

IN THE CIRCUIT COURT OF THE 17TH  
JUDICIAL CIRCUIT IN AND FOR  
BROWARD, COUNTY, FLORIDA

CASE NO.: 09-043833 (02)

BRIAN STYLES,

Plaintiff,

vs.

GARY PRONMAN, individually,  
and d/b/a Moviestar Musclecars and  
DAN PRONMAN, individually and  
d/b/a Moviestar Musclecars,

Defendants.

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**NOTICE OF FILING DEPOSITION TRANSCRIPT OF DAN PRONMAN**

Plaintiff, BRIAN STYLES, by and through undersigned counsel, hereby files the deposition transcript of Dan Pronman taken on February 17, 2010 which is attached hereto as **Exhibit "A."**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. mail upon: **Mark P. Bockstein, Esquire**, 8751 West Broward Boulevard, Suite 305, Plantation, Florida 33324, this 8 day of March, 2010.

**SHUTTS & BOWEN LLP**

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By:

  
EDWARD J. O'SHEEHAN

Florida Bar No. 0056790

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# **EXHIBIT “A”**

IN THE CIRCUIT COURT OF THE  
17TH JUDICIAL CIRCUIT IN AND  
FOR BROWARD COUNTY, FLORIDA

CASE NO. 09-043833 (02)

BRIAN STYLES,  
Plaintiff,

vs.

MOVIE STAR MUSCLECARS, INC., a  
foreign corporation, GARY  
PRONMAN, individually, and DAN  
PRONMAN, individually,

Defendants.  
\_\_\_\_\_ /

200 East Broward Boulevard  
Suite 2100  
Ft. Lauderdale Florida  
Wednesday, February 17, 2010  
12:56 p.m.

DEPOSITION OF DAN PRONMAN

Taken by MARIA ISABEL FERNANDEZ,  
Registered Professional Reporter and Notary  
Public in and for the State of Florida at Large,  
pursuant to Notice of Taking Deposition in the  
above cause.

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APPEARANCES

ON BEHALF OF THE PLAINTIFF:

Shutts & Bowen, LLP  
200 East Broward Boulevard  
PNC Center, Suite 2100  
Fort Lauderdale, Florida 33301  
BY: Edward J. O'Sheehan, Esq.

ON BEHALF OF THE DEFENDANT:

Mark P. Bockstein, P.A.  
8751 West Broward Boulevard  
Suite 305  
Plantation, Florida 33324  
BY: Mark P. Bockstein, Esq.

ALSO PRESENT:

Brian Styles  
Gary Pronman

INDEX OF EXAMINATION

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By Mr. O'Sheehan:	3			

EXHIBITS

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1 DAN PRONMAN  
2 was called as a witness by the Plaintiff and,  
3 after having been first duly sworn, was examined  
4 and testified as follows:

5 DIRECT EXAMINATION

6 BY MR. O'SHEEHAN:

7 Q. Please state your full name.

8 A. Daniel Pronman.

9 Q. No middle name?

10 A. Glen. Excuse me.

11 Q. Have you had your deposition taken  
12 before?

13 A. I don't believe so. It's possible.  
14 Many years ago. I don't recall.

15 Q. You just sat through your brother's  
16 deposition, and you heard my instructions with  
17 regard to that?

18 A. Yes, try to speak clear and concise.

19 Q. And one person speaks at a time.

20 A. You got it.

21 Q. All right. We'll just get started.  
22 What is your date of birth?

23 A. April 12, 1961.

24 Q. Where were you born?

25 A. I was born in Canada.

1 Q. Are you a Canadian citizen?

2 A. I'm a Canadian citizen.

3 Q. Are you also a U.S. citizen?

4 A. No.

5 Q. What is your legal status in the United  
6 States?

7 A. I'm not sure, to be honest with you. I  
8 reside in Quebec. I do spend some time down in  
9 Florida; quite a bit of time.

10 Q. Where do you reside in Quebec?

11 A. 341 Barnett Street in DDO, Quebec.

12 Q. When did you start residing at that  
13 address?

14 A. About since July, I believe, end of  
15 July. Before that, I resided in 169 Mozart  
16 Street in DDO.

17 Q. Have you applied for U.S. citizenship?

18 MR. BOCKSTEIN: I'm going to object  
19 to any personal questions. This is  
20 regarding jurisdiction and venue.

21 MR. O'SHEEHAN: Jurisdiction over  
22 the person of Dan Pronman. We need to  
23 know about Dan Pronman.

24 BY MR. O'SHEEHAN:

25 Q. Have you applied for a U.S. Resident

1 Alien Card?

2 MR. BOCKSTEIN: I'm going to object  
3 to that.

4 BY MR. O'SHEEHAN:

5 Q. Do you have a U.S. work visa?

6 MR. BOCKSTEIN: I'm going to  
7 object. He's a citizen of Canada.

8 BY MR. O'SHEEHAN:

9 Q. Have you applied for a U.S. work visa?

10 MR. BOCKSTEIN: I'm going to object  
11 to any of these questions.

12 BY MR. O'SHEEHAN:

13 Q. I asked if you applied for a U.S.  
14 Resident Alien Card. Do you have a U.S. Resident  
15 Alien Card?

16 MR. BOCKSTEIN: We're going to  
17 object.

18 BY MR. O'SHEEHAN:

19 Q. Are you single, married or divorced?

20 A. I am married.

21 Q. Who are you married to?

22 A. Ronabeth.

23 Q. Same last name?

24 A. Yeah.

25 Q. Is she a Canadian citizen?

1           MR. BOCKSTEIN: Object to whether  
2           she is a Canadian citizen. It has  
3           nothing to do with this case.

4       BY MR. O'SHEEHAN:

5           Q. Is she a U.S. citizen?

6           MR. BOCKSTEIN: Object to whether  
7           she's a U.S. citizen. It has nothing to  
8           do with this case.

9       BY MR. O'SHEEHAN:

10          Q. Has she applied for U.S. citizenship?

11          A. I have no idea.

12          Q. You don't know if your wife has applied  
13          for U.S. citizenship?

14                 Are you in the process of being  
15          divorced?

16          MR. BOCKSTEIN: I'm going to object  
17          as to the relevance. It has nothing to  
18          do with this case.

19       BY MR. O'SHEEHAN:

20          Q. Does your wife have a U.S. Alien Card?

21          MR. BOCKSTEIN: Object as to  
22          whether his wife has a U.S. alien card.  
23          It has nothing to do with this case.

24       BY MR. O'SHEEHAN:

25          Q. Has she applied for a U.S. alien card?

1 MR. BOCKSTEIN: I will object.

2 BY MR. O'SHEEHAN:

3 Q. Does your wife have a U.S. work visa?

4 MR. BOCKSTEIN: I will object  
5 anything to do with his wife.

6 BY MR. O'SHEEHAN:

7 Q. Has she applied for a U.S. work visa?

8 MR. BOCKSTEIN: I will object to  
9 whether she has.

10 BY MR. O'SHEEHAN:

11 Q. Are your children U.S. citizens?

12 A. No.

13 Q. Do they attend Florida universities?

14 MR. BOCKSTEIN: Object to anything  
15 to do with his children.

16 BY MR. O'SHEEHAN:

17 Q. If they attend Florida universities, do  
18 they receive in-state tuition rates or  
19 out-of-state tuition rates?

20 MR. BOCKSTEIN: Object to anything  
21 to do with his children.

22 BY MR. O'SHEEHAN:

23 Q. Do you know the address that they list  
24 as their primary residence in their records with  
25 their colleges?

1 MR. BOCKSTEIN: Nobody said they  
2 are in college. I'm going to object to  
3 anything that they would put down on any  
4 kind of a paper. If you want to ask him  
5 do his children live with him, ask him  
6 his address, that's fine.

7 BY MR. O'SHEEHAN:

8 Q. Do your children live with you?

9 A. One does --

10 Q. Which one?

11 A. -- lives with my wife. My son lives  
12 with my wife.

13 Q. Where does your wife live?

14 A. 11575 Northwest 71 Place in Parkland,  
15 Florida.

16 Q. Where do you live?

17 A. I live in Barnett in DDO, and when  
18 things are good, I do stay sometimes in Parkland.

19 Q. What do you mean by, "When things are  
20 good"?

21 MR. BOCKSTEIN: I'm going to object  
22 to anything personal with his  
23 relationship with his wife.

24 BY MR. O'SHEEHAN:

25 Q. Since April 1st, 2009, what percentage

1 of time have you spent in the Parkland address  
2 versus the Montreal address?

3 A. Since April 'til August, I spent 100  
4 percent of my time in Quebec. And from that  
5 point until now, I'd have to check my records.  
6 Give or take half of it or a little more in  
7 Quebec actually, probably, than in Florida at  
8 that time; in that period of time.

9 MR. STYLES: So from August to  
10 present, you're saying half and half?

11 THE WITNESS: A little less than  
12 half in Florida possibly. I would have  
13 to check to give you an exact number.

14 MR. BOCKSTEIN: We're talking about  
15 April, 2009 to February, 2010; is that  
16 correct?

17 THE WITNESS: Right. April, 2009  
18 'til August of 2009, I was 100 percent  
19 in Quebec.

20 MR. BOCKSTEIN: Okay.

21 THE WITNESS: Give or take a few  
22 days. I might have traveled. I don't  
23 recall if I was traveling at the time.

24 BY MR. O'SHEEHAN:

25 Q. What is the address in Canada?

1           A.    341 Barnett Street, DDO.

2           Q.    Do you own that?

3           A.    No.

4           Q.    What is it?

5           A.    It's a house.

6           Q.    Do you rent it?

7           A.    I've got an arrangement to be able to

8           occupy premise there.

9           Q.    Does anyone else live there?

10          A.    Yes.

11          Q.    Who lives there?

12                   MR. BOCKSTEIN:  It goes to

13                   jurisdiction.

14                   THE WITNESS:  A family member.

15          BY MR. O'SHEEHAN:

16          Q.    Who owns the house?

17          A.    I believe it's my brother-in-law.  I'm

18          not sure.  I've never seen the deed.

19          Q.    Would that be your wife's brother?

20          A.    My sister's husband.

21          Q.    Your sister's husband.  Okay.

22                   Do you have a Canadian passport?

23          A.    I do have a Canadian passport.

24          Q.    Do you know what address is on there?

25          A.    There's no address in Canadian

1       passports.

2           Q.     Does your spouse have a Canadian  
3       passport?

4           MR. BOCKSTEIN:  I will object to  
5       whether his spouse has one or not.

6       BY MR. O'SHEEHAN:

7           Q.     Do you have a U.S. passport?

8           A.     No.

9           Q.     Does your spouse have a U.S. passport?

10          MR. BOCKSTEIN:  Object to whether  
11       his wife has a U.S. passport.

12       BY MR. O'SHEEHAN:

13          Q.     Have you ever applied for a U.S.  
14       passport?

15          MR. BOCKSTEIN:  I will object to  
16       whether he has applied for a U.S.  
17       passport.

18       BY MR. O'SHEEHAN:

19          Q.     Has your spouse ever applied for a U.S.  
20       passport?

21          MR. BOCKSTEIN:  I will object to  
22       anything to do with his spouse.

23       BY MR. O'SHEEHAN:

24          Q.     Do you have a Canadian driver's license?

25          MR. BOCKSTEIN:  That you can

1 answer.

2 THE WITNESS: I believe so.

3 BY MR. O'SHEEHAN:

4 Q. Do you have it with you?

5 A. No.

6 Q. Do you have a Florida Driver's License?

7 A. Yes.

8 Q. On your Canadian license, what address  
9 is listed on that license?

10 A. I don't have it with me. I have to  
11 check and get back to you.

12 Q. Where is that Canadian driver's license?

13 A. Where is it?

14 Q. Yes.

15 A. Where is it?

16 Q. Yes.

17 A. It's from Quebec.

18 Q. Where is it physically located?

19 A. Probably on Barnett Street in Quebec. I  
20 would guess.

21 Q. What address is listed on your Florida  
22 driver's license?

23 MR. BOCKSTEIN: If you know. It  
24 has to do with venue and jurisdiction.

25 THE WITNESS: 11575 Northwest 71

1 Place.

2 BY MR. O'SHEEHAN:

3 Q. Is that the address where you said your  
4 wife lives?

5 A. Yes.

6 Q. When you go back and forth between  
7 Canada and the United States, what do you use for  
8 identification if the Canadian driver's license  
9 is in Quebec?

10 A. Huh? Excuse me?

11 MR. STYLES: When you go through  
12 TSA.

13 THE WITNESS: By the way, my  
14 driver's license, the address is very  
15 recent, like, in the last few weeks,  
16 just for the record.

17 MR. BOCKSTEIN: Which one?

18 THE WITNESS: The 11575. It's just  
19 been established a few weeks ago.

20 BY MR. O'SHEEHAN:

21 Q. Is that when you first obtained a  
22 Florida driver's license?

23 A. No.

24 Q. When did you first get a Florida  
25 Driver's License?

1           A.    I'd have to check and let you know.  I'm  
2   not sure.

3           Q.    Has it been more than a year?

4           A.    Can't tell you for sure.

5           Q.    Has it been less than a year?

6           A.    Could be.  That's why I'd have to check.

7           Q.    Prior to the address that you just  
8   stated that is on the license, what address was  
9   on it before?

10          A.    I'm not sure.  Again, I would have to  
11   check that for you.  I don't have it, because I  
12   no longer have it, so I have to see if I have a  
13   copy of it somewhere.  I'm not sure.

14          Q.    You never answered the question.  
15                    When you go back and forth between  
16   Canada and the United States or when you travel,  
17   since your Canadian driver's license you said is  
18   in Quebec, what do you use for identification?

19          A.    Passport is what is used in travel.

20          Q.    What about within the United States  
21   going through TSA, like going from here to  
22   Arizona, what would you use for identification?

23          A.    Passports are useful for all sorts of  
24   ID.

25          Q.    I understand that they are useful, but

1 what do you use?

2 A. Passport.

3 Q. You always take your Canadian passport  
4 when you travel?

5 A. Yes, sir.

6 Q. Does your spouse have a Florida Driver's  
7 License?

8 MR. BOCKSTEIN: We object to  
9 anything to do with his spouse.

10 BY MR. O'SHEEHAN:

11 Q. Do you have a Canadian Medicare Card?

12 A. It's personal.

13 MR. BOCKSTEIN: Did you say you  
14 were a Florida resident?

15 THE WITNESS: What's that? I don't  
16 know what I am. I don't know.

17 MR. BOCKSTEIN: Okay. Well, then  
18 he has the right to try to establish  
19 where your residency is and jurisdiction  
20 is in this case, so you have to answer  
21 that question.

22 THE WITNESS: I have a Medicare  
23 card.

24 BY MR. O'SHEEHAN:

25 Q. Are you registered to vote in Florida?

1 A. Registered to vote?

2 Q. In the elections.

3 A. No.

4 Q. What addresses have you resided at in  
5 Florida in the last five years?

6 A. In the last five years, 11575.

7 MR. BOCKSTEIN: Let him know how  
8 long you've resided at these addresses.

9 THE WITNESS: I've been there back  
10 and forth since, I guess, around  
11 September of this -- of last year, '09.

12 Prior to that, whenever I came in,  
13 I either stayed at my brother's or my  
14 father-in-law's or --

15 GARY PRONMAN: Or the condo.

16 THE WITNESS: Yeah, but not really  
17 in the condo. As well as hotels and any  
18 other places.

19 BY MR. O'SHEEHAN:

20 Q. What, the condo which you own that you  
21 just referred to?

22 A. The Deerfield condo which we try to --  
23 it's a 55-and-over community.

24 MR. STYLES: Central Village?

25 THE WITNESS: Yes. I know a lot of

1 young people.

2 MR. BOCKSTEIN: For clarification  
3 purposes, was that your father's condo?

4 THE WITNESS: Yes. We inherited it  
5 when my father passed away a few years  
6 ago. We've been kind of stuck with it.

7 BY MR. O'SHEEHAN:

8 Q. You own that condominium with your  
9 brother?

10 A. Yes, I do.

11 Q. And you rent it out?

12 A. We try to. Without much success.

13 Q. It's currently rented now, correct?

14 A. Yeah.

15 MR. BOCKSTEIN: Let me stop for a  
16 minute. She has to write everything he  
17 says, so you can't talk because it's  
18 going to be interfering. If you have  
19 something that you need to say, either  
20 write it down or tell me.

21 GARY PRONMAN: I will write it  
22 down.

23 BY MR. O'SHEEHAN:

24 Q. What happens with the rent payments that  
25 come from the condo?

1           A.    Basically what is done with it is it  
2           pays bills for whatever the condo --

3                   GARY PRONMAN:  Just say this.

4                   THE WITNESS:  Yeah.  It's only been  
5           rented for the last two months.  We  
6           haven't really been able to generate  
7           anything other than that besides bills.

8   BY O'SHEEHAN:

9           Q.    Who are the rent checks made payable to?

10          A.    None have been made yet, because none  
11       has come in yet.  The first one, hopefully, will  
12       be made shortly.  I guess it will be made to me.

13          Q.    Was there an initial deposit required  
14       when the lease was signed?

15          A.    No, no, no.

16          Q.    How many other, in the last five years,  
17       renters have you had there?

18          A.    None.

19                MR. BOCKSTEIN:  I'm going to object  
20       to any questions about the rental.  They  
21       own it and they try to rent it in  
22       Florida, in Deerfield Beach.  You don't  
23       need to get into anything else.

24                MR. O'SHEEHAN:  I want to know if  
25       they rent it and what happens with the

1 income. Does he get income from any  
2 property in Florida?

3 MR. BOCKSTEIN: Well --

4 THE WITNESS: Who, me?

5 BY MR. O'SHEEHAN:

6 Q. Yes.

7 A. No. Whatever money is collected would  
8 be half of what it costs just to pay the monthly  
9 and the taxes. There's no profit or revenue off  
10 of that property.

11 Q. Who owes the taxes on there?

12 A. Who owes the taxes?

13 Q. Yes.

14 A. It's under both our names, my brother  
15 and myself. I think my sister may still be on  
16 there.

17 GARY PRONMAN: No, no.

18 THE WITNESS: It's me and my  
19 brother.

20 BY MR. O'SHEEHAN:

21 Q. So money that comes in goes to pay a  
22 bill that you owe?

23 A. Correct.

24 Q. When I was deposing your brother  
25 earlier, we talked about the 169 Mozart Street

1 address.

2 A. Correct.

3 Q. Did you or your spouse reside at that  
4 address?

5 A. Yes.

6 Q. Did both of you reside there?

7 A. Yes.

8 Q. When did you stop residing there?

9 A. In August of '09.

10 Q. And what happened in August of '09, with  
11 regard to that?

12 A. My wife sold her house.

13 Q. It was her house?

14 A. Correct.

15 Q. You didn't have any ownership in that  
16 house?

17 A. No.

18 Q. And after August of '09, was it sold to  
19 a family member?

20 A. No, it was not.

21 Q. Was it sold to a friend?

22 A. No, it was not.

23 Q. Did you own the property in Mozart  
24 Street?

25 A. No.

1 Q. Did you have any ownership interest in  
2 it?

3 A. No.

4 Q. In December of this year, did your wife  
5 even have any ownership interest in it?

6 A. No. December of which year?

7 Q. Of '09. I'm sorry.

8 A. No. She had sold it already. If you  
9 see something different, it's a mistake.

10 Q. In Interrogatories we ask --  
11 Interrogatories to you, it says: "Please list  
12 and describe all real property you have owned,  
13 either wholly or partially, within the last five  
14 years, including mailing address and legal  
15 description if the property has no mailing  
16 address."

17 A. Uh-huh.

18 Q. And on December 24th, 2009 -- I assume  
19 this is your signature. I'll show it to you  
20 after I read this for the record. It says: "Dan  
21 Pronman owns the property located at 169 Mozart  
22 Street, DDO, Quebec, Canada, as well as half  
23 owner in the condominium in Deerfield Beach."

24 A. I apologize for that. It is definitely  
25 a typo. I lived at that address with my wife,

1 but I was never the owner of the property.

2 Q. So in December of 2009, did you live at  
3 that address with your wife?

4 A. Not in December, no. It said for the  
5 year. I lived there up until August of '09. I  
6 apologize for that.

7 Q. The question is: "List or describe all  
8 properties that you have owned, either wholly or  
9 partially, within the last five years."

10 A. It's a mistake.

11 Q. Note your response to Number 4.

12 A. Yes.

13 Q. And the question asks you for your  
14 mailing address.

15 A. Okay. Where is the answer?

16 Q. Let me read the question first. "Please  
17 state the mailing address for your primary  
18 residence for the past five years and state the  
19 dates you lived at each. If there is more than  
20 one address included in your response."

21 A. So the last -- my mailing address for  
22 the last five years was Mozart Street, DDO.

23 Q. Would you please read the response,  
24 Number 4, which you answered under oath?

25 A. Isn't it this here?

1 Q. Number 4.

2 A. "Present mailing address for the past  
3 five years are Mozart Street, DDO." I also  
4 stayed with my wife in her house in Broward.

5 Q. Doesn't it say, "present mailing address  
6 and for the last five years"?

7 A. Well, I thought you were saying my  
8 mailing address for the last five years.

9 Q. It says that your present mailing  
10 address is Mozart Street, correct?

11 A. That's a mistake. It was up until  
12 August.

13 Q. You signed these under oath in December  
14 of 2009, correct?

15 A. Correct. I guess.

16 Q. So in December of 2009, was Mozart  
17 Street your present mailing address?

18 A. Technically it was. Let me explain why.  
19 Because what I did was I mail forwarded from  
20 that. I have up to about 12 months for any mail  
21 that's coming to me. My mailing address is still  
22 169 Mozart, although I do no longer occupy that  
23 premise. It is forwarded to a new mailing  
24 address, is where the mail goes. That is my  
25 mailing address up until around March or so.

1 Q. Okay. When is it that you say your wife  
2 sold the house?

3 A. She sold it in April. We moved out in  
4 August, I believe. Give or take a few weeks. To  
5 get exact dates, I would have to check records  
6 and see if I can clarify that. I believe it was  
7 three months after she sold it. It was after the  
8 transfer.

9 Q. Did you rent it back from the people you  
10 sold it to?

11 A. Yes, we did. It was all part of her  
12 negotiation. I think it was done -- if I  
13 remember correctly -- I do not have that  
14 information in front of me -- it was part of the  
15 whole transaction, how they set it up.

16 Q. So when was the property sold?

17 A. It was sold sometime in April of '09.  
18 Again, it was her property, and I'm not sure  
19 exactly the dates when it happened. We moved out  
20 in August.

21 Q. Could it have been March of '09?

22 A. Could have been. Again, I can't tell  
23 you 100 percent, but I can verify.

24 Q. Did you or your spouse ever reside at  
25 117 Wilson, DDO, Quebec City?

1 A. Yes.

2 Q. When was that?

3 A. Up to about seven years ago maybe, give  
4 or take, six, seven years back.

5 MR. STYLES: 2003, 2004?

6 THE WITNESS: '01, '02, '03,  
7 something like that.

8 BY MR. O'SHEEHAN:

9 Q. When you moved from 117 Wilson, did you  
10 move to the 169 Mozart address?

11 A. Yes.

12 Q. 341 Barnett Street, DDO, Montreal, did  
13 you live there? Did you live at 341 Barnett  
14 Street?

15 A. Yes, after August.

16 Q. That's the current address?

17 A. Yes.

18 Q. Do you own any property in Canada?

19 A. Me, personally, I've got a piece of  
20 land, not a building on it, I have a piece of  
21 land that I believe is owned by myself and my  
22 wife.

23 Q. Where is it located?

24 A. In Saint Adolphe d'Howard.

25 Q. Can you spell that?

1           A.    No.  Saint Adolphe d'Howard.  I 'm not  
2   sure exactly.

3           GARY PRONMAN:  S-a-i-n-t.

4           THE WITNESS:  Let him spell it.

5           GARY PRONMAN:  A-d-o-l-p-h-e, d,  
6   H-o-w-a-r-d.

7           MR. STYLES:  That's in Quebec?

8           GARY PRONMAN:  Yes.

9           THE WITNESS:  That is Quebec.

10   BY MR. O'SHEEHAN:

11           Q.    Is that a city?

12           A.    It's a town, I guess, city, town.  It's  
13   small.

14           MR. STYLES:  It's a suburb of DDO?

15           THE WITNESS:  No.

16           GARY PRONMAN:  It's not a suburb.

17           MR. BOCKSTEIN:  Guys, let's not get  
18   into this.

19           THE WITNESS:  It's an hour away.

20   BY MR. O'SHEEHAN:

21           Q.    Do you have a lease for the 341 Barnett  
22   Street?

23           A.    No, I don't.

24           Q.    Does Movie Star Muscle Cars own any real  
25   property in Canada?

1 A. Own real property? No.

2 Q. Does it have a lease?

3 A. Yes, it does.

4 Q. For which address?

5 A. 1045C La Place.

6 GARY PRONMAN: 1245.

7 THE WITNESS: 1245C La Place in St.

8 Vincent De Paul Laval.

9 BY MR. O'SHEEHAN:

10 Q. When is that lease up?

11 A. It's -- I'd have to check it for you.

12 I'm not sure. It's got a few years left on it,  
13 but I'm not sure.

14 Q. How long have you been at that location?

15 A. Four years. Between four and five years  
16 now.

17 Q. Did you have any locations prior to that  
18 location?

19 A. No, none that were on lease. No.

20 Q. Prior to having this location, were you  
21 in the business of restoring cars?

22 A. Yes.

23 Q. Where did you do that work at?

24 A. Through some other subcontract shops.

25 Q. 11575 Northwest 71st Street, Parkland,

1 Florida, that's the address where your wife --

2 A. That's my wife's. She owns that home.

3 Q. Do you own that home?

4 A. No, I don't.

5 Q. Is that where you stayed last night?

6 A. Yes, it is.

7 Q. That's the address since August of this  
8 year that you said you've been spending time  
9 there, between there and Quebec?

10 A. Correct. Correct.

11 Q. Do you know if there's Homestead on that  
12 property for tax purposes?

13 A. Presently, I don't believe so.

14 Q. Do you know if it's been applied for?

15 A. I don't know a hundred percent. I can  
16 check that for you. That's my wife's department.

17 Q. Is it a single-family home or town home?

18 A. It's a single-family home.

19 Q. Another Parkland address, 12371

20 Northwest 78 Manor. Do you know who owns that?

21 A. I know -- I can't tell you 100 percent.

22 I would have to verify that for you. I can check  
23 that for you. I'm not sure.

24 Q. Do you know who lives there?

25 A. Right now, I believe nobody.

1 Q. You don't own it?

2 A. I don't. I have no interest in it  
3 whatsoever.

4 Q. Is somebody living in there?

5 A. Probably. Again, I don't know.

6 Q. Does your wife have any ownership  
7 interest in it?

8 A. Again, I'm not sure.

9 Q. Does your family?

10 A. Probably, but, again, I'm not sure.

11 Q. How far is that away from the address  
12 that you live?

13 A. It's about a couple of miles, give or  
14 take.

15 Q. Did you ever live at that address?

16 A. I stayed there.

17 Q. Would that address have been on your  
18 Florida driver's license?

19 A. I don't know. Again, I'd have to check  
20 that out. Again, the one that I have is 11575.

21 Q. But that's only two weeks ago?

22 A. Correct. I'm not sure.

23 Q. What address was on it previously?

24 A. I have to check.

25 Q. What possible address might have been on

1 it previously?

2 A. It could have been somewhere in Palm  
3 Beach. It could have been a lot of places.

4 Q. Where in Palm Beach?

5 A. I don't even know the address. Near  
6 City Place.

7 Q. Do you know if your wife owns 12371  
8 Northwest 78 Manor?

9 A. I'm not sure, no. I'm not privy to that  
10 information.

11 Q. And you said you stayed there. When did  
12 you stay there?

13 A. I've stayed there on and off for a few  
14 years. It was my father-in-law's house.

15 Q. When you say "was," did he pass away?

16 A. No. Again, I don't know exactly the  
17 details. It's not my family business, and I'm  
18 not privy to all that information.

19 Q. Does he live there?

20 A. I'm not sure. Probably not.

21 Q. When you have stayed there, was anyone  
22 else living there?

23 A. My father-in-law.

24 Q. When did he move from there?

25 A. I don't know for sure.

1 Q. Where does he live now?

2 A. He's got a few properties.

3 Q. I didn't ask what he owns. I asked  
4 where does he live now?

5 A. I'm not sure where his actual residence  
6 is.

7 MR. BOCKSTEIN: I'm going to object  
8 to where his father-in-law lives. We're  
9 getting a little far from the venue and  
10 jurisdiction.

11 BY MR. O'SHEEHAN:

12 Q. Do you own any other property, real  
13 property, that we haven't discussed yet?

14 A. No.

15 Q. Just the one piece of vacant land in  
16 Canada and the condo --

17 A. That is correct.

18 Q. -- in Deerfield Beach?

19 A. Half a condo.

20 Q. The address of 71st Place in Parkland,  
21 are any of the utilities in your name?

22 A. No.

23 Q. Do you receive any mail there?

24 A. Nope.

25 Q. You receive no mail at all at that

1 address?

2 A. No, not that I can recall.

3 Q. Where do you receive your mail at?

4 A. Mostly in my mailing address in Quebec.  
5 All my responsibilities are sent there.

6 Q. Do you have any telephone numbers in the  
7 United States?

8 A. No. I don't have any numbers in the  
9 United States.

10 Q. Do you have a cell phone in the United  
11 States?

12 A. I do not have my own cell phone, no.

13 Q. Do you have a cell phone that you use?

14 A. I use a few of them. Whatever I can get  
15 my hands on. Whatever my --

16 Q. Whose phone number is (954) 770-2314?

17 A. I believe it was my wife's.

18 Q. Do you know to what phone that's  
19 assigned right now?

20 A. Excuse me? It's my wife's phone.

21 Q. What kind of phone?

22 A. What kind of phone? It's a cell phone.

23 Q. Do you know what kind?

24 A. As in brand name?

25 Q. Yes. Blackberry --

1 A. Blackberry, Blackberry, Blackberry.

2 Q. -- iPhone?

3 Let me use the same exhibits. Let me  
4 show you Exhibit Number 6. That was for the '71  
5 Cuda?

6 A. Uh-huh.

7 Q. Do you see the phone number right at the  
8 top there?

9 A. Yep.

10 Q. Does your wife sell '71 Cudas?

11 A. If she can.

12 Q. Is she part of Movie Star Muscle Cars?

13 A. No, she is not.

14 Q. Well, your brother testified that that  
15 was an advertisement for Movie Star Muscle Cars.

16 A. Correct.

17 Q. Then why does it have your wife's phone  
18 number? You're telling us (954) 770-2314 is your  
19 wife's phone number?

20 A. It is. She has four phones. She's  
21 contracted for four phones.

22 At the time, I guess I was using that  
23 phone, one of her lines.

24 Q. So was that number being used on behalf  
25 of Movie Star Muscle Cars?

1 A. Excuse me?

2 Q. Was that number being used on behalf of  
3 Movie Star Muscle Cars?

4 A. Yes. If I had to do something for the  
5 company and I had that phone in my pocket that  
6 day, I would use it. Absolutely.

7 Q. Was this ad placed on behalf of Movie  
8 Star Muscle Cars?

9 A. Yes, it was.

10 Q. And it was placed with a (954) phone  
11 number?

12 A. It was.

13 Q. And do you know why it lists Parkland,  
14 Florida's location on that ad?

15 A. Why it lists that?

16 Q. Yes.

17 A. Typo. It was the location of where when  
18 it was set up. The car was never in Florida.

19 Q. If that's a typo, then what's the  
20 correct information?

21 A. Minnesota.

22 Q. Where did that information come from?

23 A. It was, I guess, posted.

24 Q. Who posted it?

25 A. Most probably myself.

1 Q. Do you have records of that?

2 A. I don't recall 100 percent exactly how  
3 this ad was posted. It could have been copied  
4 and pasted from another one and I just filled in  
5 the details, which I do sometimes, to save time.  
6 And that's probably why the -- you know, whatever  
7 some of this stuff was --

8 Q. So you've done other ads with Parkland,  
9 Florida?

10 A. No.

11 Q. You said you cut and paste and that was  
12 left there accidentally. That means that you had  
13 one previously with Parkland, Florida.

14 A. I don't recall ever posting another one.  
15 I don't know. It could have come from anything  
16 else. I'm not sure.

17 Q. The telephone number (954) 740-0033 --

18 A. Excuse me?

19 Q. (954) 740-0033.

20 A. That's my wife's phone.

21 Q. Home phone or cell phone?

22 A. Cell phone.

23 Q. So if we called, if we wanted to get  
24 ahold of your wife, which number would we call,  
25 the 740-0033?

1           A.   Possibly, or one of the kids could have  
2           it at the time. Like I said, she has a bunch of  
3           phones and she distributes depending on who needs  
4           what.

5                   MR. BOCKSTEIN: Can I have a  
6           second?

7                   MR. O'SHEEHAN: Sure.

8                   (Thereupon, a discussion was held off  
9           the record.)

10                   MR. BOCKSTEIN: We want to clarify  
11           something for the record. What happened  
12           with all these phone calls and all these  
13           addresses?

14                   MR. O'SHEEHAN: Okay.

15           BY MR. O'SHEEHAN:

16           Q.   Go ahead.

17           A.   Basically the reason that I have to use  
18           my wife's phone is because the destruction that  
19           has occurred in the last 12 months.

20                   MR. BOCKSTEIN: What do you mean by  
21           "destruction"?

22                   THE WITNESS: From the website, so  
23           we did Garypronman.com. What we tried  
24           to do was divert the attention and  
25           disguise myself so this is why the

1 information is different than the normal  
2 information.

3 BY MR. O'SHEEHAN:

4 Q. But that's on behalf of Movie Star  
5 Muscle Cars?

6 A. Correct.

7 Q. If you wanted to buy that car from Movie  
8 Star Muscle Cars, you'll call (954) --

9 A. Yes.

10 Q. -- 770-2314?

11 A. Correct.

12 Q. Which is a Broward County phone number,  
13 correct?

14 A. Correct.

15 Q. The phone Number (954) 781-5227, did  
16 that ever belong to you or your spouse?

17 A. I don't even recall that number. What  
18 is the number again?

19 Q. (954) 781-5227.

20 A. I don't even know that number. I'd have  
21 to check, but I don't recall that number at all.

22 Is there a date on that?

23 Q. December, 2003.

24 A. Well --

25 Q. Dealings with Jurgen Stanley.

1 A. Dealings with Jurgen Stanley?

2 Q. Yes.

3 A. No idea.

4 Q. Do you want to talk about the e-mail  
5 address GPmusclecars@aol.com? Gary says it's his  
6 e-mail. Would you use it sometimes?

7 A. We would all use that e-mail address.

8 Q. Who is "we"?

9 A. Me, Gary, and if somebody else in the  
10 shop needed to use it, but it's mostly Gary and  
11 myself.

12 Q. Did you ever use that e-mail address to  
13 e-mail Brian Styles?

14 A. I don't know. I possibly did. I had  
15 some communications with him in different areas  
16 and different ways, so I don't know for sure  
17 which way they were.

18 Q. If somebody is doing -- is that e-mail  
19 address used for Movie Star Muscle Cars?

20 A. Yes.

21 Q. So if somebody is getting e-mails on  
22 behalf of Movie Star Muscle Cars from  
23 GPmusclecars@aol.com, they wouldn't know who they  
24 were dealing with?

25 A. They wouldn't know who they were dealing

1 with.

2 Q. They wouldn't know if it was you or Gary  
3 or someone else at the shop?

4 A. Usually if it would be signed, that  
5 would give an indication. Otherwise, you're  
6 dealing with the company. You're dealing with  
7 the company.

8 Q. If you received an e-mail from  
9 GPmusclecars@aol.com, how would anyone know that  
10 it's on behalf of a company called Movie Star  
11 Muscle Cars?

12 A. How would anybody know?

13 Q. Yes.

14 A. If you're asking normally our clients,  
15 they know that's who we are. That's the only  
16 e-mail address that we have for Movie Star Muscle  
17 Cars.

18 Q. If Brian Styles received an e-mail from  
19 GPmusclecars@aol.com, for something about a car  
20 and at the bottom it says, "Gary," how would he  
21 know that it has anything to do with Movie Star  
22 Muscle Cars?

23 A. Because in the last six years, he knows  
24 Gary. He knows that Movie Star Muscle Cars is  
25 Gary's company as well as my company.

1 Q. How does he know that?

2 A. Because he's known that since day one,  
3 since he had his first connection. And I've  
4 spoken to him over the phone at times about  
5 different issues with parts and this and that.  
6 He's called me in Montreal, knowing it's Movie  
7 Star Muscle Cars. I've answered the phone,  
8 "Movie Star Muscle Cars." Or if he called my  
9 cell phone, he is calling based on questions he  
10 has from my website, parts and this and that. He  
11 knows that it's about Movie Star Muscle Cars.

12 Q. Did you ever give him anything saying  
13 "Movie Star Muscle Cars"?

14 A. Sure.

15 Q. What did he get?

16 A. A buyer's order.

17 Q. For what car?

18 A. 1969 and a half Super Bee.

19 Q. Anything else prior to that time?

20 A. What do you mean, given? That's the  
21 only --

22 Q. E-mailed him, faxed him, handed him a  
23 business card that said, "Movie Star Muscle  
24 Cars," any paperwork that said, "Movie Star  
25 Muscle Cars"?

1           A.    I'd have to check, but I believe there  
2           must be some other stuff, either invoices or  
3           transmissions or questions and answers.

4           Q.    I'm not asking you to check.  I'm asking  
5           you right now, right here.

6           A.    I can't tell you off the top of my head.

7           Q.    There's nothing that you can say that  
8           you gave to him?

9           A.    I know for a fact that I gave him a  
10          buyer's order.

11          Q.    Other than that buyer's order for the  
12          '69 Super Bee, prior to that, is there anything  
13          you can show that he had ever heard of Movie Star  
14          Muscle Cars?

15          A.    I have nothing with me.

16          Q.    Do you have e-mails?

17          A.    I can produce them.

18          Q.    E-mails that would say what?

19          A.    Where he talks about our company and  
20          certain things about our company.  I've got a  
21          check from February 24 that says, "Movie Star  
22          Muscle Cars" that he wrote and signed by Brian  
23          Styles, registered trust.

24          Q.    Did that get deposited into Movie Star  
25          Muscle Cars?

1 A. Yes, it did.

2 Q. Why was there a replacement check given?

3 A. Because the check bounced for NSF,  
4 non-sufficient funds. My bank. I have the  
5 documents.

6 Q. And so the funds never went into a Movie  
7 Star Muscle Cars' account based on that check,  
8 correct?

9 A. Of course not, because it came back  
10 non-sufficient.

11 Q. And then what happened?

12 A. Then he had to replace the check, which  
13 he did, and he replaced it to me, I believe  
14 personally, because my bank wanted to hold any  
15 check from Brian Styles for 90 days to clear,  
16 because the first one came back after 30.

17 Q. So what happened with the check that was  
18 made payable to you personally?

19 A. It was deposited into my personal  
20 account.

21 Q. Is that your personal money?

22 A. No. It's booked to the company, and  
23 it's disbursed for proper manner.

24 Q. How is it booked to the company?

25 A. As a receivable.

1 Q. Where was it deposited?

2 A. You have it in the back of the check.  
3 Bank of America.

4 Q. Which Bank of America branch? Do you  
5 know where that account is at?

6 A. That's personal information.

7 MR. BOCKSTEIN: That's regarding  
8 this business transaction.

9 THE WITNESS: In Coral Springs.

10 BY MR. O'SHEEHAN:

11 Q. I thought the company only had a  
12 business account in --

13 A. That's my personal account that it was  
14 deposited in. It was made out to me personally  
15 because the check bounced and my bank would not  
16 accept another check from Brian Styles.

17 MR. BOCKSTEIN: Which bank?

18 THE WITNESS: Laurentian Bank  
19 account.

20 BY MR. O'SHEEHAN:

21 Q. You said that the reason that that  
22 \$1,200 check originally made payable to Movie  
23 Star Muscle Cars was then requested to be made  
24 payable to you was because the bank would not  
25 take a check from Brian Styles?

1           A.    They would take it, but they would want  
2           to hold it now for an extended period of time  
3           because of the history.

4           Q.    Prior to this, isn't it true that you  
5           also received checks from Brian Styles?

6           A.    I'd like to see the original on that  
7           one. I don't recall. And I'm in the process of  
8           verifying the record of it, who that check was  
9           made out to and where it was deposited into.

10                   Do you have the backup on that?

11           MR. STYLES: Uh-huh.

12           THE WITNESS: Is that the \$12,000  
13           check?

14           MR. STYLES: That's the 10,000.

15           THE WITNESS: The 12,000. I would  
16           like to see the back of that check. I  
17           would actually like to see the  
18           originals.

19           MR. STYLES: We'll have to request  
20           them.

21           THE WITNESS: Please.

22           MR. BOCKSTEIN: We're getting past  
23           the venue part of this and jurisdiction  
24           part of this. We're getting into the  
25           meat of the case.

1           MR. O'SHEEHAN: As to Dan Pronman  
2           doing business in Broward County on  
3           behalf of Movie Star Muscle Cars?

4           MR. BOCKSTEIN: Right. He admits  
5           he does business in Broward County on  
6           behalf of Movie Star Muscle Cars, so we  
7           don't have to get into every transaction  
8           about it unless you guys don't mind. As  
9           far as I'm concerned, this is really  
10          only about jurisdiction and venue, so we  
11          don't have to get into anything else.

12          We may have to get into this later  
13          anyway, so if you want, you can go  
14          forward with this or we can object. The  
15          Judge said it's only as to venue and  
16          jurisdiction. We already admitted that  
17          we're doing business.

18 BY MR. O'SHEEHAN:

19          Q. Personally doing business or --

20          A. Movie Star Muscle Cars.

21          MR. BOCKSTEIN: And the reason I  
22          say the objection is because I really  
23          don't want to be here all day going into  
24          that part of the case if we don't have  
25          to, which I'd rather do later, if it is

1           necessary.

2           BY MR. O'SHEEHAN:

3           Q.     Back to the e-mail addresses.

4           Autocollection2@aol.com, do you know that e-mail  
5           address?

6           A.     Yes.

7           Q.     Whose e-mail address is that?

8           A.     It's, again, another e-mail address in  
9           order to avoid the problems that I'm having with  
10          the Garypronman.com website set up by Brian  
11          Styles.

12          Q.     What about Dansmopar@aol.com?

13          A.     That is my e-mail address.

14          Q.     Does anyone else use that?

15          A.     Nope. I don't believe so.

16          Q.     Do you use that personally or on behalf  
17          of the business or both?

18          A.     Little of both, I would assume.

19          Q.     If somebody was going to -- does the  
20          company have its own e-mail address?

21          A.     No, it does not. GPmusclecars is the  
22          one we use for our company.

23          Q.     And also Dansmopar?

24          A.     Correct.

25          Q.     The domain name website,

1 Moviestarmusclecars.com, is it owned by Movie  
2 Star Muscle Cars?

3 A. Well, technically it's owned by -- it's  
4 owned by Movie Star Muscle Cars. But,  
5 technically, I'm the one that opened it up, that  
6 registered the name. So I guess it's under my  
7 personal name when you register it.

8 Q. On the exhibit -- which exhibit is it  
9 that has a copy from the website?

10 Do you agree that the printout from the  
11 website says that there is an office in Coral  
12 Springs, Florida?

13 A. There's not an office in Florida, no.

14 Q. Do you agree that the printout from the  
15 Movie Star Muscle Cars website says that there's  
16 an office in Coral Springs, Florida?

17 A. Not necessarily.

18 Q. Okay. What does --

19 A. It says the offices and shop, which is  
20 the head office, which is in Laval, Quebec, St.  
21 Vincent, Laval.

22 Q. Please read verbatim.

23 A. It says, "With offices also at 5754  
24 Northwest 120th Avenue, Coral Springs, Florida  
25 33076. We ship in and out of the U.S."

1           That was referring to the e-mail address  
2           and phone number for my brother, for his personal  
3           residence.

4           Q.    Show me the e-mail address on Exhibit 2.

5           A.    GPmusclecars.

6           Q.    Show me an e-mail address?

7           A.    GPmusclecars.

8           Q.    If you typed in "GPmusclecars" and hit  
9           send, would that go to your brother?

10          A.    I have no idea.  I've never done it.  I  
11          can't tell you.

12          Q.    And where is the phone number for your  
13          brother?

14          A.    The phone number for my brother would be  
15          probably on another page.

16          Q.    Underneath the five boxes at the top,  
17          would you read those words there?

18          A.    It says, "About Movie Star Muscle Cars."

19          Q.    So it's about Movie Star Muscle Cars.  
20          Doesn't that page say there's offices in Coral  
21          Springs, Florida?

22          A.    If that's what you're inferring it to  
23          say, that's not correct.

24          Q.    Is this website put out -- is this Movie  
25          Star Muscle Cars' website?

1 A. Yes, it is.

2 Q. Is one of the purposes of Movie Star  
3 Muscle Cars' website for people to be able to  
4 contact Movie Star Muscle Cars?

5 A. The basic reason for that is for people  
6 to go on the website and see cars being restored  
7 for basically a research purpose of what the  
8 major aspect of that website is for.

9 Q. And to advertise and for people to  
10 contact you to do business with you?

11 A. Correct.

12 Q. And to make money as part of your  
13 business?

14 A. At times.

15 Q. Other domain names,  
16 classicmusclecarrestoration.com.

17 A. That has nothing to do with us, I  
18 believe. I've never heard of that and I've never  
19 seen it.

20 Q. What about Canadianbuyflorida.com?

21 A. Yeah, that is mine. I must attest to  
22 that. I opened that up about six months ago.

23 Q. Is that part of Movie Star Muscle  
24 Cars --

25 A. No.

1 Q. -- or is it separate?

2 A. It's just an idea that I have been  
3 toying with.

4 Q. What is it? -

5 A. It has no bearing on the case. Just  
6 something else I've been looking into.

7 Q. Does it deal with cars?

8 A. No, it does not. There's nothing. No  
9 company. No nothing. Besides the \$10  
10 registration fee. There is no website.

11 Q. Do you have a U.S. Social Security  
12 Number?

13 MR. BOCKSTEIN: Object to anything  
14 personal about his U.S. Social Security  
15 Number.

16 BY MR. O'SHEEHAN:

17 Q. I'm not asking what it is. I'm just  
18 asking if you have one.

19 MR. BOCKSTEIN: You can answer.

20 THE WITNESS: Yes.

21 BY MR. O'SHEEHAN:

22 Q. How long have you had it?

23 A. I'm not sure. I'd have to check.

24 Q. How would you check to find that out?

25 A. I would see what date I got it. I don't

1 know. I'm sure I have it some place in a vault.  
2 I guess it would say it in the card, I assume.

3 Q. And if we send you a Request to Produce,  
4 would you send us a copy of that?

5 A. No.

6 Q. You can redact the number if it's got a  
7 date on there.

8 MR. BOCKSTEIN: You don't have to  
9 send him the number, but you can show  
10 him the date you got it.

11 Do you have any idea when you got  
12 it, approximately, how long ago?

13 THE WITNESS: Months.

14 MR. BOCKSTEIN: Within the last  
15 year?

16 THE WITNESS: I believe so.

17 MR. BOCKSTEIN: Okay. Is that  
18 enough or do you need the exact date?

19 BY MR. O'SHEEHAN:

20 Q. Would you sign a consent where we can  
21 get that information from the IRS if you don't  
22 have it, as long as we don't get your Social  
23 Security Number?

24 A. No. I do not sign a consent to get any  
25 of that kind of information based on the

1 circumstances.

2 Q. Do you file income taxes in the United  
3 States?

4 MR. BOCKSTEIN: Object to that. It  
5 has nothing to do with jurisdiction or  
6 venue.

7 BY MR. O'SHEEHAN:

8 Q. Does Movie Star Muscle Cars pay any  
9 employees?

10 A. Yes, it does.

11 Q. Does it pay any employees in Florida?

12 A. No, it does not.

13 Q. Does Movie Star Muscle Cars distribute  
14 any dividends or profits to owners in Florida?

15 A. I'd have to check my records to see when  
16 the last time any dividends have been disbursed.

17 Q. Does Movie Star Muscle Cars pay any  
18 paychecks to employees in the United States?

19 A. No, it does not.

20 Q. How many employees does Movie Star  
21 Muscle Cars pay paychecks to?

22 A. Depending on the time, you know,  
23 anywhere from three to eight. It varies by week  
24 and month.

25 Q. Does Gary Pronman receive any income

1 from Movie Star Muscle Cars of any form?

2 A. Yes, he does.

3 Q. What form does he receive?

4 A. I don't think it's dividends. I would  
5 have to check exactly how it's booked up, but he  
6 definitely does get some money from Movie Star  
7 Muscle Cars.

8 Q. Do you know if that gets by check or  
9 direct deposit?

10 A. It would be direct deposited into the  
11 bank.

12 Q. The bank in the United States?

13 A. No, it's in Canada.

14 Q. What bank is that?

15 A. I can't tell you off the top of my head.  
16 It comes from Laurentian Bank account. I didn't  
17 come prepared with that information.

18 Q. Is it on a regular basis?

19 A. No, it's on an irregular basis.

20 Q. Is that paycheck to Gary Pronman?

21 A. Again, I've got to verify how it's  
22 booked. In Canada, there's a few different  
23 categories. I'm not sure exactly how it's  
24 booked.

25 Q. There are other employees there --

1           A.    Yes, there are.

2           Q.    -- who do get paychecks?

3           A.    Regular paychecks, yes.

4           Q.    And are income taxes withheld?

5           A.    Yes.

6           Q.    From Canadian taxes?

7           A.    Yes.

8           Q.    And the monies that go to Gary, you're

9           not sure how it's booked, but do you know if

10          taxes are withheld from that money?

11          A.    I believe so, yes. I'd have to verify.

12          I wouldn't say 100 percent, but I would believe

13          so.

14          Q.    Who would have those records?

15          A.    It would be in my bookkeeping office.

16          Q.    Is that bookkeeping office in Movie Star

17          Muscle Cars?

18          A.    Movie Star Muscle Cars, yes.

19          Q.    Not a separate account in your office?

20          A.    No.

21          Q.    Do you file taxes in the United States?

22          MR. BOCKSTEIN: I'm going to

23          object. It has nothing to do with the

24          business, but I'll let you answer it

25          over the objection.

1 Do you?

2 THE WITNESS: I have.

3 BY MR. O'SHEEHAN:

4 Q. Do you file single or married jointly or  
5 married separately?

6 A. I honestly don't know the answer to  
7 that. I'd have to look at it and find out. I'm  
8 not sure.

9 Q. Did you file taxes yet for 2009?

10 A. Again, it's close. I know it's been  
11 worked on, but I'm not sure.

12 Q. Did you file taxes for 2008?

13 A. 2008.

14 Q. You also do taxes in Canada?

15 A. Yes.

16 Q. For yourself?

17 A. Yes.

18 Q. And on behalf of the company?

19 A. Yes, of course.

20 Q. Does your wife file taxes in Canada?

21 A. Yes, I believe so.

22 Q. In the last five years, have you or your  
23 spouse paid real estate taxes in Florida?

24 A. I did on my condo. I guess it's in my  
25 name, so I guess it was considered that I paid

1 the taxes.

2 Q. What about in the last five years, have  
3 you or spouse paid any real estate taxes on any  
4 real property in Quebec?

5 A. My wife did on her property, and I might  
6 have in that piece of land, also.

7 Q. Where did you get that piece of land  
8 from?

9 A. Oh, I bought it 20 years ago.

10 Q. Do you have a Canadian Registered  
11 Retirement Savings Plan?

12 MR. BOCKSTEIN: I will object to  
13 that. That has nothing to do with  
14 jurisdiction or venue.

15 BY MR. O'SHEEHAN:

16 Q. Does your spouse have a Canadian  
17 Registered Retirement Savings Plan?

18 MR. BOCKSTEIN: I will object to  
19 any questions regarding his spouse.

20 BY MR. O'SHEEHAN:

21 Q. Do you have a 401-K or other retirement  
22 plan in the United States?

23 A. Nope.

24 Q. Does your spouse?

25 MR. BOCKSTEIN: Object to anything

1           regarding his spouse.

2           BY MR. O'SHEEHAN:

3           Q.    Do you have any credit cards or check  
4           cards or debit cards in the name of Movie Star  
5           Muscle Cars?

6           A.    No credit cards.  There is what they  
7           call a deposit card.  I don't know if you're  
8           considering that to be a check card, but it's not  
9           really -- deposits are basically done at the  
10          counter, but I guess that's what you call --

11          MR. STYLES:  It's a Visa or Master  
12          Card to make purchases?

13          THE WITNESS:  No, nothing like  
14          that.  Just a regular, where you can  
15          deposit, put in your card and do your  
16          deposits through the machine.

17          MR. STYLES:  More like an ATM card?

18          THE WITNESS:  Yes, that's exactly  
19          what it is.

20          BY MR. O'SHEEHAN:

21          Q.    Can you take money out with that?

22          A.    No.

23          Q.    What bank is that account with?

24          A.    The Laurentian Bank account.

25          Q.    Do you have any credit cards or debit

1 cards in your own name from the United States  
2 banking institutions?

3 MR. BOCKSTEIN: I'm going to object  
4 to that. That has nothing to do with  
5 venue or jurisdiction. But over my  
6 objection -- all right, we will object  
7 to that question.

8 BY MR. O'SHEEHAN:

9 Q. Other than Bank of America, do you have  
10 any other accounts at bank institutions in the  
11 United States?

12 MR. BOCKSTEIN: On behalf of Movie  
13 Star Muscle Cars?

14 MR. O'SHEEHAN: No, on behalf of  
15 Dan Pronman.

16 MR. BOCKSTEIN: I'm going to  
17 object. It's a personal question. It  
18 has nothing to do with jurisdiction or  
19 venue.

20 BY MR. O'SHEEHAN:

21 Q. Does Movie Star Muscle Cars have any  
22 other bank accounts?

23 A. No. Excuse me, can you rephrase that  
24 question?

25 Q. Any other bank accounts at any other

1 banks other than --

2 A. No.

3 Q. -- the Laurentian Bank account?

4 A. No, just Laurentian Bank of Canada.

5 Q. Do you or your spouse derive any income  
6 from any Canadian assets?

7 A. Do you want to split that question?

8 Q. Does your spouse derive any income from  
9 any --

10 MR. BOCKSTEIN: I'm going to object  
11 to anything regarding his spouse's  
12 income in Canada.

13 BY MR. O'SHEEHAN:

14 Q. Do you derive any income from any assets  
15 in Canada?

16 MR. BOCKSTEIN: Are you talking  
17 about other than Movie Star Muscle Cars?

18 MR. O'SHEEHAN: Yes.

19 THE WITNESS: No.

20 BY MR. O'SHEEHAN:

21 Q. Do you have any other business or any  
22 other income other than Movie Star Muscle Cars?

23 MR. BOCKSTEIN: Do you have any  
24 other business other than Movie Star  
25 Muscle Cars?

1 THE WITNESS: No, I have no other  
2 business and no, I have no other income.

3 BY MR. O'SHEEHAN:

4 Q. Do you derive any income from any  
5 Florida assets, other than the Deerfield condo we  
6 already spoke of?

7 A. No.

8 Q. Does your spouse derive any income from  
9 any Florida assets?

10 MR. BOCKSTEIN: Objection to  
11 anything regarding his spouse.

12 BY MR. O'SHEEHAN:

13 Q. What vehicles do you own that are titled  
14 or registered in the State of Florida?

15 A. I have a 2000 Mercedes and I've got two  
16 2003 Mustangs.

17 Q. How long have you had the Mercedes?

18 A. Eight months.

19 Q. What about the Mustangs?

20 A. One, I guess about almost a year and the  
21 other one for -- the other one for, I guess, six  
22 years.

23 Q. Prior to the Mercedes --

24 A. Just to clarify, it wasn't a Florida  
25 car, the six-year Mustang, it was a Canadian car.

1 It's only been Florida for a year.

2 Q. Where is the 2000 Mercedes? Where is it  
3 registered at, what address?

4 A. I am not sure. I believe -- I'd have to  
5 check that for you. It is definitely not -- I  
6 don't know actually.

7 MR. STYLES: Can you remember if  
8 it's Canada or Florida?

9 THE WITNESS: No, it's Florida.  
10 It's definitely registered in Florida.

11 BY MR. O'SHEEHAN:

12 Q. What about the two Mustangs, are they  
13 registered in Florida?

14 A. They are presently registered in  
15 Florida, yes.

16 Q. Prior to the 2000 Mercedes that you say  
17 you've had for about eight months, did you have  
18 another car?

19 A. Did I have another car?

20 Q. Other than the two Mustangs.

21 A. No.

22 Q. Were you driving one of the Mustangs  
23 prior to that in Florida?

24 A. Yes.

25 Q. Which one was it?

1           MR. BOCKSTEIN: I'm going to object  
2           to that. It has nothing to do with  
3           whether he has a car in Florida.

4 BY MR. O'SHEEHAN:

5           Q. Currently you have three cars registered  
6           in your name in Florida?

7           A. Correct.

8           Q. And are they titled in your name also?

9           A. Yes, they are.

10          Q. Have you been employed by any company in  
11          the State of Florida in the last ten years?

12          A. No.

13          Q. Have you done any independent contractor  
14          work for any company in Florida in the last ten  
15          years?

16          A. No.

17          Q. Does Movie Star Muscle Cars do any  
18          banking with Bank of America?

19          A. No.

20          Q. Did it ever?

21          A. No.

22          Q. How would you describe what the business  
23          is of Movie Star Muscle Cars?

24          A. Buy and sell and restore classic muscle  
25          cars, collectible vehicles.

1 Q. When you're doing business, do you  
2 always do business as Movie Star Muscle Cars, the  
3 corporation, or do you sometimes operate  
4 individually?

5 A. As a corporation.

6 Q. The checks payable out of the business  
7 generated by Movie Star Muscle Cars, would they  
8 always be payable to Movie Star Muscle Cars?

9 A. Almost always.

10 Q. And if not, why not?

11 A. If not, why not?

12 Well, if there are issues for clearing  
13 time or any other issues, as far as, you know,  
14 funds not being cleared. It's on occasion. It  
15 will be written out to my personal name.

16 Q. And then what happens with those funds  
17 that are written out to you personally?

18 A. What happens with the funds?

19 Q. Yes.

20 A. Either I will transfer it directly back  
21 or I will book it back and take the tax. Either  
22 way.

23 Q. Do you know what happened with the  
24 \$10,000 that was paid by Brian Styles to you  
25 directly?

1 A. No.

2 Q. Do you know what happened with the  
3 \$12,000 that was paid by Brian Styles to you  
4 directly?

5 A. I'd like to verify that was. I would  
6 like to get a copy of the original. I don't know  
7 what happened, if that was actually paid to me  
8 directly. I'd like to verify that.

9 MR. BOCKSTEIN: We're getting  
10 beyond jurisdiction and venue now, so I  
11 am going to object.

12 BY MR. O'SHEEHAN:

13 Q. I'm looking at the \$10,000 check. I'd  
14 like to show you that it has your name and 5740  
15 Northwest 120th Avenue in Coral Springs.

16 A. Uh-huh.

17 Q. Do you know how that --

18 MR. O'SHEEHAN: We'll make that as  
19 an exhibit.

20 MR. BOCKSTEIN: This check has  
21 nothing to do with the Super Bee that  
22 we're talking about. It has nothing to  
23 do with venue or jurisdiction.

24 MR. O'SHEEHAN: It's got Dan  
25 Pronman's name and a Coral Springs

1 address.

2 THE WITNESS: I didn't write it. I  
3 didn't write it.

4 BY MR. O'SHEEHAN:

5 Q. Did you accept it?

6 MR. BOCKSTEIN: He's admitting that  
7 he does business in the State of  
8 Florida. We've established that,  
9 through Movie Star Muscle Cars. You  
10 don't have to establish it through  
11 anything else. We've admitted that.

12 MR. O'SHEEHAN: Exhibit 8.

13 (Plaintiff's Exhibit No. 8 was  
14 thereupon marked for Identification.)

15 BY MR. O'SHEEHAN:

16 Q. Now, I just want some clarification,  
17 which will maybe help move things along.

18 You heard your counsel saying that  
19 you're admitting that you did business in Florida  
20 through Movie Star Muscle Cars?

21 A. What we do is do business all over the  
22 world. We are a corporation and we do business  
23 everywhere. We do not have an office. We do not  
24 have a company set up in Florida. We just do  
25 business. I can buy cars from anywhere. My home

1 base is still Quebec and all the business has to  
2 be declared there and booked through there. It  
3 doesn't matter where we buy cars.

4 Q. But the website page says that there's  
5 an office in Coral Springs, correct?

6 A. If the website page says it, it's  
7 obviously a typo because there is no office. It  
8 was done by my 13-old-son originally when it was  
9 set up, so it's possible that there are mistakes,  
10 many other mistakes in there that were just not  
11 corrected.

12 Q. But you do business on behalf of Movie  
13 Star Muscle Cars in Florida, correct?

14 A. I do business on behalf of Movie Star  
15 Muscle Cars all over the world. I'll buy cars  
16 from everywhere. Anyone who does business with  
17 me is doing business through Canada. The  
18 funds -- purchase orders are generated from  
19 Canada and everybody, whosoever done business  
20 with me, knows my business is in Canada.  
21 Everybody, including Mr. Styles.

22 Q. The check for \$10,000, you heard Gary  
23 testify that there's three payments, \$10,000.  
24 \$12,000 and a \$1,200 check?

25 A. Right.

1 Q. None of those payments were sent to  
2 Canada by Mr. Styles, correct?

3 A. That's why I want the hard copy on the  
4 12,000. I'd like to see it. I'm going to verify  
5 in my books to see exactly where these checks  
6 were booked.

7 Q. I didn't ask where they were booked. I  
8 said was it mailed by Mr. Styles to Canada?

9 A. The 1,200 was definitely mailed to  
10 Canada, absolutely, because it was deposited in  
11 my bank account.

12 Q. Was it mailed by Mr. Styles to Canada?

13 A. I don't know who mailed it out. How am  
14 I supposed to know that. I know I received it.

15 Q. Did you sit here and listen to your  
16 brother testify that he picked up the checks and  
17 Mr. Styles delivered checks to him in Coral  
18 Springs?

19 A. I do not know what transpired in the  
20 State of Florida when I was in Quebec. So for me  
21 to answer that question, it's impossible.

22 Q. In Quebec?

23 A. I received by mail some checks.

24 Q. From Mr. Styles?

25 A. I received 100 percent a \$1,200 check

1 from Mr. Styles.

2 Q. It was mailed from Mr. Styles to you?

3 A. I have no idea who mailed it. It was  
4 mailed to my office in Quebec and deposited into  
5 my bank in Quebec.

6 Who actually put it in a box, I have no  
7 idea.

8 Q. That's a check payable to Dan Pronman?

9 A. To Movie Star Muscle Cars, the 1,200.  
10 The \$12,000 check, again, I have to investigate.  
11 I'm waiting for some hard copy and I would like  
12 to see the hard copy of that check with the back,  
13 not just the front.

14 Q. Investigating what? What was the  
15 investigation?

16 MR. BOCKSTEIN: I'm going to  
17 object. That check has nothing to do  
18 with this particular case. Do we have  
19 the hard copy? Do we have the original  
20 check that we can supply to my client so  
21 he can look at it?

22 MR. STYLES: Which check?

23 MR. O'SHEEHAN: The \$12,000.

24 MR. STYLES: The 12,000, I believe  
25 it would need to be requested from the

1 bank.

2 THE WITNESS: You don't have a  
3 copy?

4 MR. STYLES: No, I have a copy.

5 THE WITNESS: No, I'm saying, you  
6 don't get the original back with your  
7 statement?

8 MR. STYLES: No, all digital  
9 imagining. The bank sends me digital  
10 images of the checks, but they do not  
11 include the back.

12 Northern Trust only does the front  
13 of checks. These, I do have copies of  
14 front and back which was from another  
15 bank, and they did provide them to me.

16 But they were specially requested  
17 from SunTrust Bank. So I will specially  
18 request this \$12,000 check from Northern  
19 Trust, and we will get you a copy of the  
20 back of that check.

21 MR. BOCKSTEIN: Okay. So you will  
22 be able to produce that to us?

23 MR. STYLES: Oh, yeah.

24 THE WITNESS: Give me a moment.

25 (Thereupon, a recess was taken, after

1           which the following proceedings were  
2           held:)

3       BY MR. O'SHEEHAN:

4           Q.    What are your daily responsibilities  
5       with regard to Movie Star Muscle Cars?

6           A.    Pretty much administrative.

7           Q.    What does that mean?

8           A.    Taking care of receivables, payables,  
9       bank, that type of stuff.

10          Q.    What about advertising, do you have  
11       anything to do with advertising?

12          A.    At times.   At times.

13          Q.    How does advertising get paid for?

14          A.    Usually from either a credit card,  
15       usually personal credit card.

16          Q.    You said there's no corporate credit  
17       card, correct?

18          A.    That's why it's personal.

19          Q.    Or it could be by check?

20          A.    Today it's almost exclusively paid as  
21       you call them.

22          Q.    What positions do you hold with the  
23       company?

24          A.    Excuse me?

25          Q.    What positions?

1           A.    I believe I'm the treasurer.  I'm not  
2   100 percent certain.  You have the documents.

3           MR. STYLES:  Secretary?  Treasurer?

4           THE WITNESS:  It says it in the  
5   documents.  I don't have it in front of  
6   me.  We submitted the docs.

7   BY MR. O'SHEEHAN:

8           Q.    Do you receive a paycheck from Movie  
9   Star Muscle Cars?

10          A.    I have over the years.

11          Q.    When was the last time you received a  
12   paycheck?

13          A.    I'd have to verify.  It's been a little  
14   while.  I have to verify.

15          Q.    What do you mean by "a little while"?

16          A.    Probably last year.  I don't know if  
17   there's been anything this year.

18          Q.    2009?

19          A.    Uh-huh.

20          Q.    When you receive income or payment from  
21   Movie Star Muscle Cars, is it always in the form  
22   of a paycheck for you?

23          A.    Again, I'd have to see.  Like I said,  
24   there's a few different categories.  I don't know  
25   exactly what my bookkeeper, how they do it.

1 Q. What are the categories?

2 MR. BOCKSTEIN: I'm going to object  
3 to interior business workings of Movie  
4 Star Muscle Cars. It has nothing to do  
5 with the venue or jurisdiction issue.

6 BY MR. O'SHEEHAN:

7 Q. You received paychecks in 2009 from  
8 Movie Star Muscle Cars, correct?

9 A. I believe. I'd have to verify. I'm not  
10 sure.

11 Q. You said you filed United States income  
12 tax returns?

13 A. I have.

14 Q. You also filed Canadian income tax  
15 returns?

16 A. I have to.

17 Q. The paychecks from Movie Star Muscle  
18 Cars, on what bank are they drawn?

19 A. Excuse me? Whose paychecks?

20 Q. From Movie Star Muscle Cars.

21 A. What bank are they drawn from?  
22 Laurentian Bank of Canada.

23 MR. BOCKSTEIN: Once again, I'm  
24 going to have a standing objection to  
25 the interior workings of Movie Star

1 Muscle Cars.

2 BY MR. O'SHEEHAN:

3 Q. With regard to the questions that I had  
4 asked Gary earlier about the website and the  
5 address being changed, do you know if the address  
6 was changed from 169 Mozart Street to the 1245 La  
7 Place Street?

8 A. Do I know if it has been changed?

9 Q. On the website.

10 A. When or how, I don't really recall. But  
11 169 Mozart, I guess after it was sold, it was the  
12 office that got the government paperwork. It was  
13 switched. So I guess it was switched at that  
14 point in time.

15 Q. All right. Where is the bookkeeping  
16 done out of?

17 A. Quebec.

18 Q. What address?

19 MR. BOCKSTEIN: I'm going to object  
20 again. Now we're going into the  
21 interior of the business.

22 BY MR. O'SHEEHAN:

23 Q. When did the business address change  
24 from 169 Mozart Street to 1245 La Place Street?

25 A. 2006, I would guess was when it was

1 opened or '05, '06. Maybe earlier. I'd have to  
2 check.

3 Q. All right. We're just about done.

4 With regard to doing business in Florida  
5 on behalf of Movie Star Muscle Cars, give me some  
6 of the names of individuals or companies that  
7 you've done business with in Florida in the last  
8 five years?

9 A. The name of --

10 Q. Persons or businesses that you've done  
11 business with?

12 MR. BOCKSTEIN: You're asking if  
13 Movie Star Muscle Cars has done business  
14 with people in Florida in the last four  
15 or five years?

16 THE WITNESS: He's asking who?

17 MR. BOCKSTEIN: You're asking for  
18 specific names?

19 MR. O'SHEEHAN: Yes.

20 MR. BOCKSTEIN: We're going to  
21 object to specific names. If you've  
22 done business in the State of Florida  
23 with Movie Star Muscle Cars in the last  
24 five years, I'll let you answer that  
25 question.

1 THE WITNESS: Yes.

2 BY MR. O'SHEEHAN:

3 Q. On more than one occasion?

4 A. I'd have to check. I don't know for  
5 sure how many occasions.

6 Q. Do you know if any of the dealings with  
7 Jurgen Stanley were conducted out of Florida?

8 MR. BOCKSTEIN: I'm going to once  
9 again object to any specific dealings  
10 that have nothing to do with this case.

11 BY MR. O'SHEEHAN:

12 Q. It has to do with whether Movie Star  
13 Muscle Cars was conducting business in Florida?

14 MR. BOCKSTEIN: They already said  
15 they did, that they --

16 THE WITNESS: No, not from Florida;  
17 in Florida. Big difference. Not from  
18 Florida.

19 BY MR. O'SHEEHAN:

20 Q. What is the difference to you?

21 A. Difference is if I purchase a car in  
22 Florida, I still operate my company out of  
23 Canada. I'm just making a purchase, which I  
24 purchase all over the world. There's a  
25 difference between in and from.

1 GARY PRONMAN: Hold on a second.

2 MR. O'SHEEHAN: Off the record.

3 (Thereupon, a discussion was held off  
4 the record.)

5 BY MR. O'SHEEHAN:

6 Q. What do you consider to be doing  
7 business in Florida? How would you define that?

8 A. If I purchased a car.

9 Q. What about if Gary is doing telephone  
10 calls from his house or receiving calls at his  
11 house or e-mails from his house about cars on  
12 behalf of Movie Star Muscle Cars?

13 A. He's still working for Movie Star Muscle  
14 Cars, which is Canadian, which is operating based  
15 on a Canadian operation.

16 I have a cell phone in my pocket. You  
17 have a cell phone. You can be anywhere in the  
18 world.

19 Do you work for Shutts if you're in  
20 California or if you're in Calgary? Where is  
21 your business? It doesn't matter where you are.  
22 Your phone is in your pocket, but your business  
23 is where your business is.

24 Q. So it doesn't matter if you're in  
25 Florida whether or not you're conducting business

1 in Florida?

2 A. If you're purchasing a car out of your  
3 Canadian company to be brought to Canada, that's  
4 doing business out of Canada.

5 Q. So if you purchased a car in Florida,  
6 you're doing business in Canada?

7 A. Absolutely.

8 Q. If you purchased a car in New York,  
9 you're doing business in Canada?

10 A. I'm doing business from Canada.

11 Q. If you physically traveled to New York  
12 and purchased a car?

13 A. It's absolutely business in Canada.  
14 Where do I declare the purchase, the income,  
15 everything has got to be done through Canada,  
16 through my company.

17 MR. BOCKSTEIN: I'm going to  
18 object. It's a legal conclusion where  
19 he's doing business and what "doing  
20 business" means in this particular case.  
21 I'm going to leave that up to the Court  
22 to decide what "doing business" means  
23 and what "doing business" doesn't mean.  
24 You can't ask them what "doing business"  
25 means because they don't know the legal

1           ramifications of whatever they're going  
2           to say.  If they've already said that  
3           they have a Canadian corporation and  
4           through that corporation, they do  
5           business in Florida, they do business  
6           all over the world.

7           BY MR. O'SHEEHAN:

8           Q.    What do you mean by "do business in  
9           Florida"?

10                  MR. BOCKSTEIN:  I'm going to  
11           object.

12           BY MR. O'SHEEHAN:

13           Q.    What did you mean by it?  What actions  
14           do people do that you consider doing business  
15           that you or Gary does on behalf of Movie Star  
16           Muscle Cars in Florida?

17           A.    Buying or selling collectible  
18           vehicles --

19           Q.    So --

20           A.    -- or booking restoration contracts from  
21           my operation.

22           Q.    So you and Gary have done those things  
23           in Florida on behalf of Movie Star Muscle Cars?

24           A.    I honestly cannot recollect what I have  
25           done.  I have to check it, what I personally have

1 done on behalf of Movie Star Muscle Cars.  
2 Because as I said, 90 percent of my time in the  
3 last 12 years has been operating out of a desk in  
4 Quebec.

5 Q. On the '71 Cuda that's on Exhibit 6, it  
6 has a phone number. Have you received any  
7 telephone calls about that car?

8 A. One from Mr. Styles' friend, absolutely.

9 MR. BOCKSTEIN: When you say has  
10 Dan Pronman received calls, do you mean  
11 on behalf of Movie Star Muscle Cars?

12 MR. O'SHEEHAN: Yes.

13 THE WITNESS: Only from one person,  
14 like I said, who was trying to harass me  
15 and stalk me, and that's the call that I  
16 got.

17 BY MR. O'SHEEHAN:

18 Q. Who was that from?

19 A. Who was the call from?

20 Q. Yes.

21 A. A gentleman named Rich.

22 Q. Rich what?

23 A. Rich P.

24 Q. That's his last name?

25 A. Pankz is his actual last name.

1           MR. STYLES: I want a clarification  
2           on that. You're stating that Richard  
3           Pankz harasses and stalks you?

4           THE WITNESS: No, he was verifying  
5           it was me for your purposes.

6           MR. BOCKSTEIN: I'm going to  
7           object. We're getting too far. If you  
8           want to ask anything about the specific  
9           jurisdiction or venue questions, fine,  
10          otherwise, we're getting too far.

11 BY MR. O'SHEEHAN:

12          Q. Has Movie Star Muscle Cars ever  
13          conducted business with or been involved in  
14          transactions with Richard Pankz in Florida?

15          A. Done business with, I doubt it. I  
16          really don't believe so. Has contacted in the  
17          past, absolutely.

18          Q. Contacted about what?

19          A. About different cars available and so on  
20          and so forth. But I don't recall ever -- I  
21          believe it's 12 years that I would have to check  
22          to see if there was any actual business with  
23          Richard Pankz.

24          Q. What about with regard to Robert  
25          McClelland? Have you or Gary done business on

1       behalf of Movie Star Muscle Cars with Robert  
2       McClelland or been involved in a transaction with  
3       Robert McClelland, that was involved in Florida?

4           A.     Yes, that would be the five-car deal  
5       that Brian Styles procured.

6           Q.     And where were those cars?

7           A.     Those cars were somewhere in Orlando, I  
8       believe.

9           Q.     And was Movie Star Muscle Cars involved  
10       in that transaction?

11          A.     Yes, they were.

12          Q.     And approximately when was that?

13          A.     February of '09.

14          Q.     Same question with regard to Stephen  
15       Fox. Has Movie Star Muscle Cars ever been  
16       involved in a transaction or conducted business  
17       with him in Florida?

18          A.     In Florida, no. He lives in Kentucky,  
19       so the business would have been involved in  
20       Kentucky.

21          Q.     Do you know if Gary had any dealings  
22       with Stephen Fox with regard to any transactions?

23          A.     In Kentucky, I would assume so.

24          Q.     Do you know if Gary had any  
25       communications with him from his home in Coral

1 Springs?

2 A. I don't know for a fact. I know that I  
3 deal with Steve the majority of the time so most  
4 of my contacts with Steve would be me from Quebec  
5 to Kentucky.

6 Q. When you say you deal with Steve on  
7 paying bills, you deal with Steve on  
8 administrative matters?

9 A. No, I do some. I deal with customers,  
10 when they call when I'm in the shop. They want  
11 to know about certain parts that are available or  
12 cars, if they have something to sell. They can  
13 call me, too.

14 Q. What about Phil Silva, have you worked  
15 with him or has Gary worked with him on behalf of  
16 Movie Star Muscle Cars?

17 A. Gary works with him, I believe, on  
18 behalf -- I didn't personally. I have spoken to  
19 him after the fact.

20 Q. Do you know if Gary worked with him from  
21 his house in Florida?

22 A. I believe he worked with him from Phil's  
23 house in Oklahoma or Texas. That's where he  
24 worked with Phil.

25 MR. STYLES: Just showed up without

1 calling first?

2 THE WITNESS: What's that?

3 MR. STYLES: Just showed up without  
4 calling first?

5 GARY PRONMAN: He's an attorney.

6 THE WITNESS: You're asking the  
7 questions?

8 MR. STYLES: Yes, that's the  
9 question.

10 THE WITNESS: You're asking the  
11 wrong person.

12 BY MR. O'SHEEHAN:

13 Q. Has Movie Star Muscle Cars done any  
14 business with any of the auctions,  
15 Barrett-Jackson, Mecum, R&M, within the State of  
16 Florida?

17 A. No, Mecum -- no, nothing was ever ever  
18 sold to Mecum. I believe the Toronto company  
19 called R&M, Movie Star Muscle Cars did business  
20 with through their -- they do the Florida  
21 auction. They are actually the dealer of record.

22 Movie Star Muscle Cars, they deal with  
23 clients all over the world and they are the ones  
24 that are the actual on premise dealer. They hold  
25 the license to deal in Florida. All the auction

1 companies do that.

2 So no matter where you sell a car, what  
3 auction, it's the auction company that has the  
4 business there. There, you are just a client of  
5 theirs. They come from everywhere.

6 Q. That's with regard to R&M?

7 A. All auction companies. Any auction  
8 company. They are the dealer of record.

9 Q. In Florida?

10 A. In any state. They have to have a  
11 license in every state where they hold auctions.  
12 It's not the vendor. It's the auction company.  
13 They are the dealer of record.

14 Q. Which ones have you done? Has Movie  
15 Star Muscle Cars done business within Florida?

16 A. With Barrett-Jackson -- no, not  
17 Barrett-Jackson. It was R&M.

18 Q. Which auction location was that?

19 A. That was Fort Lauderdale.

20 Q. What was the transaction or transactions  
21 that Movie Star Muscle Cars was involved in?

22 A. A car we sold.

23 Q. Do you know what car?

24 A. I'd have to check. I'm not sure. I  
25 don't recall.

1 Q. What year was it sold?

2 A. Four years ago, maybe, five years ago.  
3 Again, it's a long time ago. I'd have to check.

4 Q. Have you registered with any other of  
5 the auction companies when they're doing auctions  
6 in Florida? Has Movie Star Muscle Cars  
7 registered?

8 A. What do you mean "registered"?

9 Q. Have you attended as a registered bidder  
10 where you had to register?

11 A. I have to check. Sometimes I just go as  
12 a tourist or a registered bidder. I just pay my  
13 entry. I don't know for sure.

14 Q. And when you go as a registered bidder,  
15 do you register in your own name or on behalf of  
16 Movie Star Muscle Cars?

17 A. I don't recall. If it's a credit card,  
18 sometimes you have no choice. If they want a  
19 credit card -- I don't know. I have to check to  
20 see how it works.

21 Q. Which auctions have you gone to in  
22 Florida?

23 A. In Florida?

24 Q. In the last three years, yes.

25 A. Barrett-Jackson once and that was in

1 Fort Lauderdale.

2 Q. Where is Barrett-Jackson located?

3 A. Palm Beach.

4 GARY PRONMAN: Palm Beach.

5 BY MR. O'SHEEHAN:

6 Q. And R&M did the --

7 A. The Fort Lauderdale one. I think that's  
8 it in the last few years.

9 Q. Any in the middle of the state?

10 A. Mecum a few years ago maybe, but I don't  
11 know. I don't recall how I was registered.

12 Q. Where would that one be?

13 A. In the Orlando area, Kissimmee.

14 Q. What business has been conducted with  
15 Brian Styles?

16 A. What business?

17 Q. Yes.

18 A. Well, there's numerous --

19 MR. BOCKSTEIN: Hold on. This has  
20 nothing to do with venue or  
21 jurisdiction, and we've been here since  
22 10:00 o'clock. It's now 20 to 3:00, and  
23 I'm not going to let this go into the  
24 details of the events of this particular  
25 case. The Judge limited this to venue

1           and jurisdiction. We can get into this  
2           another time.

3       BY MR. O'SHEEHAN:

4           Q.    Other than the 1969 Super Bee, what  
5       transactions has Movie Star Muscle Cars  
6       supposedly done with Mr. Styles in Florida?

7           MR. BOCKSTEIN:  Objection.

8           MR. O'SHEEHAN:  Are you just  
9       objecting?  You said I can't talk about  
10      the specific transaction, so I didn't.  
11      Now I'm talking about other  
12      transactions.

13          MR. BOCKSTEIN:  All right.  You can  
14      talk about it.  I just don't want to be  
15      here for too much longer.

16          Go ahead and tell him.

17          THE WITNESS:  We had some brokerage  
18      agreement to buy and sell collectible  
19      cars.

20      BY MR. O'SHEEHAN:

21          Q.    Anything that evidences that that was  
22      done with Movie Star Muscle Cars as opposed to  
23      the Gary Pronman, individually, or Dan Pronman,  
24      individually?

25          A.    Yes.

1 Q. What?

2 A. I have checked the mails. I have wire  
3 deposits. I have buyer's orders. I have  
4 invoices. I have a lot of stuff.

5 Q. We are not talking about the Super Bee  
6 deal?

7 A. I'm talking about all the other events.

8 Q. Yes?

9 A. Yes.

10 Q. What are the other events? There's a  
11 five-car deal and what else?

12 MR. BOCKSTEIN: He said he had  
13 other transactions with him. That's all  
14 you need. We don't have to get into the  
15 details of all the other transactions.  
16 We are talking about venue and  
17 jurisdiction. You don't need anything  
18 else. I'll object to anything else.

19 MR. O'SHEEHAN: So we can't ask  
20 about the specific transaction because  
21 it's on the jurisdiction and venue? If  
22 I want to talk about other transactions  
23 that would have established jurisdiction  
24 or venue, I can't talk about those?

25 MR. BOCKSTEIN: They admit that

1           they had other transaction.

2           They already said they had  
3           transactions with him in the State of  
4           Florida on behalf of Movie Star Muscle  
5           Cars, but we don't have to get into the  
6           details of all that. The Judge said  
7           this is just venue and jurisdiction.

8           MR. O'SHEEHAN: Just to be clear,  
9           they admit that they had transactions  
10          with Mr. Styles on behalf of Movie Star  
11          Muscle Cars in Florida with the caveat  
12          that they claim everything they do is  
13          from Canada?

14          MR. BOCKSTEIN: You heard that over  
15          and over again during these depositions,  
16          yes.

17          MR. O'SHEEHAN: And they've also  
18          done business with other individuals or  
19          companies in Florida on behalf of Movie  
20          Star Muscle Cars, but also with the  
21          caveat that they claim everything they  
22          do is out of Canada?

23          MR. BOCKSTEIN: As well as other  
24          places in the world, other states,  
25          correct.

1 BY MR. O'SHEEHAN:

2 Q. Have you or Gary negotiated on behalf of  
3 Movie Star Muscle Cars while you were located in  
4 the State of Florida?

5 A. I haven't. I definitely haven't.  
6 Whether Gary was or wasn't, I can't say for  
7 sure -- where he was at any given time. But I  
8 definitely have not.

9 Q. Have you or Gary received payment on  
10 behalf of Movie Star Muscle Cars in the State of  
11 Florida?

12 MR. BOCKSTEIN: We've already  
13 established that. Asked and answered.

14 MR. O'SHEEHAN: I didn't ask him  
15 that question.

16 MR. BOCKSTEIN: You not only asked  
17 him the question, you showed him checks.

18 MR. O'SHEEHAN: That was him, two  
19 different people.

20 MR. BOCKSTEIN: It was him, too.

21 THE WITNESS: Have we received --

22 BY MR. O'SHEEHAN:

23 Q. Payment on behalf of Movie Star Muscle  
24 Cars in the State of Florida?

25 A. We picked up payment from what I

1 believe, yes.

2 Q. From Mr. Styles?

3 A. That's the only one, yes.

4 Q. That would be the only one?

5 A. Or that I recall.

6 MR. BOCKSTEIN: The objection is  
7 that that has nothing to do with the  
8 Super Bee. I believe those were other  
9 transactions. This particular  
10 transaction, the funds were wired to  
11 Canada.

12 MR. O'SHEEHAN: You're saying we  
13 can't talk about that transaction?

14 MR. BOCKSTEIN: Yes. You're not  
15 going to get into these other  
16 transactions.

17 MR. O'SHEEHAN: It's to establish  
18 whether there's jurisdiction or venue  
19 with Movie Star Muscle Cars in the State  
20 of Florida.

21 MR. BOCKSTEIN: You've done that  
22 already.

23 MR. O'SHEEHAN: I've established  
24 that?

25 MR. BOCKSTEIN: You haven't

1           established it. You've asked questions  
2           about it already and they've answered  
3           those questions.

4           MR. O'SHEEHAN: He has and now it's  
5           his turn.

6           MR. BOCKSTEIN: I believe you've  
7           asked those questions. Go ahead.

8           THE WITNESS: Go ahead.

9           BY MR. O'SHEEHAN:

10          Q. Do you know in the advertisement that we  
11          looked at with Gary, Advertisements 3, 4 and 5,  
12          each one of them indicates "Fl" in the  
13          advertisement for Florida?

14          A. Do I know why?

15          Q. Yes.

16          A. How would I know why? I didn't produce  
17          these. I have no idea.

18          Q. You didn't do those ads?

19          A. I didn't write the ads. The magazine  
20          does it. I have no idea.

21          Q. Did you contact the magazine to have the  
22          ads placed?

23          A. No.

24          Q. Do you know who did?

25          A. I can't tell you for sure. I would

1 guess probably it would be Gary, but I can't tell  
2 you for sure.

3 Q. And two of them are the same?

4 A. Uh-huh.

5 Q. And all the ads has a 561 area code  
6 phone number to contact, correct?

7 A. That's Gary's number.

8 Q. Which is a Florida phone number?

9 A. Uh-huh, that's correct.

10 Q. So they would be contacting Gary in his  
11 capacity --

12 A. In Movie Star Muscle Cars.

13 Q. In Florida?

14 A. No, Montreal.

15 Q. They would be calling a 561 number,  
16 which is a Florida number, right?

17 A. Right, and he would be receiving Movie  
18 Star Muscle Cars in Montreal.

19 Q. Do you have a business card?

20 A. No, not on me.

21 Q. Do you have one?

22 A. I have some business cards, yes.

23 Q. Okay.

24 MR. STYLES: I'm good.

25 MR. O'SHEEHAN: That's all the

1           questions we have. We're going to order  
2           this, also.

3                     MR. BOCKSTEIN: We're going to  
4           waive.

5                     (Thereupon, the deposition was  
6           concluded at 2:45 p.m.)

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CERTIFICATE OF OATH

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STATE OF FLORIDA )  
COUNTY OF MIAMI-DADE )

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

WITNESS my hand and official seal this 1st  
day of March, 2010.

---

MARIA ISABEL FERNANDEZ  
Notary Public - State of Florida  
My Commission No. DD 821014  
Expires: October 27, 2012

CERTIFICATE OF REPORTER

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STATE OF FLORIDA :  
: SS.  
COUNTY OF MIAMI-DADE :

I, MARIA ISABEL FERNANDEZ, Registered Professional Reporter and Notary Public in and for the State of Florida at Large, do hereby certify that I reported the deposition of DAN PRONMAN, a witness called by the Plaintiff in the above-styled cause; that said witness was duly sworn in by me; and that the foregoing pages, numbered from 1 to 96, inclusive, constitute a true and correct transcription of my shorthand report of the deposition by said witness.

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

WITNESS my hand and official seal in the City of Miami, County of Miami-Dade, State of Florida, this 1st day of March, 2010.

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MARIA ISABEL FERNANDEZ