16 167:11 184:3

**closer** 162:14

**collect** 12:10 56:7 59:18 102:3,6 105:3,18,24 106:4,8,19

**collected** 20:21 56:6 60:13 63:6 78:21 98:10 102:7 162:11

**collecting** 56:14 63:8,10 102:4

**collection** 46:1,2,6 56:17 81:11,17 84:15 87:2,7

**collections** 86:15 91:1

**collects** 63:9

**college** 16:13 48:4 49:17,22 58:8 187:8

**combine** 28:21

**combining** 36:23

**common** 77:4,5,14,23 78:1,5,11,19

**communicate** 92:25 93:1

**communicated** 92:18 96:20 135:18 149:8,10

**communication** 51:3 57:10 67:22 70:19 75:17 88:7 92:19,22 93:4 134:25 184:16

**communications** 56:14 57:16,19 68:11,19 69:12 70:21,25 76:9,12,15 79:7,9,12 80:5,24 82:24 83:8 87:22 88:2,22,24 89:3,8,11,13,15 91:25 92:6,14 93:9 183:7,10,11

**company** 10:10 25:13 34:8 36:16 44:25 48:1,7,22 54:4,19 77:22 116:24 126:19,21 127:16,24 128:5 130:18 154:1,16 164:22 179:9 180:7

**company's** 117:2

**compare** 169:15

**complaint** 59:2 60:10 63:20 64:6, 18,20,21,24 65:2,5 91:4,5 173:3,13

**complies** 7:2 17:12 87:18 94:11

**compromise** 118:2

**compulsion** 160:17

**computer** 141:21,23,24,25 142:1,3, 5

**concerned** 150:15

**concert** 117:25

**concluded** 187:25

**conclusion** 112:10

**condition** 126:20

**condominium** 53:14,19 54:10,23, 24 99:6,10 155:18 156:22

**conduct** 56:23 83:8 98:23 152:14 157:8 163:23

**conducted** 158:3,4

**conducting** 158:6

**confer** 116:7

**confident** 146:10

**confirm** 84:11 116:6,8

**confirmed** 163:6

**confiicts** 46:25

**confused** 84:23 115:10 126:10 159:23,25 176:5

**connection** 12:6,13 14:14,19,22, 24 128:13

**consideration** 54:9,11

**constitutes** 140:21

**consuitant** 160:24

**contact** 56:18 57:9 157:19,22

**contemplating** 109:11

**contends** 92:5

**contention** 67:10

**continue** 66:13

**continues** 69:5 79:5 118:4 119:2

**continuing** 94:4 170:19

**continuously** 40:4

**contract** 62:18,20 63:2,13 147:18, 21,22,24 148:22,24 151:14,16 152:5 158:13

**contracting** 149:3,6,9

**contractor** 21:25 59:14

**controls** 181:13

**conversation** 27:19,23 28:1,5,7,9, 11,16,19,20 29:6,9 31:10,24 32:8,11, 18,22 33:12 36:21 37:2,3 50:2 51:9 52:4,12 127:12 133:10 145:13 147:15

**conversations** 30:12 36:24 52:9 63:23 64:3,4,7 70:7 86:2 145:17 146:1,10,11,15,23 186:9

**conveyed** 135:17 157:3

**conviction** 42:13

**copy** 58:20,22,24 59:1 62:21 65:10 91:3 112:22 116:9,14,24 117:1 123:14 124:21 187:22

**corner** 7:19

**Corporations** 159:14

**correct** 5:15,16,19 7:23,24 8:17 9:13 11:5,9 15:7,16 16:15,20,23 17:1 18:10 24:16,17 25:13 30:22 31:4 32:21 35:4 37:8 42:1 44:6 47:13,14 50:1 67:3 75:10 81:21 100:25 111:20 130:4 131:24 133:13 153:2 159:8 162:2 163:11 166:23,25 167:13 171:25 172:1 173:11 174:14

**correctly** 7:5 9:24 14:11 15:5

**cost** 131:15

**Counsel** 55:10 56:22 71:14

**counterclaim** 90:13,15,25 91:20, 22 181:10

**counterclaims** 91:5 146:21

**County** 18:23

**couple** 39:8 58:7

**court** 12:20 13:6 18:23 19:3 20:24 21:3 37:20 38:4,5,10,11 59:19 60:15 61:3 67:18 71:7 78:9,10 82:13 98:10, 22 105:18 107:1,7 110:16 111:4 116:9,12 117:15,23 124:11 148:1,5,9, 12,16,18,19,20 149:16,22,24 150:1 187:22

**court's** 78:22 111:22 112:22 118:6

**Covenant** 165:7

**covered** 113:14,25 114:7 119:6,20 120:3,22 121:11 122:10,14 166:9

**crazy** 150:14

**create** 38:21 48:7 161:13,14

**created** 38:14,15 47:10 48:10,16 50:5,23,25 95:8

**creating** 40:19 48:3 49:9,11

**creation** 38:24 39:2 40:17

**credit** 12:21 13:10 15:2,8,20 129:12

**credited** 14:8

**criminal** 40:23,25

**crossed** 169:2

**currency** 132:1

**current** 8:14,15

**custom** 181:11

D

**dad** 104:19

**damaged** 128:7

**damages** 59:16 60:2,9,11 61:4,9, 14,22 62:1,16

**data** 8:10

**date** 5:5 43:13 47:6,19 52:14 55:3 88:13 94:15,17 95:2 109:2 138:14,15 164:15 173:8,9 176:14

**dated** 111:9 112:23

**dates** 64:14 173:18

**day** 30:6 38:3 48:8,10 49:1 50:5 52:7,8 100:8,16 105:15,16 171:22 173:13 176:19,22

**days** 29:23

**deal** 125:18

**debate** 109:7

**debating** 109:8

**debt** 54:15

**December** 45:2 114:13,16

**decide** 10:16 78:10,23

**decided** 75:10 78:7

**decides** 77:19

**decision** 10:14 75:6 77:17 78:23 104:9 105:6,9 112:13

**declaration** 22:13,15 23:6,12,23 24:1 25:6 26:21 103:24 110:20 111:8 114:11 115:4,7,14,20 116:15 117:8, 14 123:5 135:3 165:6 176:15 184:22

**deed** 154:18,19 155:1,10,13,21 158:20

**defendant** 59:13 148:23 187:12

**defense** 69:5 70:6

**defensive** 108:8

**define** 152:13 160:15

**definition** 152:17

**Denise** 9:19,22 54:5 154:2 156:8

**deny** 181:13,24 182:6

**denying** 117:11 150:6

**depend** 114:2

**deposit** 89:22,24

**deposited** 129:11,15,19

**deposition** 5:1,18 6:15,21 7:20 8:2 13:18 17:3,11,20 18:18 20:1,12 42:24 44:8 50:15 51:2,7,13 62:7 65:11,19 66:8 67:6,7,12,16,17 68:3 69:17 74:14,21 75:12 81:8,11,24 89:3 94:3 96:11 104:1 112:21 115:8,9,13,25 117:5,7 118:16 121:12 123:15 124:1, 20 125:21,22 129:2,3 135:3 138:23 140:12 144:2 146:20 156:15 160:2 164:4,7 183:21 187:25

**describe** 143:3

**description** 85:1,22

**details** 27:20 132:21

**determination** 119:8 121:5

**determined** 97:19,21 138:14

**determining** 78:22

**devices** 141:16

**difference** 70:15 168:2 171:1,3

**differences** 14:16

**difficult** 74:4

**Direct** 89:22

**directly** 27:15 93:9 110:14

**disagreement** 14:18

**discovered** 98:20

**discovery** 65:21,22 68:24 74:16,23 77:25 87:12 90:19 133:1

**discrepancy** 166:14 167:22 168:5

**discuss** 82:2 174:8

**discussed** 48:12 63:19 76:7 185:21

**discussion** 36:22 51:16,19 84:6 90:6,10 120:18 139:1 175:18
**discussions** 184:9
**dismiss** 118:2
**disputed** 12:19 13:5 147:6
**distracting** 56:23
**distribution** 148:1
**District** 115:18
**Division** 159:13
**document** 18:22 19:2,6 20:9 23:14 63:14,15,16 68:22 69:19 88:19 93:3 106:23 107:2 111:2,24 113:18 117:10 133:5,14,18 134:10,15,16 136:15,16, 18,21,25 138:6 139:11,19 140:20,25 141:2,10 144:3 154:11 155:3,5 156:12 163:22 164:3 165:15 168:10 184:14
**document's** 163:10
**documents** 40:11 66:21 67:1 68:5 70:25 71:3,6 74:15,22,25 75:4 79:6, 11,14,15 80:4,15,23 86:3,4 87:23 88:8 89:18 90:5,22 91:24 92:5,6,14 139:16,17,22 141:21 159:18 160:7 169:5,7,17 183:17 186:9
**dollar** 60:8
**dollars** 59:20 60:2,10,17,22 129:16 131:12,23 132:19 162:8 177:22
**door** 45:4
**doubt** 174:23
**drive** 45:3 53:20 155:13,18 156:22 160:11 163:19
**driver's** 124:21
**duly** 5:8,10
**duplex** 99:12

E

**e-mail** 50:18 51:12,16,20 67:8 71:18,19,23 72:4,5,11,14,15,20 73:6, 12 80:8,9 81:4,12,23 82:20,23 83:2,6, 18 84:7,19 85:1,11,14 86:1,7 87:24 90:21 136:12,19 138:8,10,22 140:16 141:17 183:22
**e-mailed** 149:5,7
**e-mails** 70:24 71:11,12,15,16 73:16, 17,18 74:7 81:2,17 82:3,21 88:1 90:1 142:20 143:1
**earlier** 39:8 57:25 58:1 86:10 94:14 127:10 139:23 159:5,23 183:6,21 185:22
**earliest** 95:2
**early** 95:3 104:17
**easy** 74:7 116:7
**effort** 11:25 73:5 74:5
**electronic** 70:24 71:13 80:12 141:16
**employee** 21:21 151:9
**employees** 9:5,7,9
**encouraged** 150:25 151:2,6
**encouraging** 176:23
**end** 39:18 55:15 99:14 143:17 178:16 187:20
**ended** 170:4,10
**entailed** 111:1
**entire** 23:14 39:10 113:16,17 119:23
**entirety** 170:12,14
**entities** 182:1
**entitled** 91:12
**entity** 181:12
**entrepreneurial** 48:6
**entry** 7:19
**error** 115:10
**essence** 95:2 100:25
**estate** 46:5,7 49:14,16 52:7 53:4,7, 9,10 161:13 182:24
**estimate** 62:4 97:24 98:16 145:22 169:11 174:1
**Evelyn** 9:24 42:11,14 45:4,13,18 46:12 159:5,19
**event** 49:5,7 79:12,13 128:23 136:6
**events** 48:15 143:8 186:24
**evidence** 185:9
**exact** 37:1 38:2 41:24 47:23 55:3 56:1 60:20 64:13 76:15 94:15,16 95:20 97:1,2,18,20 98:15 108:20 109:2 142:15 145:1,8,21 162:6,7 164:15 169:8,14
**EXAMINATION** 5:11
**examples** 7:17
**exchange** 183:22
**exclusively** 79:7
**excuse** 13:5 23:9
**execute** 158:13
**executed** 139:12
**execution** 138:12
**exhibit** 6:21,23 7:14,20 8:2 13:15,18 15:16 17:8,11 18:10,16,18 20:1,12 22:16 23:6,12,23,25 25:7 26:22 40:7, 8 42:24 43:4,5,6,10 44:8 45:15 47:19 50:10,12,14 51:2,7,13 58:9 65:8,11, 19 66:8,9 67:4,6,7 68:1,3 69:17 74:11,14,21 75:12 81:6,8,11,17,24 84:20 85:2,9 86:21,23 87:11 89:3 94:4 96:11 104:2 112:19,21 114:7,11 115:8,9,13,19,25 116:1,4,13,17,18,21 117:6,8 118:16 119:20 120:13,23 121:12 122:15,18,19,22 123:15 124:2,19,20 125:21,23 129:2,21 132:24,25 133:5,7 135:3,5 137:3 138:23 139:9,21 140:12 154:25 155:1,6 156:13,15 157:16,17 160:2 161:22 162:19 164:4 165:6,15 166:19,21 168:8,9 171:23 172:23 173:12 183:22 184:22 185:4
**exhibits** 5:4 50:16 115:21 116:5 159:3
**exist** 92:12,14
**existed** 76:13 86:14 137:8
**exists** 163:22
**expect** 176:8
**expected** 97:9 145:3,5 178:6,7
**expecting** 33:20 175:25
**experience** 34:24 35:2,20 182:4
**explain** 31:23 32:2,23 33:2 109:25 120:20 121:10
**explained** 29:10 33:5 57:25
**explaining** 114:9
**explanation** 114:6 122:14 168:5
**explicit** 184:13,20
**expression** 77:24
**extent** 33:6,8,9 68:24 79:4 115:1

F

**fact** 20:17 161:9 170:23 177:10
**facts** 20:3,7,11,13,18 22:23 23:9,10, 22 24:10,12,14,15,19 110:21
**factual** 27:3

**fair** 23:20 121:7 145:25 155:6

**false** 88:9,15,20

**familiar** 35:14 36:4 56:1 59:3,9 65:14 86:18 91:6 120:16 153:10 156:11 170:11,13 175:12 178:9 179:17 180:19 185:15 186:6

**familiarity** 57:25

**family** 22:18 27:19,22,25 28:18 29:5 42:14 46:19,20,22,24 54:20 135:18, 20 154:17 155:23,25 160:21 171:11 177:5 181:12,14,23,25 186:10

**father** 9:15 12:1,8,9,13,15,20 13:9, 14 14:9,14,17,20 15:2,7,16,20 27:8, 13,16,18 28:2,23 31:7 33:2,17,18,22 34:1,5 35:6,14,20 36:16,25 38:23 39:20,22 40:14,16,19,21 45:11,13 46:10 47:1,16,21,25 48:18 49:2 50:4 51:10 52:5,13,18 54:4,22,25 55:4 56:21 57:6 63:3,13,18,20,22,24 64:4, 5,9 68:19 70:22 71:2 72:20 73:19 75:25 78:16,18 80:6,22,25 81:1,13,20 82:2,17 84:7,19,22 85:12 86:6 88:25 89:15 97:9,23 98:23 108:14 117:24 124:18 135:22 141:17 142:20 144:5, 9,12,18,20 145:5,17 146:2,24 150:18, 21,24 151:8 154:1 157:5,19,22 158:10 161:3,5 163:1,12,23 165:7,12, 16 168:10,25 169:4 170:5 174:17 176:18 179:2 182:16 183:9,11

**father's** 9:22,23 10:4,5 12:6 28:21 33:9 56:13 58:5 75:22 82:20 160:23 162:19 181:11

**faxed** 44:17

**February** 108:21 172:8,21

**fees** 20:18,20 24:7 60:14 130:18 131:4

**Fewer** 73:25

**fighting** 148:6

**figure** 131:17

**filed** 10:23,24 18:22 90:16,20 172:6 173:3,13 176:15

**filing** 11:24 98:12 105:1,3 163:9 164:10

**filings** 164:12,22

**fill** 158:19

**filled** 58:12

**final** 127:14

**finally** 170:4

**financial** 96:25 179:24 180:2,17 182:15

**financially** 180:22

**find** 27:5 57:7 71:18 72:11 73:13,16 93:15 94:22 132:23 140:12 149:13

**finding** 71:12 73:6 125:5

**finish** 69:2

**firm** 93:13

**first-off** 12:8

**fit** 85:1

**fits** 85:22

**fix** 18:14

**fixing** 166:20

**floated** 48:12

**floating** 49:24

**Florida** 16:8,11,16,19,22,25 39:7, 10,12,19,21,23 40:5 41:15,17 42:6, 19,20,22 43:2,19,20,22 44:1 53:22 58:12,18 159:14

**flow** 98:5 167:14

**flowing** 97:13

**focus** 13:25 14:2 25:9 39:16 70:10 72:25 73:4

**focused** 95:24

**Fodera** 36:7 56:25 57:2 128:13

**Fodera's** 148:23

**follow-up** 88:1

**foreign** 34:23

**form** 41:13 80:12

**formation** 40:11

**formed** 38:18 43:1 45:10 52:4

**Fort** 42:9

**forward** 29:3 78:23 125:6,8,9

**found** 27:6 96:20 157:18 170:9

**fourth** 19:10

**frame** 95:12,23 109:2

**Frank** 27:2

**friend** 58:5

**front** 123:15 172:25

**full** 113:17

**full-time** 16:13

**fully** 40:16 121:24 170:7

**funds** 12:19 15:10,17,21 54:10 78:24 131:3,18 132:2,6 137:13,15 139:6,13 180:4

## G

**Galaz** 5:1,9,13,17 6:11,20 7:5 8:1 9:15,17 11:24 12:17 13:17 14:1 15:16 17:4,10 18:18,21 19:7 20:1,6 21:8 22:7,12 23:10,21 25:11,23 26:9,10,22 30:11 34:7,11 41:9 47:14 48:9 50:13 52:11 55:20 59:1 60:1 62:13 64:18 65:12 66:7,18,22 67:5,21 68:3 69:9 73:4,10 74:12,20 75:12,23 77:21 79:4,8 80:4 81:5,7 85:21 87:11,22 88:8 89:2 91:3 93:8 94:2,7 99:22 103:11 104:6 112:20 115:6 116:22 117:5,13,17,22,24 121:8 122:22 123:10,22 132:23 133:1 136:8,12 138:2,4,5,8 139:12,13,21 140:9 141:8 142:4 143:24 145:25 147:5 150:9 156:6 157:17 159:5 162:20 163:6 166:17 167:21 170:3 175:6 178:22 180:14 183:15 184:22

**Galaz's** 138:10

**galazryan@gmail.com** 81:4

**gather** 71:6

**gave** 26:4 54:17,23 96:2,12 97:3 98:5 114:2 127:22 128:23 129:9,14 131:1 151:4 170:22

**general** 35:13 136:3

**Generally** 107:22 145:7,8 146:18, 19 179:4

**generate** 61:14

**genuine** 117:6

**gift** 125:13

**girlfriend** 42:7 55:5,7

**give** 6:25 26:10,22 34:13 39:24 50:12 62:4 95:22 98:16 124:23 134:20 145:21 166:20 169:11

**giving** 15:1 17:20

**gmail.com.** 81:5

**goal** 175:14,21,22

**good** 5:13 15:25 51:8 55:12 125:18

**Google** 38:21

**governing** 156:8

**Government** 181:19

**graduated** 187:8

**grandfather** 9:17 12:9 28:2,8,19, 23 29:4,19,24 30:9,12,24 31:1,11,14, 23 32:2,8,11,18,23 33:16,23,24,25

36:17,24 47:12,15,17,20 48:1,17 49:2 50:3,19 51:3,10,15 52:5,13 99:25 102:19,23 103:4,13,19 104:16 107:17 108:3 112:5 113:2,14,24 114:7 119:6, 19,20 120:7,22 121:11 122:2,6,24 124:18 133:3,14,22 134:11,14,19 135:22 136:1,18 137:12 138:16 140:16 143:13 151:4 170:5 171:20 173:23 174:8,17 175:11 176:18 178:25 179:6,11 181:3,8 183:23 184:8

**grandparents** 156:1,3,10,25 157:2,4

**great** 39:15 125:12,13,19

**greater** 169:15

**group** 54:2,12,17,22 156:18,20

**growing** 179:10

**guarantee** 173:25 174:2,15 177:19

**guaranty** 177:11,13

**guess** 7:12 20:21 97:25 105:2

**guy** 32:13

**guys** 143:20

H

**habit** 181:11

**half** 61:17

**hand** 8:1 24:1 50:11 185:5,6

**handed** 74:13 91:3 112:20

**handing** 6:21

**hands** 66:10 69:20 115:23 127:20

**handwriting** 7:14

**handy** 116:18

**happen** 26:12 122:22 124:1 127:6 148:4 158:11

**happened** 30:2,18,21 35:11 51:12, 20 52:13 100:18 126:23 135:16,21 136:23 147:8 155:21 159:7 164:8 172:4,10 173:5,7,16,17

**happening** 136:6,11

**hard** 94:18

**hardware** 48:22

**harm** 61:9

**head** 27:11 57:2 61:18

**hear** 5:25 6:2 21:2 63:16

**heard** 11:3,6 23:15 121:1

**held** 59:19 60:15 61:2 105:3 106:1

**helped** 57:7

**helpful** 179:25 180:15,18 183:16

**helps** 15:3

**high** 72:17

**hired** 159:17

**history** 40:23,25

**holding** 13:6

**home** 41:10,16,19,20,23

**honest** 18:5 83:23

**hour** 55:11

**hours** 71:8,9

**huge** 145:20

**hundred** 162:8

**hung** 108:9

**husband** 125:4 126:4,16,24 128:2

I

**I-PHONE** 143:4

**idea** 30:13 35:13,18 40:24 46:11,16 48:11,23 49:14,19 51:4,11 136:10 150:9

**ideas** 49:24

**identify** 64:19 75:16 96:11,18 97:3, 6 107:4 141:22 178:3

**identifying** 31:9 118:11

**identity** 73:11 96:1

**important** 70:18 110:5

**impression** 170:20,22

**in-flows** 168:4

**inability** 59:18

**incapable** 114:9

**incident** 49:5

**include** 80:6 93:10 95:18 118:9 179:23

**included** 83:17 86:1 88:1 92:22 117:10

**includes** 81:12

**income** 109:18 110:4,5 161:14

**incorrect** 163:9 168:18

**incurred** 20:19

**independent** 121:17 122:12

**independently** 121:8

**indirectly** 27:17

**individual** 75:19

**individually** 140:7

**industry** 48:20

**inferred** 133:10

**inform** 26:14 93:20 104:10 105:22 109:21 144:4

**information** 22:14,17,20,23 23:9, 11 24:11,15,20,24 26:1,5,10,17,20,24 27:1,4,5,8,12,14 56:19 59:12 63:19 64:5 65:13 67:1,12,22 68:5,11,19,25 69:16 72:24 83:13 96:2,12,24,25 97:4,24 118:8 124:7 156:17 185:11

**informed** 26:11 28:23 93:18 98:4 135:19

**informing** 38:4

**initial** 7:12,21

**initially** 10:22 166:10 167:9 168:15

**initials** 7:7 8:16,19

**initiated** 46:16

**injunction** 110:25 111:2,23 112:1, 4,6,23 113:6,13,15 114:8,14 118:1 119:13 120:6

**injunctions** 110:16

**ink** 7:15

**inputted** 96:24

**inquired** 127:10

**inside** 53:7 161:2

**instance** 163:3

**instant** 80:20

**instructing** 77:10

**insure** 60:25

**insured** 111:11

**intentional** 148:15,16 150:3

**intentionally** 147:18,19,23

**interest** 77:4,5,14,23 78:1,5,11,19 164:25 165:2 176:24 177:7 178:4 182:25

**interested** 165:3

**interfere** 147:18,23

**interfered** 148:23

**interference** 59:14 148:21

**Internet** 106:9 157:18

**interrogatory** 94:9,25 95:25 96:10

**interrupt** 96:16

**invested** 61:13

**investigate** 94:16,20 124:5,12 149:12 155:22 171:8,15 173:19

**investigating** 124:6

**investigation** 171:9

**invite** 179:19

**invoice** 93:23

**invoices** 93:12,16

**involve** 31:2 37:6,10 82:24 91:24 93:5 104:24 140:14

**involved** 17:17 19:22 23:18 25:11, 15 31:8,12,21,25 32:3,15,19,24 33:3 34:8,9 35:25 36:1,8,14,15,19 40:21, 25 41:5,7 52:6,7 54:6 73:5 74:5 83:14,23 84:5,14 86:15 87:2,6 92:19 93:5 103:22 104:21 110:19 113:7,9 121:4 124:4 135:14 146:6,25 147:2 157:1,2 161:12 169:22,25 172:15 179:1 182:2,10 183:10 187:12

**involvement** 12:13 21:7,10,11,15, 16 23:4,7,8,10,17,21 24:2,10,12,14, 15,19 25:11,23,25 28:25 33:6 35:7 38:5,9,11,23 39:1 53:6 56:13,16,21 57:5,15 59:24 104:6,8,9,11 145:12 160:23 178:25 182:5 186:19

**involves** 90:25

**involving** 84:2 99:25

**Irving** 126:16

**item** 74:13

**items** 14:3,6

J

**Jackson** 19:1,3 20:19,20,21 25:22 29:13 31:16,19,24 32:3,14,19,24 33:3 36:9,17 47:11,18 48:2,11,18 49:3 51:5,12 65:1,4 67:23 68:12,20 69:13 70:12,22 72:21 73:21 96:3,14 99:25 100:19 101:1,6,14 102:2,5,8,9,15,21, 25 103:6,15,18 104:5 105:21 107:18 117:17 122:2,25 123:9 130:19 132:13 136:8,13 140:14 141:19 146:3,4 147:1 151:1 172:6 173:14 174:18 175:6,19 176:7,9,12 179:7 181:1,4 186:8,12,17,20

**Jackson's** 107:13 132:11 174:23 176:23 177:6 178:4 182:25

**January** 25:19 83:20 84:3,12 85:13 86:14,25 104:2 108:21 123:8,23 136:7 172:8,20

**job** 16:13 180:10

**journal** 165:25

**judge** 127:4 136:5

**judgment** 13:13 24:2,8 91:10 111:9,23 114:13,17,25 115:17,19 116:4,13,14,21,25 117:1,7,10,12 131:23 132:13,19 177:17,22 185:15

**judicial** 77:16

**Julia** 117:17

**Julian** 19:1,3 29:13 31:16,19,24 32:3,14 36:8,16 47:11,18 48:11,18 49:3 63:2 65:1,4 67:22 68:11,20 69:11,12 70:12,14,18,20,22 72:21 73:20 96:3,13 99:25 100:19 102:5,8,9 103:5 105:21 107:18 110:14 118:11 122:2,25 136:13 141:19 146:3,4 147:1 172:6 173:24 177:11 180:25 186:1,6,8,12,16,20

**July** 5:2,5

**jumped** 144:16

**June** 102:7 130:22

**jury** 127:5 136:5

**justify** 161:17

K

**Katona** 9:12 36:7

**keeping** 22:7

**kind** 57:3 142:11 165:24

**knew** 31:22 35:5,17 67:9,15 97:1,2,8 108:24 109:3 110:9 111:7 114:10,16 117:15 123:12 174:18 175:6,10 176:6,18,22 177:3,6 179:8,9 185:3,10

**knocked** 45:3

**knowing** 29:2 111:18

**knowledge** 20:3,14,17 22:14,22 26:17 35:10 103:7,8 110:18,21 115:16 118:1 121:13,16,19,20 122:8 123:8,24 185:23,25 186:24 187:6

**knowledgeable** 57:8

L

**lack** 119:22

**Lake** 45:3 53:13,19,20 152:19 154:19 155:2,13,18 156:21 157:5,9, 20 158:9 160:11 163:19

**laptop** 142:12

**late** 104:17

**Latin** 39:14,16

**Lauderdale** 42:9

**law** 93:13

**lawsuit** 8:21 10:24 11:24 12:7,14,22 14:15,20 17:25 18:4 19:3 34:9 35:18 59:2 65:4,14 66:23 67:20,23 70:12,13 75:24,25 76:2,25 77:14 101:1 169:23 170:1 187:13

**lawsuits** 35:13

**lawyer** 5:23 11:18 20:17 22:18 27:2 35:21,22,23 36:13 37:19,23,25 57:24 58:5 60:3,4,7 62:3,15 92:19 93:5,10 103:8 110:23 111:15,17 112:2 114:1, 5 115:1 118:9 119:9,15 120:5 121:3, 6,9,14,18 124:7 131:11 135:17 139:16,19,23 145:19 146:6,25 171:12 183:15,18 184:15,18 185:1,2,10,12, 16 186:10 187:1,4

**lawyer's** 111:20 119:23

**lawyers** 11:1 63:21 70:8 75:17 111:11

**lawyers'** 60:14 139:22

**Lea** 5:12,14 13:16 17:9 18:13,17 23:2,15,19 26:8 32:7 40:8 43:9,11 50:11,15 55:12,20 57:5 65:10,11 67:5 68:2,23 69:4,7 71:17 74:12 77:8,10, 13,18 79:23 80:4 81:7 84:24 86:12 88:11 90:17,20,24 99:17,22 112:11, 20 114:24 116:18 117:21 118:13 120:19 121:1,7 122:19 124:20 125:22 135:10 143:16,20,23 151:12 154:24 155:1 156:14 157:17 158:15,18,22,25 159:4 160:14 161:21,23 166:22 168:9 172:3 175:1,4 178:21 181:21 187:3, 15

**LEAH** 112:18

**learn** 106:3,6 109:13 170:3,15 176:12

**learned** 38:8 94:13 95:13,14

**leaving** 16:13

**led** 49:9

**ledger** 165:24
**left** 7:19 24:1 48:4 118:17 119:1 131:2 185:6
**legal** 11:20 75:15 77:6 103:2 112:9, 12 121:23 122:9,12,13 130:17 159:18
**length** 160:12,15
**lengthy** 37:2
**lesser** 11:13 169:15
**level** 160:22
**license** 124:21
**lien** 166:17 167:19
**life** 29:20,23 30:18 39:10 48:15 49:5
**life's** 34:24
**limited** 71:11 99:8 110:18 121:13
**lines** 79:5
**Linkedin** 8:6,9
**Lisa** 9:12 10:18,25 36:7 58:1 63:8,9 69:10 70:14,18 78:22 98:11,21 117:17 186:5
**list** 49:10 78:14 84:24
**litigate** 105:6,10
**litigation** 12:2 17:17 19:22 36:8,15 75:14 77:23 78:4,19 83:4,21 84:1,13, 18,25 85:6,22,23 86:13,17 87:1,5,6 114:12,18 115:8,15 117:16 118:4,18 119:2 146:3,4 169:22 170:1,4,8,10, 11,15,19,25 171:6,16 179:1
**live** 16:4,10 39:14,16 43:25 132:10 158:5
**lived** 16:6,8,16,19,25 39:7 40:3 43:21
**lives** 40:1 42:7,9 104:19
**living** 16:22 39:4,15,20,22 41:13 42:19,20,22 43:2,18,20,24 44:2,3 45:6 54:22,25 55:4,6
**LLC** 8:20 21:9 36:6 38:16,18,22 40:17,19 41:14 43:1 47:25 48:3,10 49:9 52:4 55:23 137:20
**loan** 129:6,13,23,24 153:23 154:7,9, 11,16 161:11,17
**locate** 71:5 74:6,7
**location** 41:13
**locations** 41:14
**logic** 120:21
**long** 14:1 16:6,8 20:9 36:2,14,21 39:22 42:17,21,23 43:2,18 49:15,18 58:4 71:5 72:12 73:13 108:25 125:9 142:9 143:5
**longer** 71:8 108:17
**looked** 17:13 90:12 93:25 183:21
**Los** 18:24
**lot** 30:11 73:16 185:23
**loud** 26:8 46:16
**louder** 6:2
**loudly** 6:1
**love** 104:18

## M

**Mac** 142:13,15
**made** 12:17 13:2 119:9 171:1,3 180:6
**mail** 44:17 58:19
**main** 11:11,12,14 20:16 40:20 175:21
**maintaining** 22:8
**make** 6:6 12:23 28:25 77:17,18 84:24 121:4 124:3 145:8 152:10 159:1 161:10 182:7,19
**maker** 10:14
**makes** 14:15 47:20 49:5 158:10
**making** 90:25 91:2 158:16 180:21
**manage** 22:10
**manager** 168:16,20,25 169:1
**managing** 35:2 53:9
**mandate** 149:16
**March** 109:15 172:22 173:3,6,12
**margin** 118:17 119:1
**mark** 7:19 18:13 140:11
**marked** 5:4 6:21 8:2 13:15,17 17:8, 10 18:16,17 40:7 50:10,12,14 65:8 67:4 68:1 74:11 81:6,8 112:19,21 116:17 122:18 124:19 125:21 154:25 156:13,15 157:16 159:3 161:22 166:21 168:8
**Massachusetts** 16:5 39:5 58:15, 17
**material** 18:9 67:17
**math** 167:20
**matter** 83:15,22 84:7 86:18,19 171:5
**matters** 145:23
**Maurice** 126:24 127:5 128:2,13
**Maurice's** 127:2
**means** 76:8 165:12 173:24 177:3
**meant** 20:7 22:22 88:5
**measured** 60:2
**mechanism** 134:24
**media** 5:7 55:15,19 99:14,20 143:17,21 178:16,20 187:20
**meetings** 158:13
**member** 21:18 42:15 46:19,23,24 150:19,22 151:18 162:22 163:1,6 179:8 181:12
**members** 46:21 181:14,25
**memorialization** 136:11
**memorialized** 80:11
**memory** 34:5
**mentioned** 20:15 28:24 46:16 82:10,11,12,17 86:10
**message** 135:17
**messages** 80:18
**messaging** 80:20
**met** 5:14
**Miami** 39:15 42:8 53:22
**middle** 85:2,12 119:1 173:2
**mind** 66:22 69:8 70:16 104:24 175:16
**mindset** 175:17
**mine** 42:15
**minutes** 5:15 13:23 166:3
**mis-paid** 86:11
**missing** 158:17
**misspoke** 157:12
**misunderstood** 15:12
**mixed** 43:3
**mobile** 142:24
**mom** 104:18,21,25 108:8 125:8 127:12,22
**mom's** 46:24
**moment** 13:16 17:9 37:11 65:16 68:14 85:16 96:24 100:1,2 105:1 112:24 115:6 156:14 164:3

**money** 10:25 11:7 13:5,9,10 15:2 22:9 33:7 46:1,2 52:19 54:8,14 55:23 56:5,15,20 59:18,20 60:13,15,19 61:13,14,15 63:5,8,10 78:21 82:12,15 89:18,21 90:3 91:11,16,20 92:18 96:25 97:10,13,14,17,25 98:5,7,10, 13,17,21 101:6,8 102:4,5,6 105:3,18, 25 107:3 121:25 124:23 127:15,18, 19,22 129:19 130:25 131:6,8 137:11 139:7 148:1 161:25 162:9,10,11,15 165:25 166:9 174:3,12 175:14,22 176:1,7 177:12,25 180:6,21 181:19 182:19 185:25

**monies** 86:11

**month** 43:17 50:22 51:1,23 52:2 62:8

**monthly** 129:24

**months** 16:9,17 37:25 39:7,9

**Mori** 81:14 85:13

**Mori@troygould** 81:20

**morning** 5:13

**mortgage** 154:4

**mother** 9:13 10:6,7,12,17 12:1,18, 21 13:4,9,11,13 14:6,9,17,18,22,24 15:3,10,18,22,25 29:1,2 31:2,7,8,12 35:16 36:15 37:7,10,11 38:7 59:17,21 60:18,23,24,25 61:4 65:13,23 66:1,25 67:11 68:10,18 78:15 84:2,13 85:23 86:17 87:1 90:24 91:9,19 98:7,13,17 99:23 100:17 101:11,19,25 102:13,18 103:17 104:10,13,15 105:7,10 106:16 107:11 108:22 109:13 114:20 120:12 124:23 125:14 127:5 128:23 129:9,14 131:1 141:20 143:10 146:4 147:1,6, 17,23 149:18 179:2,19 180:16

**mother's** 9:21 10:3 38:8 67:21 68:5 87:12 90:12 91:4 126:4,15 127:19 128:2 181:10

**move** 29:3 57:2 78:23

**moving** 30:14 47:17 51:4,11

**multiple** 92:9

**music** 46:1 55:24 56:3 57:9 82:25 84:14 86:16 87:3,8 91:17 92:1,7 96:14,21 166:10 174:19 178:5 183:1

N

**names** 26:4 96:22

**necessarily** 73:15

**needed** 67:11 93:18,20 102:16 105:6,10 180:17

**negative** 27:11

**negotiated** 174:7

**nods** 29:16

**nominal** 181:25

**non-** 21:2

**non-responsive** 21:6

**noted** 29:9 112:12 167:18

**notes** 129:24

**notifying** 38:11

**november** 45:2 114:17,25 115:17

**number** 5:7 39:24 45:3 55:19 60:19 61:18 62:4 65:17 69:17,24 70:2 94:9 99:20 112:18 133:18 143:22 145:21 162:7 166:15 167:1 169:9,14 174:5

**numbered** 14:3,6 94:3 117:22 118:21

**numbers** 43:4 66:18

O

**oath** 5:21

**objected** 89:5 96:15,17

**objection** 21:2,6 22:25 23:13 68:21 77:6,15 86:8 88:10 112:9 114:22 117:20 118:7 120:14,24 151:11 160:13 174:25 181:20 187:2

**objects** 68:23

**OBO** 165:13

**observe** 186:15

**observed** 184:6

**obtain** 98:12 116:9 135:1 175:22 176:1

**obtained** 10:25 55:23 98:14,18 102:8 103:10,13 121:17 133:2

**obtaining** 98:22

**occasion** 147:6

**occasions** 21:5

**occur** 109:9 123:1

**occurred** 36:20 138:12 172:19 179:10

**occurring** 64:8 148:25 149:20

**occurs** 144:23

**October** 45:2 137:8 138:5,13 139:6 172:2,11,20 173:5,7,9

**odd** 184:12

**offer** 13:12

**office** 41:11 53:13,19

**offices** 41:18

**official** 106:25 107:6 116:25

**Ohio** 10:19 46:3 55:24 56:8 59:23 87:7 96:14 97:12 98:25 148:3,7 162:11 175:15 177:25 178:5,10,12 183:1

**online** 27:6 106:21 107:2 111:3

**operated** 54:19

**operating** 126:12 137:17

**operations** 137:22

**opinion** 104:23

**opportunity** 29:25 31:15 32:12 34:21,23 94:13 151:5,6

**Oracle** 180:12

**order** 18:14 105:18 107:3 117:23 118:6 135:7

**ordered** 117:15

**organize** 71:6

**originated** 63:1

**ostensible** 181:25

**outflows** 168:4

**owed** 22:9 101:6

**owes** 14:9 181:18

**owned** 156:3 174:18 175:7,13 176:9,12

**owner** 8:23 54:13 63:1 78:17 97:12 118:11 140:8 141:1 155:17 156:21 179:12

**owners** 8:25 9:2 182:1

**ownership** 10:19 11:4 46:2 59:22 60:24 61:1 62:19 76:5 79:18 105:12, 14 109:21 145:10 147:7 148:3,7 150:6 162:11 167:16 174:23 176:17

**owning** 182:25

**owns** 53:4,7,13,18 178:10

P

**p.m.** 85:14 187:25

**pages** 66:8 74:15,20 75:9 81:12 155:7

**paid** 12:21 15:21 20:20 54:14 82:13, 14 90:8 93:19 126:18 130:10 131:14 132:5 139:7 167:18 171:19 176:8,25 177:17,23 178:6 180:20

**Pancoast** 45:3 53:14,19,20 152:19 153:4,8,18 154:19 155:2,13,18 156:22 157:6,9,20 158:9 160:11 163:19

**paper** 6:22 134:11,13

**papers** 37:20 38:10 149:22

**paperwork** 38:4 58:9,10 150:8

**paragraph** 20:2,12 22:15,24 23:6, 11,19 24:3,9,11,13,16,18,20,25 25:4 26:3 60:9 61:8,10 65:3 91:9,13 103:25 104:1 116:1 122:7,15 123:5, 18 135:4,5,12

**paragraphs** 26:2,21 27:14,21 59:12 61:7

**parallel** 126:23

**parents** 31:22,25 32:4,15,20,24 33:3

**part** 13:4,8 14:19 59:24 120:18 130:25 131:5 144:21 147:20 149:19 164:6 165:23 172:14 183:20

**participate** 75:3,6 186:11

**participated** 66:3

**participating** 27:25

**participation** 28:21 46:11

**parties** 69:4 70:5 75:20 160:20

**partnership** 128:4,10,15

**party** 75:14 77:3 78:4,18

**pass** 156:2 187:15,17

**past** 31:22 32:16,20,25 33:4,6 35:8 48:20 49:20 82:17 105:2 121:13 144:7 179:8 180:7 181:14,24

**pattern** 181:11

**pay** 13:13 93:18,21 130:17 131:2,4, 5,8,12,23 132:1 137:11 173:23 174:12 178:7 181:19

**paying** 15:3,9,17 153:7 162:10

**payment** 15:21 90:2 129:24 130:2,7

**payments** 182:19

**pen** 6:24 140:10,11

**penalties** 5:22 17:5,24 18:3 19:15, 18

**penalty** 19:23 20:8,13 40:13 115:15

**people** 22:21 26:4 124:15,17 132:16 156:8 177:21

**percent** 10:19 14:7 60:14 61:3 78:17 105:11,14,20 118:11 161:5,6 174:19,24 175:7 176:9,13,16,24 177:6 178:4 182:25

**percentage** 161:1

**period** 16:10 49:25 144:17

**periods** 180:20

**perjury** 5:22 17:6,18,24 18:3 19:15, 19,23 20:8,14 40:13 115:16

**permission** 125:7 127:14

**person** 22:2,7,10 31:10 33:17 34:13,14 35:19 36:13 43:25 45:1 56:19 57:7 60:7 62:14 75:19 77:22 138:3 151:20,21,22 157:19,22

**person's** 72:11

**personal** 20:3,14 21:7,16 22:14,22 23:4,8,10 24:10,19,22,24 104:23 110:21 115:16 123:8 137:3 140:15 141:24,25 142:1,2,5 145:23 185:22 186:19,23 187:5,7

**personally** 25:15 92:2,17 104:18 106:7 127:14 135:14 137:12 140:16, 22 158:4 173:19 185:3,13 186:7,11, 15 187:11

**persons** 96:1,12,19,22 97:3,6

**pertains** 151:24

**phone** 28:5 32:9 33:13,15,16,19 35:12,17 36:12 38:7 47:15,16 64:9 76:18 80:10 94:19,21,24 101:12 109:17 142:24,25 143:3,9 144:8,10, 18 147:8 179:16

**phrase** 20:12

**piece** 19:22 47:9 84:18 85:22 87:5 113:16 134:10,13

**pieces** 84:25

**pinpoint** 109:1

**place** 39:16,17 41:16 54:21 107:10 148:8,11

**plaintiff** 8:20 148:24 187:12

**planned** 146:19

**planning** 158:6

**Player** 87:7

**Players** 10:20 55:25 56:9 59:23 96:14 97:12 98:25 148:3,7 162:12 175:15 177:25 178:5,10,12 183:1

**Players'** 46:3

**pocket** 131:13

**point** 23:20 30:16,17 34:7 35:1 37:5, 6 40:20 45:14 69:19 95:14 97:14,19 101:5 102:1,13,19 137:13,16 149:17 155:6 175:9,16 177:14 180:23

**points** 11:11,12,13,14,15,17,19,22 20:16 144:13,14

**position** 67:15,20 69:13 89:2 93:8 141:7

**possibilities** 52:6

**posted** 8:9

**potential** 75:14,20 77:3 78:4,14,18 97:4,8 157:25

**potentially** 48:23 78:24 141:11

**power** 163:4,12 168:22 169:3

**practically** 144:24

**Prairie** 41:20,25 99:5 153:16,22 154:5 157:10 161:15,24 162:4,5,16 165:18 166:1

**prejudice** 118:3

**preliminary** 110:24 111:2,23 112:1,3,6,22 113:5,12,15 114:8,14 118:1 120:6

**prepare** 62:9 144:1

**prepared** 8:7 164:6 172:13

**preparing** 62:12 66:3

**present** 33:17

**presented** 29:25 34:16,17 170:8,24

**pretty** 30:5 34:23 52:12 145:2

**prevailed** 107:18 108:5

**prevented** 99:8 147:25 148:25 149:19

**prevention** 60:12

**previous** 51:16 139:1

**previously** 20:15 101:13 102:1,14, 24 103:5,14 122:24

**price** 127:11

**primarily** 12:11 95:21,24 185:15

**printed** 70:25 80:12

**prior** 42:13 88:17 90:18

**privilege** 89:4

**privileged** 63:25 64:14 72:24 74:9 76:17 79:10,13,14,16 89:1 92:11 93:9 103:13 144:16 184:16

**proceed** 17:14 55:21 66:15,16 87:19 99:17 143:23 178:21
**proceeding** 17:17,24 23:5 115:18
**proceedings** 103:2
**process** 72:21 144:4,22 148:5
**produce** 67:11,16 90:22
**produced** 75:7 90:5,23
**production** 66:7,13
**profile** 8:6
**prohibiting** 110:16
**promoted** 180:20
**prompted** 48:16 105:5,9 184:14
**property** 76:5 99:2,4 132:12 151:24 152:3,17,20 153:5,8,11,14,16,19,22 154:5,19 155:2,12,13 157:6,9,10,13, 21,25 158:3,9 160:11 161:15,24,25 162:16 165:19
**proposal** 12:17,23 13:2,4,8,22 14:7,15,21 15:1,9,17,24
**protected** 75:18
**prove-up** 176:15
**provide** 11:15,16 26:23,25 92:4,10 115:3 125:14 133:2 146:21
**provided** 27:15,17,20 72:24 74:10 75:4 87:25 115:1 118:8 119:10 120:4 122:9 124:8 134:21 139:17,20
**providing** 12:16
**public** 106:5 124:11 130:24 154:4 164:10,12,21 177:13,19
**purchase** 125:10 126:9,19 127:16, 20 129:10,16,21 130:14 131:18 180:16
**purchased** 125:6 126:5,7,10,18 131:10,15 150:7 173:20
**purchasing** 29:3 128:7
**purpose** 20:18 118:10
**purposes** 36:22
**pursuant** 49:12
**pursue** 29:11 48:24 114:3 121:24 134:22 135:24 171:12
**pursued** 33:8 107:16,24 172:20
**pursuing** 49:3,13 136:13,14
**pushed** 78:24
**put** 42:25 52:18,19 62:5 65:9 75:16 86:21 110:23 143:7 161:24 162:16 175:9 185:16
**puts** 52:20
**putting** 105:17 107:3

Q

**question** 15:12 20:25 23:1,14 32:6 51:8 53:17 60:6,8 73:8 77:7 84:10,11, 23 85:3 86:12 94:12 96:7,8,9,18 110:2 118:14,23 120:25 123:3,4 126:13 134:6 138:20 139:20 141:13 170:14 174:23 175:3,5 176:2 183:19 184:11,25
**questions** 5:21,23 6:10 59:5,11 65:12,21,23 66:6,17 73:1,3 74:17 85:18 87:17 88:14 94:8 112:25 115:13 144:23 145:1,9 181:7 187:18
**quibble** 100:14
**quick** 143:16 167:20 178:14
**Quit** 154:19 155:10,12

R

**R.T.G.** 8:16
**Raul** 9:15 26:9 74:8 75:23 78:25 79:8 87:22 88:2,7 161:5 162:20 163:6 186:5
**Raulgalaz1@aol.com** 82:21
**re-sold** 128:17
**re-spelled** 169:3
**reached** 125:5
**read** 17:15 78:3 81:15 85:16 87:15 94:7,11 111:22,25 119:16 120:20
**reading** 111:4 113:10,12
**ready** 17:14 55:20 59:10 66:14,16 74:17 85:17 87:16,19 99:17 112:25 143:20,23 178:21
**real** 46:5,7 49:14,16 52:6 53:4,6,10 161:13 167:20 182:24
**realize** 37:9
**reason** 6:12 10:21 11:6 48:25 52:3 68:15 95:20 96:15 99:11 117:4 132:12 170:24 175:25 176:8 178:9
**reasons** 10:23 11:3,10 181:18,22
**recall** 28:10 29:8 34:3 36:18 37:1,4, 16 38:2 44:18 46:18 47:23 48:13 50:6 55:2 57:12,14 58:25 63:14 64:13,16 81:10 87:24 89:20 92:20 93:24 95:20 98:19 132:22 136:4 140:5 145:1,6,21 147:12 148:13 154:10 169:8 176:14 179:3
**receive** 13:5,9 14:7 56:19 72:5 89:21 107:3 141:17 142:20,25 159:18 173:25
**received** 11:7 12:18,20 13:10,11 50:19 63:22 71:20,24 73:20 74:15,22 75:1 81:13,19,23 89:19 91:11,16 96:25 98:8 170:20
**receives** 93:17
**receiving** 61:15 82:4 104:16 147:25
**recent** 164:20
**Recently** 164:16
**recess** 55:17 80:1 99:16 143:19 178:18
**recipient** 71:2 72:3 73:7,12 80:7,8
**recognize** 8:3 11:4 18:19,20,21 40:8 50:15 65:20,22 68:4 125:22 147:7 175:20
**recollect** 140:25
**recollection** 34:4
**record** 5:7 55:16,19 79:21,25 80:3 99:15,21 106:5 136:6,10 138:6 143:18,22 165:24 178:17,20 187:21
**recorded** 80:18 154:4
**records** 22:3 107:1,7 111:4 114:19 116:9,12,25 117:2,13,16 118:18 124:11 154:5 156:7,16,24 159:12
**recover** 176:7
**recuperate** 175:14
**recurring** 161:14
**red** 140:10,11
**refamiliarize** 59:10
**refer** 73:20
**reference** 86:23 91:9
**referenced** 23:5 25:12
**referred** 60:9 61:10 64:23 65:1,5 111:9 114:13 115:6 117:7
**referring** 24:3 72:20 75:24 78:21 79:7 84:19 86:6 103:10 109:20 115:22 130:8 139:9 140:2 149:25 157:18 162:4
**refers** 25:18 61:8 77:4 116:1
**reflect** 52:11 70:25 80:5,24 89:18 119:18 159:14

**reflected** 14:21 129:1
**reflects** 89:24 93:4
**refrain** 57:4
**refusal** 105:11
**refuse** 105:13
**regard** 80:21 83:21 148:15 152:20
**register** 42:14
**registered** 41:11,17 42:11,16,25 44:19 45:19,23 46:12,17 53:13,18 159:6,10,21,22
**registry** 12:19 59:19 60:16 61:3 82:13 98:11,22 105:4,19
**relate** 70:22 91:25 146:14
**related** 40:11 145:17 146:20 163:25
**relating** 96:13 152:3 185:9
**relation** 99:9 127:7 128:1 143:8 160:19
**relationship** 29:2 148:25 149:14, 15,19 151:10,17
**relevant** 66:22,23,24 67:2,23 68:16, 20,25 69:1,8,10,11,13,16 70:5,11,13, 16 89:6,8,12 92:1,7,12 96:3,4 97:14, 17
**relied** 124:7
**rely** 114:4 124:15
**remedies** 91:11
**remember** 17:6 29:5,20 30:8,23 40:18 52:2 108:20 135:3 146:23 153:2,5 157:14 164:15,17 166:5 184:9
**remuneration** 182:15
**rendered** 115:17
**renovate** 128:5
**renovated** 99:12
**renovation** 46:5,7
**rent** 157:5,12
**rental** 157:19,21,25
**rented** 158:9
**renters** 167:16
**repair** 128:6,16
**repeat** 15:14 25:2 37:21 53:17 65:15 67:24 69:14 78:2 85:3 100:24 140:18 154:21 167:25 175:2 176:2 183:19
**rephrase** 12:24 96:8 100:22
**REPORTER** 187:22
**representation** 139:8
**representative** 7:1,17,20 21:24 136:9 168:19
**representing** 120:5
**represents** 44:24
**reprimand** 83:10,11
**request** 68:5,24 69:17,24 70:2 87:12,13,15
**requests** 65:23 66:7,12 67:21 74:16,23 77:25 92:9
**require** 67:18 92:8 95:7 101:16 124:3
**required** 103:21 114:18
**requires** 77:16 112:12
**resale** 128:6,9
**reserve** 187:18
**resign** 159:11
**resigned** 45:18 159:9
**resigning** 159:5
**response** 27:11 29:16 69:16 70:1,4 74:16,23 87:13,15,21 88:6 94:9 95:1, 25 116:20 137:5
**responses** 68:4 77:24 87:11 90:22 92:10 146:21
**responsibility** 105:22
**responsible** 22:7 40:17 153:7,9
**responsive** 21:1,3 79:6,11,14 87:23 88:8
**rest** 162:15
**restate** 147:20
**Restrictive** 165:6
**retail** 128:9
**review** 18:9
**rights** 12:11 24:21 25:12,22 37:12 46:3,7 55:24 56:8,11,15,17 57:8 61:1 76:7 79:19 80:21 82:25 84:3,14,15 86:16 87:3 93:19 96:3,13 98:6 100:2, 4,9 102:8 104:5,16 105:12,14 110:4, 17 114:18 117:15 118:3,17 119:2 123:9 130:20 131:13,15,21 132:2,6 136:8 141:18 143:13 146:2 147:7 150:10,25 172:4 174:19 175:7,24 176:9,13,24 177:7,12,15,17 178:4,12 179:7,20 180:25 181:7 183:1
**role** 151:10,17 163:16,17,18 178:25
**roughly** 29:14 38:1 39:23 42:18 43:17
**Royal** 5:13 70:19 172:14
**royalties** 62:19 64:24 84:2,15 86:15 87:2,7 109:18 110:4,12,13 141:19 147:1
**royalty** 46:6
**RTG** 8:20,23,25 9:3,5,9 10:10,12,14, 16 11:16 25:13 36:6 38:4,14,15,16,24 39:2,13 40:5,12,15,17,19 41:16,18 42:25 45:19,23,25 46:4,8 47:10,25 48:16 50:5,23,25 52:4,14,19 53:4,7, 12,16,18,23 54:9,11,12,15,18,23,25 55:23 56:7 57:24 58:10 62:18,23 64:21,23 65:2,4,5,13 67:11,16 68:23 69:12,15 70:20,21 71:16 74:16,22 75:23,25 76:1,11,25 77:4,14,22 78:5, 12 79:1,8 82:18 83:8,14,17 84:1,5,13 87:1 88:23,24 89:19,21 90:2,5,8,13, 21,25 91:10,16,25 92:3,5,6,15 93:12, 14 94:16,20 98:24 99:3,9,24 101:1,5, 8,13,25 102:13 108:3 113:2 120:5 123:2 131:23 132:1,5,13,17,19 133:1, 15 134:12,17,20 136:6,10 137:8,11, 13,15 138:3,4,5,11,17,19 139:3,4,8, 13,14 140:4,8,17,22 141:1,5 149:9,12 150:17,19,22 151:8,10,14,17,22 152:4,18 153:21 154:16,18 155:2,17 156:21 159:6,18 160:8,11 161:11,14, 16,24 162:9,15,22 163:2,6,16,20,24 164:22 165:7,10,16,21,24 166:1,14, 18 167:14,23 168:11 169:5,7,22,25 173:13 176:25 177:8,22 182:10,19 183:1,4,10,16
**RTG's** 19:3 38:5,11 59:1,16 60:1 61:21 62:1,15 65:22 67:20 68:4 76:25 77:24 85:23 86:16 87:11 88:6 101:1 131:11,16,21 133:4 147:7,18,22 148:22,24
**RTG001** 133:19 134:10
**RTG005** 117:22 118:22,23
**rules** 20:24
**Ryan** 5:1,9 31:15 81:5 138:2,4,24 139:11,12

## S

**sale** 126:22 132:14,16
**sales** 126:16 127:24 128:3,9,11,14 180:18,19
**sample** 7:21

**samples** 6:25 7:1,6
**save** 106:23
**saved** 130:13
**savings** 180:9,11,22
**school** 72:18
**score** 12:1,22
**scratched** 168:16
**search** 71:13 72:5,7 164:21
**searched** 38:21 164:11
**secondary** 36:10
**Secretary** 156:17,25 159:12,13
**seeks** 68:24
**Segundo** 21:8,18,21,25 22:3,8,9 25:20 36:8,15,16 100:18 101:2,6,14 103:18 104:3 107:25 113:3 114:19 117:24 118:4 120:8,9,11 122:23,25 123:21 133:22 134:14 135:25 136:7, 17,20 150:10 170:4,19 176:7 179:1, 12 180:24 184:8
**Segundo's** 102:2,14,20,25 103:5, 14 110:17
**selected** 42:15
**sell** 34:13 160:17
**seller** 160:16
**selling** 35:2 48:21
**send** 72:5 93:23 140:25 141:17,21 142:19,25 187:23
**sender** 71:2 72:3 73:6,11,12 80:7
**sending** 82:3 128:15
**sense** 6:6 14:15
**sentence** 24:25 25:10,18 26:3 69:2 79:3 104:1 118:16,25 119:7,20 120:22 121:11 122:7 123:7 135:13
**sentences** 25:9
**separate** 36:24 104:19
**separately** 70:9
**September** 26:13 27:24 29:7,14 32:8 33:13 36:12,25 37:5,13,17 43:1, 14,16,17 44:5 45:2 47:4,7,19,21 50:19 51:23 52:2,14 94:14 95:15,17, 24 100:15 101:12 104:17 109:6 111:9 147:8
**sequence** 143:8
**set** 39:13 40:4 52:14 65:12 96:21
**sets** 181:23
**setting** 40:14 47:24 58:10
**settle** 118:2
**settling** 12:22 14:16
**shakes** 27:11
**share** 83:13 102:9
**shared** 22:17 97:23 98:4 104:22 185:11
**sheet** 6:22
**Sheriff's** 132:14,16
**shoes** 105:21 107:13
**shop** 128:16
**shops** 128:8
**short** 37:3 99:13
**shortly** 37:18 38:9 49:1 52:13
**show** 20:18 138:9 140:13
**showed** 164:23
**showings** 158:2
**shows** 82:1 138:7
**side** 9:21 10:3
**sign** 44:10 118:2 150:18,21 151:15 154:9 160:2 163:1,4,14 169:17
**signature** 6:25 7:1,7,13,18 19:12, 13 44:7 125:25 160:4 162:20 165:10 187:24
**signed** 19:6,9,14,17 20:8 22:13 44:11 110:16 111:8 114:11 115:4,7, 14 116:14 117:14 126:2 139:12 150:23 151:14 160:8 165:7,16 168:10 169:5,7
**significance** 95:5 109:17,23
**significant** 35:6 131:3
**significantly** 182:10
**signing** 111:13
**signs** 151:16,23 152:2
**similar** 61:12
**simplistic** 44:22
**sir** 25:3 122:21 149:18 184:25
**sit** 88:14 117:5 146:13
**sitting** 170:18
**situation** 89:7
**skip** 158:14 161:20
**smaller** 11:15,17,19 20:16
**Smart** 142:25
**software** 48:21
**sole** 140:8
**solely** 118:10
**someone's** 127:19
**son** 125:14
**sort** 21:24
**sound** 90:11
**source** 26:17 27:3 54:10 110:5 131:17 167:15 178:6
**speaking** 134:25
**specific** 49:5 75:19 99:11 109:19 111:24 138:14 179:3 181:22
**specifically** 29:10 30:24 64:7 96:23 103:9,23 107:21 114:17 123:17 128:6 140:19 142:2 146:17 185:7
**specifics** 27:21 29:8 30:9 70:17 103:1 108:7 114:1
**speculate** 84:22 86:9 92:9,23 95:7 101:17,21 107:9 121:23 124:4
**speculating** 161:8
**speculation** 101:24 169:21
**spent** 39:10 62:12 166:1,14 167:23
**spirit** 48:7
**spoke** 144:3
**spoken** 63:21 76:18 149:4
**spot** 62:5
**SSL** 25:19 104:2 123:9
**stable** 180:22
**stack** 132:24 139:21,22
**stance** 119:24 120:2,4
**stand** 99:19 107:12
**start** 51:8 71:23 81:16 109:22 171:19
**started** 180:21
**startup** 48:23 49:11,19 52:8
**state** 18:23 39:12 41:17 156:7,17,25 159:13
**stated** 22:15,24 23:3,11,16,22 24:11,16,20,25 26:2 110:24 123:11 127:10
**statement** 77:9 88:9,15,20 89:23 145:9 171:23 173:10

**states** 43:25 95:12 136:19,20
**stating** 24:7 107:2
**status** 171:9,15
**step** 157:11
**stepping** 110:11
**sticker** 6:23
**stop** 118:5 186:4
**street** 42:3
**strikes** 184:12
**strong** 29:1
**stuff** 185:13,23
**subject** 5:21 17:5,18 35:6 70:13 89:4
**subjected** 18:3 19:14,23
**subjecting** 17:23 19:18
**subjects** 70:11
**submitted** 19:2 37:19 38:4,9 88:18
**subsequent** 90:18
**subsidiary** 11:13
**Subsidy** 54:2,12,17,22 156:18,20
**substance** 11:21 146:14
**substantial** 12:21 13:10 15:2 161:25
**suddenly** 108:8
**sue** 10:6,7,16 30:1,15 31:16 32:13 34:12 35:3 47:11,18 48:2 51:5,11 100:19 101:14 102:2,15,20,25 103:5, 14,18 110:17 122:25 140:3,14 177:10 181:4
**sued** 10:12 107:17 108:18,19 149:18 176:7
**Sueno** 120:8
**Suenos** 21:9,18,22,25 22:3,9 25:20 36:8,15,16 100:18 101:2,6 104:3 107:25 113:3 114:19 117:24 118:4 120:9,11 122:23,25 123:21 133:22 134:14 135:25 136:7,17,21 150:11 170:4,19 179:12 180:24 184:8
**Suenos'** 101:14 176:7 179:1
**suffering** 61:14
**suggest** 48:25 85:20 110:3 183:15 184:18
**suggesting** 85:21 127:4
**suggestion** 46:11 49:4,6 85:24
**suing** 48:18 59:16,20 60:17,23,24, 25 61:4 101:2,8 108:15,16 141:18,19 147:1 175:14,19,22
**suit** 172:6
**summary** 156:16
**sums** 145:2
**Superior** 18:22
**supplement** 90:21 92:4
**support** 12:16 52:20,25 124:16 161:17 179:19,25 180:2,17 182:16
**supported** 127:17
**supporting** 151:20,21,22
**supports** 182:13
**suppose** 74:3
**supposed** 74:24,25
**surgery** 108:21,23 109:3,4,9,10
**surprised** 164:2
**swear** 40:13
**swore** 20:13 103:25 110:20 115:19 117:8 123:7
**sworn** 5:8,10 115:15 186:23

## T

**takes** 73:13
**taking** 111:17 119:24,25
**talk** 6:2 40:14,16 80:21,22 82:7 83:24,25 161:4
**talked** 6:1 30:13 46:13 47:21,25 49:2 107:11 109:5 139:23 144:4,9,13, 14 149:2 176:19 179:5
**talking** 13:23 40:19 48:17 60:12 71:15,16,17 84:3,14 86:16 87:3 100:5 136:13 142:21 145:22 149:23
**talks** 98:20
**task** 145:20
**taxes** 153:7
**technical** 11:20
**technology** 48:20
**telephone** 29:6 30:12 51:9 146:1
**telling** 22:19 84:9 88:4 123:13 167:8 186:24
**tells** 32:12
**tending** 35:3
**term** 18:6,10 78:20
**terminology** 75:15
**terms** 11:21 31:9 52:18 74:5 76:4,6 89:6 90:7 94:24 98:25 99:1,2 121:23 152:16 161:1 169:6 172:4
**Terracorp** 159:16,20 160:1
**test** 149:13
**testified** 5:10
**testimony** 62:13 186:23
**Texas** 115:19 126:16 156:6,16,25
**texts** 80:16
**thereof** 114:19 117:16 118:18
**thing** 15:25 23:3 34:18 125:19 171:18 172:3 180:1
**things** 11:20 53:12 80:11 111:4,16, 19 166:13
**thinking** 7:11 47:24 49:15,18 62:12
**thinks** 108:13
**thought** 34:21 37:6 39:15 52:24 68:16 103:20 108:9,11 125:12,13,19 134:2 166:8,11
**thousand** 162:8
**thousands** 73:15,18,24,25
**time** 5:6,14 6:10 17:1,16,19,20,23 18:2 19:21 22:3 28:11,24 29:1,23 34:15 35:5 36:2,12,14,18 37:1,19 38:2,3,8,10,19 39:4,20 40:4 41:12,14, 19 42:12,17,21,24 43:2,18,24 45:9, 14,15 47:23 48:4,17,21 49:25 50:4,7 51:25 52:1,17 55:1,2,12,18 59:8 60:21 62:9,12 73:5,16 74:5 83:16 88:12,13,17 94:7 95:12,23 96:5 97:15,19 99:23 101:6 102:5 103:20 104:22 106:2,15 108:16,20 109:1,16 110:10 114:10 117:14 118:12 119:12 125:4 126:17 127:17 128:11,20 131:3,11,21 132:22 134:2 137:14,16, 18 143:8 149:17 164:19 170:15 175:13,16,17 176:15 177:14 179:3 180:17,19,21
**times** 52:20 64:13 145:16 159:25
**title** 126:25 127:2
**titled** 168:18
**today** 6:18 9:12 17:5,16 18:2,7,8 19:21 21:8 37:22 40:1,5 41:20,23 45:23 53:18 62:7 67:6,10,12,17 88:14,20 96:6,7,17 110:15 111:22,25 113:10,12,23 117:4 119:16,17,25

120:2,20 128:21 134:1 144:2 146:13 164:7 170:18

**Today's** 5:5

**told** 28:8 30:25 41:3 52:25 56:17 61:16 63:17 68:14 82:17 96:1,23 97:11 100:8,10 105:15 107:16,24 119:15 121:9 134:9 135:14,20 147:5 151:5,9 159:6 166:8 174:16,22 183:6 185:12 187:4

**top** 7:19 19:10 82:1 155:9

**topic** 31:11 36:23 47:17 73:7,11 82:2

**topics** 64:20,23 66:23 147:2

**total** 166:13 169:7

**track** 74:9 165:25

**tracking** 98:9

**transaction** 126:23 129:9 160:10, 12

**transfer** 90:7 110:17 122:23 123:2 134:23 138:15 139:14 140:22 145:10 155:24 171:2 172:19 173:9 174:3 186:20

**transferred** 53:24 54:1,24 55:1 103:18 104:5 107:17,20 108:2 120:17 123:9,21 136:17,20 139:4 186:1,8,12

**transferring** 25:12,22 35:18 134:22 136:1,7 140:3 179:6 186:16

**transition** 16:12

**Tray** 23:16

**Trey** 37:22 64:1,8,10 65:10 74:8 76:21 112:12 124:18 144:3,14 145:13,18

**Trey's** 77:9

**trial** 187:19

**truck** 125:6,7,11 126:5,8,10,11,25 127:7,11,13,15,16,20,21,23 129:10, 13,17,21 130:15 180:16

**true** 19:24 21:19,20,22,23 22:1 25:1 38:12 44:1 87:23 131:25 159:9 162:24,25 171:16 187:13,14

**trust** 134:21

**trustworthy** 46:22 47:2,5

**turn** 71:7 75:10

**turned** 114:20 117:17 120:12

**type** 14:18 72:9 98:6 119:8,12 121:24 140:25 144:23 184:23,24

**typed** 185:1

**typically** 144:22

## U

**uh-hum** 7:16 14:4 43:11,15 48:5 53:18 66:11 69:24,25 83:19 97:22 110:6 123:6 135:6 138:20,25 154:22 155:11,14 158:21 165:20 167:5 168:3 172:12 173:4,15 175:8 183:24 184:17 185:7

**ultimately** 39:17 61:12 70:18 119:10,11 163:5 174:3

**unable** 121:9

**unauthorized** 11:8

**underneath** 70:1 129:5

**understand** 5:17,20 6:6,17 7:5 11:12 13:12 14:11,13 15:5,10 18:5,8, 9 19:17 20:10 25:19 31:21 36:19 44:21 64:19 69:15 73:7 83:11 84:9 85:5,24 86:5 91:19 95:1 97:16,20 104:3 113:9 119:17 120:1 121:23 126:17 134:8 169:13 170:13 171:13 175:2 183:20 185:8,17,21

**understanding** 6:18 31:20 36:1, 11,20 109:16 110:25 113:17 119:22, 23 120:21 121:15,17 122:5 128:19 186:3

**understood** 17:4 18:6 32:14 34:15 52:23 104:20 175:5

**undertaken** 124:9

**union** 129:12

**unique** 145:15

**United** 43:25

**unknown** 94:15

**unsecured** 154:7 161:11

**unusual** 30:5

**update** 92:4

**upset** 127:13

## V

**valid** 111:12 119:11 151:5 171:2

**validate** 133:11

**validity** 90:7

**variety** 49:8

**vehicles** 128:7

**verify** 94:23 132:21

**Vernon** 9:19,22 54:5 154:2 156:8

**versus** 36:7

**view** 15:1,24 44:22

**viewed** 177:9

**viewing** 157:20,23

**viewings** 158:2

**violated** 113:19,20

**violation** 112:3,5 119:12 120:5

**voicemail** 80:18

**volume** 161:1

## W

**wanted** 28:24 39:14,16,17 48:7,24 72:19 104:19 156:1 161:12 164:23

**wanting** 174:12

**ways** 7:12

**website** 8:9

**Wednesday** 85:13 86:14

**week** 12:17 13:2 90:16 92:5 144:7

**Western** 115:18

**white** 21:4 22:25 23:13 26:6 32:5 37:19,22 38:9 43:3,6,8 55:10,14 56:22 57:1,3 68:21 69:2,6 71:14 76:21 77:6,12,15 79:21 84:21 86:8 88:10 90:15,18 96:10 112:9 114:22 117:20 118:7 120:14,24 135:9 151:11 154:23 158:14,16,21,23 159:2 160:13 161:19 171:25 174:25 181:20 187:2, 18,23

**White's** 23:20

**willful** 148:15,16

**willfully** 147:17,19,23

**willingness** 139:2

**withheld** 105:18

**won** 178:8

**wondering** 48:9 107:5 110:2 184:12 185:24

**word** 184:2

**words** 88:6 119:16 140:11,13 185:9

**work** 48:20 93:13 105:22 128:15 130:18 161:2 165:18 180:3,7

**worked** 128:4,7 180:18

**working** 16:13 20:21 48:19 49:14, 16 128:8

**works** 154:1 181:23

**Worldwide** 54:2,12,17,22 156:17, 20

**write** 7:12 26:6 131:19,20 132:1 185:20

**writes** 165:13

**written** 65:12 154:11,15 183:17 184:13,20 185:9

**wrong** 49:6 69:18 110:7 111:12 115:8 163:10

**wrongful** 150:3,5

**wrote** 168:15,20 185:20

**WSG** 153:25 154:18 155:2,18,22 156:3,7,8 157:1 160:12,23,25 161:2, 10 182:20,22

## Y

**year** 49:20 172:16,18,21

**years** 12:2 16:7,14,16 29:15 30:10, 20 32:22 39:8,25 44:4 48:20 58:7 142:10,17 143:6 180:8

1 IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
2 SAN ANTONIO DIVISION

3

4 RTG, LLC, )
)
5 Plaintiff )
)
6 VS. )No. 5:19-CV-0087-DAE
)
7 LISA KATONA FODERA, )
)
8 Defendants )
9 _____

10

11

12 VIDEOTAPED DEPOSITION OF
13 RYAN T. GALAZ
14

15 July 22, 2019
16 10:00 a.m.
17

18 1100 N.W. Loop 410, Suite 700
19 San Antonio, Texas

20

21

22

23 JOB NO.: 403888

24 YVETTE GALLARDO - CA CSR-12889

25

1 COURT REPORTER'S CERTIFICATE

2 I, YVETTE GALLARDO, a Notary Public for
3 the State of Texas, No. 5195157, and a Certified
4 Shorthand Reporter, licensed in California, certify;
5 That the foregoing deposition of RYAN
6 GALAZ, was had before me at the time and place
7 therein set.
8 That the testimony of the witness, the
9 questions propounded, and all objections and
10 statements made at the time of the examination
11 were recorded stenographically by me and were
12 thereafter transcribed;
13 That the foregoing is a true and correct
14 transcript of my shorthand notes so taken.
15 I further certify that I am not a relative
16 or employee of any attorney of the parties, nor
17 financially interested in the action.
18 I declare under penalty of perjury under
19 the laws of Texas, that the foregoing is true
20 and correct.
21 Dated this 6TH day of August, 2019.
22
23 Yvette Gallardo
YVETTE GALLARDO, CA-CSR No. 12889
24 Notary Public # 5195157
Expiration: 4-1-23
25

1 CHANGES AND SIGNATURE

2 WITNESS NAME: DATE OF DEPOSITION:
3 Ryan Galaz July 22nd, 2019

| PAGE | LINE | CHANGE | REASON |
|---|---|---|---|
| 24 | 12 | "Know" to "No" | Grammatical Error |
| 27 | 2 | "Frank" to "Brian" | Incorrect Name |
| 49 | 12 | "Pursuant" to "Pursuit" | Grammatical Error |
| 159 | 16 | "Terracorp " to "Paracorp" | Incorrect Name |
| 159 | 20 | "Terracorp" to "Paracorp" | Incorrect Name |
| 160 | 1 | "Terracorp" to "Paracorp" | Incorrect Name |
| 175 | 14 | "Recuperate" to "Recoup" | Grammatical Error |

1 I, Ryan Galaz , have read the
2 foregoing deposition and hereby affix my signature
3 that same is true and correct, except as noted above.
4
5
6
7 [WITNESS]
8
9 SOPHANY U. SAR
Notary Public
10 Commonwealth of Massachusetts
My Commission Expires
November 1, 2024
11
12
13
14 9/3/19
15
16
17
18
19
20
21
22
23
24
25

RG

1 IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
2 SAN ANTONIO DIVISION
3
4 RTG, LLC )
)
5 Plaintiff, )
)
6 vs. ) NO.: 5:19-CV-0087-DAE
)
7 Lisa Katona Fodera, )
)
8 Defendant. )
9
10
11 ----------
12 ORAL and VIDEOTAPED DEPOSITION OF
13 ALFREDO GALAZ
14 DECEMBER 12, 2019
15 ----------
16
17 ORAL and VIDEOTAPED DEPOSITION OF ALFREDO GALAZ,
18 produced as a witness at the instance of the DEFENDANT,
19 and duly sworn, was taken in the above-styled and
20 numbered cause on December 12, 2019, from 10:36 a.m. to
21 12:34 p.m., before Marleen Campbell, reported by machine
22 shorthand, at the offices of Bayne, Snell & Krause, 1250
23 N.E. Loop 410, Suite 725, San Antonio, Texas, 78209,
24 pursuant to the Federal Rules of Civil Procedure.
25



1 A P P E A R A N C E S
2
3 FOR PLAINTIFF:
4 Mr. David C. "Clay" Snell, Esquire
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8 FOR DEFENDANT:
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12
13
14 ALSO PRESENT: Lisa Katona Fodera
15 Roxanna Herring, Videographer
16
17
18
19
20
21
22
23
24
25



1 INDEX


| | | PAGE |
|---|---|---|
| 2 | Appearances | 2 |
| 3 | Index of Exhibits | 3 |
| 4 | ALFREDO GALAZ | |
| 5 | Examination by Mr. Lea | 4, 81 |
| 6 | Examination by Mr. Snell | 69 |
| 7 | Changes & Signature Page | 85 |
| 8 | Reporter's Certificate | 87 |


9
10 EXHIBITS


| | EXHIBIT NUMBER | DESCRIPTION | PAGE |
|---|---|---|---|
| 12 | Exhibit 1 | - Deposition Notice | 6 |
| 13 | Exhibit 2 | - Letter dated 1/19/2015 | 7 |
| 14 | Exhibit 3 | - Judgment filed 11/16/15 | 28 |
| 15 | Exhibit 4 | - Preliminary Injunction | 36 |
| 16 | Exhibit 5 | - State Court Petition Entered 01/31/14 | 40 |
| 17 | Exhibit 6 | - Official Form 101, Voluntary | |
| 18 | | Petition for Individuals Filing for Bankruptcy | 47 |
| 19 | Exhibit 7 | - First National Bank Texas, | |
| 20 | | Statement Date 09/23/16 - 10/22/16 | 58 |
| 21 | Exhibit 8 | - Statement Summary, balance | |
| 22 | | as of 10/22/16 | 58 |
| 23 | Exhibit 9 | - Statement 10/1/16 to 10/31/16 | 59 |
| 24 | Exhibit 10 | - Resignation, Accounting and Request for Discharge | 63 |


25



1 THE VIDEOGRAPHER: We're on the record on
2 December 12, 2019, at 10:36 a.m.
3 MR. SNELL: And I would just like to request
4 that the witness be allowed to read and sign the
5 deposition.
6 ALFREDO GALAZ,
7 having been duly sworn, testified as follows:
8 EXAMINATION
9 BY MR. LEA:
10 Q. Good morning, Mr. Galaz. My name is Royal Lea.
11 Would you tell us your name?
12 **A. Alfred Galaz.**
13 Q. Mr. Galaz, you and I have met before, haven't
14 we?
15 **A. Yes, we have.**
16 Q. You understand that we're here for your
17 deposition today, don't you?
18 **A. Yes.**
19 Q. And you understand that I'm Lisa Katona's
20 lawyer.
21 **A. Yes.**
22 Q. You've given a deposition before, haven't you?
23 **A. Yes, I have.**
24 Q. So you have some familiarity with the
25 proceedings, how they might work today.

Page 5

1 **A. Yes.**
2 Q. You understand that I'm going to ask you
3 questions, don't you?
4 **A. Yes.**
5 Q. And that as best you can and under oath, you're
6 to answer the questions. You understand that, don't
7 you?
8 **A. Yes.**
9 Q. If I ask you something, Mr. Galaz, and you don't
10 hear me, will you tell me so that I can talk louder
11 until you do hear me?
12 **A. Yes, I will.**
13 Q. If I ask you something and you don't understand
14 what I've said, will you tell me so that I can rephrase
15 my question until you do understand me?
16 **A. Yes.**
17 Q. While I'm asking you questions, Mr. Galaz, if
18 you want to take a break for any reason at all, please
19 just tell me or Mr. Snell, and we'll take a break at
20 your convenience.
21 **A. Okay.**
22 Q. Are you feeling okay today?
23 **A. Yes, I am.**
24 Q. Are you taking any medication that, to your
25 knowledge, affects or impairs your ability to hear, talk

Page 6

1 with people?
2 **A. To some extent, yes.**
3 Q. Tell us what that is.
4 **A. I take three blood pressure medications. I take**
5 **insulin. Two different kinds of insulin. I take a**
6 **steroid, aspirin.**
7 Q. Okay.
8 **A. And I've recently had surgery.**
9 Q. I understand that, and that's kind of why I
10 asked you the question.
11 **A. Yeah.**
12 Q. I thought you might be taking some medication.
13 And, again, I want to encourage you, anytime you want to
14 take a break, please tell me, and we will.
15 **A. Okay.**
16 Q. As far as you're aware, do any of those
17 medications impair your ability to communicate with
18 people, talking orally like this?
19 **A. Not communicating.**
20 Q. Okay.
21 **A. But memory, yes.**
22 (Exhibit 1 was marked.)
23 BY MR. LEA:
24 Q. Okay. All right. All right. Mr. Galaz, let me
25 ask you to look, if you would, at this letter that I've

Page 7

1 marked as Exhibit 1 to your deposition. And it's a copy
2 of a letter that I sent on November 22nd to Mr. Snell
3 and to Brian Boydston. Have you seen that letter
4 before?
5 **A. Yes, I have.**
6 Q. And you understand that the third page of that
7 letter is a list of documents that I was asking you to
8 bring to the deposition?
9 **A. Correct.**
10 Q. And you brought some documents to the --
11 **A. Yes.**
12 Q. -- deposition, didn't you?
13 **A. Correct.**
14 MR. LEA: I've put an Exhibit 2 sticker,
15 Mr. Galaz, on this collection of documents that
16 Mr. Snell handed me earlier.
17 (Exhibit 2 was marked.)
18 BY MR. LEA:
19 Q. Would you look at that collection of documents
20 I've marked as Exhibit 2? And there's several different
21 items there, so be sure to look through all of them.
22 **A. Okay.**
23 Q. Is Exhibit 2, Mr. Galaz, everything that you've
24 brought to the deposition that is responsive to this
25 list of documents that is the third page of Exhibit 1?

Page 8

1 **A. Yes.**
2 Q. Do you have any other documents other than
3 what's in Exhibit 2 that are described by or responsive
4 to any of these categories of documents?
5 **A. No, I don't.**
6 Q. Did you look?
7 **A. Yes, I have looked. Yes.**
8 Q. Okay. So you looked for the kinds of documents
9 I asked for, and all that you found is the collection of
10 documents that's there in Exhibit 2.
11 **A. Correct.**
12 Q. Where did you look?
13 **A. In my attic. I moved, and lots of stuff has**
14 **been lost or misplaced. I have no idea where any of**
15 **this would be.**
16 Q. Okay. Let me ask you this: Is it fair to say,
17 Mr. Galaz, that you looked everywhere you could think of
18 to look where any of those documents might be?
19 **A. Correct.**
20 Q. And after you looked anywhere you could think of
21 to look, the collection that is there in Exhibit 2 is
22 all you could find?
23 **A. Yes.**
24 Q. All right. One of the categories of
25 documents -- well, let me back up and do it this way:

Page 9

1 You understand that part of what we're talking about
2 here is apparently I guess sometime in 2015 you were
3 involved in Segundo Suenos, LLC; is that right?
4 **A. 2015. I don't know because I transferred it.**
5 Q. Were you ever involved in Segundo Suenos?
6 **A. Yes, at the time.**
7 Q. All right. And when did you transfer Segundo
8 Suenos?
9 **A. Oh, God. Right after the Fifth Circuit Court**
10 **vacated the earlier -- Judge King's ruling.**
11 Q. Okay.
12 **A. I think that was 2014?**
13 Q. What is it that you transferred and to whom did
14 you transfer it?
15 **A. To myself.**
16 Q. Okay. What did you transfer to yourself?
17 **A. The uncontested non-music rights.**
18 Q. Okay. And, so, am I understanding you to say
19 that Segundo Suenos owned some rights?
20 **A. Uh-huh.**
21 Q. And you transferred those rights out of Segundo
22 Suenos to yourself --
23 **A. Correct.**
24 Q. -- personally as Alfred Galaz.
25 **A. Correct.**

Page 10

1 Q. And that happened you think shortly after there
2 was a ruling by the Fifth Circuit.
3 **A. Correct.**
4 Q. All right. Why did you do that?
5 **A. Primarily because of the ruling -- the prior**
6 **ruling of Judge King in taking away all the music rights**
7 **and because there was no more money or funds coming in**
8 **through the music rights to Segundo Suenos in the Morgan**
9 **Stanley account. So there was no need to keep that**
10 **account. So I transferred it over to my -- to my**
11 **personal account, so I just, you know, transferred the**
12 **whole thing.**
13 Q. And what exactly is it that you transferred?
14 **A. Mostly the rights and the claims that I had. I**
15 **had two claims: One to -- I can't think of his name --**
16 **someone here in San Antonio, and Julian Jackson.**
17 Q. So does that mean that essentially you
18 transferred over two rights to sue people, two different
19 people, one of them was a person here in San Antonio.
20 **A. Yes.**
21 Q. And one of them was Julian Jackson.
22 **A. Correct.**
23 Q. And those were two rights that previously had
24 belonged to Segundo Suenos, and you transferred them
25 over to yourself.

Page 11

1 **A. Yes.**
2 Q. When you did that, did you give or pay anything
3 to Segundo Suenos?
4 **A. No.**
5 Q. Why not?
6 **A. Because I was Segundo Suenos. I was the sole**
7 **proprietor.**
8 Q. Now, you understood at that time, didn't you,
9 that Lisa was still suing or making claims against
10 Segundo, didn't you?
11 **A. Only for the music rights.**
12 Q. You didn't think she was suing Segundo for
13 money?
14 **A. No.**
15 Q. You didn't understand that.
16 **A. No.**
17 Q. Did you ever learn that Segundo Suenos owed her
18 money?
19 **A. No.**
20 Q. Today do you have any idea whether or not
21 Segundo Suenos owes Lisa money?
22 **A. No.**
23 Q. What did you do, Mr. Galaz, to set aside
24 anything to take care of Lisa or protect in case Segundo
25 Suenos would owe Lisa anything before you did this

Page 12

1 transfer?
2 **A. I didn't ever think I owed her anything.**
3 Q. I understand that.
4 **A. Yeah.**
5 Q. So does that mean that you didn't do anything to
6 set aside any money or assets to protect Lisa in case
7 Segundo Suenos did owe her money?
8 **A. No.**
9 Q. Did you have any care about whether or not
10 Segundo Suenos might owe Lisa money?
11 MR. SNELL: Objection; vague.
12 **THE WITNESS: You're making a presumption. I**
13 **don't -- did I have any care?**
14 BY MR. LEA:
15 Q. Yes, sir, any care or concern or regard for
16 whether or not --
17 **A. Or knowledge?**
18 Q. Yes, sir.
19 **A. I had no knowledge that I owed her anything.**
20 Q. Did you care if you might owe her something?
21 MR. SNELL: Objection; vague.
22 **THE WITNESS: I wouldn't care -- I mean --**
23 **you're asking whether I had any feelings about --**
24 BY MR. LEA:
25 Q. Let me --

Page 13

1 A. There was no understanding that I owed her
2 anything.
3 Q. You had been involved in litigation with Lisa --
4 A. And I thought it all ended.
5 Q. Did anyone tell you that it was all over?
6 A. I assumed it was all over. I thought I was done
7 with that litigation.
8 Q. You thought Segundo Suenos was all done with
9 that litigation?
10 A. Correct, yes.
11 Q. Where did you get that idea?
12 A. That was my assumption.
13 Q. Okay. Other than it being an assumption and
14 thought in your head, did you do anything else to
15 determine whether or not it was correct that it was all
16 over between Segundo and Lisa?
17 A. No, I didn't do anything else.
18 Q. Did you talk to Raul about --
19 A. No. No.
20 Q. Okay. So Raul didn't tell you anything at all
21 about whether Segundo did or didn't owe money to Lisa;
22 is that correct?
23 A. Correct. He never said anything.
24 Q. Okay. And you never talked to him about it.
25 A. No.

Page 14

1 Q. In any event, you didn't pay Segundo anything at
2 all for the two rights that you got from Segundo, one of
3 them being the right to sue Julian Jackson.
4 A. No.
5 Q. Is there anything in paper, Mr. Galaz, that says
6 Segundo transfers or assigns or gives to you the right
7 to sue Julian Jackson?
8 A. The only thing that I -- that I could see is
9 this first sentence up here, when I was writing to
10 Julian Jackson, I said, "I am the successor-of-interest
11 of Raul Galaz and Segundo Suenos."
12 Q. Other than that letter --
13 A. Other that than letter, that was it.
14 Q. Okay. And so there's -- do you know what an
15 "assignment" is?
16 A. Legally, no.
17 Q. Did anyone sign any document on behalf of
18 Segundo Suenos saying that Segundo transferred or gave
19 you any right to sue Julian Jackson?
20 A. No.
21 Q. That never happened, did it?
22 A. No.
23 Q. Did you talk to Raul at all about the idea of
24 Segundo transferring or assigning these rights to you?
25 A. I spoke with him following the Fifth Circuit

Page 15

1 Court decision, and I mentioned to him that Julian had
2 taken all of that money prior to that time, and I
3 mentioned to him that I need to get that money back from
4 Julian Jackson.
5 Q. Did you say you needed to get it back or Segundo
6 needed to get it back?
7 A. Segundo.
8 Q. And what did he say?
9 A. He said, "Yeah."
10 Q. Okay. But then did you talk to him about --
11 A. The details? No.
12 Q. Did you talk to him about the idea that Segundo
13 would assign those rights to you?
14 A. No, I never talked to him about that.
15 Q. That's interesting, Mr. Galaz, because in that
16 letter you were just referring to --
17 A. Uh-huh.
18 Q. -- the letter that is the first page of
19 Deposition Exhibit 2, you said that you were also the
20 successor-in-interest to Raul Galaz.
21 A. Uh-huh.
22 Q. How did that come to be?
23 MR. SNELL: Objection; argumentative.
24 THE WITNESS: I -- Brian Boydston, Raul, and I,
25 all three compiled that letter because the second part

Page 16

1 of that -- or the second page of that letter is
2 something that Raul -- was a letter that Raul had
3 written. So I included that -- or Brian did in this
4 letter to Julian where I say, "Additionally, review of
5 Raul Galaz's records reveals that there has been no
6 response to the letter that was sent to you by Raul
7 Galaz" --
8 BY MR. LEA:
9 Q. Right.
10 A. -- yeah. So I guess Brian included all of that
11 with what I had said at the first -- the first page.
12 Q. Tell me on the first page what part of that you
13 think is material that you composed or wrote yourself.
14 MR. SNELL: Objection; vague.
15 THE WITNESS: Oh, I can't. I don't -- this was
16 by telephone. This was, what, in 19 -- 2015. I don't
17 remember what I said or others said or what I
18 contributed or what other people contributed.
19 BY MR. LEA:
20 Q. Would it be fair for us to tell the court in
21 this case, Mr. Galaz, that you and Raul and Brian
22 Boydston all had a hand in writing this letter that is
23 there in Exhibit 2 in front of you?
24 A. Information, yes. I don't know how much each
25 one contributed.

Page 17

1 Q. No, I understand that.
2 **A. But there was infor- -- you know, information**
3 **that each of us offered.**
4 Q. I understand we don't know how much from each
5 person.
6 **A. Uh-huh.**
7 Q. But is it fair to say that each of those three
8 people, you, Raul, and Brian, had some part in creating
9 this letter that's the first three pages -- four pages
10 of Exhibit 2?
11 MR. SNELL: Objection; asked and answered.
12 BY MR. LEA:
13 Q. Go ahead, you can answer.
14 **A. Yeah. I really don't know. I -- I couldn't**
15 **say.**
16 Q. Do you feel pretty confident sitting here today
17 that you didn't write all of the letter?
18 **A. Yes.**
19 Q. And if you had to try to think about who the
20 other sources or authors of parts of the letter would
21 be, would you include Raul in that list?
22 **A. That's a long time ago; I don't really remember**
23 **whether -- how involved he was or not. I know that that**
24 **second page was something that he had written, but I**
25 **don't know whether he gave that to Brian and Brian wrote**

Page 18

1 **it in. I don't know how that ever came about. It**
2 **didn't come to me and then I wrote it in, but I really**
3 **don't know how it got there.**
4 Q. Is it fair to say that Brian was involved?
5 **A. Yes.**
6 Q. Okay. So you were definitely involved in part
7 of it.
8 **A. (Nodding head up and down.)**
9 Q. Yes?
10 **A. Yes.**
11 Q. Brian was involved in part of it.
12 **A. (Nodding head up and down.)**
13 Q. Yes?
14 **A. Yes.**
15 Q. And then Raul may have had some contribution to
16 some of it.
17 **A. Yes.**
18 Q. All right. How did you come to be the
19 successor-in-interest to Raul?
20 **A. The only -- okay. First let me start off by I**
21 **really don't remember. What I remember best is, it had**
22 **something to do with getting the rights from -- from**
23 **Julian Jackson in some fashion, and I don't know that --**
24 **I'll have to digress because I really don't know, and**
25 **the Hummer was something that was sold by auction. That**

Page 19

1 **Hummer really was Raul's. Judge King neglected -- you**
2 **know, when I told him in court, "Raul paid me for this**
3 **Hummer. I just had not gotten around to changing**
4 **titles." And so -- and I had the checks. I had**
5 **cancelled checks at that time that Raul had already paid**
6 **for that Hummer. So I felt in some way it was Raul's.**
7 **You know, it wasn't Segundo Suenos' really. If Judge**
8 **King had listened to me. He never even noted that in**
9 **any of his writings that that Hummer was Raul's, that he**
10 **had paid me for it.**
11 Q. Okay.
12 **A. So --**
13 Q. And I appreciate you telling me that. But the
14 letter here says that you were the successor-in-interest
15 of Raul Galaz. And aside from what you've told me about
16 the situation with the Hummer --
17 **A. Uh-huh.**
18 Q. -- how did you come to be the
19 successor-in-interest of Raul Galaz?
20 MR. SNELL: Objection; asked and answered.
21 **THE WITNESS: I don't know.**
22 BY MR. LEA:
23 Q. Okay. Is there anything in writing signed by
24 Raul that says you became his successor-in-interest like
25 it says here in this letter?

Page 20

1 **A. I don't think so.**
2 Q. Was there ever?
3 **A. I don't think so.**
4 Q. Did you pay Raul anything to become his
5 successor-in-interest for what it says here in the
6 letter?
7 **A. No.**
8 Q. Have you ever been involved in any kind of
9 litigation or lawsuit, Mr. Galaz, where in some way Raul
10 wasn't involved?
11 **A. Would you repeat that? I don't understand that.**
12 Q. Yes, sir. You've been involved in some
13 litigation, haven't you?
14 **A. Yes.**
15 Q. You understand what it means to be involved in
16 litigation.
17 **A. Yes.**
18 Q. Have you ever been involved in any litigation
19 where Raul wasn't involved?
20 **A. You'd have to be specific. What litigation are**
21 **you talking about?**
22 Q. Well, I don't know. I'm trying to find out from
23 you.
24 **A. As far as I -- I don't know of any that he was.**
25 **Other than -- other than this litigation here --**

Page 21

1 Q. Okay.
2 **A. -- with Segundo Suenos and the Oshita -- well,**
3 **that -- he wasn't involved in that. Just the Segundo**
4 **Suenos was the only thing.**
5 Q. Okay. That's the only one you can think of
6 where he was involved?
7 **A. Yes.**
8 Q. Okay. Raul is your son, correct?
9 **A. Yes.**
10 Q. Ryan is your grandson?
11 **A. Yes.**
12 Q. Denise Vernon is your daughter.
13 **A. Yes.**
14 Q. Ruth Galaz is a former wife. You were formerly
15 married to her?
16 **A. Yes.**
17 Q. When did your marriage to Ruth end, roughly,
18 approximately?
19 **A. To who?**
20 Q. Ruth.
21 **A. Ruth? 19- -- let's see -- -50 -- 1956 I think**
22 **or '57. I don't know.**
23 Q. Is when your marriage to Ruth ended?
24 **A. Oh, ended.**
25 Q. Yes, sir.

Page 22

1 **A. Oh, I thought you --**
2 Q. I'm sorry. I apologize for that.
3 **A. Ended. I think it was in 1976.**
4 Q. Okay. is when your marriage to Ruth ended.
5 **A. I think so.**
6 Q. Ruth is Raul's mother?
7 **A. Mother, yes.**
8 Q. Okay. After your marriage to Ruth ended, you've
9 had at least one other marriage since then.
10 **A. Yes.**
11 Q. More than one?
12 **A. Two.**
13 Q. Two. Okay. You've never been a lawyer.
14 **A. No. No.**
15 Q. Okay.
16 **A. I had three other marriages. Not two.**
17 Q. Okay. How did you know -- because the letter
18 says you were the successor-in-interest of Raul Galaz.
19 How did you know that you had become the
20 successor-in-interest to Raul Galaz?
21 **A. I don't remember that -- when that was written**
22 **or -- that was so long ago, I really don't remember any**
23 **of that.**
24 Q. Okay. Do you feel like it must have been --
25 that that's something Raul must have agreed to, though?

Page 23

1 **A. I have no idea.**
2 Q. Do you think maybe he didn't agree to you being
3 this --
4 **A. I don't even know if he's seen this.**
5 Q. You think he never saw this letter.
6 **A. I don't know. I did not ever give that to him.**
7 Q. Okay. But you had in your own mind the idea
8 that you were his successor-in-interest, didn't you?
9 MR. SNELL: Objection; asked and answered.
10 **THE WITNESS: I don't know.**
11 BY MR. LEA:
12 Q. You said you were, didn't you?
13 **A. I have -- I have seen this letter refreshed, I**
14 **mean, just this week. All these years, I mean, it's**
15 **been trashed if I ever had it or when I got it. I**
16 **haven't -- I haven't dealt with this since 2000-, what,**
17 **-15?**
18 Q. So this copy of the letter that's there in
19 Exhibit 2, where was it? Where did you get it?
20 **A. Gosh. I don't know where. I don't know if Raul**
21 **sent this to me, because when I got -- when I got your**
22 **deposition, I had no idea what that was for. I thought**
23 **it had something to do with the Oshita case. And for**
24 **all these months, I had no idea, and I finally called**
25 **Raul and asked him, I said, "What's all this -- I got a**

Page 24

1 **deposition. What's it about?"**
2 Q. And what did he tell you?
3 **A. When did you send the deposition? It was**
4 **between that time and more recently.**
5 Q. Okay.
6 **A. May have sent it last week or --**
7 Q. What did he send you?
8 **A. Let me see. I think he sent me this.**
9 Q. The first part of Exhibit 2, which is the letter
10 we've talked about.
11 **A. Yeah.**
12 Q. The letter to Julian Jackson.
13 **A. Yeah. This thing here on what the -- what was**
14 **it? The receiver --**
15 Q. Okay.
16 **A. -- his information.**
17 Q. Why don't you do this for us, Mr. Galaz --
18 **A. And that's all.**
19 Q. -- would you hold -- if you'll hold that up, the
20 videographer will be able to focus in --
21 **A. Okay.**
22 Q. -- and see the items that you got from Raul
23 Galaz.
24 **A. Correct.**
25 Q. Okay. Now, tell me about your conversation with

Page 25

1 Raul about the deposition.
2 **A. I asked him what it was about.**
3 Q. What did he say?
4 **A. He said, "Oh, it's some sort of litigation." He**
5 **said he wasn't involved with it, and he said it was**
6 **between Ryan and Lisa.**
7 Q. What else did he say?
8 **A. That's all.**
9 Q. Okay.
10 **A. We talked about football.**
11 Q. All right. But somehow you must have also
12 talked about documents or information that you should
13 bring to the deposition.
14 **A. That may have been a different conversation, and**
15 **I may have mentioned that at some time and said, "Oh" --**
16 **and I think that was just recently like within a week**
17 **because I was coming -- I didn't know that I had**
18 **anything to bring.**
19 Q. Okay.
20 **A. In your -- in your deposition it didn't say**
21 **anything to bring. Not deposition. Your thing where I**
22 **should appear in court.**
23 Q. You mean the letter that's Exhibit 1?
24 **A. No.**
25 Q. Oh, the subpoena from back in August?

Page 26

1 **A. The subpoena.**
2 Q. Okay.
3 **A. It didn't say a thing.**
4 Q. Okay.
5 **A. It didn't even say what it was about.**
6 Q. Okay. So that was back in August.
7 **A. Correct.**
8 Q. But then more recently, like sometime after
9 November 22nd, the date of deposition, Exhibit 1, you
10 had a conversation with Raul about things that you would
11 bring to the deposition; is that right?
12 **A. Probably.**
13 Q. All right. And as a part of that conversation
14 with Raul, Raul sent you those two pages that you held
15 up for the camera just a moment ago.
16 **A. Yes.**
17 Q. Because you didn't have them, Raul did.
18 **A. Correct.**
19 Q. Did you ask Raul if he had any of the other
20 kinds of documents that were described here?
21 **A. No.**
22 Q. Did you send a copy of Exhibit 1 to Raul so he'd
23 know what kinds of things you were looking for?
24 **A. No.**
25 Q. How did he know what kinds of things you were

Page 27

1 looking for?
2 **A. I don't know.**
3 Q. Did he already have his own copy of Exhibit 1?
4 **A. I have no idea.**
5 Q. Did you tell him that there was this list of
6 documents?
7 **A. No.**
8 Q. So do you remember how the topic came up that
9 there were things you were supposed to bring to a
10 deposition?
11 **A. I don't know if he asked me the question or**
12 **whether I asked him the question. I really don't**
13 **remember whether one or the other said, you know, what**
14 **is this about or is there anything I need to take or**
15 **something like that to that order.**
16 Q. And what did he say?
17 **A. But I don't know whether he said that or, you**
18 **know, asked me, are you prepared, or whether I asked**
19 **him. So I really -- I mean, we're talking about a**
20 **conversation that maybe took five, ten seconds, you**
21 **know, because that was not really our discussion. Our**
22 **discussion was about football.**
23 Q. Somehow as a part of that conversation you got
24 those two documents from him.
25 **A. Correct.**

Page 28

1 Q. How did that come about?
2 **A. Other than my saying, "I don't have anything to**
3 **take" or "I don't know what I'm supposed to take," and**
4 **he may have just said -- may have just emailed them to**
5 **me.**
6 Q. How would he know what to email to you?
7 **A. I have no idea.**
8 Q. Okay. But somehow he did.
9 **A. He may have just guessed. I don't know.**
10 Q. You think he just guessed.
11 **A. I have no idea.**
12 MR. LEA: Okay.
13 (Exhibit 3 was marked.)
14 BY MR. LEA:
15 Q. Mr. Galaz, I've marked a document there as
16 deposition Exhibit 3.
17 **A. Uh-huh.**
18 Q. And it's a judgment from the Segundo litigation
19 with Lisa, and it's -- if you look at the third page,
20 it's signed on November -- signed by the judge on
21 November 16, 2015. Do you see that?
22 **A. Yes.**
23 Q. Have you ever seen this document before?
24 **A. Yes, I have.**
25 Q. When did you see it?

Page 29

1 **A. I guess in 1915.**
2 Q. In 2015?
3 **A. 2015, yeah.**
4 Q. Okay. Now, it says right there on the first
5 page, kind of in the middle, that it is ordered,
6 adjudged and decreed that plaintiff, Lisa Galaz, shall
7 recover the amount of $491,309.10 of and from Raul and
8 Segundo Suenos, jointly and severally.
9 **A. Uh-huh.**
10 Q. So you knew that from sometime in late 2015,
11 didn't you?
12 **A. Probably.**
13 Q. Okay. And you knew before that that Lisa had
14 been suing Segundo for money, didn't you?
15 **A. Say that again.**
16 Q. Yes, sir. You see here in the middle of the
17 page on Exhibit 3 where it's talking about an amount of
18 dollars?
19 **A. Uh-huh.**
20 Q. You knew before that that Lisa was suing Segundo
21 to get money from Segundo, didn't you?
22 **A. No.**
23 Q. When you saw this for the first time in 2015,
24 were you shocked to learn that Segundo owed Lisa money?
25 **A. Never considered that.**

Page 30

1 Q. Okay. But after you saw this, did you
2 understand that Segundo owed Lisa money?
3 **A. No.**
4 Q. Okay. Did you ever ask Raul or anyone else
5 about whether or not Segundo owed Lisa money?
6 **A. No.**
7 Q. Look with me, if you would -- so why don't you
8 do this, Mr. Galaz: Take a moment and read all of
9 Exhibit 3 to yourself.
10 **A. Okay.**
11 Q. And tell me when you've read it because I want
12 to ask you some questions about it.
13 **A. Okay. (Reading.)**
14 **Okay.**
15 Q. After you got a copy of this in 2015, Exhibit 3,
16 what did you do to turn over to Lisa any of the assets
17 that it says should be turned over to Lisa?
18 **A. Well, my assumption was that our lawyer, Scott**
19 **Rose, took care of that. That's my assumption; he took**
20 **care of all that.**
21 Q. Other than assuming Scott Rose was gonna take
22 care of it, what did you do yourself --
23 **A. Nothing else. I didn't do anything personally.**
24 Q. Did you talk to Raul about what you or he should
25 do --

Page 31

1 **A. No.**
2 Q. -- to comply with Exhibit 3?
3 **A. No.**
4 Q. What assets did Segundo have in 2015?
5 MR. SNELL: Objection; vague.
6 **THE WITNESS: Gosh. 2015. I guess the -- two**
7 **things. I'm trying to think of the guy's name that we**
8 **have here. That -- that claim, and the Julian Jackson**
9 **claim.**
10 BY MR. LEA:
11 Q. So in 2015 Segundo owned two things. It owned
12 the right to sue this guy in San Antonio, whoever that
13 is, and the right to sue Julian Jackson, correct?
14 **A. Correct.**
15 Q. Did it own anything else in 2015 other than
16 those two rights to sue people?
17 **A. No.**
18 Q. All right. And so when you transferred those
19 two rights to sue people out of Segundo to yourself, you
20 took all of the assets that Segundo had, didn't you?
21 **A. Those two, yes.**
22 Q. Those two assets were all that it had, weren't
23 they?
24 **A. Correct.**
25 Q. And you took them for yourself personally,

Page 32

1 didn't you?
2 **A. Yes.**
3 Q. And you didn't pay or contribute anything back
4 to Segundo Suenos in return, did you?
5 **A. Correct.**
6 Q. in late 2015 when the court signed this judgment
7 that's Exhibit 3, you were still holding onto the right
8 to sue Julian Jackson, weren't you?
9 **A. Yes. I was personally, yes.**
10 Q. You hadn't transferred it or given it over to
11 Ryan yet, had you?
12 **A. Correct.**
13 Q. Did it occur to you, Mr. Galaz, gee, maybe this
14 right to sue Jackson is something that's covered by this
15 judgment, Exhibit 3?
16 **A. No.**
17 Q. Did you investigate that?
18 **A. No.**
19 Q. Didn't do anything at all to --
20 **A. Never considered that it --**
21 Q. Never considered --
22 **A. -- had anything to do with anything.**
23 Q. All right.
24 **A. I thought that was all finished. Segundo**
25 **Suenos, that was past history to me.**

Page 33

1 Q. After Exhibit 3, where did you get the idea that
2 Segundo Suenos --
3 **A. Well, there was nothing left. I mean, when**
4 **Judge King ordered that all music rights were no longer**
5 **Segundo's, that finished it.**
6 Q. But Exhibit 3 doesn't say just music rights. it
7 says, any funds or assets of Segundo Suenos, doesn't it?
8 MR. SNELL: Objection; the document speaks for
9 itself.
10 BY MR. LEA:
11 Q. Go ahead, you can answer.
12 **A. Is that what it says in this letter? Yeah,**
13 **that's what it says in this letter or --**
14 Q. Exhibit 3, the judgment.
15 **A. Yes.**
16 Q. Yes, sir.
17 **A. And I took that to mean Lisa shall have --**
18 **rather, Julian Jackson shall have 50 percent, Lisa**
19 **25 percent, Raul 25 percent of the music rights.**
20 Q. Yes, sir.
21 **A. Those were not music rights.**
22 Q. But then if you go a little further down on the
23 very same page, Mr. Galaz -- do you see the very next
24 paragraph that begins, it is further ordered, adjudged
25 and decreed?

Page 34

1 **A. Yes.**
2 Q. On the second page?
3 **A. Yes.**
4 Q. And it says that the preliminary injunction
5 previously granted in this adversary proceeding will be
6 made permanent. Do you see that?
7 **A. Uh-huh.**
8 Q. And it continues, defendants Raul Galaz and
9 Segundo Suenos are ordered not to spend, dissipate or
10 transfer any funds or assets of Segundo Suenos. You see
11 that, don't you?
12 **A. Yes.**
13 Q. What did you think into that -- about that?
14 **A. That it just meant the music rights. That's**
15 **all. Nothing else.**
16 Q. Where did you get that idea?
17 **A. In my head. That was my interpretation.**
18 Q. Did Raul --
19 **A. I'm not a lawyer, so that was my interpretation.**
20 Q. Raul is covered by this document as well, isn't
21 he?
22 **A. Yes --**
23 Q. He's mentioned.
24 **A. -- I guess so.**
25 Q. Did you talk to him about it?

Page 35

1 **A. No.**
2 Q. Continuing on that page at the top of the third
3 page, it says, the rights, claims, litigation, and all
4 records thereof shall be turned over to Lisa Galaz.
5 **A. Yes.**
6 Q. What did you do in response to that?
7 **A. Okay --**
8 MR. SNELL: Objection; asked and answered.
9 **THE WITNESS: Personally, I did nothing.**
10 BY MR. LEA:
11 Q. Did you ask anyone to do anything on your
12 behalf?
13 **A. Scott Rose, as a lawyer, was to take care of all**
14 **that.**
15 Q. Did you ask him to take care of it for you?
16 **A. No. Raul probably did.**
17 Q. Do you know that Raul did?
18 **A. No. I just assumed that as the lawyer he would**
19 **take care of everything. Whatever -- you know, whatever**
20 **judgements came about, he would take care of it.**
21 Q. All right.
22 **A. And my assumption is that when you're talking**
23 **about these other litigations, you're referring to these**
24 **others: Chappell Hill -- Warner-Chappell Music, heirs,**
25 **Middlebrookes. Those; I thought that's what you're**

Page 36

1 **referring to. Nothing else.**
2 **That had to do with the music. Julian Jackson**
3 **taking the Hummer had nothing to do with the music**
4 **rights.**
5 Q. And did Julian Jackson take the Hummer?
6 **A. Well, he took the money from the Hummer.**
7 Q. So did Lisa owe Segundo Suenos money for -- she
8 got some of the money from the Hummer too, didn't she?
9 **A. Yes.**
10 Q. Why didn't you sue her?
11 **A. Goodness of my heart.**
12 Q. That's your answer to that question?
13 **A. I have no --**
14 MR. SNELL: Objection; argumentative.
15 **THE WITNESS: -- idea.**
16 MR. SNELL: Asked and answered.
17 (Exhibit 4 was marked.)
18 BY MR. LEA:
19 Q. Mr. Galaz, do you recognize what I've marked as
20 Deposition Exhibit 4?
21 **A. Let's see. Do I recognize this?**
22 Q. Yes, sir, that was my question.
23 **A. No, I do not.**
24 Q. Never seen it before?
25 **A. Well, I may have in what was it -- what year was**

Page 37

1 this?
2 Q. January of 2015.
3 **A. I may have seen it in 2015, but --**
4 Q. Do you remember it from 2015?
5 **A. I'li read it.**
6 **i don't remember it. i may have seen it. i**
7 **don't remember this.**
8 Q. Mr. Gaiaz, before the deposition today,
9 Mr. Snell and I have had some conversations about
10 whether or not your appearance at the deposition today
11 would be as if you had been served with a subpoena.
12 Do you agree that you're appearing here today as
13 if you had been served with a subpoena?
14 **A. Yes.**
15 Q. All right. Do you recall ever saying to
16 yourself, thinking about Exhibit 4 and your letter
17 that's in Exhibit 2, gee, I wonder if there's any
18 overlap here between these two?
19 **A. You mean at this moment, am I -- is this what**
20 **I -- no, I have not thought about it.**
21 Q. Did you ever think about that?
22 **A. Well, I never knew about it.**
23 Q. So you never knew at all about Exhibit 4?
24 **A. Okay, remind me. This Is Exhibit 4, right?**
25 Q. Yes, sir, the one that has that sticker on it,

Page 38

1 4.
2 **A. Okay. And what's your question?**
3 Q. So what I'd like for you to do is take your
4 letter that's there in Exhibit 2.
5 **A. The letter 2 --**
6 Q. Yes, sir.
7 **A. -- to Julian Jackson?**
8 Q. You've got your right hand on it right there.
9 **A. Okay.**
10 Q. And, you know, they're pretty close in time.
11 One of them has a date on it of January 22nd.
12 **A. Uh-huh.**
13 Q. And one of them has a date on it of
14 January 19th. They're both in 2015.
15 **A. Yeah, right. Okay.**
16 Q. And so I'm thinking, weil, they're pretty close
17 in time.
18 **A. Uh-huh.**
19 Q. And I'm wondering if there was ever any thought
20 in your head that, gee, there's some connection between
21 these two things going on here?
22 **A. No, because there was no way I would have known,**
23 **predicted the future. I mean, if this took place on the**
24 **19th of January and this the 22nd, this came --**
25 Q. A few days later.

Page 39

1 **A. -- a few days later.**
2 Q. Yes, sir.
3 **A. Yes, i could never have predicted the future.**
4 Q. But when the -- on January 22nd when you did see
5 Exhibit 24, did you say to yourself, oh, this is part of
6 what's happened in my letter on January 19th?
7 **A. You know, the only way I can answer that is what**
8 **I had on January 19th belonged to me personally. I was**
9 **asking for something from Julian Jackson that belonged**
10 **to me personally. Not from Segundo Suenos. This**
11 **applies to Segundo Suenos who at that time had nothing.**
12 Q. And the reason it had nothing, of course, is
13 because it gave you everything that it did have, right?
14 **A. And I didn't know this was gonna happen.**
15 MR. SNELL: Objection. Objection; argumentative
16 and asked and answered.
17 BY MR. LEA:
18 Q. But when Exhibit 4 did happen --
19 **A. Uh-huh.**
20 Q. -- did you think you needed to put back into
21 Segundo what you had taken from Segundo?
22 **A. No.**
23 Q. Why not?
24 **A. Because I probably didn't read this until maybe**
25 **a month later or February or -- I don't know when I**

Page 40

1 **would have seen this.**
2 Q. Whenever it is that you saw it, what thought did
3 you give to putting back in Segundo what you had taken
4 from Segundo?
5 **A. I didn't think anything. I thought that didn't**
6 **apply to me.**
7 Q. What is -- what was your involvement, Mr. Galaz,
8 in Worldwide Subsidy Group?
9 **A. What was my involvement.**
10 Q. That was my question to you, sir.
11 **A. I was a part owner of it for the year --**
12 **one year. It was only one year. I think that was 2017.**
13 Q. And haven't you said before in court that you
14 were an owner of Worldwide Subsidy Group going back to
15 2012?
16 **A. Oh, no. No.**
17 Q. Never said that before.
18 **A. No.**
19 (Exhibit 5 was marked.)
20 BY MR. LEA:
21 Q. Mr. Gaiaz, isn't it Exhibit 5 a copy of a
22 lawsuit that you filed against Lisa in 2013?
23 **A. Okay.**
24 Q. That's what it is, isn't it?
25 **A. I guess so.**

Page 41

1 Q. Well, look back at the last two pages and tell
2 me if that's your signature on each of the last
3 two pages.
4 **A. Yes. Yes.**
5 Q. The signature on the second to last page is made
6 as an oath to tell the truth and signed before a notary,
7 isn't it?
8 **A. Yes.**
9 MR. SNELL: Royal, let me ask you: What does
10 this have to do -- you and I discussed his appearance
11 here voluntarily today. And I don't understand what the
12 questions -- WSG case, it's been litigated. But why are
13 we talking about that in this case? I mean, there are
14 some constraints to what you can ask him about in this
15 deposition.
16 MR. LEA: Clay, I think WSG is very relevant
17 here and --
18 **THE WITNESS: This is Marian Oshita --**
19 MR. SNELL: Wait. Hold on a second. I'd like
20 Mr. Lea and I to discuss this.
21 His appearance was to talk about this case. I
22 mean, we're not relitigating WSG. And so, before I
23 instruct him not to answer --
24 MR. LEA: I think WSG is relevant. There are a
25 number of questions about WSG in Ryan's deposition

Page 42

1 testimony and the role between WSG & RTG, and I intend
2 to ask him those questions, Clay. What you and he
3 choose to do in response to that is yours to decide, but
4 I --
5 MR. SNELL: Yeah, I know it's my decision. I
6 don't need you to tell me when I'll tell him not to
7 answer. You don't need to give me that authority, but
8 I'm asking -- you and I discussed this, and his
9 appearance to appear here voluntarily was to -- you're
10 not gonna -- it wasn't gonna be an open book to get into
11 everything. I don't see what a previously litigated
12 case -- this case -- the WSG case has been fully and
13 completely litigated.
14 MR. LEA: It has, and I agree with that.
15 MR. SNELL: Okay. So why are we talking about
16 his -- the original petition he filed in that previously
17 fully litigated case back in 2013?
18 MR. LEA: Because, Clay, he said a second ago
19 that his only involvement with WSG was in 2000- -- one
20 year in 2017.
21 MR. SNELL: I'm gonna instruct him not to answer
22 that because you're trying to possibly impeach him on an
23 entirely collateral matter that has nothing whatsoever
24 to do with --
25 MR. LEA: We disagree about that.

Page 43

1 MR. SNELL: Okay.
2 MR. LEA: WSG's role with RTG in 2017 is
3 relevant in this case.
4 MR. SNELL: I don't think RTG existed in 2013.
5 MR. LEA: 2017.
6 MR. SNELL: Okay.
7 MR. LEA: And so I want --
8 MR. SNELL: But what does that have to do with
9 the Ohio Players? I mean, we're here discussing alleged
10 fraudulent transfers. What does WSG have to do with
11 that? Before I -- I'd like to understand your basis and
12 I'd kinda like to understand. Educate me.
13 MR. LEA: And I'm gonna try. My position, Clay,
14 is that everything that is RTG is a fraudulent transfer,
15 including a substantial amount of money that RTG has
16 taken from WSG.
17 MR. SNELL: I don't think you've alleged that in
18 the complaint. It's not alleged in the complaint, and
19 we're not gonna talk about things that aren't even --
20 you haven't even alleged.
21 So I'm going to instruct him not to answer that.
22 That you've not alleged anything in this complaint about
23 WSG transfers, and so I'm going to instruct him not to
24 answer anything on that.
25 MR. LEA: All right. So I want to go through

Page 44

1 them and get it all on the record.
2 MR. SNELL: Okay. But just so I'm clear, you're
3 wanting to investigate potential fraudulent transfers
4 from WSG to RTG? Is that the basis for these questions?
5 MR. LEA: I want to find out about transfers
6 from WSG --
7 MR. SNELL: Okay.
8 MR. LEA: -- to RTG.
9 MR. SNELL: There's not a single allegation in
10 any live pleading in this case, and the pleading
11 deadline has passed, that raises any concern about
12 transfers from WSG to RTG.
13 MR. LEA: You may think that. We disagree about
14 that.
15 MR. SNELL: Okay. Okay, well --
16 BY MR. LEA:
17 Q. So, Mr. Galaz, you were involved in WSG as early
18 as 2012, weren't you?
19 **A. No.**
20 MR. SNELL: Objection; asked and answered.
21 BY MR. LEA:
22 Q. In November of 2012 didn't you acquire Marian
23 Oshita's 25 percent interest in WSG?
24 **A. Oh. Oh, okay. I -- I didn't know what you were**
25 **referring to. Yes. I mean -- did I -- the answer to**

Page 45

1 **this is, yes, I sued Lisa for money from -- owed to**
2 **Marian Oshita.**
3 Q. But my question is: You became a 25 percent
4 owner in WSG in 2012, didn't you?
5 **A. Yes.**
6 MR. SNELL: Objection; asked and answered.
7 **THE WITNESS: Yes. I'm sorry, I didn't know**
8 **what you were referring to.**
9 BY MR. LEA:
10 Q. That's all right.
11 **A. I didn't know the connection.**
12 Q. Have you told Ryan that you were involved in
13 WSG?
14 **A. No.**
15 Q. Never?
16 **A. I don't know. We've had -- I've had lots of**
17 **conversations with Ryan. I have no idea, you know, what**
18 **we talked about. Seldom do we talk about business,**
19 **seldom.**
20 Q. WSG gave a condominium to RTG --
21 MR. SNELL: I'm going to instruct him not to
22 answer that because it's clearly beyond the scope of
23 discovery in this case.
24 **THE WITNESS: You're telling me history. Okay,**
25 **I don't know this, but you --**

Page 46

1 BY MR. LEA:
2 Q. So my question was going to be --
3 **A. Do I know? No, I don't know.**
4 Q. Did you have any involvement in that event?
5 **A. No.**
6 Q. WSG gave $900,000 to RTG for its purchase of a
7 duplex in Florida. What was your involvement in that?
8 **A. None.**
9 MR. SNELL: I'm going to instruct him not to
10 answer anything else about WSG.
11 BY MR. LEA:
12 Q. Did you talk to Ryan about either of those
13 events?
14 MR. SNELL: I'm going to instruct him not to
15 answer that.
16 BY MR. LEA:
17 Q. Are you going to answer that question?
18 **A. No.**
19 Q. You're not gonna answer that question?
20 **A. I didn't talk to Ryan about this.**
21 Q. All right. You know that in part the business
22 of WSG was to prosecute or collect copyright claims for
23 owners of copyrights, don't you?
24 **A. Yes.**
25 Q. There came a time when WSG assigned or

Page 47

1 transferred to you all of its rights to collect those
2 claims, didn't it?
3 **A. Yes.**
4 MR. SNELL: I'm going to instruct him not to
5 answer anything else about WSG.
6 BY MR. LEA:
7 Q. Are you going to answer that question?
8 **A. Should I?**
9 MR. SNELL: I instruct you not to.
10 **THE WITNESS: No.**
11 BY MR. LEA:
12 Q. Mr. Snell is your lawyer here today?
13 **A. Yes.**
14 Q. And so you're not going to answer that question
15 about the transfer of rights or claims by WSG to you; is
16 that right?
17 **A. Correct.**
18 Q. You filed a Chapter 7 bankruptcy proceeding
19 earlier --
20 MR. SNELL: And I'm gonna -- this is -- you and
21 I discussed this, and you represented to me that we
22 weren't gonna discuss his 2018 bankruptcy. So I'm going
23 to instruct him not to answer anything with regard to
24 his 2018 bankruptcy.
25 (Exhibit 6 was marked.)

Page 48

1 BY MR. LEA:
2 Q. Mr. Gaiaz, I want to ask you some questions
3 about Deposition Exhibit 6, which is a copy of your
4 petition for bankruptcy and schedules in your
5 bankruptcy, and they are dated May 28th, this year. Do
6 you recognize them?
7 MR. SNELL: Why -- before I instruct him not to
8 answer, what does his 2018 bankruptcy have to do with
9 anything that occurred the latest in 2016? I mean, this
10 is abusive, I think. And you and I discussed this, and
11 your representation to me was --
12 MR. LEA: I think I told you I was going to ask
13 him some questions about his schedules.
14 MR. SNELL: No, I think the only thing you were
15 going to ask him was the fact of the bankruptcy for
16 purposes supporting your argument that you believe he
17 was insolvent at a time a transfer was made in 2016.
18 Nobody's disputing the fact of the bankruptcy, but
19 getting into his schedules, this is improper, I'm going
20 to instruct him not to answer.
21 MR. LEA: All right. So let's go through it,
22 and you can do that.
23 MR. SNELL: I'll save you this trouble, and
24 anything with regard to his schedules -- well, what
25 specifically do you want to ask him about the schedules?

Page 49

1 I'm curious.
2 MR. LEA: On page --
3 MR. SNELL: More about WSG, we're not -- yeah,
4 how could you possibly want -- for what reason could you
5 possibly want to ask him about schedules that mention
6 WSG that have anything to do with this lawsuit?
7 BY MR. LEA:
8 Q. Did you formally do business under the name
9 Worldwide Subsidy, Mr. Galaz?
10 MR. SNELL: I'm going to instruct him not to
11 answer.
12 **THE WITNESS: I'll follow my lawyer's advice and**
13 **I will not answer it.**
14 BY MR. LEA:
15 Q. Did you give your interest in Worldwide Subsidy
16 to your ex-wife, Ruth?
17 MR. SNELL: I'm going to instruct him not to
18 answer.
19 **THE WITNESS: I will not answer it.**
20 BY MR. LEA:
21 Q. What happened to the business of Worldwide
22 Subsidy so that it was worthless in 2019 when you filed
23 for bankruptcy?
24 MR. SNELL: I'm going to instruct him not to
25 answer that question and anything about WSG as it

Page 50

1 relates to the 2018 bankruptcy.
2 **THE WITNESS: I will not answer.**
3 MR. SNELL: I'm sorry, the 2019 bankruptcy.
4 BY MR. LEA:
5 Q. Who is Chantel Sloan?
6 **A. I'm sorry, what?**
7 Q. Who is Chantel Sloan?
8 **A. Oh, Chan? That used to be my son's girlfriend.**
9 Q. Raul's girlfriend.
10 **A. Yes.**
11 Q. How did your name come to be on a deed to her
12 home?
13 MR. SNELL: I'm going to instruct him not to
14 answer that.
15 **THE WITNESS: I won't answer that.**
16 MR. SNELL: Why are you asking about a deed on a
17 home? What does that have to do with a transfer of Ohio
18 Players' claims against Julian Jackson?
19 MR. LEA: He said he thinks they're not Ohio
20 Players' claims, Clay.
21 MR. SNELL: Well, you know what we're --
22 MR. LEA: No, I don't know what you're talking
23 about.
24 MR. SNELL: It's your case. You brought it.
25 You know --

Page 51

1 MR. LEA: It is.
2 MR. SNELL: -- what it's about.
3 MR. LEA: And I've alleged that there is a
4 pattern of fraudulent transfers and Raul Galaz using all
5 of his family members as shills to conduct his business.
6 And these questions and these trans- -- fraudulent
7 transactions are all about that, Clay, and they are
8 relevant. If you want to instruct him not to answer
9 relevant questions, that's your business.
10 MR. SNELL: Well, they're not relevant --
11 MR. LEA: We disagree about that.
12 MR. SNELL: It's not even relevant, it's not
13 even reasonably calculated to lead to the discovery of
14 admissible evidence. I'm not even -- I'm not discussing
15 relevance with you. I mean, it's not even calculated
16 to --
17 BY MR. LEA:
18 Q. And so are you gonna answer that question --
19 **A. No.**
20 Q. -- Mr. Galaz? Okay.
21 MR. SNELL: And what really insenses me is --
22 and so now going forward, you can -- that everything
23 with you is going to be in writing. Okay? No more
24 gentlemen's agreements with you because you and I
25 discussed this, and the conditions of his voluntary

Page 52

1 appearance in this was it was going to be limited to the
2 facts of this case. We weren't going to get into his
3 bankruptcy schedules --
4 MR. LEA: The agreement was that it was going to
5 be as if he had been subpoenaed, and --
6 MR. SNELL: No, it wasn't.
7 MR. LEA: Well, he's said on the record it was.
8 MR. SNELL: No. And there was other things we
9 discussed -- and that's fine, we're going to do it this
10 way. And going forward, I know how we have to treat
11 communications and agreements so --
12 BY MR. LEA:
13 Q. Mr. Galaz, is your phone number (210) 789-9084?
14 **A. No. What's -- what's the number again?**
15 Q. Yes, sir. (210) 789-9084.
16 **A. No.**
17 Q. Do you recognize that phone number?
18 **A. It may have been my old one.**
19 Q. You think it was your old phone number?
20 **A. I have no idea. I can't remember.**
21 Q. Okay. You don't recognize it from anywhere
22 else?
23 **A. I don't -- no, I don't recognize it.**
24 Q. How did you arrive at the dollar amount Ryan
25 would pay you for the rights to sue Julian Jackson?

Page 53

1 A. He suggested it, and I thought, that's good.
2 Okay.
3 Q. The idea was -- it originated with him.
4 A. I think so.
5 Q. And did you ask him how he arrived at that
6 amount?
7 A. No, I didn't.
8 Q. Was Raul involved in the discussion?
9 A. No.
10 Q. Was there a three-way call among you and Ryan
11 and --
12 A. There was not.
13 Q. -- Raul?
14 A. No.
15 Q. No three-way call to talk about --
16 A. I've never had a conference call with anybody.
17 Q. With anyone in your whole life.
18 A. In my whole life that I can think of, yeah.
19 Q. And specifically not one with Ryan and Raul --
20 A. No. I would have remembered that.
21 Q. -- about the transfer of the right to sue Julian
22 Jackson.
23 A. Right.
24 MR. LEA: Let's take a short break, and I'll go
25 through my notes. I don't have a lot more.

Page 54

1 THE VIDEOGRAPHER: Off the record at 11:43 a.m.
2 (Recess taken.)
3 THE VIDEOGRAPHER: We're back on the record at
4 11:53 a.m.
5 BY MR. LEA:
6 Q. Mr. Galaz, are you ready to proceed?
7 A. Yes.
8 Q. So far in the deposition have you understood
9 everything that I've asked you?
10 A. I think so.
11 Q. Is there anything -- any of the answers that
12 you've given me where you think you said something that
13 was incorrect or something that you should change?
14 A. I can't think of anything.
15 Q. Okay. Did you transfer or assign to Ryan the
16 right to sue Julian Jackson?
17 A. Yes.
18 Q. Was there anything in writing other than your
19 email exchange referring to his payment to you of
20 $5,000?
21 A. No.
22 Q. So just like when Segundo transferred that right
23 to you, when you transferred it to Ryan, you didn't sign
24 anything saying, I assign or transfer or gift this right
25 to you, Ryan, did you?

Page 55

1 A. No.
2 MR. SNELL: Objection; assumes disputed facts.
3 BY MR. LEA:
4 Q. Did you attend any of the events in New Orleans
5 in the Court of Appeals?
6 A. Yes.
7 Q. Were you there for the oral argument the last
8 time in the Court of Appeals?
9 A. Yes.
10 Q. What did you think that was about?
11 A. About -- I'm trying to think. It wasn't the
12 Oshita thing, was it?
13 I think it was about something Judge King wrote,
14 and Segundo and Raul appealed this, wanted him to
15 reverse the decision.
16 Q. So what was there to reverse later in 2015
17 if--as you believed in January of 2015--it was all over?
18 A. I'm really confused about, you know, the dates
19 when all of this took place. I don't know; I can't
20 answer that.
21 Q. But you went to New Orleans, didn't you, for the
22 appeal proceedings --
23 A. Yes.
24 Q. -- after the date of your letter that's in
25 Exhibit 2.

Page 56

1 A. Yes.
2 Q. Why did you go?
3 MR. SNELL: Objection; asked and answered.
4 THE WITNESS: I don't know.
5 BY MR. LEA:
6 Q. It was for court. It wasn't a pleasure trip,
7 was it?
8 A. No.
9 Q. And it was about the Segundo litigation. You
10 remember that --
11 A. Yes.
12 Q. -- don't you?
13 A. Yes.
14 Q. Does that bring you to the conclusion,
15 Mr. Galaz, that the Segundo litigation must have been
16 continuing after the date of your letter that's there in
17 Exhibit 2?
18 A. I thought it was the Oshita case that I was
19 going to. I don't remember -- I don't remember about
20 Segundo.
21 Q. Okay. May I see that stack of paper that is
22 Exhibit 2, Mr. Galaz?
23 A. (Witness complies.)
24 Q. This is Exhibit 6.
25 A. Oh.

Page 57

1 Q. There was a stack that was Exhibit 2.
2 **A. Is this?**
3 Q. Yes, sir, but it also had maybe that material
4 right there that was included with it.
5 MR. SNELL: No, this is not. This was not
6 Exhibit 2.
7 MR. LEA: Exhibit 2 was a collection of --
8 MR. SNELL: Yeah, but these are my documents.
9 MR. LEA: Okay. So maybe there's more there?
10 **THE WITNESS: 2? This is 3.**
11 MR. SNELL: That's part of 2.
12 MR. LEA: That's part of Exhibit 2.
13 **THE WITNESS: This?**
14 MR. LEA: Yes, sir. May I have that?
15 **THE WITNESS: All of it?**
16 MR. LEA: Yes.
17 MR. SNELL: Yeah, let's straighten it out.
18 Let's make sure we're clear on what Exhibit 2 was.
19 MR. LEA: To get that clarity, I propose that we
20 disassemble it and mark each one of them as a separate
21 exhibit. We referred to it as 2 already, but I think it
22 will be simpler if we refer to his letter as 2 and then
23 give the rest of them separate numbers.
24 Do you have any objection to that?
25 MR. SNELL: No, that's fine.

Page 58

1 BY MR. LEA:
2 Q. So, Mr. Galaz, earlier you and i talked about
3 this whole stack of papers as Exhibit 2, but it's a
4 collection of more than one document, isn't it?
5 **A. Yes.**
6 MR. LEA: And so what I'd like for you to do now
7 is agree with me that the Exhibit 2 sticker is actually
8 only on your letter that's dated January 22nd, 2015.
9 And then let's mark the rest of the items that were
10 previously in that collection --
11 MR. SNELL: Just so we're clear, that Exhibit 2
12 I believe includes the attachments showing transmittals.
13 It's not only the letter itself.
14 MR. LEA: Okay. Exhibit 7? Is that our next
15 number?
16 THE REPORTER: I believe so.
17 (Exhibit 7 was marked.)
18 BY MR. LEA:
19 Q. Mr. Galaz, tell us what Exhibit 7 is.
20 **A. This is the deposit made for me from Ryan on**
21 **October 6, 2016.**
22 Q. That's showing the deposit into your bank of the
23 $5,000 that he paid you.
24 **A. Correct.**
25 (Exhibit 8 was marked.)

Page 59

1 BY MR. LEA:
2 Q. What is Exhibit 8?
3 **A. This is -- I guess in 2016, that is my ending**
4 **balance at the Texas Bank.**
5 Q. May I see?
6 (Exhibit 9 was marked.)
7 BY MR. LEA:
8 Q. Okay. What is Exhibit 9?
9 **A. Oh, let's see. Oh, this is -- this is the**
10 **transfer from Ryan to me, giving the confirmation number**
11 **and showing that he transferred $5,000 to me.**
12 Q. Okay.
13 **A. And the second page, you want that too?**
14 Q. Yes, sir, please, I do.
15 **A. That was what I previously sent to him in**
16 **September telling him that he could continue the**
17 **litigation against Julian Jackson for $5,000. And I**
18 **gave him the routing number of the bank, the account**
19 **number, the bank and the bank's address.**
20 Q. So the second page of Exhibit 9 is the email --
21 **A. Yes.**
22 Q. -- where you were telling him $5,000.
23 **A. Correct.**
24 Q. And the first page of Exhibit 9 is from Ryan's
25 bank records showing that he sent you the $5,000.

Page 60

1 **A. Correct.**
2 Q. The first page of Exhibit 9 is not something
3 that you had in your records to bring here, is it?
4 **A. No. Ryan sent these to me.**
5 Q. When?
6 **A. Oh, gosh. This week maybe. I don't know. it**
7 **was very recently.**
8 Q. Why did he send them to you?
9 **A. Because i didn't have those. I guess I could go**
10 **into a story.**
11 **Should I go into the story?**
12 MR. SNELL: If you want to answer his question
13 that way, go ahead.
14 **THE WITNESS: Okay. I needed to show that I had**
15 **received $5,000 from Ryan, and so I went to my -- well,**
16 **i went to my computer, tried finding it, and my computer**
17 **only allows me to -- this is going to be a long story --**
18 **only allows me to look at my bank account for one month**
19 **at a time. So I had to go and scroll down, and I**
20 **thought, okay, I'm not gonna scroll down from 2019 to**
21 **2016 to try to find a deposit.**
22 **So then I went to the bank and gave them a**
23 **particular date, I said, "I need a deposit -- showing**
24 **that I received a deposit -- or made a deposit**
25 **October 13, 2016." So the nice woman was there helping**

Page 61

1 me and all of that. And then I read the second page of
2 the letter. Well, it was the Texas Bank, not the
3 Oklahoma Bank. So I felt very embarrassed, you know, I
4 was at the wrong bank.
5 So then I went home, started calling the Texas
6 Bank. That was terrible because I could never get ahold
7 of an operator, you know, hit the dial, if you want to
8 know what your balance is, this, this, this. I could
9 never get an operator. Finally, oh, I got an operator
10 about five different times. This was terrible.
11 So I asked them, gave them the information, I
12 needed a deposit. I no longer had a bank account at
13 that bank, but I needed, you know, some sort of evidence
14 to show that I had made a deposit -- or a deposit had
15 been made October 3rd, 2016.
16 Well, they wouldn't give it to me because what I
17 had on file at that bank at that time was my Texas
18 driver's license. I no longer have a Texas driver's
19 license nor do I remember what that driver's license
20 number was. Therefore, they're not gonna give me
21 anything.
22 I worked and worked at it, and I finally got
23 ahold of somebody, and they, of course, transferred it
24 over to another supervisor and all of that. This is --
25 it took a whole day to do that. I finally got ahold of

Page 62

1 somebody, gave her my social security number, driver's
2 license number, the account number. I had the account
3 number at that particular time. And so they emailed me
4 what you've got there.
5 BY MR. LEA:
6 Q. And the reason that you needed something showing
7 the deposit of the $5,000 was so that you could bring
8 something --
9 A. For you.
10 Q. -- for me today.
11 A. Yeah.
12 Q. It wasn't for some other purpose.
13 A. No.
14 Q. Okay.
15 A. That was two days ago that this happened.
16 Q. Okay. And then somewhere along the way, though,
17 apparently Ryan sent it to you.
18 A. No. He sent me this way before.
19 Q. When did he send it to you way before?
20 A. Oh, gosh. This month sometime, I guess.
21 Q. Okay. And why did he send you what he sent you?
22 A. Because I guess he knew that this is what he --
23 I needed to show I guess because he had been here before
24 and needed to show that he paid me.
25 Q. So of the papers that you've brought for me

Page 63

1 today, Mr. Galaz, which of them are papers that you
2 actually had yourself as opposed to things that you got
3 from either Ryan or Raul?
4 A. The bank statements.
5 Q. Anything else?
6 A. No.
7 (Exhibit 10 was marked.)
8 BY MR. LEA:
9 Q. Okay. What is Exhibit 10?
10 A. Oh, yeah. That was the receiver -- this is to
11 show the money that I guess Julian Jackson and Lisa took
12 for the auction of the Hummer and the computers.
13 Q. Where did you get Exhibit 10?
14 A. I think Raul sent that to me.
15 Q. Okay. Now, if you take Exhibits 7, 8, 9, and 10
16 in that stack --
17 A. Okay. 7, 8, 9. Okay.
18 Q. -- and then take Exhibit 2 and put it on the
19 stack with 7, 8, 9, and 10. Will you confirm for me
20 that that stack of Exhibits 2, 7, 8, 9, and 10 is what
21 you brought for me this morning and it's what we
22 previously had all grouped together as Exhibit 2?
23 A. Say that again.
24 Q. Yes, sir. Remember this morning --
25 A. Uh-huh.

Page 64

1 Q. -- I think that stack that now you're touching
2 in both of your hands, we had it all -- we were
3 referring to it all as Exhibit 2.
4 A. Oh.
5 Q. And now we've given some of those different
6 pieces of papers different exhibit numbers. And I just
7 want to confirm that what was previously all together as
8 Exhibit 2 is now 2, 7, 8, 9, and 10; is that correct?
9 A. Yes.
10 Q. All right. You filed that bankruptcy that we
11 talked about earlier this year, Chapter 7 bankruptcy.
12 A. Yes.
13 Q. Was your financial condition significantly
14 different in 2016 when you transferred the rights to sue
15 Julian Jackson to Ryan?
16 A. Yes.
17 Q. How was it different?
18 A. I had a lot of money in 2016.
19 Q. And what happened to that money between 2016 and
20 '19?
21 A. Okay. My stepdaughter -- husband left her with
22 two children. She had spinal surgery. Spinal surgery.
23 Because he left her, she had to pay the lawyer to get a
24 divorce. She had no job because she had spinal surgery
25 and was -- could not work, had no income. My wife gave

Page 65

1 her a lot of money and -- including a credit card that
2 she ran up tremendously.
3 I had partial knowledge of what had happened. I
4 never knew the full extent of it. And when I did find
5 out what the full extent was, it was way beyond what we
6 could -- what we could afford, because she had given a
7 lot. Over $100,000.
8 Q. Okay. I want to go back in time right before --
9 I'm sorry. Go ahead.
10 A. No. I was gonna say all that took place within,
11 say, three to four months.
12 Q. In which year? 2019?
13 A. 2019, yeah.
14 Q. Okay. So right before Segundo transferred to
15 you the right to sue Julian Jackson -- so the rights are
16 still inside Segundo. Okay?
17 A. Uh-huh.
18 Q. You were the only owner of Segundo, weren't you?
19 A. Yes.
20 Q. Which means you were the only decision maker for
21 Segundo, weren't you?
22 A. Correct.
23 Q. So when the rights were inside Segundo, you were
24 the -- the right to sue Julian Jackson --
25 A. Uh-huh.

Page 66

1 Q. -- you were the person who could decide what
2 would happen to that right, weren't you?
3 A. Correct.
4 Q. And then once you transferred it to yourself,
5 you were still the person who could decide what to do
6 with that right, weren't you?
7 A. Yes.
8 Q. That didn't change in any way before or after
9 the transfer, did it?
10 A. Correct.
11 Q. How did Segundo benefit from you transferring
12 the right to sue Julian Jackson out of Segundo to
13 yourself personally?
14 A. How did Segundo --
15 Q. Yes, sir.
16 A. -- benefit from that transfer. Well, I was
17 Segundo, so I -- I -- it was just from one pocket into
18 the other.
19 Q. Okay.
20 A. I had to -- when Judge King gave his order in I
21 think 2010, he stopped all of the music rights that
22 would come to Segundo; therefore, there was no need in
23 keeping a bank account under the name of Segundo which I
24 had previously with Morgan Stanley. So it all just
25 merged into my own personal bank account, and so, what

Page 67

1 was Segundo's was mine.
2 Q. When you transferred -- when you had Segundo
3 transferred to you the right to sue Julian Jackson, was
4 there any way for Lisa to find out about that happening?
5 A. No.
6 Q. 'Cause you didn't tell her about it.
7 A. You mean that I transferred from Segundo to
8 myself?
9 Q. Yes, sir.
10 A. No.
11 Q. And without you telling her about it, there
12 wasn't any other way for her to know about it, was
13 there?
14 A. I -- I don't know. I mean, I -- I don't think
15 anybody knew.
16 Q. Okay. And there wasn't any way for anyone else
17 to know other than you telling them, was there?
18 A. Correct.
19 MR. SNELL: Objection; calls for speculation.
20 BY MR. LEA:
21 Q. Well, let me ask you this: Would you make a
22 list for me, Mr. Galaz, of all of the ways that you can
23 think of that Lisa could have found out that you
24 transferred the rights from Segundo to yourself?
25 MR. SNELL: Objection; calls for speculation.

Page 68

1 BY MR. LEA:
2 Q. Go ahead, make a list for me, please.
3 A. I don't understand the question. A list of
4 people or --
5 Q. How would she find out? I'm asking you: Can
6 you think of any ways that Lisa could have learned about
7 that?
8 A. I suppose getting a statement from Morgan
9 Stanley, which was given to her at the time of the
10 preliminary trial. And even at the end, yeah, I'm sure
11 Scott Rose would have -- I think you asked Scott Rose
12 for our -- our bank statement, Morgan Stanley, which was
13 the money that was in Segundo Suenos.
14 Q. Are you saying, Mr. Galaz, you think that Scott
15 Rose told me or Lisa?
16 A. No. I think Scott Rose -- I remember a
17 conversation Scott Rose was having -- I was in that --
18 MR. SNELL: Wait a second. You don't disclose
19 anything that you and Mr. Rose --
20 THE WITNESS: Okay.
21 MR. SNELL: -- discussed. That's privileged.
22 That's attorney-client privilege. So don't divulge
23 that.
24 THE WITNESS: Okay.
25 You knew. My answer is you knew about it.

Page 69

1 BY MR. LEA:
2 Q. I knew about your transfer from Segundo to
3 yourself of the right to sue Julian Jackson?
4 **A. No, that's not what I'm saying.**
5 Q. That's what I'm trying to focus on: That
6 transfer. Was there any way for Lisa or anyone else to
7 know about it?
8 MR. SNELL: Objection; asked and answered, calls
9 for speculation.
10 **THE WITNESS: I don't know what was in Lisa's**
11 **head.**
12 BY MR. LEA:
13 Q. Can you think of a way that the information
14 could get into her head?
15 MR. SNELL: Objection; asked and answered, calls
16 for speculation.
17 **THE WITNESS: I don't know.**
18 BY MR. LEA:
19 Q. Why didn't you ever notify the court about the
20 transfer?
21 **A. I didn't know I was required to.**
22 MR. LEA: Pass the witness.
23 EXAMINATION
24 BY MR. SNELL:
25 Q. Mr. Galaz, as you know, I'm Clay Snell, and I

Page 70

1 represent RTG. You understand that, right, sir?
2 **A. Yes.**
3 Q. Okay. Let me just get a little bit of
4 background from you, sir. How old a man are you?
5 **A. I am 84. I'll be 85 next month.**
6 Q. Well, congratulations on the longevity.
7 Are you retired, sir, or --
8 **A. Yes, I am.**
9 Q. How long have you been retired?
10 **A. Three years.**
11 Q. And what occupation did you retire from?
12 **A. I was a clinical psychologist.**
13 Q. Just kind of generally run me through the source
14 of employers you've had through your lifetime as a
15 clinical psychologist.
16 **A. I worked 20 years as a clinical psychologist at**
17 **a medical center; I was the director of doctoral**
18 **training. I then went to Germany, worked there for**
19 **seven years. During that time I was the director of**
20 **five clinics in the State of -- medical clinics in the**
21 **State of Bavaria, working for the United States**
22 **Department of Defense. Then I went to Fort Hood, Texas.**
23 **Worked there for another six, seven years, working at**
24 **that base for the Department of Defense as a clinical**
25 **psychologist.**

Page 71

1 Q. Would that be a clinical psychologist for
2 soldiers and service members?
3 **A. Yes.**
4 Q. Okay.
5 **A. Service members, family members of servicemen.**
6 Q. Okay. Go on. I interrupted you. But go ahead.
7 **A. And then -- then I retired from the government**
8 **service in 2004. And then for the next 10 years I was a**
9 **consultant at nursing homes, three different nursing**
10 **homes in the Killeen, Texas area.**
11 Q. And you did that until you retired about
12 three years ago?
13 **A. Yes.**
14 Q. All right.
15 **A. Yes.**
16 Q. So you retired in, what, 2016?
17 **A. Yes.**
18 Q. Okay. Do you remember what month it was you
19 retired in 2016?
20 **A. I think February.**
21 Q. Okay. And then after that did you leave the
22 Killeen area?
23 **A. Yes. I moved from Killeen the end of August and**
24 **moved to Oklahoma, Tulsa, Oklahoma in September.**
25 Q. Is that where you live currently?

Page 72

1 **A. Yes.**
2 Q. All right. Did you ever serve in the military,
3 sir? You mentioned working for DOD. Did you --
4 **A. Yes. I was drafted into the army during the**
5 **Korean War. I was in the army from 1953 to '55.**
6 Q. All right. Now, currently, RTG, my client, you
7 understand is owned by Ryan Galaz, your grandson?
8 **A. Yes.**
9 Q. And just generally tell us how often do you
10 speak or see Ryan?
11 **A. Well, that varies. it's variable. Sometimes we**
12 **could speak as much as once a month or sometimes even**
13 **once a year. I don't see him often. Last real time I**
14 **saw him was at his sister's graduation in Los Angeles.**
15 Q. But other than seeing him in person, do you all
16 speak on the phone occasionally?
17 **A. Occasionally. And that's mostly -- very, very**
18 **seldom would we ever talk about this, meaning the**
19 **litigation. Very -- that -- it's practically null.**
20 Q. What sort of common interest do you and Ryan
21 have that you all would talk about?
22 **A. Duke basketball.**
23 Q. Did Ryan attend Duke University?
24 **A. Yes.**
25 Q. And that would explain his passion --

Page 73

1 A. **Yes.**
2 Q. -- for Duke basketball.
3 All right. Let me ask you a few more things.
4 We talked about this transfer of the Jackson claim from
5 Segundo Suenos to yourself. And Mr. Lea asked you
6 whether you paid any kind of money to Segundo for that,
7 and I believe your answer was, no, you did not; is that
8 correct?
9 A. **That's correct.**
10 Q. Do you believe, though, that you gave any sort
11 of value to Segundo in exchange for the transfer of the
12 Jackson claim to yourself?
13 MR. LEA: Excuse me. Objection; leading.
14 **THE WITNESS: Oh, the letter?**
15 MR. LEA: Go ahead, you can answer.
16 BY MR. SNELL:
17 Q. I tell you what: He objected, so I want to
18 re-ask that question.
19 A. **Uh-huh.**
20 Q. Did you give any sort of consideration to
21 Segundo for the transfer from Segundo to yourself of the
22 Jackson claim?
23 A. **Not in terms of money, but I did in terms of my**
24 **time and effort. I even had to take off work when I had**
25 **the court cases that were up here or going to**

Page 74

1 **New Orleans. I had to take off work at that time. Gave**
2 **up money that way, and, of course, personal funds taking**
3 **me here, taking me to New Orleans.**
4 Q. At the time that Segundo was involved in
5 litigation in these different lawsuits, was there
6 anybody other than yourself that was making decisions
7 and keeping track of the litigation on behalf of
8 Segundo?
9 A. **No.**
10 Q. Did you personally ever receive any compensation
11 from Segundo for overseeing the litigation, for
12 traveling to attend court hearings or trials or
13 depositions?
14 A. **No.**
15 Q. Now, what you've produced for us today in
16 response to the request from Mr. Lea, among these
17 documents is Exhibits -- are Exhibits 7 and 8. And just
18 so I'm clear, am I correct that Exhibit 7 reflects a
19 deposit of $5,000 from Ryan Galaz to you?
20 A. **Yes.**
21 Q. Okay. And is that $5,000 deposit from Ryan
22 Galaz the $5,000 consideration Ryan gave you for the
23 transfer of the Jackson claim to ultimately my client,
24 RTG?
25 MR. LEA: Objection.

Page 75

1 **THE WITNESS: Correct.**
2 MR. LEA: Excuse me. Objection; leading.
3 BY MR. SNELL:
4 Q. What was the $5,000 deposit in Exhibit 7? What
5 was that for, the deposit from Ryan Galaz?
6 A. **That was a claim I had to try to retrieve some**
7 **of the money -- or all of the money that Jackson had**
8 **taken prior to the Fifth Circuit Court reversing Judge**
9 **King's jurisdiction.**
10 Q. All right. Now, back in October of 2016,
11 Mr. Lea asked you earlier about whether your financial
12 condition that led to the bankruptcy in 2019 was
13 different from your financial condition back in 2016
14 when Ryan purchased the Jackson claim.
15 A. **Uh-huh.**
16 Q. Do you recall that?
17 A. **Yes.**
18 Q. Okay. And how was your financial condition
19 different in October of 2016 as compared to 2019 when
20 you filed bankruptcy?
21 A. **At the time of 2016 I had a lot of money at that**
22 **time.**
23 Q. All right. And the events that led to your
24 bankruptcy, you described those for us earlier, and you
25 mentioned your stepdaughter racking up credit card debt;

Page 76

1 is that correct?
2 A. **Yes.**
3 Q. And how much credit card debt did your
4 stepdaughter rack up?
5 A. **Well, it wasn't just the credit card debt.**
6 Q. Well, let's talk just about the credit card
7 debt.
8 A. **Okay. About 46,000 -- either 46,000 or 64,000.**
9 **I don't know.**
10 Q. Okay. And that was -- was that debt that she
11 was liable for or you and/or your wife were liable for?
12 A. **My wife was liable for that.**
13 Q. Okay. And when was that debt incurred? Over
14 what time frame are we talking about?
15 A. **That would have been either the end of 2018 and**
16 **the beginning of 2019.**
17 Q. All right.
18 A. **Most of it was probably in 2019.**
19 Q. All right. Back in 2016 did your stepdaughter
20 have a credit card that --
21 A. **No.**
22 Q. -- was guaranteed by either you or your wife?
23 A. **Not at that time.**
24 Q. All right. Is there a document that would
25 refresh your recollection as to how much money you had

Page 77

1 in your bank account as of October 22nd, 2016?
2 Well, let me ask you this way: Can you recall
3 how much money you had in your bank account on
4 October 22, 2016? Can you right now recall that?
5 **A. No, because I had just sold a house, and I**
6 **can't --**
7 Q. Okay.
8 **A. There were two bank accounts.**
9 Q. Let me just ask you this: Is there a document
10 that would refresh your recollection as to how much
11 money you had in your bank account as of October 22,
12 2016?
13 **A. That would be the balance that I had in the**
14 **Texas Bank and the balance that I would have had --**
15 Q. Let me show you Exhibit 8. Would you take a
16 look at Exhibit 8 --
17 **A. Yes.**
18 Q. -- and tell us what is Exhibit 8?
19 **A. This is the balance I had in the Texas Bank.**
20 Q. Well, I'm not asking you what information it
21 reflects. What is Exhibit 8? Would you tell us what
22 Exhibit 8 is?
23 **A. This is the monthly report that I got from the**
24 **Texas Bank.**
25 Q. Okay. And does it reflect a closing balance as

Page 78

1 of October 22nd, 2016?
2 **A. Yes, it does.**
3 Q. And does that refresh your recollection as to
4 how --
5 **A. Yes.**
6 Q. -- much money you had in that bank account?
7 **A. Yes.**
8 Q. And what is the amount that you had --
9 **A. $17,647.**
10 Q. Let me re-ask the question just so I can make
11 sure we're clear.
12 What is the amount -- how much money did you
13 have in your Texas National Bank account as of
14 October 22, 2016?
15 **A. At the beginning of that month or the --**
16 Q. As of October 22, 2016.
17 **A. $17,000.**
18 Q. What is the amount?
19 **A. 17,000.**
20 Q. Okay. Back in 2016 were you keeping current on
21 your debts back then?
22 **A. Yes.**
23 Q. Were you past due on any debts back in 2016?
24 **A. No.**
25 Q. Did you have any creditors hounding you back in

Page 79

1 2016?
2 **A. No.**
3 Q. In addition to the monies reflected in
4 Exhibit 8, were there any other bank accounts in which
5 you had money, either you or your wife Lois?
6 **A. Oh, yes.**
7 Q. So does --
8 **A. We were -- at that time we had already moved,**
9 **and I was taking out the money from the Texas Bank,**
10 **putting it into the Oklahoma Bank, and my wife had her**
11 **account from the Texas Bank, and she moved her account**
12 **into the Oklahoma Bank.**
13 Q. All right.
14 **A. My wife still had an IRA of about $135,000 in an**
15 **account, a Morgan Stanley account in Temple, Texas.**
16 Q. Did you personally have any monies in addition
17 to the amounts reflected in Exhibit 8 about the third
18 week of October 2016?
19 **A. Well, by that time I was already -- both my wife**
20 **and I were getting social security, and we were**
21 **getting -- each of us were getting retirement. I had**
22 **two retirement funds, and she had her retirement fund**
23 **from the government.**
24 Q. Okay.
25 **A. So we were getting monthly income.**

Page 80

1 Q. Do you -- after -- strike that.
2 When you entered into this agreement with Ryan
3 for the purchase -- his purchase of the Jackson claim,
4 did you have any other agreement that you would ever
5 receive any sort of money from him on the backside or
6 down the road after that?
7 **A. No.**
8 Q. Did you hear any more from Ryan about what, if
9 anything, he did with the Jackson claim after he paid
10 the $5,000 to you?
11 **A. No.**
12 Q. What is the first that you heard anything
13 whatsoever came of the Jackson claim after October 2016?
14 **A. Only when this came up. Maybe within a week or**
15 **two weeks ago did I ever know anything --**
16 Q. Do you have --
17 **A. -- beyond what happened after I transferred**
18 **that -- that claim to him.**
19 Q. Did you have any agreement with your son Raul
20 about anything at all whatsoever to do with Jackson
21 claims or Ohio Players' music rights?
22 **A. No.**
23 MR. SNELL: That's all I have. No further
24 questions.
25 MR. LEA: I've got a few more questions for you,

Page 81

1 Mr. Galaz.
2 FURTHER EXAMINATION
3 BY MR. LEA:
4 Q. In 2016 and '17 didn't you also own a valuable
5 interest in Worldwide Subsidy Group?
6 **A. Yes. What -- what year?**
7 Q. '16 and '17.
8 **A. No. No. Well, I don't think so.**
9 Q. You owned it in 2012.
10 **A. Yeah.**
11 Q. And you owned it in 2018, didn't you?
12 **A. I really can't answer that because I really**
13 **don't -- don't remember when all of that was**
14 **transferred. I -- I -- I know that I -- I can tell you**
15 **when I didn't have any interest in that. In the years**
16 **of 2016, '17, my tax reports don't, I don't.**
17 Q. You told the bankruptcy court that you
18 transferred it in 2018.
19 **A. Well --**
20 Q. Was that true when you said it?
21 **A. I guess so.**
22 MR. SNELL: I'm going to instruct him not to
23 answer the question on what he told the bankruptcy court
24 in 2019.
25 BY MR. LEA:

Page 82

1 Q. So did you own it until you transferred it?
2 MR. SNELL: We're not gonna -- he's not going to
3 answer questions about the transfer of WSG in 2019 or
4 whenever.
5 **THE WITNESS: I won't answer it.**
6 BY MR. LEA:
7 Q. Was your ownership of WSG a part of your
8 financial condition before you transferred it?
9 **A. Let me just say that I don't remember the dates**
10 **of all of these things, you know? When all of these**
11 **things took place, I don't remember the dates.**
12 Q. Regardless of the dates, you owned it until you
13 transferred it, didn't you?
14 MR. SNELL: I'm gonna instruct him not to answer
15 anything more about the ownership or transfers of WSG.
16 BY MR. LEA:
17 Q. Are you going to answer that question?
18 **A. No, I won't answer it.**
19 Q. Why did you tell the State of Texas that you
20 owned it in 2018?
21 MR. SNELL: I'm going to instruct him not to
22 answer that.
23 **THE WITNESS: I won't answer it.**
24 MR. SNELL: Misstates facts.
25 BY MR. LEA:

Page 83

1 Q. You told Mr. Snell that you understood that he
2 was the lawyer for RTG?
3 **A. Yes.**
4 Q. You also understand that he's also your lawyer,
5 don't you?
6 **A. Yes.**
7 Q. And so, you knew before he told you that he was
8 RTG's lawyer today that he was RTG's lawyer today
9 because he's your lawyer, as well --
10 **A. Yes.**
11 Q. -- isn't he?
12 How long has he been your lawyer?
13 **A. Oh, he represented Segundo -- again, I don't**
14 **remember the dates, but this would have been for several**
15 **years, years ago. '15. 2015? 2014?**
16 Q. So you think even at the time you transferred --
17 at the time you had Segundo transfer to you the right to
18 sue Julian Jackson, you think Mr. Snell was your lawyer
19 at that time?
20 **A. Not actively representing me at that time.**
21 Q. In any way was he your lawyer at that time?
22 **A. I don't think so.**
23 Q. So when --
24 **A. I don't know.**
25 Q. If you take that as a marker, what's the event

Page 84

1 that you next remember when he became your lawyer?
2 **A. When we went to -- oh, when the Oshita case came**
3 **up.**
4 Q. Okay.
5 **A. Yeah.**
6 MR. LEA: Okay. Pass the witness.
7 MR. SNELL: Nothing further.
8 THE VIDEOGRAPHER: Off the record, August 12,
9 2019, at 12:34 p.m.
10 (WHEREUPON, the deposition of ALFREDO GALAZ was
11 concluded at 12:34 p.m.)
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1 CHANGES AND SIGNATURE

2 PAGE LINE CHANGE REASON

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1 I, ALFREDO GALAZ, have read the foregoing
2 deposition and hereby affix my signature that same is
3 true and correct, except as noted above.
4
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7 _____
ALFREDO GALAZ
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1 IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
2 SAN ANTONIO DIVISION
3
RTG, LLC )
4 )
Plaintiff, )
5 )
vs. ) NO.: 5:19-CV-0087-DAE
6 )
Lisa Katona Fodera, )
7 )
Defendant. )
8
9 REPORTER'S CERTIFICATION
ORAL DEPOSITION OF
10 ALFREDO GALAZ
DECEMBER 12, 2019
11
12 I, MARLEEN CAMPBELL, Certified Shorthand Reporter,
13 hereby certify to the following:
14 That the witness, ALFREDO GALAZ, was duly sworn by
15 the officer and that the transcript of the oral
16 deposition is a true record of the testimony given by
17 the witness.
18 I further certify that pursuant to FRCP Rule
19 30(e)(1) that the signature of the deponent:
20 __X___ was requested by the deponent or a party
21 before the completion of the deposition and returned
22 within 30 days from date of receipt of the transcript.
23 If returned, the attached Changes and Signature Page
24 contains any changes and the reasons therefor;
25 _____ was not requested by the deponent or a party



1 before the completion of the deposition.
2 I further certify that I am neither attorney nor
3 counsel for, related to, nor employed by any of the
4 parties to the action in which this testimony was taken.
5 Further, I am not a relative or employee of any
6 attorney of record in this cause, nor do I have a
7 financial interest in the action.
8 Subscribed and sworn to on this the 30th
9 day of December, 2019.
10
11
12 Marleen Campbell
13 _____
MARLEEN CAMPBELL, CSR No. 7554
14 Lexitas - Firm Registration No. 539
100 N.E. Loop 410, Suite 955
15 San Antonio, Texas 78216
210-481-7575
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## Exhibits

**Galaz Exh 001** 6:22 7:1,25 25:23 26:9,22 27:3
**Galaz Exh 002** 7:14,17,20,23 8:3, 10,21 15:19 16:23 17:10 23:19 24:9 37:17 38:4 55:25 56:17,22 57:1,6,7, 12,18 58:3,7,11 63:18,22 64:3,8
**Galaz Exh 003** 28:13,16 29:17 30:9,15 31:2 32:7,15 33:1,6,14
**Galaz Exh 004** 36:17,20 37:16,23, 24 39:18
**Galaz Exh 005** 40:19,21
**Galaz Exh 006** 47:25 48:3 56:24
**Galaz Exh 007** 58:14,17,19 74:18 75:4
**Galaz Exh 008** 58:25 59:2 77:15, 16,18,21,22 79:4,17
**Galaz Exh 009** 59:6,8,20,24 60:2
**Galaz Exh 010** 3:24 63:7,9,13

## $

**$100,000** 65:7
**$135,000** 79:14
**$17,000** 78:17
**$17,647** 78:9
**$491,309.10** 29:7
**$5,000** 54:20 58:23 59:11,17,22,25 60:15 62:7 74:19,21,22 75:4 80:10
**$900,000** 46:6

## -

**-15** 23:17
**-50** 21:21

## 1

**1** 6:22 7:1,25 25:23 26:9,22 27:3
**10** 63:7,9,13,15,19,20 64:8 71:8
**10:36** 4:2
**11:43** 54:1
**11:53** 54:4
**12** 4:2 84:8
**12:34** 84:9,11
**13** 60:25
**15** 83:15
**16** 28:21 81:7
**17** 81:4,7,16
**17,000** 78:19
**19** 16:16 64:20
**19-** 21:21
**1915** 29:1
**1953** 72:5
**1956** 21:21
**1976** 22:3
**19th** 38:14,24 39:6,8

## 2

**2** 7:14,17,20,23 8:3,10,21 15:19 16:23 17:10 23:19 24:9 37:17 38:4,5 55:25 56:17,22 57:1,6,7,10,11,12,18, 21,22 58:3,7,11 63:18,20,22 64:3,8
**20** 70:16
**2000-** 23:16 42:19
**2004** 71:8
**2010** 66:21
**2012** 40:15 44:18,22 45:4 81:9
**2013** 40:22 42:17 43:4
**2014** 9:12 83:15
**2015** 9:2,4 16:16 28:21 29:2,3,10,23 30:15 31:4,6,11,15 32:6 37:2,3,4 38:14 55:16 58:8 83:15
**2015--it** 55:17
**2016** 48:9,17 58:21 59:3 60:21,25 61:15 64:14,18,19 71:16,19 75:10,13, 19,21 76:19 77:1,4,12 78:1,14,16,20, 23 79:1,18 80:13 81:4,16
**2017** 40:12 42:20 43:2,5
**2018** 47:22,24 48:8 50:1 76:15 81:11,18 82:20
**2019** 4:2 49:22 50:3 60:20 65:12,13 75:12,19 76:16,18 81:24 82:3 84:9
**210 789-9084** 52:13,15
**22** 77:4,11 78:14,16
**22nd** 7:2 26:9 38:11,24 39:4 58:8 77:1 78:1
**24** 39:5
**25** 33:19 44:23 45:3
**28th** 48:5

## 3

**3** 28:13,16 29:17 30:9,15 31:2 32:7, 15 33:1,6,14 57:10
**3rd** 61:15

## 4

**4** 36:17,20 37:16,23,24 38:1 39:18
**46,000** 76:8

## 5

**5** 40:19,21
**50** 33:18
**55** 72:5
**57** 21:22

## 6

**6** 47:25 48:3 56:24 58:21
**64,000** 76:8

## 7

**7** 47:18 58:14,17,19 63:15,17,19,20 64:8,11 74:17,18 75:4

## 8

**8** 58:25 59:2 63:15,17,19,20 64:8 74:17 77:15,16,18,21,22 79:4,17
**84** 70:5
**85** 70:5

## 9

**9** 59:6,8,20,24 60:2 63:15,17,19,20 64:8

A

**a.m.** 4:2 54:1,4
**ability** 5:25 6:17
**abusive** 48:10
**account** 10:9,10,11 59:18 60:18 61:12 62:2 66:23,25 77:1,3,11 78:6, 13 79:11,15
**accounts** 77:8 79:4
**acquire** 44:22
**actively** 83:20
**addition** 79:3,16
**Additionally** 16:4
**address** 59:19
**adjudged** 29:6 33:24
**admissible** 51:14
**adversary** 34:5
**advice** 49:12
**affects** 5:25
**afford** 65:6
**agree** 23:2 37:12 42:14 58:7
**agreed** 22:25
**agreement** 52:4 80:2,4,19
**agreements** 51:24 52:11
**ahead** 17:13 33:11 60:13 65:9 68:2 71:6 73:15
**ahold** 61:6,23,25
**Alfred** 4:12 9:24
**ALFREDO** 4:6 84:10
**allegation** 44:9
**alleged** 43:9,17,18,20,22 51:3
**allowed** 4:4
**amount** 29:7,17 43:15 52:24 53:6 78:8,12,18
**amounts** 79:17
**and/or** 76:11
**Angeles** 72:14
**answers** 54:11
**Antonio** 10:16,19 31:12
**anytime** 6:13
**apologize** 22:2
**apparently** 9:2 62:17
**appeal** 55:22
**appealed** 55:14
**Appeals** 55:5,8
**appearance** 37:10 41:10,21 42:9 52:1
**appearing** 37:12
**applies** 39:11
**apply** 40:6
**approximately** 21:18
**area** 71:10,22
**argument** 48:16 55:7
**argumentative** 15:23 36:14 39:15
**army** 72:4,5
**arrive** 52:24
**arrived** 53:5
**aspirin** 6:6
**assets** 12:6 30:16 31:4,20,22 33:7 34:10
**assign** 15:13 54:15,24
**assigned** 46:25
**assigning** 14:24
**assignment** 14:15
**assigns** 14:6
**assumed** 13:6 35:18
**assumes** 55:2
**assuming** 30:21
**assumption** 13:12,13 30:18,19 35:22
**attachments** 58:12
**attend** 55:4 72:23 74:12
**attic** 8:13
**attorney-client** 68:22
**auction** 18:25 63:12
**August** 25:25 26:6 71:23 84:8
**authority** 42:7
**authors** 17:20
**aware** 6:16

B

**back** 8:25 15:3,5,6 25:25 26:6 32:3 39:20 40:3,14 41:1 42:17 54:3 65:8 75:10,13 76:19 78:20,21,23,25
**background** 70:4
**backside** 80:5
**balance** 59:4 61:8 77:13,14,19,25
**bank** 58:22 59:4,18,19,25 60:18,22 61:2,3,4,6,12,13,17 63:4 66:23,25 68:12 77:1,3,8,11,14,19,24 78:6,13 79:4,9,10,11,12
**bank's** 59:19
**bankruptcy** 47:18,22,24 48:4,5,8, 15,18 49:23 50:1,3 52:3 64:10,11 75:12,20,24 81:17,23
**base** 70:24
**basis** 43:11 44:4
**basketball** 72:22 73:2
**Bavaria** 70:21
**beginning** 76:16 78:15
**begins** 33:24
**behalf** 14:17 35:12 74:7
**believed** 55:17
**belonged** 10:24 39:8,9
**benefit** 66:11,16
**bit** 70:3
**blood** 6:4
**book** 42:10
**Boydston** 7:3 15:24 16:22
**break** 5:18,19 6:14 53:24
**Brian** 7:3 15:24 16:3,10,21 17:8,25 18:4,11
**bring** 7:8 25:13,18,21 26:11 27:9 56:14 60:3 62:7
**brought** 7:10,24 50:24 62:25 63:21
**business** 45:18 46:21 49:8,21 51:5, 9

C

**calculated** 51:13,15
**call** 53:10,15,16

**called** 23:24
**calling** 61:5
**calls** 67:19,25 69:8,15
**camera** 26:15
**cancelled** 19:5
**card** 65:1 75:25 76:3,5,6,20
**care** 11:24 12:9,13,15,20,22 30:19, 20,22 35:13,15,19,20
**case** 11:24 12:6 16:21 23:23 41:12, 13,21 42:12,17 43:3 44:10 45:23 50:24 52:2 56:18 84:2
**cases** 73:25
**categories** 8:4,24
**center** 70:17
**Chan** 50:8
**change** 54:13 66:8
**changing** 19:3
**Chantel** 50:5,7
**Chappell** 35:24
**Chapter** 47:18 64:11
**checks** 19:4,5
**children** 64:22
**choose** 42:3
**Circuit** 9:9 10:2 14:25 75:8
**claim** 31:8,9 73:4,12,22 74:23 75:6, 14 80:3,9,13,18
**claims** 10:14,15 11:9 35:3 46:22 47:2,15 50:18,20 80:21
**clarity** 57:19
**Clay** 41:16 42:2,18 43:13 50:20 51:7 69:25
**clear** 44:2 57:18 58:11 74:18 78:11
**cllent** 72:6 74:23
**clinical** 70:12,15,16,24 71:1
**clinics** 70:20
**close** 38:10,16
**closing** 77:25
**collateral** 42:23
**collect** 46:22 47:1
**collection** 7:15,19 8:9,21 57:7 58:4,10
**common** 72:20
**communicate** 6:17
**communicating** 6:19
**communications** 52:11
**compared** 75:19
**compensation** 74:10
**compiled** 15:25
**complaint** 43:18,22
**completely** 42:13
**complies** 56:23
**comply** 31:2
**composed** 16:13
**computer** 60:16
**computers** 63:12
**concern** 12:15 44:11
**concluded** 84:11
**conclusion** 56:14
**condition** 64:13 75:12,13,18 82:8
**conditions** 51:25
**condominium** 45:20
**conduct** 51:5
**conference** 53:16
**confident** 17:16
**confirm** 63:19 64:7
**confirmation** 59:10
**confused** 55:18
**congratulations** 70:6
**connection** 38:20 45:11
**consideration** 73:20 74:22
**considered** 29:25 32:20,21
**constraints** 41:14
**consultant** 71:9
**continue** 59:16
**continues** 34:8
**continuing** 35:2 56:16
**contribute** 32:3
**contributed** 16:18,25
**contribution** 18:15
**convenience** 5:20
**conversation** 24:25 25:14 26:10, 13 27:20,23 68:17
**conversations** 37:9 45:17
**copy** 7:1 23:18 26:22 27:3 30:15 40:21 48:3
**copyright** 46:22
**copyrights** 46:23
**correct** 7:9,13 8:11,19 9:23,25 10:3, 22 13:10,15,22,23 21:8 24:24 26:7,18 27:25 31:13,14,24 32:5,12 47:17 58:24 59:23 60:1 64:8 65:22 66:3,10 67:18 73:8,9 74:18 75:1 76:1
**court** 9:9 15:1 16:20 19:2 25:22 32:6 40:13 55:5,8 56:6 69:19 73:25 74:12 75:8 81:17,23
**covered** 32:14 34:20
**creating** 17:8
**credit** 65:1 75:25 76:3,5,6,20
**creditors** 78:25
**curious** 49:1
**current** 78:20

## D

**date** 26:9 38:11,13 55:24 56:16 60:23
**dated** 48:5 58:8
**dates** 55:18 82:9,11,12 83:14
**daughter** 21:12
**day** 61:25
**days** 38:25 39:1 62:15
**deadline** 44:11
**dealt** 23:16
**debt** 75:25 76:3,5,7,10,13
**debts** 78:21,23
**December** 4:2
**decide** 42:3 66:1,5
**decision** 15:1 42:5 55:15 65:20
**decisions** 74:6
**decreed** 29:6 33:25
**deed** 50:11,16
**defendants** 34:8
**Defense** 70:22,24
**Denise** 21:12
**Department** 70:22,24

**deposit** 58:20,22 60:21,23,24 61:12,14 62:7 74:19,21 75:4,5
**deposition** 4:5,17,22 7:1,8,12,24 15:19 23:22 24:1,3 25:1,13,20,21 26:9,11 27:10 28:16 36:20 37:8,10 41:15,25 48:3 54:8 84:10
**depositions** 74:13
**details** 15:11
**determine** 13:15
**dial** 61:7
**digress** 18:24
**director** 70:17,19
**disagree** 42:25 44:13 51:11
**disassemble** 57:20
**disclose** 68:18
**discovery** 45:23 51:13
**discuss** 41:20 47:22
**discussed** 41:10 42:8 47:21 48:10 51:25 52:9 68:21
**discussing** 43:9 51:14
**discussion** 27:21,22 53:8
**disputed** 55:2
**disputing** 48:18
**dissipate** 34:9
**divorce** 64:24
**divulge** 68:22
**doctoral** 70:17
**document** 14:17 28:15,23 33:8 34:20 58:4 76:24 77:9
**documents** 7:7,10,15,19,25 8:2,4,8,10,18,25 25:12 26:20 27:6,24 57:8 74:17
**DOD** 72:3
**dollar** 52:24
**dollars** 29:18
**drafted** 72:4
**driver's** 61:18,19 62:1
**due** 78:23
**Duke** 72:22,23 73:2
**duly** 4:7
**duplex** 46:7

E

**earlier** 7:16 9:10 47:19 58:2 64:11 75:11,24
**early** 44:17
**Educate** 43:12
**effort** 73:24
**email** 28:6 54:19 59:20
**emailed** 28:4 62:3
**embarrassed** 61:3
**employers** 70:14
**encourage** 6:13
**end** 21:17 68:10 71:23 76:15
**ended** 13:4 21:23,24 22:3,4,8
**ending** 59:3
**entered** 80:2
**essentially** 10:17
**event** 14:1 46:4 83:25
**events** 46:13 55:4 75:23
**evidence** 51:14 61:13
**ex-wife** 49:16
**EXAMINATION** 4:8 69:23 81:2
**exchange** 54:19 73:11
**Excuse** 73:13 75:2
**exhibit** 6:22 7:1,14,17,20,23,25 8:3,10,21 15:19 16:23 17:10 23:19 24:9 25:23 26:9,22 27:3 28:13,16 29:17 30:9,15 31:2 32:7,15 33:1,6,14 36:17,20 37:16,17,23,24 38:4 39:5,18 40:19,21 47:25 48:3 55:25 56:17,22,24 57:1,6,7,12,18,21 58:3,7,11,14,17,19,25 59:2,6,8,20,24 60:2 63:7,9,13,18,22 64:3,6,8 74:18 75:4 77:15,16,18,21,22 79:4,17
**Exhibits** 63:15,20 74:17
**existed** 43:4
**explain** 72:25
**extent** 6:2 65:4,5

F

**fact** 48:15,18
**facts** 52:2 55:2 82:24
**fair** 8:16 16:20 17:7 18:4
**familiarity** 4:24
**family** 51:5 71:5
**fashion** 18:23
**February** 39:25 71:20
**feel** 17:16 22:24
**feeling** 5:22
**feelings** 12:23
**felt** 19:6 61:3
**file** 61:17
**filed** 40:22 42:16 47:18 49:22 64:10 75:20
**finally** 23:24 61:9,22,25
**financial** 64:13 75:11,13,18 82:8
**find** 8:22 20:22 44:5 60:21 65:4 67:4 68:5
**finding** 60:16
**fine** 52:9 57:25
**finished** 32:24 33:5
**Florida** 46:7
**focus** 24:20 69:5
**follow** 49:12
**football** 25:10 27:22
**formally** 49:8
**Fort** 70:22
**forward** 51:22 52:10
**found** 8:9 67:23
**frame** 76:14
**fraudulent** 43:10,14 44:3 51:4,6
**front** 16:23
**full** 65:4,5
**fully** 42:12,17
**fund** 79:22
**funds** 10:7 33:7 34:10 74:2 79:22
**future** 38:23 39:3

G

**Gaiaz** 4:6,10,12,13 5:9,17 6:24 7:15,23 8:17 9:24 11:23 14:5,11 15:15,20 16:7,21 19:15,19 20:9 21:14 22:18,20 24:17,23 28:15 29:6 30:8 32:13 33:23 34:8 35:4 36:19 37:8 40:7,21 44:17

48:2 49:9 51:4,20 52:13 54:6 56:15, 22 58:2,19 63:1 67:22 68:14 69:25 72:7 74:19,22 75:5 81:1 84:10

**Galaz's** 16:5

**gave** 14:18 17:25 39:13 45:20 46:6 59:18 60:22 61:11 62:1 64:25 66:20 73:10 74:1,22

**gee** 32:13 37:17 38:20

**generally** 70:13 72:9

**gentlemen's** 51:24

**Germany** 70:18

**gift** 54:24

**girlfriend** 50:8,9

**give** 11:2 23:6 40:3 42:7 49:15 57:23 61:16,20 73:20

**giving** 59:10

**God** 9:9

**good** 4:10 53:1

**Goodness** 36:11

**gosh** 23:20 31:6 60:6 62:20

**government** 71:7 79:23

**graduation** 72:14

**grandson** 21:10 72:7

**granted** 34:5

**Group** 40:8,14 81:5

**grouped** 63:22

**guaranteed** 76:22

**guess** 9:2 16:10 29:1 31:6 34:24 40:25 59:3 60:9 62:20,22,23 63:11 81:21

**guessed** 28:9,10

**guy** 31:12

**guy's** 31:7

H

**hand** 16:22 38:8

**handed** 7:16

**hands** 64:2

**happen** 39:14,18 66:2

**happened** 10:1 14:21 39:6 49:21 62:15 64:19 65:3 80:17

**happening** 67:4

**head** 13:14 18:8,12 34:17 38:20 69:11,14

**hear** 5:10,11,25 80:8

**heard** 80:12

**hearings** 74:12

**heart** 36:11

**heirs** 35:24

**held** 26:14

**helping** 60:25

**Hill** 35:24

**history** 32:25 45:24

**hit** 61:7

**hold** 24:19 41:19

**holding** 32:7

**home** 50:12,17 61:5

**homes** 71:9,10

**Hood** 70:22

**hounding** 78:25

**house** 77:5

**Hummer** 18:25 19:1,3,6,9,16 36:3, 5,6,8 63:12

**husband** 64:21

I

**idea** 8:14 11:20 13:11 14:23 15:12 23:1,7,22,24 27:4 28:7,11 33:1 34:16 36:15 45:17 52:20 53:3

**if--as** 55:17

**impair** 6:17

**impairs** 5:25

**impeach** 42:22

**improper** 48:19

**include** 17:21

**included** 16:3,10 57:4

**includes** 58:12

**including** 43:15 65:1

**income** 64:25 79:25

**incorrect** 54:13

**incurred** 76:13

**infor-** 17:2

**information** 16:24 17:2 24:16 25:12 61:11 69:13 77:20

**injunction** 34:4

**insenses** 51:21

**inside** 65:16,23

**insoivent** 48:17

**instruct** 41:23 42:21 43:21,23 45:21 46:9,14 47:4,9,23 48:7,20 49:10,17, 24 50:13 51:8 81:22 82:14,21

**insulin** 6:5

**intend** 42:1

**interest** 44:23 49:15 72:20 81:5,15

**interesting** 15:15

**interpretation** 34:17,19

**interrupted** 71:6

**investigate** 32:17 44:3

**invoived** 9:3,5 13:3 17:23 18:4,6,11 20:8,10,12,15,18,19 21:3,6 25:5 44:17 45:12 53:8 74:4

**involvement** 40:7,9 42:19 46:4,7

**IRA** 79:14

**items** 7:21 24:22 58:9

J

**Jackson** 10:16,21 14:3,7,10,19 15:4 18:23 24:12 31:8,13 32:8,14 33:18 36:2,5 38:7 39:9 50:18 52:25 53:22 54:16 59:17 63:11 64:15 65:15, 24 66:12 67:3 69:3 73:4,12,22 74:23 75:7,14 80:3,9,13,20 83:18

**January** 37:2 38:11,14,24 39:4,6,8 55:17 58:8

**job** 64:24

**jointly** 29:8

**judge** 9:10 10:6 19:1,7 28:20 33:4 55:13 66:20 75:8

**judgements** 35:20

**judgment** 28:18 32:6,15 33:14

**Julian** 10:16,21 14:3,7,10,19 15:1,4 16:4 18:23 24:12 31:8,13 32:8 33:18 36:2,5 38:7 39:9 50:18 52:25 53:21 54:16 59:17 63:11 64:15 65:15,24 66:12 67:3 69:3 83:18

**jurisdiction** 75:9

K

**Katona's** 4:19
**keeping** 66:23 74:7 78:20
**Killeen** 71:10,22,23
**kind** 6:9 20:8 29:5 70:13 73:6
**kinda** 43:12
**kinds** 6:5 8:8 26:20,23,25
**King** 10:6 19:1,8 33:4 55:13 66:20
**King's** 9:10 75:9
**knew** 29:10,13,20 37:22,23 62:22 65:4 67:15 68:25 69:2 83:7
**knowledge** 5:25 12:17,19 65:3
**Korean** 72:5

L

**late** 29:10 32:6
**latest** 48:9
**lawsuit** 20:9 40:22 49:6
**lawsuits** 74:5
**lawyer** 4:20 22:13 30:18 34:19 35:13,18 47:12 64:23 83:2,4,8,9,12,18,21 84:1
**lawyer's** 49:12
**Lea** 4:9,10 6:23 7:14,18 12:14,24 16:8,19 17:12 19:22 23:11 28:12,14 31:10 33:10 35:10 36:18 39:17 40:20 41:16,20,24 42:14,18,25 43:2,5,7,13,25 44:5,8,13,16,21 45:9 46:1,11,16 47:6,11 48:1,12,21 49:2,7,14,20 50:4,19,22 51:1,3,11,17 52:4,7,12 53:24 54:5 55:3 56:5 57:7,9,12,14,16,19 58:1,6,14,18 59:1,7 62:5 63:8 67:20 68:1 69:1,12,18,22 73:5,13,15 74:16,25 75:2,11 80:25 81:3,25 82:6,16,25 84:6
**lead** 51:13
**leading** 73:13 75:2
**learn** 11:17 29:24
**learned** 68:6
**leave** 71:21
**led** 75:12,23
**left** 33:3 64:21,23
**Legally** 14:16
**letter** 6:25 7:2,3,7 14:12,13 15:16,18,25 16:1,2,4,6,22 17:9,17,20 19:14,25 20:6 22:17 23:5,13,18 24:9,12 25:23 33:12,13 37:16 38:4,5 39:6 55:24 56:16 57:22 58:8,13 61:2 73:14
**liable** 76:11,12
**license** 61:18,19 62:2
**life** 53:17,18
**lifetime** 70:14
**limited** 52:1
**Lisa** 4:19 11:9,21,24,25 12:6,10 13:3,16,21 25:6 28:19 29:6,13,20,24 30:2,5,16,17 33:17,18 35:4 36:7 40:22 45:1 63:11 67:4,23 68:6,15 69:6
**Lisa's** 69:10
**list** 7:7,25 17:21 27:5 67:22 68:2,3
**listened** 19:8
**litigated** 41:12 42:11,13,17
**litigation** 13:3,7,9 20:9,13,16,18,20,25 25:4 28:18 35:3 56:9,15 59:17 72:19 74:5,7,11
**litigations** 35:23
**live** 44:10 71:25
**LLC** 9:3
**Lois** 79:5
**long** 17:22 22:22 60:17 70:9 83:12
**longer** 33:4 61:12,18
**longevity** 70:6
**looked** 8:7,8,17,20
**Los** 72:14
**lost** 8:14
**lot** 53:25 64:18 65:1,7 75:21
**lots** 8:13 45:16
**louder** 5:10

M

**made** 34:6 41:5 48:17 58:20 60:24 61:14,15
**make** 57:18 67:21 68:2 78:10
**maker** 65:20
**making** 11:9 12:12 74:6
**man** 70:4
**Marian** 41:18 44:22 45:2
**mark** 57:20 58:9
**marked** 6:22 7:1,17,20 28:13,15 36:17,19 40:19 47:25 58:17,25 59:6 63:7
**marker** 83:25
**marriage** 21:17,23 22:4,8,9
**marriages** 22:16
**married** 21:15
**material** 16:13 57:3
**matter** 42:23
**meaning** 72:18
**means** 20:15 65:20
**meant** 34:14
**medical** 70:17,20
**medication** 5:24 6:12
**medications** 6:4,17
**members** 51:5 71:2,5
**memory** 6:21
**mention** 49:5
**mentioned** 15:1,3 25:15 34:23 72:3 75:25
**merged** 66:25
**met** 4:13
**middle** 29:5,16
**Middlebrookes** 35:25
**military** 72:2
**mind** 23:7
**mine** 67:1
**misplaced** 8:14
**Misstates** 82:24
**moment** 26:15 30:8 37:19
**money** 10:7 11:13,18,21 12:6,7,10 13:21 15:2,3 29:14,21,24 30:2,5 36:6,7,8 43:15 45:1 63:11 64:18,19 65:1 68:13 73:6,23 74:2 75:7,21 76:25 77:3,11 78:6,12 79:5,9 80:5
**monies** 79:3,16
**month** 39:25 60:18 62:20 70:5 71:18 72:12 78:15
**monthly** 77:23 79:25
**months** 23:24 65:11

**Morgan** 10:8 66:24 68:8,12 79:15
**morning** 4:10 63:21,24
**mother** 22:6,7
**moved** 8:13 71:23,24 79:8,11
**music** 10:6,8 11:11 33:4,6,19,21 34:14 35:24 36:2,3 66:21 80:21

N

**National** 78:13
**needed** 15:5,6 39:20 60:14 61:12, 13 62:6,23,24
**neglected** 19:1
**nice** 60:25
**Nobody's** 48:18
**nodding** 18:8,12
**non-music** 9:17
**notary** 41:6
**noted** 19:8
**notes** 53:25
**notify** 69:19
**November** 7:2 26:9 28:20,21 44:22
**null** 72:19
**number** 41:25 52:13,14,17,19 58:15 59:10,18,19 61:20 62:1,2,3
**numbers** 57:23 64:6
**nursing** 71:9

O

**oath** 5:5 41:6
**objected** 73:17
**objection** 12:11,21 15:23 16:14 17:11 19:20 23:9 31:5 33:8 35:8 36:14 39:15 44:20 45:6 55:2 56:3 57:24 67:19,25 69:8,15 73:13 74:25 75:2
**occasionally** 72:16,17
**occupation** 70:11
**occur** 32:13
**occurred** 48:9
**October** 58:21 60:25 61:15 75:10, 19 77:1,4,11 78:1,14,16 79:18 80:13
**offered** 17:3
**Ohio** 43:9 50:17,19 80:21
**Oklahoma** 61:3 71:24 79:10,12
**open** 42:10
**operator** 61:7,9
**opposed** 63:2
**oral** 55:7
**orally** 6:18
**order** 27:15 66:20
**ordered** 29:5 33:4,24 34:9
**original** 42:16
**originated** 53:3
**Orleans** 55:4,21 74:1,3
**Oshita** 21:2 23:23 41:18 45:2 55:12 56:18 84:2
**Oshita's** 44:23
**overlap** 37:18
**overseeing** 74:11
**owe** 11:25 12:7,10,20 13:21 36:7
**owed** 11:17 12:2,19 13:1 29:24 30:2, 5 45:1
**owes** 11:21
**owned** 9:19 31:11 72:7 81:9,11 82:12,20
**owner** 40:11,14 45:4 65:18
**owners** 46:23
**ownership** 82:7,15

P

**p.m.** 84:9,11
**pages** 17:9 26:14 41:1,3
**paid** 19:2,5,10 58:23 62:24 73:6 80:9
**paper** 14:5 56:21
**papers** 58:3 62:25 63:1 64:6
**paragraph** 33:24
**part** 9:1 15:25 16:12 17:8 18:6,11 24:9 26:13 27:23 39:5 40:11 46:21 57:11,12 82:7
**partial** 65:3
**parts** 17:20
**Pass** 69:22 84:6
**passed** 44:11
**passion** 72:25
**past** 32:25 78:23
**pattern** 51:4
**pay** 11:2 14:1 20:4 32:3 52:25 64:23
**payment** 54:19
**people** 6:1,18 10:18,19 16:18 17:8 31:16,19 68:4
**percent** 33:18,19 44:23 45:3
**permanent** 34:6
**person** 10:19 17:5 66:1,5 72:15
**personal** 10:11 66:25 74:2
**personally** 9:24 30:23 31:25 32:9 35:9 39:8,10 66:13 74:10 79:16
**petition** 42:16 48:4
**phone** 52:13,17,19 72:16
**pieces** 64:6
**place** 38:23 55:19 65:10 82:11
**plaintiff** 29:6
**Players** 43:9
**Players'** 50:18,20 80:21
**pleading** 44:10
**pleasure** 56:6
**pocket** 66:17
**position** 43:13
**possibly** 42:22 49:4,5
**potential** 44:3
**practically** 72:19
**predicted** 38:23 39:3
**preliminary** 34:4 68:10
**prepared** 27:18
**pressure** 6:4
**presumption** 12:12
**pretty** 17:16 38:10,16
**previously** 10:23 34:5 42:11,16 58:10 59:15 63:22 64:7 66:24
**Primarily** 10:5
**prior** 10:5 15:2 75:8
**privilege** 68:22
**privileged** 68:21

**proceed** 54:6
**proceeding** 34:5 47:18
**proceedings** 4:25 55:22
**produced** 74:15
**propose** 57:19
**proprietor** 11:7
**prosecute** 46:22
**protect** 11:24 12:6
**psychologist** 70:12,15,16,25 71:1
**purchase** 46:6 80:3
**purchased** 75:14
**purpose** 62:12
**purposes** 48:16
**put** 7:14 39:20 63:18
**putting** 40:3 79:10

Q

**question** 5:15 6:10 27:11,12 36:12, 22 38:2 40:10 45:3 46:2,17,19 47:7, 14 49:25 51:18 60:12 68:3 73:18 78:10 81:23 82:17
**questions** 5:3,6,17 30:12 41:12,25 42:2 44:4 48:2,13 51:6,9 80:24,25 82:3

R

**rack** 76:4
**racking** 75:25
**raises** 44:11
**ran** 65:2
**Raul** 13:18,20 14:11,23 15:20,24 16:2,5,6,21 17:8,21 18:15,19 19:2,5, 15,19,24 20:4,9,19 21:8 22:18,20,25 23:20,25 24:22 25:1 26:10,14,17,19, 22 29:7 30:4,24 33:19 34:8,18,20 35:16,17 51:4 53:8,13,19 55:14 63:3, 14 80:19
**Raul's** 19:1,6,9 22:6 50:9
**re-ask** 73:18 78:10
**read** 4:4 30:8,11 37:5 39:24 61:1
**Reading** 30:13
**ready** 54:6
**real** 72:13
**reason** 5:18 39:12 49:4 62:6
**recall** 37:15 75:16 77:2,4
**receive** 74:10 80:5
**received** 60:15,24
**receiver** 24:14 63:10
**recently** 6:8 24:4 25:16 26:8 60:7
**recess** 54:2
**recognize** 36:19,21 48:6 52:17,21, 23
**recollection** 76:25 77:10 78:3
**record** 4:1 44:1 52:7 54:1,3 84:8
**records** 16:5 35:4 59:25 60:3
**recover** 29:7
**refer** 57:22
**referred** 57:21
**referring** 15:16 35:23 36:1 44:25 45:8 54:19 64:3
**reflect** 77:25
**reflected** 79:3,17
**reflects** 74:18 77:21
**refresh** 76:25 77:10 78:3
**refreshed** 23:13
**regard** 12:15 47:23 48:24
**relates** 50:1
**relevance** 51:15
**relevant** 41:16,24 43:3 51:8,9,10,12
**relitigating** 41:22
**remember** 16:17 17:22 18:21 22:21,22 27:8,13 37:4,6,7 52:20 56:10,19 61:19 63:24 68:16 71:18 81:13 82:9,11 83:14 84:1
**remembered** 53:20
**remind** 37:24
**repeat** 20:11
**rephrase** 5:14
**report** 77:23
**REPORTER** 58:16
**reports** 81:16
**represent** 70:1
**representation** 48:11
**represented** 47:21 83:13
**representing** 83:20
**request** 4:3 74:16
**required** 69:21
**response** 16:6 35:6 42:3 74:16
**responsive** 7:24 8:3
**rest** 57:23 58:9
**retire** 70:11
**retired** 70:7,9 71:7,11,16,19
**retirement** 79:21,22
**retrieve** 75:6
**return** 32:4
**reveals** 16:5
**reverse** 55:15,16
**reversing** 75:8
**review** 16:4
**rights** 9:17,19,21 10:6,8,14,18,23 11:11 14:2,24 15:13 18:22 31:16,19 33:4,6,19,21 34:14 35:3 36:4 47:1,15 52:25 64:14 65:15,23 66:21 67:24 80:21
**road** 80:6
**role** 42:1 43:2
**Rose** 30:19,21 35:13 68:11,15,16, 17,19
**roughly** 21:17
**routing** 59:18
**Royal** 4:10 41:9
**RTG** 42:1 43:2,4,14,15 44:4,8,12 45:20 46:6 70:1 72:6 74:24 83:2
**RTG's** 83:8
**ruling** 9:10 10:2,5,6
**run** 70:13
**Ruth** 21:14,17,20,21,23 22:4,6,8 49:16
**Ryan** 21:10 25:6 32:11 45:12,17 46:12,20 52:24 53:10,19 54:15,23,25 58:20 59:10 60:4,15 62:17 63:3 64:15 72:7,10,20,23 74:19,21,22 75:5,14 80:2,8
**Ryan's** 41:25 59:24

S

**San** 10:16,19 31:12

**save** 48:23
**schedules** 48:4,13,19,24,25 49:5 52:3
**scope** 45:22
**Scott** 30:18,21 35:13 68:11,14,16,17
**scroll** 60:19,20
**seconds** 27:20
**security** 62:1 79:20
**Segundo** 9:3,5,7,19,21 10:8,24 11:3,6,10,12,17,21,24 12:7,10 13:8, 16,21 14:1,2,6,11,18,24 15:5,7,12 19:7 21:2,3 28:18 29:8,14,20,21,24 30:2,5 31:4,11,19,20 32:4,24 33:2,7 34:9,10 36:7 39:10,11,21 40:3,4 54:22 55:14 56:9,15,20 65:14,16,18, 21,23 66:11,12,14,17,22,23 67:2,7,24 68:13 69:2 73:5,6,11,21 74:4,8,11 83:13,17
**Segundo's** 33:5 67:1
**seldom** 45:18,19 72:18
**send** 24:3,7 26:22 60:8 62:19,21
**sentence** 14:9
**separate** 57:20,23
**September** 59:16 71:24
**serve** 72:2
**served** 37:11,13
**service** 71:2,5,8
**servicemen** 71:5
**set** 11:23 12:6
**severally** 29:8
**shills** 51:5
**shocked** 29:24
**short** 53:24
**shortly** 10:1
**show** 60:14 61:14 62:23,24 63:11 77:15
**showing** 58:12,22 59:11,25 60:23 62:6
**sign** 4:4 14:17 54:23
**signature** 41:2,5
**signed** 19:23 28:20 32:6 41:6
**significantly** 64:13
**simpler** 57:22
**single** 44:9
**sir** 12:15,18 20:12 21:25 29:16 33:16,20 36:22 37:25 38:6 39:2 40:10 52:15 57:3,14 59:14 63:24 66:15 67:9 70:1,4,7 72:3
**sister's** 72:14
**sitting** 17:16
**situation** 19:16
**Sloan** 50:5,7
**Snell** 4:3 5:19 7:2,16 12:11,21 15:23 16:14 17:11 19:20 23:9 31:5 33:8 35:8 36:14,16 37:9 39:15 41:9,19 42:5,15,21 43:1,4,6,8,17 44:2,7,9,15, 20 45:6,21 46:9,14 47:4,9,12,20 48:7, 14,23 49:3,10,17,24 50:3,13,16,21,24 51:2,10,12,21 52:6,8 55:2 56:3 57:5, 8,11,17,25 58:11 60:12 67:19,25 68:18,21 69:8,15,24,25 73:16 75:3 80:23 81:22 82:2,14,21,24 83:1,18 84:7
**social** 62:1 79:20
**sold** 18:25 77:5
**soldiers** 71:2
**sole** 11:6
**son** 21:8 80:19
**son's** 50:8
**sort** 25:4 61:13 72:20 73:10,20 80:5
**source** 70:13
**sources** 17:20
**speak** 72:10,12,16
**speaks** 33:8
**specific** 20:20
**specifically** 48:25 53:19
**speculation** 67:19,25 69:9,16
**spend** 34:9
**spinal** 64:22,24
**spoke** 14:25
**stack** 56:21 57:1 58:3 63:16,19,20 64:1
**Stanley** 10:9 66:24 68:9,12 79:15
**start** 18:20
**started** 61:5
**State** 70:20,21 82:19
**statement** 68:8,12
**statements** 63:4
**States** 70:21
**stepdaughter** 64:21 75:25 76:4,19
**steroid** 6:6
**sticker** 7:14 37:25 58:7
**stopped** 66:21
**story** 60:10,11,17
**straighten** 57:17
**strike** 80:1
**stuff** 8:13
**subpoena** 25:25 26:1 37:11,13
**subpoenaed** 52:5
**Subsidy** 40:8,14 49:9,15,22 81:5
**substantial** 43:15
**successor-in-interest** 15:20 18:19 19:14,19,24 20:5 22:18,20 23:8
**successor-of-interest** 14:10
**sue** 10:18 14:3,7,19 31:12,13,16,19 32:8,14 36:10 52:25 53:21 54:16 64:14 65:15,24 66:12 67:3 69:3 83:18
**sued** 45:1
**Suenos** 9:3,5,8,19,22 10:8,24 11:3, 6,17,21,25 12:7,10 13:8 14:11,18 21:2,4 29:8 32:4,25 33:2,7 34:9,10 36:7 39:10,11 68:13 73:5
**Suenos'** 19:7
**suggested** 53:1
**suing** 11:9,12 29:14,20
**supervisor** 61:24
**supporting** 48:16
**suppose** 68:8
**supposed** 27:9 28:3
**surgery** 6:8 64:22,24
**sworn** 4:7

## T

**taking** 5:24 6:12 10:6 36:3 74:2,3 79:9
**talk** 5:10,25 13:18 14:23 15:10,12 30:24 34:25 41:21 43:19 45:18 46:12, 20 53:15 72:18,21 76:6
**talked** 13:24 15:14 24:10 25:10,12 45:18 58:2 64:11 73:4

**talking** 6:18 9:1 20:21 27:19 29:17 35:22 41:13 42:15 50:22 76:14
**tax** 81:16
**telephone** 16:16
**telling** 19:13 45:24 59:16,22 67:11, 17
**Temple** 79:15
**ten** 27:20
**terms** 73:23
**terrible** 61:6,10
**testified** 4:7
**testimony** 42:1
**Texas** 59:4 61:2,5,17,18 70:22 71:10 77:14,19,24 78:13 79:9,11,15 82:19
**thereof** 35:4
**thing** 10:12 14:8 21:4 24:13 25:21 26:3 48:14 55:12
**things** 26:10,23,25 27:9 31:7,11 38:21 43:19 52:8 63:2 73:3 82:10,11
**thinking** 37:16 38:16
**thinks** 50:19
**thought** 6:12 13:4,6,8,14 22:1 23:22 32:24 35:25 37:20 38:19 40:2,5 53:1 56:18 60:20
**three-way** 53:10,15
**time** 9:6 11:8 15:2 17:22 19:5 24:4 25:15 29:23 38:10,17 39:11 46:25 48:17 55:8 60:19 61:17 62:3 65:8 68:9 70:19 72:13 73:24 74:1,4 75:21, 22 76:14,23 79:8,19 83:16,17,19,20, 21
**times** 61:10
**tities** 19:4
**today** 4:17,25 5:22 11:20 17:16 37:8,10,12 41:11 47:12 62:10 63:1 74:15 83:8
**told** 19:2,15 45:12 48:12 68:15 81:17,23 83:1,7
**top** 35:2
**topic** 27:8
**touching** 64:1
**track** 74:7
**training** 70:18
**trans-** 51:6
**transactions** 51:7
**transfer** 9:7,14,16 12:1 34:10 43:14 47:15 48:17 50:17 53:21 54:15,24 59:10 66:9,16 69:2,6,20 73:4,11,21 74:23 82:3 83:17
**transferred** 9:4,13,21 10:10,11,13, 18,24 14:18 31:18 32:10 47:1 54:22, 23 59:11 61:23 64:14 65:14 66:4 67:2,3,7,24 80:17 81:14,18 82:1,8,13 83:16
**transferring** 14:24 66:11
**transfers** 14:6 43:10,23 44:3,5,12 51:4 82:15
**transmittals** 58:12
**trashed** 23:15
**traveling** 74:12
**treat** 52:10
**tremendously** 65:2
**trial** 68:10
**trials** 74:12
**trip** 56:6
**trouble** 48:23
**true** 81:20
**truth** 41:6
**Tulsa** 71:24
**turn** 30:16
**turned** 30:17 35:4

U

**Uh-huh** 9:20 15:17,21 17:6 19:17 28:17 29:9,19 34:7 38:12,18 39:19 63:25 65:17,25 73:19 75:15
**ultimately** 74:23
**uncontested** 9:17
**understand** 4:16,19 5:2,6,13,15 6:9 7:6 9:1 11:15 12:3 17:1,4 20:11, 15 30:2 41:11 43:11,12 68:3 70:1 72:7 83:4
**understanding** 9:18 13:1
**understood** 11:8 54:8 83:1
**United** 70:21
**University** 72:23

V

**vacated** 9:10
**vague** 12:11,21 16:14 31:5
**valuable** 81:4
**variable** 72:11
**varies** 72:11
**Vernon** 21:12
**voluntarily** 41:11 42:9
**voluntary** 51:25

W

**Wait** 41:19 68:18
**wanted** 55:14
**wanting** 44:3
**War** 72:5
**Warner-chappell** 35:24
**ways** 67:22 68:6
**week** 23:14 24:6 25:16 60:6 79:18 80:14
**weeks** 80:15
**whatsoever** 42:23 80:13,20
**wife** 21:14 64:25 76:11,12,22 79:5, 10,14,19
**woman** 60:25
**wondering** 38:19
**work** 4:25 64:25 73:24 74:1
**worked** 61:22 70:16,18,23
**working** 70:21,23 72:3
**Worldwide** 40:8,14 49:9,15,21 81:5
**worthless** 49:22
**write** 17:17
**writing** 14:9 16:22 19:23 51:23 54:18
**writings** 19:9
**written** 16:3 17:24 22:21
**wrong** 61:4
**wrote** 16:13 17:25 18:2 55:13
**WSG** 41:12,16,22,24,25 42:1,12,19 43:10,16,23 44:4,6,12,17,23 45:4,13, 20 46:6,10,22,25 47:5,15 49:3,6,25

82:3,7,15

**WSG's** 43:2

Y

**year** 36:25 40:11,12 42:20 48:5 64:11 65:12 72:13 81:6

**years** 23:14 70:10,16,19,23 71:8,12 81:15 83:15

1 CHANGES AND SIGNATURE

2 PAGE LINE CHANGE REASON

3 10 14-16,20

The responses are somewhat incorrect. The transfer of the right to
4 sue Jon Philip Monson was not directly from Segundo Suenos to
myself. Rather, on reflection, it had been seized by a receiver
5 appointed by the bankruptcy court, then transferred to me by the
receiver. As such, the only right to sue that was transferred by
6 Segundo Suenos to me was the right to sue Julian Jackson.

7 20 7

The answer requires a clarification. Reference to Raul Galaz in
8 Exhibit 2 was a reference to the transfer Raul Galaz made in the
name of Artist Rights Foundation, and was the basis for demanding
9 certain information from Julian Jackson in that letter. While it
is correct that Raul was not paid anything, Artist Rights Foundation
10 had been paid when I paid taxes owed to the State of California on
its behalf.

11

12 31 14,17,21,24

13 39 10-11

The responses are incorrect. I omitted reference to one other
14 asset owned by Segundo Suenos, LLC that had not been transferred
to me. Specifically, I forgot to mention a judgment dated
15 September 3, 2014 in the amount of $56,025 against two
individuals and their companies, Amado Ramos dba R-Mobile
16 Communication and dba Paloma Communications, and Dawn Chiasson.

17



1 I, ALFREDO GALAZ, have read the foregoing

2 deposition and hereby affix my signature that same is

3 true and correct, except as noted above.

4 JURAT

5 State of Oklahoma
County of Tulsa

6 Subscribed and sworn before me
this 3rd day of January, 2020
7 by Alfredo Galaz

Anit Kalasuva
Notary Public
My Commission Expires: January 21, 2020

ANIT KALASUVA
Notary Public
State of Oklahoma
Commission # 16000782
My Commission Expires Jan 21, 2020

A Galaz

ALFREDO GALAZ

8

# Proof of Delivery

I hereby certify that on Monday, March 16, 2020, I provided a true and correct copy of the Appendix Volume 3 to the following:

National Association of Broadcasters (NAB) aka CTV, represented by John Stewart, served via Electronic Service at jstewart@crowell.com

Public Television Claimants (PTC), represented by Dustin Cho, served via Electronic Service at dcho@cov.com

MPA-Represented Program Suppliers (MPA), represented by Alesha M Dominique, served via Electronic Service at amd@msk.com

Canadian Claimants Group, represented by Victor J Cosentino, served via Electronic Service at victor.cosentino@larsongaston.com

Multigroup Claimants (MGC), represented by Brian D Boydston, served via Electronic Service at brianb@ix.netcom.com

Joint Sports Claimants (JSC), represented by Michael E Kientzle, served via Electronic Service at michael.kientzle@apks.com

Signed: /s/ Matthew J MacLean