

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

IN RE:

FAITH ELYZABETH ANTONIO,)	Case No. 8:20-bk-07637
Debtor)	Chapter 7
)	
)	
DGP PRODUCTS INCS, DBA)	
NUMERIC RACING)	
Plaintiff)	Adversary Case No. 8:20-ap-00537-CPM
vs.)	
)	
FAITH ELYZABETH ANTONIO,)	
Defendant)	
)	

NOTICE OF FILING E-MAIL COMMUNICATIONS RELATED TO INTUIT

Defendant, Faith Elyzabeth Antonio, pro se, and as such notices this Honorable Court and all interested parties of E-Mail Communications Related To Intuit and Defendant's concerns made at trial, and states the following in support of:

RELEVANT PROCEDURAL HISTORY

1. On December 10, 2020, DGP Products, Inc. ("**Plaintiff**") filed Notice of Service of Subpoenas to Produce Documents, including to Intuit, Inc. (Doc. 11).
2. On April 22, 2021, Plaintiff produced the Intuit production from its subpoena to Defendant.
3. On July 20, 2021, Defendant moved for Sanctions Based on Plaintiff's Alteration and Spoliation of Evidence with Memorandum of Law based upon her concerns with the QuickBooks production. (Doc. 178).
4. On October 20, 2021, DGP Products, Inc. ("**Plaintiff**") requested this Court for an Order Instructing Intuit to Produce Archived Files in Native Format ("**Intuit Order**", Doc. 354).

As basis for this request, Plaintiff listed the QuickBooks documents in its possession that was provided to Defendant (¶¶ 2-5), and in pertinent part stated:

- a. Since the QuickBooks audit trail as produced is not satisfactory to Debtor, this Court has instructed DGP to produce the audit trail in real time that will require access to Intuit’s archives in its native format and not the PDF archives (¶ 7).
 - b. Brad Kanter, (“**DGP’s Expert**”) has confirmed with Intuit that upon court order, Intuit will produce a “hard copy” of the needed audit data. In addition, DGP’s Expert wants to acquire a complete “backup” of DGP’s QuickBooks database from Intuit, which his team will restore on a QuickBooks desktop program and allow for live access of the audit trail beyond the two-year period limitation... In sum, in order to obtain anything more than the last two years we must provide an order so that they may access their archives... (¶ 9)
 - c. DGP requests that this Court enter an order instructing Intuit to produce the **audit logs**, in the form of a “complete backup” of the entire DGP database for conversion to QuickBooks desktop for the purpose of data presentation in open court from June 1, 2014 to November 16, 2020. (¶ 10)
5. On October 22, 2021, in Plaintiff’s Rely to Debtor’s Response to Plaintiff’s

Request, in relevant part, Plaintiff stated:

- a. On October 19, 2021, upon learning that DGP had to again provide access to the QB Production in its native format, DGP contacted DGP’s Expert to assist. (¶ 4).
- b. Any changes made by DGP, after the alleged embezzlement, does not mitigate the act of embezzling. The modifications by the Plaintiff were his crude way to “classify” those entries, he deemed were fraudulent. (¶ 9).
- c. DGP Expert adheres to the AICPA Code of Professional Conduct. As such he serves the client with integrity and objectivity, and he does not subordinate his opinion to that of any party for their benefit. (¶ 10).
- d. On October 21, 2021, DGP Expert had a phone call with Andrea from the Office of The President at Intuit about the audit log matter. During this phone call Andrea confirmed Intuit keeps a record of all phone conversations. Andrea indicated they would provide this information, if subpoenaed by the court, so we may validate our efforts with Intuit. In addition, at the Court’s discretion, Intuit would welcome subpoenaing Mr. Mark Notarainni, Chief Customer Success Officer at Intuit to testify via Zoom about the audit trail limitations if needed. (¶ 11)

6. On October 28, 2021, this Court entered an Order Granting Plaintiff's Expedited Motion for Entry of Order Instructing Intuit to Produce Archived Files in Native Format. (Doc.

370). In relevant part, this Court ordered, on or before November 11, 2021, Intuit shall:

- a. Produce to Plaintiff all audit logs from June 1, 2014 to November 16, 2020 for data presentation in open court. (¶ 3(i)).
- b. Provide to Plaintiff complete access to the audit trail from June 1, 2014 until November 16, 2020 in its native format via online access of QuickBooks online software program. (¶ 3(ii)).
- c. Produce to Plaintiff a paper copy of the audit trail from June 1, 2014 to November 16, 2020. (¶ 3(iii)).

7. On November 5, 2021, Plaintiff filed its Subpoena to Intuit, Inc., Mark Notarainni, to appear for the hearing on November 16, 2021. The subpoena dated November 1, 2021 and served on November 4, 2021. (Doc. 385).

8. On November 5, 2021, Keith Fendrick entered his Notice of Appearance stating Pursuant to Bankruptcy Rule 2002, Intuit requests that all notices and other papers are served upon HK Law (Doc. 386).

9. On November 10, 2021, Plaintiff filed its Notice of Compliance with Order Regarding Intuit Records. (Doc. 400). Plaintiff filed the audit log for Intuit Account #3849. Plaintiff also included an email from Mr. Fendrick stating, in pertinent part:

Attached are the audit logs required under the court's order at paragraph 3.iii. Victoria, I'd like to talk with you about the subpoenas. I have asked an associate to prepare objections and a motion to quash but I am wondering what you really need from them given Intuit's previous production, Intuit putting the records back up for you until year end, and our sending the information attached.

10. On November 10, 2021, Intuit moved to Quash or Modify Plaintiff's Subpoena (Doc. 398).

11. On November 11, 2021, Plaintiff filed its Notice of Filing Summary of Discovery Provided to Debtor (Doc. 422). Plaintiff listed: 04.22.21 – Non-Party Document Production of Intuit Link: 2021.04.22 DGP v. Antonio [adv bkcy] – Docs to Def.

12. On November 11, 2021, Defendant filed an Amended Notice Advising Court of Plaintiff's failure to abide by this Court's Order with production of Intuit documents (Doc. 405). Defendant stated her concerns that the filing did not contain any Certificate of Business Records from Intuit nor does this filing include any other documents from Intuit as ordered by this Court. Defendant also provides excerpts of representations made to the Court regarding Intuit, including by DGP's Expert on August 3, 2021 (pg. 7):

THE COURT: All right. What would be the process for regaining access to the online QuickBooks so that the audit log tool could be used in real time?

MR. KANTER: And that is an excellent point. We had tried with Intuit. We would make a second attempt to get them to, you know -- if that online QuickBooks is still available. The issue is, Your Honor, that we suspect some of these QuickBooks accounts were trial accounts is part of the issue where -- and they have documented those, I believe, from Intuit themselves. One of the associates there had identified them as trial, meaning that at a 30-day expiration period, for example, they're no longer active. And that's been the explanation, thus, far of why we've had the -- you know, not been able to use those databases to go back in time and run those audit reports off of those databases.

13. On November 17, 2021, Defendant contacted Mr. Fendrick to confirm there was no other information other than the Intuit #3849 audit log, attached hereto as Exhibit "A".

14. On November 23, 2021, Defendant filed Notice of Service of Subpoenas to Produce Documents directed at Intuit, Inc. and Synovus. (Doc. 446).

15. On November 24, 2021, Defendant complied with this Court's Order suspending operation of Local Rules (Doc. 405) and filed Defendant's Notice of Filing Plaintiff's Intuit QuickBooks including Stripe Data Provided From the Intuit Subpoena. (Doc. 450). With this

production, at footnote 2, Defendant noted: Account ID's containing * are accounts with no further documents forwarded by Plaintiff. The certification of domestic business records contained Plaintiff's Bates Number INT DGP 000001 – INT DGP 000405 and without any signature by Denis Boulankine.

16. On December 2, 2021, Mr. Fendrick emailed the Solomon Law Group, inclusive of Defendant asking if Plaintiff intended to file an objection to Defendant's subpoena, attached hereto as Exhibit "B".

17. On December 3, 2021, Plaintiff filed its Motion for Protective Order of Subpoenas Directed to Intuit, Inc., Morgan Stanley, and BlueHost, Inc. (Doc. 461).

18. On July 5, 2022, Defendant contacted Mr. Fendrick to obtain a business certification record for the data/documents responsive to Plaintiff's Notice of Compliance, attached hereto as Exhibit "C".

19. On December 27, 2022, Defendant moved for leave to Amend her Witness List for Trial and to Obtain a Subpoena for the Corporate Representative of Intuit, Inc. to Appear as Rebuttal Witness, which this Court entered the Order granting Defendant's motion in part. (Doc. 1005).

EMAIL COMMUNICATIONS

20. On December 29, 2022, Plaintiff emailed Defendant, cc'ing Mr. Fendrick, requesting Defendant, "at your earliest convenience, please provide our office with the name and contact information of the person employed by Intuit, Inc. that you intend to call as a witness at the trial.

21. On February 17, 2023 at 12:31 pm, during the status conference, Defendant stated her concerns that she did not receive all the records from Intuit's production to Plaintiff. This

Court instructed Defendant to contact Intuit to confirm. Defendant complied and emailed Denis Boulankine and the Intuit Subpoena with the following request:

- a. On **April 21, 2021**, you had provided documents responsive to the attached subpoena. Can you please certify if the documents received were in PDF format or excel format or a combination?
- b. Can you also please tell me if you provided **account information page for each account and the account changes for each account**.
- c. Can you please also tell me if you had provided the INT DGP bates label on all documents and pdfs?

22. Instead of responding to Defendant, on February 17, 2023 at 1:59 pm, Mr.

Fendrick emails the Solomon Law Group attaching Defendant's email, attached hereto as Exhibit "D", stating:

Adam, this came in to my client today. I thought there was a hearing on this (I think I might have attended). Also saw the defendant moved to recuse Judge McEwen.

Anyway, not sure why she is asking these questions now and wanted to see if you all remember a hearing where our production was discussed.

23. In response at 2:30 pm, Mr. Tammaro writes:

Thank you for forwarding. Judge McEwen has not been recused. The Motion was denied. The trial is over. We will get back to you on Monday. When we respond, we will provide you with the transcript of the hearing when we discussed intuit, the outcome of the previous motion for protective order, and a detailed chronology and any documents you may need so that you have a clear picture of the history and what happened here.

24. On February 20, 2023 at 12:19 pm, Plaintiff's counsel emails Mr. Fendrick with a full colloquy of their version of events that occurred at the hearing and a different version of information that Defendant was seeking from Intuit, stating: "the Court took a break for Defendant to contact Denis Boulankine and inquire whether Intuit had produced a different batch of documents to the Solomon Law Group than what had been produced to Defendant."

Attached is the detailed chronology of the repeated production from Intuit to Defendant. We believe that her confusion arose from the fact that when we received the documents from you “in native format”, i.e., excel on November 9, 2021 at 3:30 p.m. we did NOT receive a certification for the two excel files. We forwarded as received. We also converted to PDF and filed it as received to prevent her from saying that she did not receive it. Defendant then received from you the two exact excel files, this time with a certification that the records (i.e., the spreadsheets) were being identified as INT DGP 00406 ad INT DGP 00407.

As a result, Defendant believes that these two batches of audit logs are different (although the excel spreadsheet are exact duplicates but for the identifying labels) has represented to the Court that I committed a fraud upon the court as I removed certain pages prior to producing to her because I did not produce to her the documents marked at INT DGP 000406 and INT DGP 00407 when in fact I did. Please see attached emails.

Can you please assist in resolving this confusion and clarifying that the two batches are the exact same but for the labeling?

25. On February 21, 2022, Mr. Tammaro follows up on Ms. Cruz-Garcia’s email, stating:

I’m following up on Ms. Cruz-Garcia’s email below. Have you had the opportunity to discuss the issues with your client and confirm our understanding as detailed below? Is there a plan in place to respond or address to Ms. Antonio’s inquiries directed to Intuit?

26. On February 21, 2023 at 3:19 p.m., Mr. Fendrick responds to Mr. Tammaro, possibly unintentionally sent to Defendant and Denis Boulkaline at Denis_Boulkaline@intuit.com, stating, “A little pushy. He only sent the email yesterday on a national holiday.”

27. On February 21, 2023 at 3:45 p.m., Mr. Fendrick emails Defendant, Mr. Tammaro, and Ms. Cruz-Garcia, completely disregarding Defendant’s email and states:

Good afternoon, in response to requests from each of you, the production Intuit made in your case was only one batch of audit logs. I have attached our responses from the summer of 2022. The logs were once shared but

not formally produced. They were then bates-numbered and formally produced, and I've attached the certification we sent in July 2022 regarding that. I trust this answers each of your questions.

28. On February 22, 2023, Plaintiff filed Notice of Filing Communications Regarding Intuit Records (Doc. 1030), in pertinent part:

Our replies to the Debtor's questions:

On April 21, 2021, you had provided documents responsive to the attached subpoena. Can you please certify if the documents received were in PDF format or excel format or a combination?

Intuit produced documents bates labeled INT DGP 000001 - INT DGP 000405, which was a combination of PDFs and Excel spreadsheets.

Can you also please tell me if you provided account information page for each account and the account changes for each account. Intuit is unable to answer this question as customer had a number of different products and services, both desktop and online. Intuit produced account profiles, transactions, applications, statements, audit/user logs, etc. that would reflect account activity. Intuit provided this information as requested in your case.

Can you please also tell me if you had provided the INT DGP bates label on all documents and pdfs? Yes, INT DGP bates label is added to each document. For PDFs Intuit added them to each document page, and for Excel spreadsheets, Intuit added them to file names. As stated in my email yesterday to all of you, the logs were once shared but not formally produced. They were then bates-numbered and formally produced.

29. The response directly from Mr. Fendrick is not verified from Intuit and Mr. Fendrick did not even bother to acknowledge Defendant pertaining to her questions relating to the April 21, 2021 production, instead is responsive to Ms. Garcia's email. This Court has previously stated that answers from an attorney is not a verified response from Intuit. Defendant requested the account detail pages and Mr. Fendrick writes that Intuit is not able to provide this information? In the Defendant's view, this type of communication between Plaintiff and Mr. Fendrick, a disinterested representative on non-party Intuit, without involvement of Defendant

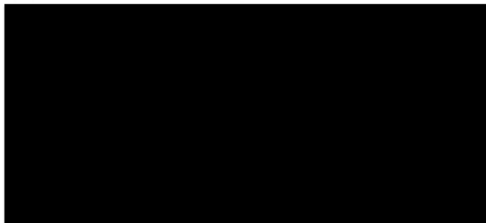
exudes a type of back yard dealing. Although Defendant is Pro Se, she should be treated fairly by all. Defendant's answers were never verified directly by Intuit, and of course, Plaintiff will find another way to twist this against Defendant.

Respectfully submitted,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed and served via email through the Clerk of Court and the CM/ECF upon all parties of this action on June 30, 2023.

A handwritten signature in black ink, similar in style to the one above, with loops and a long horizontal stroke.



Faith Antonio <faithantonio.legal@gmail.com>

FW: Numeric Racing

Fendrick, William K (TPA - X36707) <Keith.Fendrick@hklaw.com>
To: Faith Antonio <faithantonio.legal@gmail.com>

Wed, Nov 17, 2021 at 3:37 PM

You're welcome. There was no other information provided period.

W. Keith Fendrick | Holland & Knight

Florida Supreme Court Certified Mediator
Equity Partner
Holland & Knight LLP
100 North Tampa Street, Suite 4100 | Tampa, Florida 33602
Phone 813.227.6707 | Fax 813.229.0134
keith.fendrick@hklaw.com | www.hklaw.com

From: Faith Antonio <faithantonio.legal@gmail.com>
Sent: Wednesday, November 17, 2021 2:54 PM
To: Fendrick, William K (TPA - X36707) <Keith.Fendrick@hklaw.com>
Subject: Re: FW: Numeric Racing

[External email]

Thank you. Just to confirm there was no other information provided that would have been necessary to provide a usb?

On Wed, Nov 17, 2021 at 8:09 AM Fendrick, William K (TPA - X36707) <Keith.Fendrick@hklaw.com> wrote:

Here you are with the same message I sent to plaintiff's counsel when I sent these last week:

"Attached are the audit logs required under the court's order at paragraph 3.iii

I am told that they only print out in hard copy at approximately 400 entries per page. And you do have to manually do it page by page."

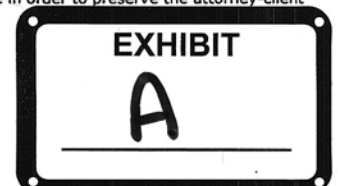
W. Keith Fendrick | Holland & Knight

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Respectfully,

Faith Elyzabeth Antonio



Defendant's Recent Discovery directed to Intuit

8 messages

Fendrick, William K (TPA - X36707) <Keith.Fendrick@hklaw.com> Thu, Dec 2, 2021 at 9:47 AM
To: Victoria Cruz-Garcia <vgarcia@solomonlaw.com>, Faith Antonio <faithantonio.legal@gmail.com>
Cc: "Olson, Andrea E (TPA - X36577)" <Andrea.Olson@hklaw.com>, Stanford Solomon <SSolomon@solomonlaw.com>

Ms. Cruz-Garcia, good morning. We were wondering if the Plaintiff intends to file an objection to the Defendant's subpoena directed to Intuit which was filed with the Court last week?
Thanks

Keith

W. Keith Fendrick | Holland & Knight

Florida Supreme Court Certified Mediator
Equity Partner
Holland & Knight LLP
100 North Tampa Street, Suite 4100 | Tampa, Florida 33602
Phone 813.227.6707 | Fax 813.229.0134
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Victoria Cruz-Garcia <vgarcia@solomonlaw.com> Thu, Dec 2, 2021 at 10:08 AM
To: "Fendrick, William K (TPA - X36707)" <Keith.Fendrick@hklaw.com>, Faith Antonio <faithantonio.legal@gmail.com>
Cc: "Olson, Andrea E (TPA - X36577)" <Andrea.Olson@hklaw.com>, Stanford Solomon <SSolomon@solomonlaw.com>

Good morning!

Yes sir, we absolutely intend to object and request a hearing on the matter. This would be the third request for the same records at Debtor's request. It is duplicative and unnecessary. Thank you.

Victoria



Victoria Cruz-Garcia

Phone: 813-225-1818
Fax: 813-225-1050
Email: vgarcia@solomonlaw.com

www.solomonlaw.com



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[Quoted text hidden]

Faith Antonio <faithantonio.legal@gmail.com>

Thu, Dec 2, 2021 at 11:38 AM

To: Victoria Cruz-Garcia <vgarcia@solomonlaw.com>

Cc: "Fendrick, William K (TPA - X36707)" <Keith.Fendrick@hklaw.com>, "Olson, Andrea E (TPA - X36577)" <Andrea.Olson@hklaw.com>, Stanford Solomon <ssolomon@solomonlaw.com>

Good Morning!

Mr. Fendrick, according to your client (Intuit), the audit trail is available online to Plaintiff?

I am requesting a transcript of the hearing, but just want to confirm.

Thank you for your time!

Faith E. Antonio

[Quoted text hidden]

Victoria Cruz-Garcia <vgarcia@solomonlaw.com>

Thu, Dec 2, 2021 at 6:27 PM

To: "Fendrick, William K (TPA - X36707)" <Keith.Fendrick@hklaw.com>, Faith Antonio <faithantonio.legal@gmail.com>

Cc: "Olson, Andrea E (TPA - X36577)" <Andrea.Olson@hklaw.com>, Stanford Solomon <ssolomon@solomonlaw.com>

Mr. Fendrick,

When did you send the Intuit disclosures sent to us on November 9th to Ms. Antonio in compliance with the Order? I would like to mention that in our objection as well. Thank you.

Victoria



Faith Antonio <faithantonio.legal@gmail.com>

Request for Business Certification Record

Fendrick, William K (TPA - X36707) <Keith.Fendrick@hklaw.com>
To: Faith Antonio <faithantonio.legal@gmail.com>
Cc: "vgarcia@solomanlaw.com" <vgarcia@solomanlaw.com>

Tue, Jul 5, 2022 at 12:40 PM

Ms. Antonio, your email to my client below was forwarded to me because, as you know, they are represented by counsel in this matter. They previously provided a certification on April 21, 2021, so could you please tell me exactly what you need from them and I can review your request.

Thank you.

Regards

W. Keith Fendrick | Holland & Knight

Florida Supreme Court Certified Mediator
Equity Partner
Holland & Knight LLP
100 North Tampa Street, Suite 4100 | Tampa, Florida 33602
Phone 813.227.6707 | Fax 813.229.0134
keith.fendrick@hklaw.com | www.hklaw.com

From: Faith Antonio <faithantonio.legal@gmail.com>
Sent: Tuesday, July 5, 2022 11:55 AM
To: SubpoenaTeam <subpoenateam@intuit.com>; denis.boulankine@intuit.com
Subject: Request for Business Certification Record

Good Morning,

I am the (self-represented) Defendant in the case, DGP Products, Inc. v Faith Elyzabeth Antonio (8:20-ap-00537-CPM, Florida Middle District Bankruptcy Court).

I am contacting you in regard to obtaining a business certification record for the data/documents responsive to the attached Order, Doc. 370 that was provided to Mr. Keith Fendrick, Esq of Holland & Knight, on behalf of Intuit in November 2021.

In Plaintiff's Notice of Compliance (attached as Doc. 400), one audit log was provided for account ending 3849, as responsive to this request.

Mr. Fendrick's Draft Motion and the Subpoena from DGP Products, Inc.'s original request is also attached (Intuit record 24525).

I am currently in trial, set to commence August 29, 2022, and request the certification for purposes if any authentication objections should arise.

Thank you for your time and assistance in this matter.

--

Respectfully,

Faith Elyzabeth Antonio
Pro Se/Defendant



FW: DGP Products, Inc/Bankruptcy/Faith Elyzabeth Antonio 8:20-ap-00537-CPM/Our File No 80374.22003

1 message

Fendrick, William K (TPA - X36707) <Keith.Fendrick@hklaw.com>

Tue, Feb 21, 2023 at 3:19 PM

To: "Boulankine, Denis" <Denis_Boulankine@intuit.com>, Faith Antonio <faithantonio.legal@gmail.com>

A little pushy. He only sent the email yesterday on a national holiday.

W. Keith Fendrick | Holland & Knight

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Phone 813.227.6707 | Fax 813.229.0134
keith.fendrick@hklaw.com | www.hklaw.com

From: Adam Tamaro <atamaro@solomonlaw.com>

Sent: Tuesday, February 21, 2023 3:00 PM

To: Fendrick, William K (TPA - X36707) <Keith.Fendrick@hklaw.com>

Subject: RE: DGP Products, Inc/Bankruptcy/Faith Elyzabeth Antonio 8:20-ap-00537-CPM/Our File No 80374.22003

[External email]

I spelled your name incorrectly in the email below. My sincere apologies!

THE SOLOMON LAW GROUP, P.A.

Adam Tamaro

Law Clerk

Phone: 813-225-1818

Fax: 813-225-1050

Email: atamaro@solomonlaw.com

www.solomonlaw.com



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From: Adam Tamaro
Sent: Tuesday, February 21, 2023 2:29 PM
To: Fendrick, William K (TPA - X36707) <Keith.Fendrick@hklaw.com>
Cc: Stanford Solomon <SSolomon@SolomonLaw.com>; Victoria Cruz-Garcia <vgarcia@solomonlaw.com>
Subject: DGP Products, Inc/Bankruptcy/Faith Elyzabeth Antonio 8:20-ap-00537-CPM/Our File No 80374.22003

Good afternoon Mr. Fendrich,

I'm following up on Ms. Cruz-Garcia's email below. Have you had the opportunity to discuss the issues with your client and confirm our understanding as detailed below? Is there a plan in place to respond or address to Ms. Antonio's inquiries directed to Intuit?

Thank you.

From: Victoria Cruz-Garcia <vgarcia@solomonlaw.com>
Sent: Monday, February 20, 2023 12:19 PM
To: Fendrick, William K (TPA - X36707) <Keith.Fendrick@hklaw.com>; Adam Tamaro <atamaro@solomonlaw.com>
Cc: Stanford Solomon <SSolomon@SolomonLaw.com>
Subject: RE: Expedited Request DGP Products, Inc vs Faith Elyzabeth Antonio 8:20-ap-00537-CPM
Importance: High

Mr. Fendrick,

I hope you are well. Trial ended on Wednesday, February 15, 2023 after 13 days of trial testimony. On Friday, February 17, 2023 Judge McEwen held a Zoom conference to "true up" all exhibits. At that time after the Intuit records had been admitted without objection, Defendant raised her objection for the FIRST time alleging that the documents (although Bates Labeled by Intuit) were not genuine. The Court took a break for Defendant to contact Denis Boulankine and inquire whether Intuit had produced a different batch of documents to the Solomon Law Group than what had been produced to Defendant.

Attached is the detailed chronology of the repeated production from Intuit to Defendant. We believe that her confusion arose from the fact that when we received the documents from you "in native format", i.e., excel on November 9, 2021 at 3:30 p.m. we did NOT receive a certification for the two excel files. We forwarded as received. We also converted to PDF and filed it as received to prevent her from saying that she did not receive it. Defendant then received from you the two exact excel files, this time with a certification that the records (i.e., the spreadsheets) were being identified as INT DGP 00406 and INT DGP 00407.

As a result, Defendant believes that these two batches of audit logs are different (although the excel spreadsheet are exact duplicates but for the identifying labels) has represented to the Court that I committed a fraud upon the court as I removed certain pages prior to producing to her because I did not produce to her the documents marked at INT DGP 000406 and INT DGP 00407 when in fact I did. Please see attached emails.

Can you please assist in resolving this confusion and clarifying that the two batches are the exact same but for the labeling?

Victoria

THE SOLOMON LAW GROUP, P.A.

Victoria Cruz-Garcia

Partner

Phone: 813-225-1818

Fax: 813-225-1050

Email: vgarcia@solomonlaw.com

www.solomonlaw.com



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From: Fendrick, William K (TPA - X36707) <Keith.Fendrick@hklaw.com>

Sent: Friday, February 17, 2023 2:34 PM

To: Adam Tammaro <atammaro@solomonlaw.com>

Cc: Victoria Cruz-Garcia <vgarcia@solomonlaw.com>

Subject: Re: Expedited RequestDGP Products, Inc vs Faith Elyzabeth Antonio 8:20-ap-00537-CPM

Cool. Thanks.

On Feb 17, 2023, at 14:30, Adam Tammaro <atammaro@solomonlaw.com> wrote:

[External email]

Dear Keith,

Thank you for forwarding. Judge McEwen has not been recused. The Motion was denied. The trial is over. We will get back to you on Monday. When we respond, we will provide you with the transcript of the hearing when we discussed intuit, the outcome of the previous motion for protective order, and a detailed chronology and any documents you may need so that you have a clear picture of the history and what happened here.

Thank you and have a great weekend.

THE SOLOMON LAW GROUP, P.A.

Adam Tammaro

Law Clerk

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<SLG_Vert_logo_015142b9-4da8-4f0d-aed3-8d49c66e35e8.png>

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From: Fendrick, William K (TPA - X36707) <Keith.Fendrick@hklaw.com>

Sent: Friday, February 17, 2023 1:59 PM

To: Adam Tammaro <atammaro@solomonlaw.com>

Subject: FW: Expedited RequestDGP Products, Inc vs Faith Elyzabeth Antonio 8:20-ap-00537-CPM

Adam, this came in to my client today. I thought there was a hearing on this (I think I might have attended).

Also saw the defendant moved to recuse Judge McEwen.

Anyway, not sure why she is asking these questions now and wanted to see if you all remember a hearing where our production was discussed.

Thanks
Keitha

W. Keith Fendrick | Holland & Knight

Florida Supreme Court Certified Mediator

Equity Partner

Holland & Knight LLP

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keith.fendrick@hklaw.com | www.hklaw.com

From: Faith Antonio <faithantonio.legal@gmail.com>
Sent: Friday, February 17, 2023 12:31 PM
To: denis.boulankine@intuit.com; SubpoenaTeam <subpoenateam@intuit.com>
Subject: Expedited RequestDGP Products, Inc vs Faith Elyzabeth Antonio 8:20-ap-00537-CPM

Good Afternoon,

I am the Defendant in this action that is currently active in trial.

On April 21, 2021, you had provided documents responsive to the attached subpoena. Can you please certify if the documents received were in PDF format or excel format or a combination?

Can you also please tell me if you provided account information page for each account and the account changes for each account.

Can you please also tell me if you had provided the INT DGP bates label on all documents and pdfs?

I appreciate an expedited response at your earliest convenience.

Thank you so much for your time.

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Respectfully,

Faith Antonio

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