

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

IN RE:)	Case No: 8:20-BK-07637
)	Chapter 7
FAITH ELYZABETH ANTONIO,)	
)	
Debtor.)	
_____)	
DGP PRODUCTS INC., D/B/A)	
NUMERIC RACING,)	
Plaintiff,)	
)	
vs.)	Adversary Case No:
)	8:20-ap-00537-CPM
FAITH ELYZABETH ANTONIO,)	
)	
Defendant.)	
_____)	

**DGP PRODUCT’S NOTICE OF FILING
SUMMARY OF DISCOVERY PROVIDED TO DEBTOR**

DGP Products Inc. d/b/a Numeric Racing (“DGP”) hereby gives notice of its filing of Summary of Discovery provided to Faith Elyzabeth Antonio (“Debtor”) as follows:

<u>Doc. No./Title</u>	<u>Response Date</u>	<u>Bates No.</u>
Debtor’s First Request For Production 02.02.21	03.04.21 – DGP’s Response To First Request For Production Of Documents (Letter with Confidentiality Agreement) Link: 2021.03.04 Letter to Faith Antonio with Enclosures.pdf	N/A
	03.22.21 – Response Via Link Re: Non-Party Documents as to: <ul style="list-style-type: none"> • Merrick Bank • SunCoast Credit Union • Affirm • Wells Fargo • Synovus Bank 	N/A

<u>Doc. No./Title</u>	<u>Response Date</u>	<u>Bates No.</u>
	<ul style="list-style-type: none"> • Stripe • Automattic Inc (Wordpress) • FedEx Express Link: https://solomon1881-my.sharepoint.com/:f/g/personal/mkunkel_solomonlaw_com1/EjEhHY8czzBGi9LE4lh3w4oBgjkUxncSoBOPmPTAywltZA?e=RogjIE	
	03.24.21 – Non-Party Document Production of Innisbrook Resort Link: <i>DGP v. Antonio [adv bkcy]-Docs from 3rd Parties</i>	N/A
	03.25.21 & 03.26.21 – DGP’s Amended Response To Defendant’s First Request For Production Link: <i>2021.03.25 DGP v. Antonio [adv bkcy]-DGP’s Doc Prod In Resp to Def’s 1st RFP</i>	PayPal (01.01.15 – 11.30.19) DGP00001 – DGP00210 Synovus Bank (01.31.14 – 12.31.19 Redacted) DGP00211 – DGP00540 Synovus Bank (12.17.18 – 01.16.19 Redacted) DGP0041 – DGP00542 Amazon Amex (01.01.19 – 12.31.19 Redacted) DGP00503 – DGP00505 PayPal (06.01.14 – 07.19.20) DGP00546 – DGP00567

<u>Doc. No./Title</u>	<u>Response Date</u>	<u>Bates No.</u>
		<p>Synovus Bank Account (12.15.14 – 01.16.20 Redacted) DGP00568 – DGP01112</p> <p>1099 Payroll Records (2016-2019) DGP01113 – DGP01117</p> <p>Corporate Amex (Acct. 7-81005 04.22.16 – 12.24.19) DGP01118 – DGP01575</p> <p>Auth QB Online (All Other Reports 2014 - 2019) DGP01576 – DGP02555 Auth QB Online (Audit Log 03.19.19 – 11.30.19) DGP02556 – DGP02787</p> <p>Auth QB Online (Bank Reconciliation Stmt 01.03.17 - 12.17.19) DGP02788 - DGP02978</p>

<u>Doc. No./Title</u>	<u>Response Date</u>	<u>Bates No.</u>
		<p>Auth QB Online (Deleted Voided Transactions 03.19.19 – 11.28.19) DGP02979 – DGP02980</p> <p>QB Desktop Backup 1 (06.01.14 – 11.16.20) DGP02981 – DGP05562</p> <p>QB Desktop Backup 2 (Synovus Bank Period Ending 02.28.17) DGP05563 – DGP06050</p> <p>QB Desktop Backup 3 (Synovus Bank Period Ending 02.28.17) DGP06051 – DGP06540</p> <p>QB Desktop Backup 4 (Synovus Bank Period Ending 02.28.17) DGP06541 – DGP07028</p>

<u>Doc. No./Title</u>	<u>Response Date</u>	<u>Bates No.</u>
		<p>QB Desktop Backup 5 (Synovus Bank Period Ending 01.31.15) DGP07029 – DGP08783</p> <p>QB Desktop Backup 6 (Synovus Bank Period Ending 01.31.15) DGP08784 – DGP10538</p> <p>QB Desktop Backup 7 (Synovus Bank Period Ending 01.31.15) DGP10539 – DGP12050</p> <p>QB Desktop Backup 8 (Synovus Bank Period Ending 01.31.15) DGP12060 – DGP13620</p> <p>Receipts (Publix; Sam’s; Health & Wellness Center 2018 & 2019) DGP13621 – DGP13628</p>

<u>Doc. No./Title</u>	<u>Response Date</u>	<u>Bates No.</u>
		Advanced Auto Parts Receipts (12.22.16 – 10.06.19) DGP13629 – DGP13676 Stamps.com Shipping History (07.08.17 - 12.31.19) DGP13677 – DGP13683 QB Payments (08.31.14 – 11.30.19) DGP13684 - DGP13777 Stripe (12.01.17 – 12.31.17) DGP13778 – DGP13811
	04.16.21 – Non-Party Document Production of: <ul style="list-style-type: none"> • Earthlink • Godaddy • Paypal Link: 2021.04.16 DGP v. Antonio [adv bkcy]	N/A
	04.22.21 – Non-Party Document Production of Intuit Link: 2021.04.22 DGP v. Antonio [adv bkcy] – Docs to Def	N/A
	05.05.21 – Non-Party Document Production of Square Link: 2021.05.05 DGP v. Antonio [adv bkcy] – Docs to Def	N/A

<u>Doc. No./Title</u>	<u>Response Date</u>	<u>Bates No.</u>
	05.14.21 – Non-Party Document Production of Bluehost Link: 2021.05.14 DGP v. Antonio [adv bkcy] – Docs to Def	N/A
	05.25.21 – DGP’s Supplemental Response To Defendant’s First Request For Production Link: 2021.05.25 DGP v. Antonio [adv bkcy]-DGP’s Supp Prod in Resp to Def’s 1st RFP	CapitalOne (03.14.14 – 05.10.18) DGP13812 - DGP14113 Synovus Signature Cards (Redacted) DGP14114 – DGP14119
	06.03.21 – No.7 Receipts For Purchases From Pharmacies, Grocery Stores, or Convenience Stores <ul style="list-style-type: none"> • Advanced Auto Parts (12.22.16 – 10.16.19) • Letter From Square Dated 03.03.21 • Statements From fiverr (02.2017 – 10.2018) • Godaddy.com Receipts (01.29.17 – 02.07.19) • Miscellaneous Receipts including but not limited to: Best Buy, Pro Auto Collision Carstar; Ferman Nissan; and Florida Orthopedic. • Woocommerce Receipts (12.17.18 - 10.31.19) Link: Antonio, Faith-Docs 6-3-21	N/A
	06.15.21 – Amex Statements - Acct. 1006 (09.15.17 – 12.17.18) Link: AMEX Statements [DGP14120-14216].PDF	DGP14120 – DGP14216
	06.17.21 – Amex Statements - Acct. 3001 (01.24.20 – 07.24.20) Link: AMEX Statements [DGP14217-14304].PDF	DGP14217 – DGP14304
	06.28.21 – Non-Party Production of Documents From Stripe Database Link: Stripe Database [DGP14305-14326].PDF	DGP14305 – DGP14326

<u>Doc. No./Title</u>	<u>Response Date</u>	<u>Bates No.</u>
	<p>07.22.21 –</p> <ul style="list-style-type: none"> • 2019 Year End Summary Discover Card Acct. 8366 • Synovus Bank Signature Card • R-2018 Signature Card For Account Owners: DGP Products Inc. Signed By Daniel Geberth (Redacted) <p>Discover-2019-YearEndSummary.pdf</p>	N/A
Doc. 182	<p>Doc.182 07.23.21 – Notice of DGP’s Providing Documents In Response To Defendant’s First Request For Production of Documents & To Satisfy Requests From July 21, 2021 Hearing</p> <ul style="list-style-type: none"> • Discover Card Documents (all statements provided in DGP/Geberth’s possession at time of filing): August 2019 Statement, September 2019 Statement, October 2019 Statement, and December 2019 Statement • Bank of America Card ending in 3459 (all statements provided in DGP/Geberth’s possession at time of filing): 2017 Year End Statement • Bank of America 3549 (all statements provided in DGP/Geberth’s possession at time of filing): • 2017 Year End Summary • Synovus Card 2018 • Receipts reflected in Complaint: Assurant Liability, Affirm, numerous Best Buy, Office Depot, Quickbooks Receipt Welltrek, Sunpass, Target Receipts, GoDaddy, Hotels.com, Publix, 1 & 1 Internet, 1Themes Media LLC, Quill <p>DGP-Antonio 7-23-21 Additional Discovery</p>	N/A
	<p>07.29.21 – No. 1 Clean Synovus Statements 12.31.15 thru 2018</p> <ul style="list-style-type: none"> • 2021.07.29 Production [Statements] <ul style="list-style-type: none"> ○ 01 – 2014 Statements ○ 02 – Ionos Invoices ○ 03 – 2018 Statements • Synovus Statements Starting in 2016 <p>Synovus Statements starting in 2016.pdf</p>	DGP14327 – DGP14808

<u>Doc. No./Title</u>	<u>Response Date</u>	<u>Bates No.</u>
Doc. 195	<p>Doc.195 08.02.21 – DGP’s Supplemental Notice of Providing of Documents In Response To Defendant’s First Request For Production of Documents & To Satisfy Requests From July 21, 2012 Hearing</p> <ul style="list-style-type: none"> • Discover Card Documents (all statements provided in DGP/Geberth’s possession at time of filing): August 2019 Statement, September 2019 Statement, October 2019 Statement, and December 2019 Statement • Bank of America Card ending in 3459 (all statements provided in DGP/Geberth’s possession at time of filing): 2017 Year End Statement • Bank of America 3549 (all statements provided in DGP/Geberth’s possession at time of filing): • 2017 Year End Summary • Clean Copies of Synovus • Synovus Card 2018 • Receipts reflected in Complaint: Assurant Liability, Affirm, numerous Best Buy, Office Depot, Quickbooks Receipt Welltrek, Sunpass, Target Receipts, GoDaddy, Hotels.com, Publix, 1 & 1 Internet, 1Themes Media LLC, Quill 	<p>N/A</p> <p>DGP14523- DGP14808 to supplement DFP00211-00540 and DFP00541- 00542 provided on 3/25/21</p>
Doc. 203	<p>Doc.203 08.03.21 – DGP Products Inc.’s Response In Opposition To Defendant Motion For Contempt & Enforcement And/Or Sanctions Due To Discovery Abuse [D.E. 188]</p> <p>Rx to Mtn for Contempt DE 203</p> <ul style="list-style-type: none"> • Copy of Oath Response • Ionos • Transcript • Transmittal Email • Rejection Email • Composite Exhibit 	N/A

<u>Doc. No./Title</u>	<u>Response Date</u>	<u>Bates No.</u>
Doc. 259	<p>Doc.259 08.26.21 – DGP’s NOF Intuit/QuickBooks Check Audit History (Production Pages Attached)</p> <ul style="list-style-type: none"> • Intuit Check 2027 History of Modifications • Intuit Check 1925 History of Modifications • Intuit Check 1961 History of Modifications • Intuit Check 2004 History of Modifications • Intuit Check 1973 History of Modifications • Intuit Check 1955 History of Modifications • Intuit Check 1964 History of Modifications • Intuit Check 1980 History of Modifications • Intuit Check 2011 History of Modifications • Intuit Check 2017 History of Modifications • Intuit Check 1909 History of Modifications • Intuit Check 2024 History of Modifications • Intuit Check 1968 History of Modifications • Intuit Check 2006 History of Modifications 	N/A
Doc. 269	<p>Doc.269 09.02.21 – DGP’s NOF Communications Regarding Unauthorized Transactions (Production Pages Attached)</p> <ul style="list-style-type: none"> • Text Message from Defendant to Daniel Geberth 11/15/19 • Email between Defendant and Daniel Geberth regarding unauthorized payment • Communication regarding unauthorized transactions 	N/A
Antonio’s Second Request For Production 09.10.21	<p>10.11.21 – DGP’s Response To Defendant’s Second Request For Production of Documents</p> <ul style="list-style-type: none"> • Kanter & Associates, P.A. CV • August 7, 2020 Civil Theft Demand to Antonio • August 13, 2020 Amended Civil Theft Demand to Antonio • (Footnote 1) RE_DGP Products Inc. – Antonio – Meet and Confer – Antonio’s 2nd Amended Memo in Support of Mtn to Compel <p><i>DGP’s Response to Second Request for Production</i></p>	N/A

<u>Doc. No./Title</u>	<u>Response Date</u>	<u>Bates No.</u>
Doc. 400	Doc 400 11.10.21 DGP's Notice of Compliance with Order Regarding Intuit Records <ul style="list-style-type: none">• Audit Trail Email• Audit Trail 1• Audit Trail 2	N/A

Respectfully submitted,

/s/ Stanford R. Solomon

Stanford R. Solomon

ssolomon@solomonlaw.com

Florida Bar No. 302147

THE SOLOMON LAW GROUP, P.A.

1881 West Kennedy Boulevard, Suite D

Tampa, Florida 33606-1611

(813) 225-1818 (Tel)

(813) 225-1050 (Fax)

Attorneys for **DGP PRODUCTS INC.**

