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UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

IN RE:

FAITH ELYZABETH
ANTONIO,

Debtor.

_____ /

Case No.
8:20-bk-07637-CPM
Chapter 7

DPG PRODUCTS, INC., d/b/a
NUMERIC RACING,
Plaintiff,

vs.

Adv. Proc. No.
8:20-ap-00537-CPM

FAITH ELYZABETH ANTONIO,
Defendant.

_____ /

DEPOSITION OF: FAITH ELYZABETH ANTONIO
DATE: November 19, 2021
TIME: 1:44 p.m. to 5:05 p.m.
PLACE: Sam M. Gibbons U.S. Courthouse
801 North Florida Avenue
Courtroom 8B
Tampa, Florida

PURSUANT TO: Notice by counsel for Defendant
for purposes of discovery, use at
trial or such other purposes as
are permitted under the Federal
Rules of Civil Procedure

REPORTED BY: Aaron T. Perkins, RMR, CRR, CRC
Notary Public, State of
Florida at Large

Volume 2
Pages 170 to 313

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APPEARANCES:

STANFORD R. SOLOMON, ESQUIRE
Solomon Law Group
1881 West Kennedy Boulevard
Suite D
Tampa, Florida 33606

Attorney for Plaintiff

FAITH ELYZABETH ANTONIO
Pro se Debtor/Defendant

BARBARA HART, ESQUIRE
Stichter, Riedel, Blain & Postler, P.A.
110 East Madison Street
Suite 200
Tampa, Florida 33602
Court-Appointed Observer

ALSO PRESENT:

Honorable Catherine P. McEwen
Daniel Geberth (via Zoom videoconference)
Brad S. Kanter, CPA

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I N D E X

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E X H I B I T S

(NONE MARKED)

1 of his business --

2 Q. Okay. When did he --

3 A. -- for the most part.

4 Q. What did you know about his business when you
5 say "for the most part"?

6 A. He didn't even mention that he had a business
7 until August of 2014.

8 Q. And you had a breast augmentation?

9 A. Yes.

10 Q. When did you have that?

11 A. June 2014.

12 Q. Who paid for that?

13 A. Daniel.

14 Q. And was he lucid in June of 2014 when he paid
15 for your breast augmentation?

16 A. Yes.

17 Q. But he wasn't --

18 A. From my -- not from my -- from what I
19 encountered, he was.

20 Q. And you also had a tummy tuck?

21 A. Yes.

22 Q. And how much was the breast augmentation?

23 A. I don't know offhand.

24 Q. How much was the tummy tuck?

25 A. I don't know offhand.

1 Q. Well, was it -- were the two procedures
2 together more than \$10,000?

3 A. I would perceive so.

4 Q. And were they more than \$20,000?

5 A. I don't know.

6 Q. And how did you get Daniel to pay for those?

7 A. I didn't get Daniel to pay for anything. He
8 offered.

9 Q. And how did he do that?

10 A. Hey, I will pay for your whatever. Would you
11 like to get that done? I didn't ask for it. He
12 suggested it.

13 Q. Okay. Was anybody else around when he
14 suggested that less than a month after you met him that
15 he would pay for a breast augmentation and a tummy tuck?

16 A. Are you insinuating that I did something like
17 that without him? He brought me to single appointment
18 himself too. This has nothing to do with the complaint.

19 Q. Was anyone else around when he suggested less
20 than a month after you first met him that he would pay
21 for breast augmentation or a tummy tuck?

22 A. No. I don't remember.

23 Q. Is there anybody else who heard or was aware
24 of Daniel's purported agreement to pay for a tummy tuck
25 and a breast augmentation in June of --

1 A. This is really out of line.

2 Q. -- in June 2014?

3 A. This has nothing to do with what's in the
4 complaint or my answering these questions.

5 MS. HART: Let's not cross-talk, right?

6 BY MR. SOLOMON:

7 Q. Your answer, ma'am?

8 A. I'm not answering this question. This is out
9 of bounds. This is not relevant.

10 MS. HART: Ms. Antonio, you can object to the
11 form.

12 THE WITNESS: I object to form, relevancy, no
13 foundation.

14 BY MR. SOLOMON:

15 Q. Okay. Your answer, ma'am? What's your
16 answer?

17 A. For what?

18 Q. The question that you just objected to.

19 A. I don't remember what the question was.

20 Q. Well, go back and rewind the --

21 A. I don't know. You will have to repeat
22 yourself.

23 Q. Rewind your objection. What were you
24 objecting to? Because if you tell me what the objection
25 is, maybe I can --

1 A. You can just stop right now. You're not going
2 to talk about my personal self right now, so stop.

3 MS. HART: Ms. Antonio?

4 MR. SOLOMON: Ma'am --

5 MS. HART: Mr. Solomon, let me please.

6 Ms. Antonio --

7 THE MARSHAL: This is bankruptcy court, so
8 let's try to be civil. Okay?

9 MR. SOLOMON: Are you insinuating that I'm not
10 being civil?

11 THE MARSHAL: No. I'm just saying you need to
12 give each other a chance to talk.

13 MR. SOLOMON: Well, you see, the way it works
14 in my world in these is one person speaks at a
15 time. I was speaking, and she interrupted and
16 spoke over me, so I wasn't finished what I was
17 saying. I want the opportunity to finish the
18 question so that we have a clean record and not
19 have her just obliterate everything I say by
20 talking over me. And I'm not being rude; I'm just
21 being direct. I have a right to do that. The
22 rules say so.

23 My question --

24 THE WITNESS: This is not in the complaint.
25 I'm not going to answer anything about my

1 personal -- what's in my body or what's not, so you
2 can move on.

3 MS. HART: Mr. Solomon, why don't we add this
4 question to the objectionable list.

5 MR. SOLOMON: This is not one question. It's
6 a series, and it has to do with the theme of my
7 case. I refuse to move on. Thank you.

8 MS. HART: Would you like to, at this point,
9 have the judge come in to the courtroom?

10 MR. SOLOMON: I don't need the judge. I think
11 I asked a direct question, and I'm entitled to a
12 direct answer. If she's just going to not answer
13 it, that's it. Fine. But I get to ask the
14 question and make a record.

15 MS. HART: Yes, sir, you do. And we need to
16 not talk over each other.

17 BY MR. SOLOMON:

18 Q. Was there anyone else around when you say
19 Daniel suggested less than a month after you met him
20 that he would pay for breast augmentation and a tummy
21 tuck?

22 A. I don't know.

23 Q. Are you planning on bringing any other witness
24 to suggest that Daniel has told other people that he
25 would pay your expenses for either personal matters or

1 other items?

2 A. I don't know.

3 Q. Do you have anybody who heard Daniel say that
4 he would support you?

5 A. I don't know.

6 Q. Do you have anyone who you intend to bring to
7 court to say that Daniel agreed to pay your expenses?

8 A. I don't know.

9 Q. Do you plan to bring to court anyone who is
10 going to say that Daniel, less than a month after you
11 met him, agreed to pay very large charges, into the
12 thousands, for your personal being?

13 A. I don't know.

14 Q. Okay. When will you know the answers to those
15 questions?

16 A. I don't know.

17 Q. All right. Do you have --

18 A. I have attorney-client privilege.

19 Q. Do you have any documents that support your
20 proposition that Daniel agreed to take care of you,
21 support you, pay your expenses?

22 A. I do not recall.

23 Q. Okay. Have you looked in terms of trying to
24 make your Rule 26 disclosures in this case to determine
25 whether --

1 A. I object, attorney-client privilege.

2 Q. -- you have any support for the proposition
3 that Daniel agreed to pay your personal expenses?

4 A. Attorney-client privilege. I object.

5 MS. HART: You're looking at me, Mr. Solomon.
6 Is there something that you would like to ask me?

7 MR. SOLOMON: She's objecting on an
8 attorney-client privilege. There's no
9 attorney-client privilege.

10 THE WITNESS: I'm not going to tell you what
11 I'm going to do in my case. That's not up for
12 discussion.

13 MR. SOLOMON: Let's think about this for just
14 a minute. I'm asking in a discovery deposition
15 after -- on a date where the trial was already to
16 have taken place, what witnesses she has for these
17 things, and she is saying, Attorney-Client
18 privilege; I'm not going to tell you. And that
19 doesn't deserve a comment from the observer?

20 THE WITNESS: This was exactly what you get
21 from me after I get it from you. This whole time I
22 tried the same discovery and --

23 MR. SOLOMON: You see, I'm not going to --

24 MS. HART: Ms. Antonio, please, Mr. Solomon,
25 please stop. Please stop.

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CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

I, the undersigned authority, certify that
FAITH ANTONIO, appeared personally before me and was
duly sworn.

WITNESS my hand and official seal this 8th day of
December, 2021.

Aaron T. Perkins, RMR, CRR, CRC, CCR
Notary Public - State of Florida
My Commission Expires: 4/1/2024
Commission No. GG975331

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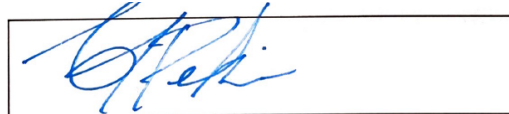
REPORTER'S CERTIFICATE

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

I, Aaron T. Perkins, Registered Merit Reporter and Certified Realtime Reporter, certify that I was authorized to and did stenographically report the deposition of FAITH ANTONIO; that a review of the transcript WAS NOT requested; and that the transcript is a true and complete record of my stenographic notes.

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

Dated this 8th day of December 2021.



Aaron T. Perkins, RMR, CRR, CRC