

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 GARY PRONMAN**

Plaintiff, BRIAN STYLES, by and through undersigned counsel, hereby files the deposition transcript of Gary 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**

*Counsel for Plaintiff*

200 East Broward Boulevard

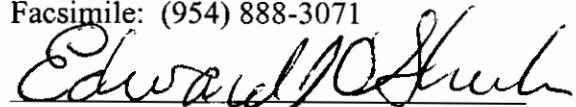
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By:



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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.

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200 East Broward Boulevard  
Suite 2100  
Ft. Lauderdale Florida  
Wednesday, February 17, 2010  
10:20 a.m.

DEPOSITION OF GARY 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  
Dan Pronman

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GARY PRONMAN

was called as a witness by the Plaintiff and,  
after having been first duly sworn, was examined  
and testified as follows:

DIRECT EXAMINATION

BY MR. O'SHEEHAN:

Q. Could you please state your full name?

A. Gary Elden Pronman.

Q. Mr. Pronman, have you ever had your  
deposition taken before?

A. Yes.

Q. How many times?

A. I don't recall. More than once, I  
think.

Q. In connection with what?

A. A lawsuit with my house.

Q. The house where?

A. In Florida.

Q. When was that?

A. It was over the last two years. I don't  
remember the exact date.

Q. Is it still going on?

A. Oh, no. It's been completed.

Q. Okay. You've been deposed before.

1 There was a court reporter there and we have a  
2 court reporter here today.

3 She's already interrupted you. We have  
4 to make sure of a couple of things. She is  
5 taking everything down so only one person can  
6 speak at a time. You have to speak loud enough  
7 and clear enough for her to hear.

8 A. Okay.

9 Q. You can't nod your head or shake your  
10 head, because everything has got to be verbal for  
11 her to take it down.

12 If you don't understand something I'm  
13 asking --

14 A. I'll ask you again.

15 Q. Yes.

16 If you are giving us answers, we are  
17 assuming you're understanding the questions.

18 A. Okay.

19 Q. How is your health today?

20 A. Pardon me?

21 Q. How is your health?

22 A. How is my health? Okay.

23 Q. Are you taking any medications or  
24 anything that would affect your ability to give a  
25 deposition today?

1 A. No.

2 Q. What is your date of birth?

3 A. That's personal information. I'm not  
4 disclosing any personal information. I'm sorry.

5 MR. BOCKSTEIN: I'm going to  
6 object. The Judge has already ruled  
7 that this deposition is for venue  
8 purposes only, so we will expect only  
9 venue questions.

10 This lawsuit is as a result of the  
11 plaintiff purchasing luxury cars and  
12 collectible cars from a Canadian  
13 corporation, and that's the venue that  
14 we're looking for here and those are the  
15 questions that we would expect and those  
16 are the questions that we will answer.

17 BY MR. O'SHEEHAN:

18 Q. What is your date of birth?

19 A. I just --

20 MR. BOCKSTEIN: Object. It has  
21 nothing to do with venue.

22 BY MR. O'SHEEHAN:

23 Q. Where were you born?

24 A. Again.

25 MR. BOCKSTEIN: You can tell him.

1 THE WITNESS: No.

2 MR. BOCKSTEIN: I will object.

3 Nothing to do with venue.

4 MR. O'SHEEHAN: It has to do with  
5 venue.

6 THE WITNESS: No, it doesn't.

7 MR. O'SHEEHAN: Because it has to  
8 do where he's a citizen of and where he  
9 resides. That's venue.

10 MR. BOCKSTEIN: If you ask him  
11 where he resides, he will tell you.

12 BY MR. O'SHEEHAN:

13 Q. Where were you born?

14 A. I'm a citizen of Canada and I am Florida  
15 resident.

16 Q. Where were you born?

17 A. Object.

18 MR. BOCKSTEIN: Tell him where you  
19 were born.

20 THE WITNESS: I object.

21 MR. BOCKSTEIN: I'm going to  
22 object.

23 THE WITNESS: I'm not going to  
24 answer that question.

25 MR. BOCKSTEIN: It has nothing to

1 do with venue.

2 BY MR. O'SHEEHAN:

3 Q. Where were you born?

4 A. Okay. This is over.

5 MR. BOCKSTEIN: Don't leave.

6 THE WITNESS: Listen, this is  
7 ridiculous. He's asking questions ten  
8 times.

9 MR. BOCKSTEIN: Gary, you're not  
10 supposed to leave.

11 Go see if you can get him back.

12 DAN PRONMAN: Let him cool off for  
13 a minute.

14 MR. O'SHEEHAN: Go off.

15 (Thereupon, a discussion was held off  
16 the record.)

17 BY MR. O'SHEEHAN:

18 Q. One of the reasons I'm asking you where  
19 you were born is because there are Broward County  
20 court records that say that you were born  
21 somewhere.

22 A. Okay. Then that's fine.

23 Q. Were you born in New York?

24 A. Again, asked and answered.

25 Q. It has not been answered.

1           MR. BOCKSTEIN: We're going to  
2           object to any question where he was  
3           born. It has nothing to do with the  
4           venue in this case.

5           MR. O'SHEEHAN: It does have to do  
6           with venue, but we'll go on.

7 BY MR. O'SHEEHAN:

8           Q. Are you a Canadian citizen?

9           A. Yes.

10          Q. How long have you been a Canadian  
11          citizen?

12          A. As long as I can remember.

13          Q. How did you become a Canadian citizen?

14          A. Asked and answered. Again, it's  
15          personal. Nothing to do with venue.

16          Continue.

17          Q. How did you become a Canadian citizen?

18          A. This is ridiculous. I'm telling you  
19          right now.

20          MR. BOCKSTEIN: I am going to  
21          object. He said he's a Canadian  
22          citizen. It doesn't matter how he  
23          became a Canadian citizen.

24 BY MR. O'SHEEHAN:

25          Q. When did you become a Canadian citizen?

1 MR. BOCKSTEIN: Were you a Canadian  
2 citizen before this lawsuit?

3 THE WITNESS: Yes.

4 BY MR. O'SHEEHAN:

5 Q. When did you become a Canadian citizen?

6 MR. BOCKSTEIN: We're going to  
7 object to when he became a Canadian  
8 citizen.

9 MR. O'SHEEHAN: We're here for  
10 discovery. Discovery is answering  
11 questions.

12 MR. BOCKSTEIN: We're here for  
13 discovery only about venue.

14 MR. O'SHEEHAN: Venue and  
15 jurisdiction.

16 MR. BOCKSTEIN: Correct.

17 And when he became a Canadian  
18 citizen has nothing to do with venue or  
19 jurisdiction. As long as he was a  
20 Canadian citizen before this lawsuit and  
21 before they did business together.

22 BY MR. O'SHEEHAN:

23 Q. What is your legal status in the United  
24 States?

25 A. Object.

1 MR. BOCKSTEIN: We're going to  
2 object to any legal status in the United  
3 States. He's a resident of Florida.

4 BY MR. O'SHEEHAN:

5 Q. Are you single or married?

6 A. Personal.

7 MR. BOCKSTEIN: I'm going to object  
8 as to whether he's single or married.  
9 It has nothing to do with venue.

10 BY MR. O'SHEEHAN:

11 Q. If you're married, is your spouse a U.S.  
12 Citizen?

13 MR. BOCKSTEIN: It has nothing to  
14 do with venue.

15 BY MR. O'SHEEHAN:

16 Q. Do you have a Canadian passport?

17 A. Again, it's personal. I'm not going to  
18 answer.

19 MR. BOCKSTEIN: He's a Canadian  
20 citizen. We object to any other  
21 personal questions.

22 BY MR. O'SHEEHAN:

23 Q. If you have a Canadian passport, what  
24 address is listed on your Canadian passport?

25 MR. BOCKSTEIN: We will object to

1 any personal questions relating to that.  
2 He is a Florida resident and is a  
3 Canadian citizen. That's all you need  
4 for venue.

5 MR. O'SHEEHAN: The address that  
6 you have on a passport is relevant to  
7 this.

8 MR. BOCKSTEIN: I don't see why  
9 it's relevant. Why would that be  
10 relevant to venue? He lives in Florida.  
11 He lives in Florida and he's a Canadian  
12 citizen. Any personal information about  
13 him is not related to venue in this  
14 case.

15 BY MR. O'SHEEHAN:

16 Q. Are you a United States citizen?

17 MR. BOCKSTEIN: Object. He is a  
18 Canadian citizen and a Florida resident.

19 BY MR. O'SHEEHAN:

20 Q. Are you also a United States citizen?

21 MR. BOCKSTEIN: I am going to  
22 object as to whether he's a United  
23 States citizen.

24 MR. O'SHEEHAN: What is the basis  
25 of that objection?

1           MR. BOCKSTEIN: It has nothing to  
2 do with venue in this case of whether  
3 the plaintiff did business with a  
4 Canadian corporation.

5           MR. O'SHEEHAN: The defendants in  
6 this case are not just a corporation.  
7 It's Mr. Pronman, Gary Pronman and Dan  
8 Pronman, also.

9           MR. BOCKSTEIN: You are suing them  
10 as a corporation and as individuals.

11          MR. O'SHEEHAN: Right.

12          MR. BOCKSTEIN: He has told you  
13 that he is a Canadian citizen and he's a  
14 Florida resident. That's all you need  
15 for venue. You don't need anything  
16 else.

17          MR. O'SHEEHAN: I need him to  
18 answer the questions that I'm asking in  
19 this deposition.

20          MR. BOCKSTEIN: Ask the question.

21 BY MR. O'SHEEHAN:

22          Q. In addition to being a Canadian citizen,  
23 are you also a United States citizen?

24          MR. BOCKSTEIN: Object. It has  
25 nothing to do with venue.

1 BY MR. O'SHEEHAN:

2 Q. Do you concede that the courts in  
3 Florida have jurisdiction over you because you  
4 reside in Florida?

5 MR. BOCKSTEIN: Objection. You're  
6 asking for a legal conclusion. You  
7 can't ask for a legal conclusion.

8 BY MR. O'SHEEHAN:

9 Q. Where do you reside?

10 A. At 5754 Northwest 120th Avenue, Coral  
11 Springs, Florida 33076.

12 Q. And in what county is that in?

13 A. Broward.

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

15 MR. BOCKSTEIN: I'm going to object  
16 to any personal questions.

17 BY MR. O'SHEEHAN:

18 Q. Have you ever applied for a U.S.  
19 passport?

20 MR. BOCKSTEIN: I'm going to object  
21 to any personal questions.

22 BY MR. O'SHEEHAN:

23 Q. Do you have a driver's license?

24 MR. BOCKSTEIN: I'm going to object  
25 to any personal questions.

1           MR. O'SHEEHAN: Mr. Bockstein, he's  
2 personally sued in this lawsuit. These  
3 are questions about him personally of  
4 whether there's jurisdiction and venue  
5 over him personally. That's why I'm  
6 asking him personal questions.

7           MR. BOCKSTEIN: He has told you  
8 that he's a Florida resident and he's a  
9 Canadian citizen.

10           If you are a Florida resident, he  
11 can answer that question, but whether he  
12 has a Florida driver's license, it has  
13 nothing to do with this case. The Judge  
14 has ruled that you can't ask personal  
15 questions in this case.

16           MR. O'SHEEHAN: The Judge has not  
17 ruled that.

18           THE WITNESS: Yes, he has.

19           MR. BOCKSTEIN: Don't answer for  
20 me.

21           We had a hearing with the Judge and  
22 the Judge ruled.

23           MR. O'SHEEHAN: He overruled all of  
24 your objections.

25           MR. BOCKSTEIN: He overruled --

1           MR. O'SHEEHAN: All of your  
2           objections on discovery were based on  
3           personal questions. He overruled all of  
4           those and told us to go forward with  
5           discovery as to jurisdiction and venue,  
6           jurisdiction and venue as to the  
7           individual defendants. I need to ask  
8           them personal questions about  
9           jurisdiction and venue, about their  
10          personal information. That's what  
11          establishes that.

12          MR. BOCKSTEIN: You asked him where  
13          he lived. He told you where he lived.  
14          He's a resident of Florida, and you  
15          don't need any other personal  
16          information besides that for venue.

17          MR. O'SHEEHAN: On the record, are  
18          you agreeing that venue against Gary  
19          Pronman is proper in Broward County,  
20          Florida?

21          MR. BOCKSTEIN: Not in this case.  
22          This case is about a plaintiff who did  
23          business with a Canadian corporation,  
24          sent funds to a Canadian corporation,  
25          obtained or was trying to obtain a

1 Canadian car from Canada. And  
2 everything in this case has to do with  
3 Canada.

4 The fact that you also tried to sue  
5 them personally has nothing to do with  
6 the facts of this case. And as far as  
7 we're concerned, there is no  
8 jurisdiction and no venue in the United  
9 States. Venue lies in Canada, and  
10 there's a Treaty that we also put into  
11 this case to say that if the Judge  
12 decides that there might be venue here,  
13 the Treaty will apply and all of the  
14 applications of the Treaty would apply  
15 to this case. That's our defense.  
16 That's what we've always said and you  
17 are trying to make venue and  
18 jurisdiction apply in Florida.

19 We say he's a Florida resident and  
20 he's a Canadian citizen. That's all  
21 we're going to answer about venue and  
22 that's all we're going to tell you about  
23 venue. I don't think you need any more.

24 MR. O'SHEEHAN: Are you conceding  
25 that there's venue and jurisdiction over

1 Gary Pronman?

2 MR. BOCKSTEIN: No, we're not.

3 MR. O'SHEEHAN: Then we're going  
4 through all these questions.

5 BY MR. O'SHEEHAN:

6 Q. Do you have a Florida driver's license?

7 MR. BOCKSTEIN: Object to any  
8 personal questions.

9 BY MR. O'SHEEHAN:

10 Q. Do you have a Florida Resident ID Card?

11 MR. BOCKSTEIN: Objection to any of  
12 these questions. He said he was a  
13 Florida resident.

14 BY MR. O'SHEEHAN:

15 Q. Do you have any government issued  
16 identification that has an address on it?

17 MR. BOCKSTEIN: I don't know what  
18 you mean by "government issued  
19 identification."

20 THE WITNESS: Like a driver's  
21 license. Same question.

22 MR. O'SHEEHAN: I asked for a  
23 driver's license, ID card.

24 MR. BOCKSTEIN: He's a Florida  
25 resident and he is a Canadian citizen.

1           We're going to object to any other  
2           personal information.

3       BY MR. O'SHEEHAN:

4           Q.    Do you have a Canadian Medicare Card?

5                   MR. BOCKSTEIN:  I am going to  
6           object as to whether he has a Canadian  
7           Medicare Card.

8       BY MR. O'SHEEHAN:

9           Q.    Are you registered to vote in the State  
10          of Florida?

11                   MR. BOCKSTEIN:  I'm going to object  
12          to whether he is registered to vote in  
13          the State of Florida.

14       BY MR. O'SHEEHAN:

15           Q.    Did you vote in the last presidential  
16          election?

17                   MR. BOCKSTEIN:  I'm going to object  
18          to any personal questions in this case.  
19          The only questions are as to venue and  
20          jurisdiction.

21       BY MR. O'SHEEHAN:

22           Q.    What address do you consider to be your  
23          primary residence?

24                   A.    5754 Northwest 120th Avenue, Coral  
25          Springs, Florida, 33076.

1 Q. How long have you resided there?

2 A. I think since 2001 or 2000, 2001.

3 Q. Who else lives there with you?

4 A. My dog.

5 Q. Is that a house or an apartment?

6 A. It's a townhouse.

7 Q. How many days would you estimate you  
8 spent in Quebec since April 1st, 2009?

9 A. Since April 1st, 2009?

10 Q. Yes.

11 A. I don't remember. I have to look into  
12 that further.

13 Q. Have you been to Quebec since April 1st,  
14 2009?

15 A. Have I been to Quebec since April 1st,  
16 2009?

17 DAN PRONMAN: April.

18 MR. STYLES: April is the date that  
19 I attempted to purchase the vehicle  
20 which is why we're asking.

21 THE WITNESS: I don't remember.

22 MR. STYLES: You don't remember if  
23 you've been there or you don't remember  
24 how many days?

25 THE WITNESS: I have to check with

1 my records. I'm not sure if I was  
2 there.

3 BY MR. O'SHEEHAN:

4 Q. Did you bring any documents that we  
5 requested in the Notice of Deposition?

6 A. I wasn't aware that you requested  
7 documents.

8 MR. BOCKSTEIN: The documents that  
9 you requested were all personal, so we  
10 did not bring those documents.

11 THE WITNESS: I guess not.

12 MR. O'SHEEHAN: The passport would  
13 show comings and goings.

14 BY MR. O'SHEEHAN:

15 Q. The house in Coral Springs or the town  
16 home in Coral Springs, do you have Homestead --

17 A. Yes.

18 Q. -- on it for tax purposes?

19 A. Yes.

20 Q. Where does your brother, Dan, reside?

21 A. You have to -- where my brother Dan  
22 resides?

23 Q. Yes.

24 A. He resides in Quebec, and he goes back  
25 and forth to here.

1 Q. To where?

2 A. To Florida.

3 Q. Where here?

4 A. Florida.

5 Q. Where does he spend most amount of his  
6 time?

7 A. Probably in Quebec.

8 MR. STYLES: Do you know that  
9 address?

10 THE WITNESS: In Quebec?

11 MR. STYLES: Yes.

12 THE WITNESS: Do I know the address  
13 in Quebec?

14 MR. BOCKSTEIN: I'm going to object  
15 to anybody else asking questions besides  
16 you.

17 BY MR. O'SHEEHAN:

18 Q. Do you know what address he resides at  
19 in Quebec?

20 A. I'm not giving personal information, so  
21 I would object for the record.

22 MR. BOCKSTEIN: We will object. If  
23 you want to ask Dan where he lives, you  
24 can ask Dan.

25 MR. O'SHEEHAN: I can ask Gary that

1 also.

2 MR. BOCKSTEIN: We will object to  
3 Gary answering where Dan lives. He  
4 already said that he lives both in  
5 Canada and in the United States.

6 BY MR. O'SHEEHAN:

7 Q. Where does Dan's wife live?

8 MR. BOCKSTEIN: I'm going to object  
9 to where Dan's wife lives.

10 MR. O'SHEEHAN: It has to do with  
11 Dan Pronman and he's a party and I can  
12 ask anybody, whether a party or  
13 nonparty, that question.

14 MR. BOCKSTEIN: Where Dan Pronman's  
15 wife lives has nothing to do with venue  
16 or jurisdiction in this case.

17 MR. O'SHEEHAN: It's going to help  
18 establish where Dan Pronman lives.

19 MR. BOCKSTEIN: Where Dan lives  
20 does decide where jurisdiction and venue  
21 is in this case or has a bearing on it.  
22 It really doesn't -- as far as we're  
23 concerned, where he lives is immaterial  
24 and irrelevant to this case because what  
25 we're dealing with is a Canadian

1 corporation, so you can ask him where he  
2 lives, but as far as we're concerned, it  
3 doesn't really have relevance issues as  
4 to jurisdiction and venue purposes.

5 BY MR. O'SHEEHAN:

6 Q. Did you ever reside at 3621 Turtle Run  
7 Boulevard in Coral Springs?

8 A. Yes.

9 Q. When was that?

10 A. Sometime between, I guess, and 2000 and  
11 1997, I believe.

12 Q. Was that a home or an apartment?

13 A. It was an apartment.

14 Q. Did you have Homestead there?

15 A. No.

16 Q. Did you own it or rent it?

17 A. No, it was a rental.

18 Q. Did you ever reside at 804 Rue Connaught  
19 Circle in Quebec?

20 MR. BOCKSTEIN: I am going to  
21 object to where he ever resided in  
22 Quebec. It has nothing to do with the  
23 jurisdiction of this case or the venue.

24 BY MR. O'SHEEHAN:

25 Q. Did you ever own that property?

1 MR. BOCKSTEIN: I'm going to object  
2 to whether he owned that property. It  
3 has nothing to do with it. He said he's  
4 a Canadian citizen and he said he was a  
5 Florida resident.

6 BY MR. O'SHEEHAN:

7 Q. Do you own any property or have a lease  
8 on any property in Canada?

9 A. Do I own or have a lease on a property  
10 in Canada? I lease our offices.

11 DAN PRONMAN: That's not you.

12 THE WITNESS: I think --

13 DAN PRONMAN: Is that corporate or  
14 personal?

15 MR. BOCKSTEIN: Let's object.  
16 Let's clarify the question. Are you  
17 talking business or a personal lease?

18 BY MR. O'SHEEHAN:

19 Q. You personally. You say you're a  
20 citizen of Canada. As a citizen of Canada, do  
21 you have a place that you go to and live?

22 A. No. I said I'm a resident of Florida.

23 Q. Did you ever reside at 11575 Northwest  
24 71st Place in Parkland, Florida?

25 A. Did I ever reside there?

1 Q. Yes.

2 A. No.

3 Q. Did you own that property?

4 A. No.

5 Q. Did you rent that property?

6 A. No.

7 Q. Do you know who lives there?

8 A. That's a personal question.

9 MR. BOCKSTEIN: We object. It has  
10 nothing to do with jurisdiction or  
11 venue.

12 MR. STYLES: I take that as a  
13 "yes."

14 BY MR. O'SHEEHAN:

15 Q. Did you ever reside at 12371 Northwest  
16 78 Manor, Parkland, Florida?

17 A. No.

18 Q. Do you have any ownership in that  
19 property?

20 A. No.

21 Q. Have you ever had any ownership in that  
22 property?

23 A. No.

24 Q. Do you know who owns that property?

25 MR. BOCKSTEIN: I'm going to

1 object. It has nothing to do with this  
2 case.

3 THE WITNESS: Exactly.

4 MR. BOCKSTEIN: It has nothing to  
5 do with jurisdiction and it has nothing  
6 to do with venue.

7 BY MR. O'SHEEHAN:

8 Q. Well, Dan Pronman owns that property.

9 A. That's Dan Pronman.

10 DAN PRONMAN: I'm right here.

11 THE WITNESS: I'm going to get  
12 coffee.

13 BY MR. O'SHEEHAN:

14 Q. Do you know who owns 12371 Northwest 78  
15 Manor in Parkland, Florida?

16 MR. BOCKSTEIN: If it's his place,  
17 you can say it's his place.

18 THE WITNESS: I know who owns it,  
19 yes.

20 BY MR. O'SHEEHAN:

21 Q. Who owns it?

22 A. Morris Zand.

23 Q. And who is that?

24 A. Who is that?

25 Q. Yes.

1 A. That's an in-law of ours.

2 Q. Can you explain the relationship? You  
3 said you're not married, right?

4 A. He's my brother's wife's father.

5 MR. BOCKSTEIN: Which again has  
6 nothing to do with this case. It has  
7 nothing to do with venue. It has  
8 nothing to do with jurisdiction.

9 BY MR. O'SHEEHAN:

10 Q. Now, I'm going to go back to the  
11 questions about your brother.

12 Where does he live? Where does he  
13 reside?

14 A. Asked and answered. I've already  
15 answered the same question. This is ridiculous.

16 MR. BOCKSTEIN: I'm going to  
17 object. You asked him where he resides.  
18 Gary Pronman doesn't want to answer  
19 where he resides. It has nothing to do  
20 with jurisdiction or venue, because  
21 we're dealing with a Canadian  
22 corporation. As far as we're concerned,  
23 the personal lawsuit against both of  
24 them should be dismissed because it is  
25 not proper in this case.

1 BY MR. O'SHEEHAN:

2 Q. Does Mr. Zand reside at that property?

3 MR. BOCKSTEIN: I'm going to object  
4 to anything about Morris Zand. It has  
5 nothing to do with this case.

6 BY MR. O'SHEEHAN:

7 Q. I'm going to ask again. Where does Dan  
8 Pronman reside?

9 He's a named party in this lawsuit.

10 A. I said he resides in Canada and he  
11 resides in Florida.

12 Q. What addresses?

13 A. I don't know them offhand.

14 Q. What county in Florida?

15 A. I think Broward.

16 Q. What city?

17 MR. BOCKSTEIN: If you know.

18 THE WITNESS: Parkland.

19 BY MR. O'SHEEHAN:

20 Q. Other than the address you told us about  
21 in Coral Springs, do you have any other property  
22 in Florida?

23 A. Do I have any other property in Florida?

24 Q. Do you own any other property in  
25 Florida?

1 A. Yes.

2 Q. What other property do you own?

3 A. I partially own 167 Newport K in  
4 Deerfield Beach.

5 Q. What is that?

6 A. It's a condo.

7 Q. You said you partially own it. Who else  
8 partially owns it?

9 A. My brother.

10 Q. Your brother, Dan?

11 A. Yes.

12 Q. Do you rent out that condo?

13 A. When we can.

14 Q. Is there currently a tenant in it?

15 A. Right now there is, yes.

16 Q. How long has that tenant been there?

17 MR. BOCKSTEIN: I'm going to object  
18 to anything about the tenant. It has  
19 nothing to do with jurisdiction and  
20 nothing to do with venue.

21 MR. O'SHEEHAN: Well, if they're  
22 doing business in the State of Florida,  
23 it would give jurisdiction over a party.

24 MR. BOCKSTEIN: Doing business -- I  
25 don't know what your definition of

1 "doing business" is, but renting out a  
2 condo has nothing to do with doing  
3 business in this state.

4 MR. O'SHEEHAN: Owning property and  
5 renting it out in the State of Florida  
6 gives the Court general jurisdiction  
7 over somebody.

8 MR. BOCKSTEIN: It has nothing to  
9 do with the Movie Star Muscle Cars  
10 corporation.

11 MR. O'SHEEHAN: Movie Star Muscle  
12 Cars has very little to do with this  
13 case.

14 BY MR. O'SHEEHAN:

15 Q. Do you have any utility bills in your  
16 name in Broward County?

17 A. Yes.

18 Q. Which ones?

19 A. That's personal.

20 MR. BOCKSTEIN: We will object to  
21 which ones. He said he has utility  
22 bills in his name.

23 BY MR. O'SHEEHAN:

24 Q. What mobile phone telephone numbers do  
25 you have?

1 MR. BOCKSTEIN: Object to any local  
2 telephone numbers that he has in his  
3 name.

4 BY MR. O'SHEEHAN:

5 Q. As opposed to the entire phone number,  
6 can you give me the area code and the first three  
7 numbers of the phone number?

8 A. I have a cell phone, you asked?

9 Q. Yes.

10 A. 561.

11 Q. And what about home phone?

12 A. 954.

13 Q. Do you have any business telephones in  
14 Florida --

15 A. No.

16 Q. -- other than those two numbers?

17 A. Those are not business phones.

18 Q. What is that?

19 A. Those are not business phones.

20 Q. Do you have any business phone numbers?

21 A. No.

22 MR. BOCKSTEIN: He asked you if you  
23 had any business phone numbers.

24 DAN PRONMAN: Does your business  
25 have phone numbers?

1 THE WITNESS: Does my business have  
2 phone numbers or do I have a business  
3 phone number?

4 BY MR. O'SHEEHAN:

5 Q. Do you have a business phone numbers?

6 A. Me personally, no.

7 Q. Does your business have a phone number?

8 A. Yes.

9 Q. What is the phone number for your  
10 business?

11 A. 450 are the first three digits. 450 are  
12 the first three digits.

13 Q. Do you know the rest of the phone  
14 number?

15 A. Excuse me?

16 Q. Do you know the rest of the phone number  
17 for your business?

18 A. Yes, I just don't want to give it out.  
19 That's personal.

20 MR. BOCKSTEIN: What is your  
21 business phone number?

22 THE WITNESS: 664-3459, area code  
23 450.

24 BY MR. O'SHEEHAN:

25 Q. Do you know whose phone number (954)

1 461-8020 is?

2 A. No.

3 Q. Do you know the fax number (954)  
4 461-8020?

5 A. No.

6 Q. Did you ever know whose number that  
7 phone number was?

8 MR. BOCKSTEIN: We'll object to  
9 whether he knew what phone number that  
10 was in the past. It has nothing to do  
11 with this case.

12 BY MR. O'SHEEHAN:

13 Q. Did you ever use that phone number for  
14 business?

15 MR. BOCKSTEIN: That you can  
16 answer.

17 THE WITNESS: I'm not sure if I  
18 ever did. I have to check to see.

19 MR. BOCKSTEIN: You have to talk in  
20 a loud clear voice, because she has to  
21 write down everything you say.

22 THE WITNESS: Sorry.

23 BY MR. O'SHEEHAN:

24 Q. Have you ever transacted business, which  
25 would include advertising using the e-mail

1 address of GPmusclecars@aol.com?

2 MR. BOCKSTEIN: I'm going to object  
3 to the question and ask for  
4 clarification of the question.

5 Do you mean did Movie Star Muscle  
6 Cars ever transact business with that  
7 and as president of Movie Star Muscle  
8 Cars did he ever do it? Is that what  
9 you're asking?

10 BY MR. O'SHEEHAN:

11 Q. We'll ask it both ways. First  
12 personally, have you ever done business at  
13 GPmusclecars@aol.com, including advertising?

14 A. No.

15 Q. Have you ever used that e-mail address?

16 A. Yes.

17 Q. Why have you used that e-mail address?

18 MR. O'SHEEHAN: Mr. Bockstein,  
19 there's a pending question. You  
20 shouldn't be speaking to your client  
21 during deposition.

22 THE WITNESS: Repeat the question.

23 BY MR. O'SHEEHAN:

24 Q. What have you used that  
25 GPmusclecars@aol.com for?

1 A. Why have I used it?

2 Q. Yes.

3 A. It's an e-mail address.

4 Q. What do you use it for?

5 A. E-mail.

6 Q. For what purpose?

7 A. For purposes of e-mails.

8 Q. For business purposes?

9 A. For business purposes. On occasion, I  
10 guess. I can't tell you exactly when or where.

11 Q. Have you ever sent an e-mail from that  
12 address to Brian Styles offering a car for sale?

13 A. Have I ever sent e-mails from that  
14 address to Brian Styles? I have sent e-mails to  
15 Brian Styles. I don't recall offhand what were  
16 the e-mails.

17 Q. Do you know if in those e-mails was  
18 Movie Star Muscle Cars mentioned?

19 A. Again, I don't have my records in front  
20 of me, so I couldn't tell you offhand.

21 Q. When you're using that e-mail address  
22 for business purposes, do they generally include  
23 any reference to Movie Star Muscle Cars?

24 A. Again, I have to check my records. I'm  
25 not sure offhand.

1 Q. Do you have an auto signature block with  
2 your signature that includes Movie Star Muscle  
3 Cars?

4 A. An auto signature block? I don't  
5 understand what you mean.

6 Q. Every time you send an e-mail, it has  
7 your name at the bottom or it has something at  
8 the bottom.

9 A. Okay. Does it include that?

10 Q. Do you have an auto signature set up?

11 A. Not that I'm aware of, other than  
12 GPmusclecars, from that e-mail address.

13 MR. BOCKSTEIN: I need to talk to  
14 my client for a second.

15 (Thereupon, a recess was taken, after  
16 which the following proceedings were  
17 held:)

18 BY MR. O'SHEEHAN:

19 Q. What's the business of Movie Star Muscle  
20 Cars?

21 A. Movie Star Muscle Cars is in the  
22 business of buying, selling and restoring  
23 collectible automobiles.

24 Q. Do you ever do business on your own  
25 outside of Movie Star Muscle Cars?

1 A. Me personally, no.

2 Q. What about your brother?

3 A. No.

4 Q. How long has Movie Star Muscle Cars been  
5 a corporation?

6 A. I think since '98.

7 Q. When I say, "a corporation," what kind  
8 of business entity is Movie Star Muscle Cars?

9 A. It's an incorporated company.

10 Q. Is it a limited liability company, a  
11 partnership, a corporation? Do you know the  
12 answer?

13 A. Honestly it's a corporation. I don't  
14 really understand the question. It's a  
15 corporation. I don't understand your question  
16 completely.

17 Q. But you and your brother never do  
18 business individually?

19 A. I never do business individually.

20 Q. If people owe money to Movie Star Muscle  
21 Cars, who would the check be made payable to?

22 A. Movie Star Muscle Cars.

23 Q. Do you recognize the number (954)  
24 781-5227?

25 A. No, not offhand.

1 Q. Did you ever do business with a Jurgen  
2 Stanley?

3 A. Did I ever do business with Jurgen  
4 Stanley?

5 MR. BOCKSTEIN: I'm going to object  
6 to doing business with anyone else  
7 except Brian Styles in this matter.  
8 This is about jurisdiction and venue.

9 MR. O'SHEEHAN: This would have to  
10 do with where Mr. Pronman, both  
11 Mr. Pronmans, did business and/or Movie  
12 Star Muscle Cars, where they do business  
13 and whether there would be jurisdiction  
14 or venue in Florida.

15 MR. BOCKSTEIN: I don't understand  
16 that question.

17 MR. O'SHEEHAN: If Movie Star  
18 Muscle Cars does business in Florida  
19 that gives jurisdiction of Florida over  
20 the company.

21 MR. BOCKSTEIN: No, it doesn't.

22 MR. O'SHEEHAN: Did you miss that  
23 day in law school?

24 THE WITNESS: Did you do the same?

25 MR. BOCKSTEIN: If Movie Star

1 Muscle Cars has a registered agent in  
2 Florida to do business, then Florida has  
3 jurisdiction over Movie Star Muscle  
4 Cars.

5 Movie Star Muscle Cars was always  
6 doing business from Canada. Whether  
7 Gary or Dan Pronman live here or not or  
8 whether they were president or vice  
9 president of the company has nothing to  
10 do with whether Movie Star Muscle Cars  
11 is a Canadian corporation and the  
12 Canadian corporation did business out of  
13 Canada.

14 BY MR. O'SHEEHAN:

15 Q. Mr. Pronman, are you an agent of Movie  
16 Star Muscle Cars?

17 A. No. I'm president of the company.

18 Q. Can you bind Movie Star Muscle Cars to  
19 contracts?

20 A. Excuse me?

21 Q. Can you enter into contracts on behalf  
22 of Movie Star Muscle Cars?

23 A. I believe so, yes.

24 Q. So you act as their agent in entering  
25 into transactions?

1           A.    I am president of the company.

2           Q.    Do you enter into contracts on behalf of  
3    Movie Star Muscle Cars?

4           A.    Yes.  Asked and answered.

5           Q.    Does your brother also enter into  
6    contracts on behalf of Movie Star Muscle Cars?

7           A.    You can ask my brother.  He's here.

8           Q.    No, I can ask you.

9           A.    Yes, obviously he does.

10          Q.    It's not obvious because I don't know.

11          A.    Either one of us can write contracts on  
12    behalf of the company.

13          Q.    Where do you both reside or where do you  
14    reside?

15          A.    I reside at 5754 Northwest 120th Avenue,  
16    Coral Springs.

17          Q.    And out of that, as president of Movie  
18    Star Muscle Cars, do you write contracts in  
19    Florida?

20          A.    Do I write contracts in Florida?  No, I  
21    don't.

22          Q.    Have you ever entered into a contract in  
23    Florida?

24          A.    No, I don't think I have.

25          Q.    Where have you entered into contracts?

1           A.    Everything is generated from our  
2   Canadian office.

3           Q.    Explain the transaction with Mr. Styles  
4   with regard to the 1969 Super Bee, where did that  
5   take place?

6           A.    Where did that take place?  In Canada.

7           Q.    Explain to me how it took place in  
8   Canada.

9           A.    Mr. Styles approached me to purchase the  
10   car.  As he was looking, he -- when we started to  
11   do business, he approached me after he sold his  
12   company, stating that, "I have a lot of money and  
13   I want to put my money to work in buying and  
14   selling rare cars and I know the market is down.  
15   It's a time for me to make money."

16          Q.    Where did he approach you?

17          A.    He approached me -- he called me at my  
18   house in Florida, because that's how we initially  
19   started to do business.

20          Q.    So you transacted business as president  
21   of Movie Star Muscle Cars from your house in  
22   Florida with Mr. Styles?

23          A.    No.  The transaction went through my  
24   Montreal office.  He wired money for this 1969  
25   Super Bee based on a contract that was generated

1 from the Montreal office, and that's where the  
2 money was paid and wired to -- from Florida to  
3 the Montreal office.

4 Q. How did he find out about the car?

5 A. Again, he asked me about certain cars  
6 that he was looking for. I found the car and we  
7 had forwarded him pictures.

8 Q. Where did you forward him pictures from?

9 A. I believe they came from Montreal. They  
10 came through the Montreal office out of Canada.

11 Q. Through you?

12 A. No. It came through my brother, as best  
13 I can recollect. I can check and get back to you  
14 on the exact things.

15 Q. Does someone in Canada use the  
16 Gpmusclicars@aol.com e-mail address?

17 A. Yes, occasionally, they do.

18 Q. Who does?

19 A. My brother can be using it or one of the  
20 people that work in my office.

21 Q. If Dan is using that e-mail address, at  
22 the end of the e-mail, would he write "Gary" as  
23 from Gary?

24 A. Probably not.

25 Q. If an e-mail came to Mr. Styles and said

1 that it was from Gary?

2 A. It probably came from me.

3 Q. And where would you be sending it from  
4 most likely?

5 A. Probably from my house in Florida or it  
6 could be if I was in Montreal, from my office in  
7 Montreal. It all depends where I am at the time.

8 Q. Since April 1st, 2009, what dates were  
9 you in Montreal?

10 A. I don't remember. I would have to get  
11 back to you.

12 Q. How are you going to be able to get back  
13 to me?

14 A. Check my records.

15 Q. What records are you going to check?

16 A. My travel records.

17 Q. What travel records do you have?

18 A. I have to go check. I'm not sure.

19 Q. So Movie Star Muscle Cars has been a  
20 corporation since 1998, you believe?

21 A. I believe so. You have the copies of  
22 the incorporation date. I don't remember offhand  
23 the exact date.

24 Q. Was the incorporation in 2004?

25 A. Yes.

1 Q. And your testimony is that you never do  
2 business personally; you always do it on behalf  
3 of Movie Star Muscle Cars?

4 A. To the best of my recollection.

5 Q. What about the e-mail address,  
6 autocollection2@aol.com, do you use that e-mail  
7 address?

8 A. No.

9 Q. Who uses that e-mail address?

10 A. I have no idea.

11 Q. What about Zraremusclecars@aol.com, do  
12 you recognize that e-mail address?

13 A. Yes.

14 Q. Who uses that e-mail address?

15 A. I've used it or my brother might have  
16 used it.

17 Q. Do you still use it?

18 A. Do I still use it? Not really.

19 Q. And what did you use it for?

20 A. To post advertisement on a website.

21 Q. Where have you advertised?

22 A. Where have I advertised?

23 Q. Yes.

24 A. On different websites.

25 Q. Okay.

1           A.   Hemmings News.  I advertise in different  
2 websites.

3           Q.   And just for clarification, you said, "I  
4 advertise in different websites."  Is Gary  
5 Pronman advertising in websites or is Movie Star  
6 Muscle Cars advertising?

7           A.   Me, personally, no.  I don't advertise  
8 me, personally.

9           Q.   So the advertisement mentions Movie Star  
10 Muscle Cars?

11          A.   Sometimes they do.  It all depends on  
12 what's being advertised.

13          Q.   Can you give me an example of something  
14 where Movie Star Muscle Cars wouldn't be  
15 mentioned?

16          A.   An example?

17          Q.   Yes.

18          A.   I have to think about that one.

19               MR. BOCKSTEIN:  If you don't know,  
20 you don't know.

21               THE WITNESS:  I'm not sure.  I'm  
22 not sure.

23 BY MR. O'SHEEHAN:

24          Q.   Do you know of any advertisements where  
25 you have used Movie Star Muscle Cars in the

1 advertisement?

2 A. On our website.

3 Q. What about advertisements on other  
4 websites or in magazines?

5 A. That we have used it?

6 Q. Yes.

7 A. We've placed cars on Ebay that we've  
8 used Movie Star Muscle Cars as a reference, that  
9 I can remember. I don't remember offhand  
10 everything, but that's one example I can  
11 remember.

12 Q. What about the e-mail address  
13 Dansmopar@aol.com, do you use that e-mail  
14 address?

15 A. No.

16 Q. Do you know who uses that e-mail  
17 address?

18 A. Yes.

19 Q. Who uses that e-mail address?

20 A. That's my brother's e-mail address.

21 Q. You don't use it?

22 A. No.

23 Q. What about Gpmusclecars@aol.com, that's  
24 your e-mail address, but you say he also uses it?

25 A. Yes. Because those are things that I

1 need to send from Montreal or I'll use it when  
2 I'm in Montreal.

3 Q. Do you only use it from Montreal?

4 A. No.

5 Q. Why would something need to be sent from  
6 Montreal?

7 A. If I'm there and I need to respond to  
8 somebody, I will use it as my e-mail address.

9 Q. What about websites? You had mentioned  
10 websites. Do you own the domain  
11 Moviestarmusclicars.com?

12 A. Me, personally?

13 Q. Yes.

14 A. No.

15 Q. Who owns it?

16 A. I'm not sure.

17 Q. Who set up the website?

18 A. A friend of mine.

19 Q. Who is that friend?

20 A. Patrick Young.

21 Q. Patrick Young?

22 A. Uh-huh.

23 Q. How do you spell the last name?

24 A. Y-o-u-n-g, I believe.

25 Q. Where is he located?

1 A. Where is he located?

2 Q. Yes.

3 A. In Florida.

4 Q. In what city?

5 A. What city?

6 Q. Yes.

7 DAN PRONMAN: He didn't set it up.

8 THE WITNESS: Oh, he didn't set it  
9 up.

10 DAN PRONMAN: No.

11 THE WITNESS: I guess I'm mistaken.  
12 Sorry.

13 BY MR. O'SHEEHAN:

14 Q. The domain name  
15 classicmusclecarrestoration.com, do you know that  
16 website?

17 A. No.

18 Q. Do you have anything to do with that  
19 website?

20 A. Not that I'm aware of.

21 Q. What about  
22 classicmusclecarrestoration.com?

23 A. No.

24 Q. Canadianbuyflorida.com?

25 A. No.

1 Q. Do you know that website?

2 A. No.

3 Q. Have you ever been to that website?

4 A. No, not that I can recall.

5 Q. Same questions: Do you know those  
6 domain names?

7 A. No.

8 Q. Do you have a U.S. Social Security  
9 Number?

10 MR. BOCKSTEIN: I'm going to object  
11 to asked and answered. We've already  
12 objected to that.

13 MR. STYLES: You didn't ask that  
14 yet.

15 MR. O'SHEEHAN: That's the first  
16 time I ask that.

17 MR. BOCKSTEIN: We're not going to  
18 give a Social Security Number.

19 MR. O'SHEEHAN: I'm not asking what  
20 it is.

21 BY MR. O'SHEEHAN:

22 Q. Do you have one?

23 MR. BOCKSTEIN: We are also going  
24 to object to whether he has one. He  
25 says he's a Canadian citizen and a

1 Florida resident.

2 BY MR. O'SHEEHAN:

3 Q. As a Florida resident, do you pay United  
4 States income taxes?

5 MR. BOCKSTEIN: I'm going to  
6 object. It has nothing to do with venue  
7 or jurisdiction.

8 BY MR. O'SHEEHAN:

9 Q. As a Canadian citizen, do you pay  
10 Canadian income tax?

11 MR. BOCKSTEIN: I will object. It  
12 has nothing to do with venue or  
13 jurisdiction in this particular set of  
14 facts.

15 BY MR. O'SHEEHAN:

16 Q. Does Movie Star Muscle Cars pay Canadian  
17 taxes?

18 A. Yes.

19 Q. Does Movie Star Muscle Cars pay taxes in  
20 any other country?

21 A. No.

22 Q. Have you filed any income tax returns in  
23 Quebec in the last five years?

24 MR. BOCKSTEIN: I'm going to object  
25 to anything to do with him personally.

1 It has nothing to do with jurisdiction  
2 or venue. He's a Canadian citizen and  
3 he's a Florida resident.

4 BY MR. O'SHEEHAN:

5 Q. As a Florida resident, have you paid  
6 Florida real estate taxes in the last five years?

7 A. Yes.

8 Q. Have you, as a Canadian citizen, paid  
9 any real estate taxes in Quebec in the last five  
10 years?

11 MR. BOCKSTEIN: I'm going to object  
12 to anything to do with Quebec as a  
13 Canadian citizen. He's a Canadian  
14 citizen. He's a Florida resident.

15 BY MR. O'SHEEHAN:

16 Q. Do you have a Canadian Registered  
17 Retirement Savings Plan?

18 MR. BOCKSTEIN: I'm going to object  
19 to anything personal regarding him.

20 MR. O'SHEEHAN: The question is:  
21 Is there a personal jurisdiction over  
22 him? I need to ask personal questions  
23 to establish whether there's personal  
24 jurisdiction over him.

25 MR. BOCKSTEIN: You already have.

1 He's a Florida resident and he is a  
2 Canadian citizen. You don't need any  
3 more than that.

4 MR. O'SHEEHAN: Are you conceding  
5 that there is jurisdiction --

6 MR. BOCKSTEIN: No.

7 MR. O'SHEEHAN: -- and venue?

8 MR. BOCKSTEIN: No, we're not  
9 conceding that there is jurisdiction and  
10 venue.

11 THE WITNESS: I need to go to the  
12 bathroom.

13 MR. O'SHEEHAN: Okay.

14 (Thereupon, a recess was taken, after  
15 which the following proceedings were  
16 held:)

17 BY MR. O'SHEEHAN:

18 Q. Do you have any type of 401-K or  
19 retirement account in the United States?

20 MR. BOCKSTEIN: Object. It has  
21 nothing to do with jurisdiction or venue  
22 in this set of facts.

23 BY MR. O'SHEEHAN:

24 Q. Do you personally have any credit cards  
25 or debit cards from a Canadian banking

1 institution?

2 MR. BOCKSTEIN: I object. He is a  
3 Canadian citizen and a Florida resident.

4 BY MR. O'SHEEHAN:

5 Q. Do you have any credit cards or debit  
6 cards as president of Movie Star Muscle Cars?

7 A. No.

8 Q. Do you have any, whether from Canadian  
9 institutions or American?

10 A. Do I what?

11 Q. You have no credit card or debit card on  
12 behalf of Movie Star Muscle Cars?

13 A. Not that I can remember. I don't  
14 believe so. Not that I can remember.

15 Q. Do you have any accounts at any Canadian  
16 banking institutions?

17 MR. BOCKSTEIN: Under Movie Star  
18 Muscle Cars?

19 MR. O'SHEEHAN: No, him personally.

20 MR. BOCKSTEIN: As to him  
21 personally, we're not going to answer.  
22 We will object.

23 BY MR. O'SHEEHAN:

24 Q. Where does Movie Star Muscle Cars do its  
25 banking?

1 A. In Canada.

2 Q. What bank?

3 A. Bank Laurentian, Laurentian Bank.

4 Q. Is that only bank that it does business  
5 with?

6 A. Yes.

7 Q. When you make deposits on behalf of  
8 Movie Star Muscle Cars, where are the deposits  
9 made?

10 A. On behalf of Movie Star Muscle Cars?

11 Q. When the check is written out to Movie  
12 Star Muscle Cars, where is the check deposited?

13 A. In Canada, in most cases, that I can  
14 remember.

15 MR. BOCKSTEIN: You mean which bank  
16 it's deposited at?

17 MR. O'SHEEHAN: Yes.

18 THE WITNESS: Bank Laurentian.

19 BY MR. O'SHEEHAN:

20 Q. Do you ever deposit in any other banks?

21 A. Not that I can remember, no.

22 Q. Let's mark this as the first exhibit.  
23 It's a check for \$1,200 from Brian Styles made  
24 payable to Movie Star Muscle Cars.

25 A. Okay.

1                   (Plaintiff's Exhibit No. 1 was  
2                   thereupon marked for Identification.)

3                   THE WITNESS: What was your  
4                   question?

5                   BY MR. O'SHEEHAN:

6                   Q. Do you remember receiving a check from  
7                   Brian Styles for \$1,200?

8                   A. Do I remember receiving it?

9                   Q. Yes.

10                  MR. BOCKSTEIN: Are you asking  
11                  about the specific check?

12                  MR. O'SHEEHAN: Yes.

13                  THE WITNESS: Do I remember it? I  
14                  don't remember.

15                  BY MR. O'SHEEHAN:

16                  Q. It's in your Interrogatory responses.  
17                  You discussed it.

18                  A. Okay. Do I remember receiving the  
19                  check? It's possible. I don't remember offhand  
20                  exactly. I'm not saying I didn't receive it. I  
21                  don't remember.

22                  Q. Do you remember having an issue with the  
23                  check because it didn't get deposited and by the  
24                  time it did, Mr. Styles had closed the bank  
25                  account and he had to write another check?

1           A.    I remember there being some issue that  
2    one check bounced.

3           Q.    Do you know if that's this check?

4           A.    I honestly don't remember.

5           Q.    Do you know why this check made payable  
6    to Movie Star Muscle Cars showed it was deposited  
7    in Bank of America?

8           A.    I don't have any idea why.

9                   DAN PRONMAN:  I'd like to see  
10            originals to know if that's the case.  
11            If the check bounced, it was not  
12            deposited in Bank of America.

13                   THE WITNESS:  I have no idea what  
14            happened with the bank and why the check  
15            bounced or why it was supposedly Bank of  
16            America.

17                   DAN PRONMAN:  I have to look at  
18            originals.

19                   THE WITNESS:  I don't remember.

20    BY MR. O'SHEEHAN:

21            Q.    Do you know why it would have been  
22            attempted to be deposited into the Bank of  
23            America account?

24            A.    I have no idea why.

25            Q.    Does Movie Star Muscle Cars have an

1 account at Bank of America?

2 A. No, it does not.

3 Q. Has Movie Star Muscle Cars ever had an  
4 account at Bank of America?

5 A. No, it never did.

6 DAN PRONMAN: What's the date on  
7 this? You need originals to answer  
8 that.

9 BY MR. O'SHEEHAN:

10 Q. Do you have any rental properties in  
11 Canada?

12 A. Do I have any rental properties in  
13 Canada? You asked that question.

14 Me, personally, no.

15 Q. Do you have any vehicles titled in your  
16 name in Canada?

17 A. No.

18 Q. Do you have any vehicles titled or  
19 registered in your name in Florida?

20 A. Yes.

21 Q. What vehicles?

22 A. I don't want to disclose that. It's  
23 personal.

24 MR. BOCKSTEIN: We're going to  
25 object to which vehicles, but he has

1 vehicles titled in his name in Florida.

2 BY MR. O'SHEEHAN:

3 Q. Were you employed by any companies in  
4 the State of Florida for the last ten years?

5 MR. BOCKSTEIN: I'm going to  
6 object. It has nothing to do with  
7 jurisdiction or venue in this case.

8 MR. O'SHEEHAN: Does the Court  
9 have personal jurisdiction over him has  
10 to do with where he's done business,  
11 where he lives, where he resides, where  
12 he's the citizen of.

13 MR. BOCKSTEIN: Doing business in  
14 this particular case, it's a matter of  
15 case law. The case law defines what  
16 "doing business" means when you deal  
17 with a foreign corporation.

18 MR. O'SHEEHAN: Jurisdiction also  
19 deals with doing business if you do  
20 business --

21 MR. BOCKSTEIN: He said he's a  
22 Florida resident. He doesn't have to  
23 answer any other questions.

24 MR. O'SHEEHAN: What does him  
25 saying he's a Florida resident mean?

1 MR. BOCKSTEIN: I'm not going to  
2 answer questions.

3 MR. O'SHEEHAN: I'm trying to get a  
4 stipulation so we don't have to go  
5 through all of these things.

6 MR. BOCKSTEIN: You're not getting  
7 any stipulation.

8 MR. O'SHEEHAN: All right.

9 BY MR. O'SHEEHAN:

10 Q. Does Movie Star Muscle Cars have an  
11 office in Florida?

12 A. No.

13 Q. Why does the website list the fact that  
14 there's an office in Coral Springs?

15 A. No. The website lists that I have an  
16 e-mail address at my home address. As you can  
17 read the website, it says, "GPmusclecars."  
18 That's what the indication is.

19 MR. O'SHEEHAN: Can I mark this as  
20 Exhibit 2, please?

21 (Plaintiff's Exhibit No. 2 was  
22 thereupon marked for Identification.)

23 BY MR. O'SHEEHAN:

24 Q. Can you please read this Exhibit 2,  
25 which is from your website, the last three lines

1 starting with "Our offices and shop"?

2 A. Well, if you read it, you're reading too  
3 far ahead, because it says, "Movie Star Muscle  
4 Cars" on the fourth line "/GPmusclecars." That's  
5 what it indicates as the Coral Springs office  
6 e-mail address. If you read it any other way,  
7 it's a misinterpretation.

8 Q. Can you read the last three lines,  
9 please?

10 A. "Located at 1245 La Place St. Vincent De  
11 Paul Laval, Quebec, with offices also at 5754  
12 Northwest 120th Avenue, Coral Springs, Florida  
13 33076. We ship in and out of the U.S. from  
14 Chazy, New York."

15 Q. Doesn't it say that it has offices in  
16 Coral Springs, Florida?

17 A. That represents again the GPmusclecars  
18 e-mail address. I didn't write it. That's how I  
19 interpreted it. Just for convenience only.

20 (Thereupon, a phone interruption  
21 was had.)

22 BY MR. O'SHEEHAN:

23 Q. This is on the web page that's entitled  
24 "About Movie Star Muscle Cars," correct?

25 A. I believe so, yes.

1 Q. What is your explanation of "Offices  
2 also at 5754 Northwest 120th Avenue, Coral  
3 Springs"?

4 A. It's in relation to the Gpmusclecars  
5 only as a convenience.

6 Q. What is GPmusclecars?

7 A. It's my e-mail address.

8 Q. Which you said you used to do business  
9 with?

10 A. Right.

11 Q. And you only do business as the  
12 president of Movie Star Muscle Cars?

13 A. Right.

14 Q. And you do that out of Coral Springs,  
15 Florida, correct?

16 A. Uh-huh.

17 Excuse me? I said that I use the e-mail  
18 out of Coral Springs, Florida. I don't do  
19 business out of Coral Springs, Florida. I do  
20 business for Movie Star Muscle Cars out of  
21 Canada.

22 Q. How many days were you in Canada since  
23 April 21st, 2009?

24 A. I don't remember offhand.

25 Q. Approximately?

1 A. I can't remember.

2 Q. Do you think it's more than ten?

3 A. Again, I don't recall.

4 Q. I've been looking at this exhibit for  
5 about three minutes. I don't see the e-mail  
6 address on here that you're referring to.

7 Can you show me where the e-mail address  
8 is?

9 A. GPmusclecars.  
10 Moviestarmusclecars/GPmusclecars. That's just as  
11 a reference and an act of convenience.

12 Q. So you're telling me if I typed in an  
13 e-mail, Moviestarmusclecars/GPmusclecars, that  
14 would be an e-mail that would go to you?

15 A. Well, I didn't prepare the website.  
16 That can be a typo. And to be honest with you, I  
17 don't really look at it very often. And there's  
18 more than one spelling mistake and typo on the  
19 website. So if you want to cite me for bad  
20 spelling or errors, I accept the citation.

21 Q. Is it a typo that it says, "Offices at  
22 5754 Northwest 120th Avenue, Coral Springs,  
23 Florida"?

24 A. It must be.

25 Q. So you're denying that Movie Star Muscle

1 Cars has offices at 5754 Northwest 120th Avenue  
2 in Coral Springs, Florida?

3 A. Yes, I am denying it.

4 MR. BOCKSTEIN: What address is  
5 that?

6 THE WITNESS: That's my home  
7 address.

8 BY MR. O'SHEEHAN:

9 Q. And has Brian Styles ever mailed checks  
10 to you for Movie Star Muscle Cars at that home  
11 address?

12 A. I don't know what Brian Styles does.  
13 Why don't you ask him?

14 Q. Have you ever received money from  
15 Mr. Styles at that address for Movie Star Muscle  
16 Cars?

17 A. I don't recall. I would have to check  
18 my records.

19 Q. What records are you going to check?

20 A. My records.

21 Q. What records are those?

22 A. Checks and things that I received. I  
23 don't remember offhand.

24 Q. How do you know if you received it in  
25 Coral Springs by your records?

1           A.    I'll try to see if I have any envelopes  
2           that I didn't throw away and when it was sent and  
3           not sent. Offhand, I can't remember.

4           Q.    Isn't it true that the check on Exhibit  
5           1 is payable to Movie Star Muscle Cars?

6           A.    Is it true?

7           Q.    That it's got the address of Coral  
8           Springs on that check.

9           A.    Okay. But I didn't issue that check.  
10          What anybody puts on a check that I don't issue,  
11          I can't control.

12          Q.    Have you received other payments on  
13          behalf of Movie Star Muscle Cars at the Coral  
14          Springs address, other than from Mr. Styles?

15          A.    I can't remember offhand.

16          Q.    Have you spoken with people on the phone  
17          from your Coral Springs home doing business on  
18          behalf of Movie Star Muscle Cars?

19          A.    Have I spoken to people? Yes.

20          Q.    Doing business on behalf of Movie Star  
21          Muscle Cars.

22          A.    Yes.

23          Q.    And you said, as the president, you have  
24          the authority and ability to enter into  
25          contracts?

1           A.    All contracts that I enter into are  
2           generated from our Montreal office.

3           Q.    What do you mean by "generated"?

4           A.    It means generated.

5           Q.    What does "generated" mean?

6           A.    Exactly what it sounds like.  Any  
7           contracts that I enter into are generated through  
8           our Montreal corporation.

9           Q.    Are all of your contracts you enter into  
10          written contracts?

11          A.    Most of the time.  Not always.

12          Q.    So if it's an oral agreement --

13          A.    It's still generated from my Montreal  
14          office.

15          Q.    Explain how that happens.

16          A.    Because I represent -- I am the  
17          president of Movie Star Muscle Cars and if I do  
18          business with Movie Star Muscle Cars as the  
19          president, everything is generated from my  
20          Montreal corporation.  I don't do business  
21          personally.

22          Q.    So if you're in Florida and you enter  
23          into a contract with somebody orally, where are  
24          you entering into that contract or where is that  
25          contract being generated from?

1 A. From Montreal. From my Montreal office.

2 Q. Even if you're physically here in  
3 Florida?

4 A. Yes.

5 Q. Why is that?

6 A. Because I -- again, I repeat, I'm  
7 president of Movie Star Muscle Cars and any  
8 contracts that I enter into under Movie Star  
9 Muscle Cars is generated from our Montreal,  
10 Quebec office.

11 Q. So if you enter into a contract in  
12 Florida while you're here in Florida, you're  
13 saying the contract is generated out of Canada?

14 A. Uh-huh.

15 Q. But where is the business being  
16 transacted?

17 A. In Canada. I can represent Movie Star  
18 Muscle Cars as president of the company anywhere  
19 and doing business based on and out of my  
20 Montreal, Quebec office. That's how I do  
21 business. Period.

22 Q. So if in this case, Mr. Styles is doing  
23 business with you and talking with you in  
24 Florida, is he also doing business in Canada?

25 A. Yes, absolutely.

1 Q. And if you go to an auction in Arizona  
2 and buy a car there, is the car auction doing  
3 business in Canada because you bought a car from  
4 them?

5 A. Yes, absolutely. Car is being -- I buy  
6 a car, I automatically take a bill of lading and  
7 have the car delivered to Canada. I don't do  
8 business out of Florida. It's done out of  
9 Canada. I buy the car to export the car back to  
10 Canada. Period.

11 Q. What are your daily responsibilities as  
12 president of Movie Star Muscle Cars?

13 A. My daily responsibilities are buying and  
14 selling muscle cars. Overseeing the restoration  
15 process. Researching parts. Knowledge of the  
16 vehicles. You know, answering questions from my  
17 guys in the shop and talking to certain clients.

18 Q. Do you have any other jobs?

19 A. Do I have any other jobs?

20 Q. Or generate income any other way other  
21 than from Movie Star Muscle Cars.

22 A. I think that's a personal question. I  
23 don't want to answer that.

24 MR. BOCKSTEIN: Movie Star Muscle  
25 Cars is his business. His income comes

1 from Movie Star Muscle Cars.

2 Do you have any other American  
3 business.

4 THE WITNESS: No.

5 MR. BOCKSTEIN: Okay.

6 BY MR. O'SHEEHAN:

7 Q. Do you personally generate any income or  
8 get paid any other way?

9 MR. BOCKSTEIN: He told you he has  
10 a rental property.

11 BY MR. O'SHEEHAN:

12 Q. Other than the rental property?

13 A. It's not very profitable.

14 Excuse us a second.

15 (Thereupon, a recess was taken, after  
16 which the following proceedings were  
17 held:)

18 BY MR. O'SHEEHAN:

19 Q. Is part of the business of Movie Star  
20 Muscle Cars brokering deals for cars?

21 A. Occasionally. Not too often.

22 Q. And if you broker a deal as the  
23 president of Movie Star Muscle Cars and received  
24 a payment for brokerage services, who would the  
25 check be made to?

1           A.    In most cases, it would be made to Movie  
2    Star Muscle Cars unless other arrangements are  
3    made.

4           Q.    What other arrangements might be made?

5           A.    It all depends on the circumstances of  
6    the deal.

7           Q.    Other than making it payable to Movie  
8    Star Muscle Cars, who might the check be made  
9    payable to?

10          A.    It may be paid either to Dan Pronman,  
11    and that would probably be it.

12          Q.    Why would it be paid to Dan Pronman?

13          A.    Because in some cases, we want the money  
14    quicker.  Because sending the money to Canada  
15    takes time to clear a check.  And if it's a small  
16    amount or a minimal amount and we want the money  
17    quicker, it's more easily done to his name, that  
18    would be the case, or if a customer might request  
19    certain special circumstances.

20          Q.    If it's made payable to Dan Pronman,  
21    where would the check be deposited, into whose  
22    account?

23          A.    You will have to ask Dan Pronman that  
24    question.

25          Q.    What are the special circumstances where

1 that would come up?

2 A. Every deal is unique so it's on a one  
3 deal by one deal basis. Like I said, I don't do  
4 very many brokerage deals, so they are quite rare  
5 for us. We mostly buy and sale.

6 Q. If a check was made payable to Dan  
7 Pronman, would it still be income for Movie Star  
8 Muscle Cars?

9 A. Yes.

10 Q. Would it go into Movie Star Muscle Cars'  
11 accounts?

12 A. You'll have to ask Dan Pronman how he  
13 does that.

14 Q. Would it show on Movie Star Muscle Cars'  
15 taxes?

16 A. You will have to ask Dan Pronman how he  
17 does that.

18 Q. As the president of the company, you  
19 don't know about the taxes from Movie Star Muscle  
20 Cars?

21 A. I'm not the treasurer or secretary. I'm  
22 just the president. I don't deal with the  
23 financials.

24 Q. Do you receive a paycheck from Movie  
25 Star Muscle Cars or dividends, as an owner, or

1 both?

2 MR. BOCKSTEIN: I'm going to object  
3 at this point. This is goading into  
4 other than jurisdiction and venue. He's  
5 president of Movie Star Muscle Cars.  
6 Movie Star Muscle Cars is a Canadian  
7 corporation. As far as for purposes of  
8 this deposition is concerned, it's  
9 beyond the scope.

10 BY MR. O'SHEEHAN:

11 Q. Does your employment dues include  
12 marketing or placing print ads or classified ads  
13 in magazines or online websites on behalf of  
14 Movie Star Muscle Cars?

15 A. Can you repeat the question, please?

16 Q. I asked you previously about what your  
17 duties were. I want to get a little bit more  
18 specific into that.

19 A. Okay.

20 Q. Do your duties include placing  
21 advertisements?

22 A. It may.

23 Q. Do you have any advertisements, other  
24 than the website currently running?

25 A. I don't think so.

1 Q. You said you're in the business of  
2 buying and selling cars. Do you have any cars  
3 for sale right now?

4 A. And restoration. And restoring cars.  
5 I'm not sure what I have for sale right  
6 now.

7 Q. As the president of Movie Star Muscle  
8 Cars, you don't know if you have any cars for  
9 sale?

10 A. At this moment, not that I'm aware of.  
11 I mean, like I said --

12 Q. You don't do the finances?

13 A. That's right.

14 Q. You don't know if you have any cars for  
15 sale.

16 Do you do the actual restoration?

17 A. No.

18 Q. What do you do?

19 A. I pay somebody to do it. I spend my  
20 time here in deposition. That's what I'm doing.

21 Q. What was the last car that Movie Star  
22 Muscle Cars sold?

23 A. I don't remember.

24 Q. Who would know that?

25 A. Well, you know, I have to check our

1 records and come back to you. I don't remember  
2 offhand.

3 Q. Did you sell a car in 2010?

4 A. Did we sell a car in 2010? This is  
5 2010. This month, I don't believe so. I have to  
6 check, but I don't think so. But I'm not sure.

7 Q. Did you sell any cars last year in 2009?

8 A. Yes.

9 Q. Do you know how many cars approximately?

10 A. Not offhand.

11 Q. Can you name one buyer that you sold a  
12 car to?

13 A. I will not disclose my business  
14 contacts. Sorry.

15 Q. Does Movie Star Muscle Cars conduct any  
16 business with Florida residents?

17 A. Conduct business with Florida residents?  
18 You have to be more specific. I don't know what  
19 you mean by that.

20 Q. Have you ever brokered any deals for  
21 Florida residents?

22 A. I brokered a deal for Brian Styles.  
23 He's a Florida resident.

24 Q. Did you do that personally or on behalf  
25 of Movie Star Muscle Cars?

1           A.    No.  That was on behalf of Movie Star  
2   Muscle Cars.

3           Q.    Where did your communications with  
4   Mr. Styles take place?

5           A.    Mr. Styles contacted me.  They took  
6   place by him calling me at my house and back and  
7   forth through our Montreal office.

8           Q.    Would you have records from your  
9   Montreal office of calling Mr. Styles' house?

10          A.    There will probably be some.  I'm not  
11   sure.  There were probably e-mails.  I'm not  
12   sure.  Again, I would have to check everything.

13          Q.    And have you ever been to Mr. Styles'  
14   house?

15          A.    Yes, I have.

16          Q.    Has Mr. Styles ever been to your house  
17   in Coral Springs?

18          A.    Yes, he has.

19          Q.    What was the purpose of him coming to  
20   your house in Coral Springs?

21          A.    I believe he came to pick me up to go  
22   see some cars in Orlando or near Orlando.

23          Q.    Did he ever deliver payment to you in  
24   your house in Coral Springs?

25          A.    No.

1 Q. Did you ever pick up payment from him at  
2 his house?

3 A. I believe I did.

4 Q. And that was on behalf of Movie Star  
5 Muscle Cars?

6 A. Yes, it was.

7 Q. Do you remember who the check would have  
8 been payable to?

9 A. I don't remember.

10 Q. On the website, when we first got  
11 involved in this lawsuit, last year, the website  
12 down at the bottom, it had shops and offices. It  
13 had 169 Mozart Street, DDO, Quebec City. What is  
14 that address?

15 A. What is that address? 169 Mozart  
16 Street?

17 Q. Yes. It was shown --

18 A. That was a mailing address.

19 Q. Is that where cars get restored?

20 A. No. Cars get restored at the St.  
21 Vincent De Paul address.

22 Q. What is 169 Mozart Street?

23 A. I already answered that.

24 Q. Is that a business?

25 A. I said it was a mailing address.

1 Q. Is that a Post Box?

2 A. Asked and answered.

3 MR. BOCKSTEIN: Is it a mailing  
4 address?

5 THE WITNESS: Yes.

6 MR. BOCKSTEIN: It's a mailing  
7 address.

8 BY MR. O'SHEEHAN:

9 Q. Is it a house?

10 MR. BOCKSTEIN: It's your business.  
11 You have to tell him what it is.

12 THE WITNESS: It's a house, yes.

13 BY MR. O'SHEEHAN:

14 Q. Was business done out of that house?

15 A. Was business done out of that house?

16 Q. If someone wanted a car restored, would  
17 they bring it to that address?

18 A. No, they wouldn't.

19 Q. Were checks received at that address?

20 A. I don't believe so. I'm not sure.

21 DAN PRONMAN: Clarify. What  
22 checks?

23 BY MR. O'SHEEHAN:

24 Q. If people were paying checks to Movie  
25 Star Muscle Cars, would they be mailed to that

1 address?

2 A. It would probably be mailed to the St.  
3 Vincent De Paul address. In most cases.

4 Q. You testified that on your website that  
5 address is on there because that's the mailing  
6 address for Movie Star Muscle Cars?

7 DAN PRONMAN: Government.

8 THE WITNESS: It's for government  
9 purposes, yes, the mailing address.

10 BY MR. O'SHEEHAN:

11 Q. What government purposes?

12 A. The Canadian or Quebec government.

13 Q. What do you mean for purposes? What  
14 purposes?

15 A. I will defer those questions to my  
16 brother. He can answer them more thoroughly than  
17 I can.

18 Q. Now, after the lawsuit has been filed,  
19 the website has been updated and now does have  
20 the St. Vincent De Paul address on there.

21 A. Okay.

22 Q. What is that address?

23 A. That's the office address where we do  
24 the restorations.

25 Q. And why was the other address taken off

1 there?

2 A. I'll defer that question to my brother.

3 Q. When the 169 Mozart Street address was  
4 listed on there, was business still being done at  
5 the St. Paul -- was the shop being run at the St.  
6 Paul address?

7 A. Yes. The La Place in St. Vincent De  
8 Paul address.

9 Q. Just for the record, the address is  
10 1245C La Place, St. Vincent De Paul, Laval,  
11 Quebec.

12 A. That's correct.

13 Q. Do you know who updated the website?

14 A. No, I don't.

15 Q. When the lawsuit was originally filed,  
16 it had the Mozart Street address and it also  
17 showed an office in Coral Springs, correct?

18 A. No.

19 MR. BOCKSTEIN: You're talking  
20 about on the website?

21 BY MR. O'SHEEHAN:

22 Q. On the website.

23 A. I told you already that I referred to  
24 that website as a GPmusclecars e-mail address.

25 DAN PRONMAN: Can I have a copy of

1           that?

2           MR. STYLES: Not here.

3           DAN PRONMAN: Because I don't  
4           remember what it says. We have to look  
5           at it.

6           MR. STYLES: Okay.

7           DAN PRONMAN: He's answering  
8           questions on something that maybe if I  
9           see it.

10          BY MR. O'SHEEHAN:

11          Q. Did you have contact with Jurgen Stanley  
12          from your home in Florida?

13          A. I don't recall.

14          MR. BOCKSTEIN: I'm going to object  
15          to any business dealings. This is only  
16          regarding venue in this case.

17          BY MR. O'SHEEHAN:

18          Q. Did Movie Star Muscle Cars do business  
19          with Jurgen Stanley?

20          MR. BOCKSTEIN: Once again, it has  
21          nothing to do with venue or  
22          jurisdiction.

23          MR. O'SHEEHAN: Whether the  
24          corporation conducted business in  
25          Florida?

1           MR. BOCKSTEIN: The definition of  
2           "business" is defined by the case law.  
3           He already said he can do business  
4           anywhere in the world and have a  
5           Canadian corporation.

6           BY MR. O'SHEEHAN:

7           Q.    So you do business on behalf of Movie  
8           Star Muscle Cars out of your home in Coral  
9           Springs; is that correct?

10          A.    I do business -- I said I send e-mails  
11          out of my house in Coral Springs. I do business  
12          anywhere in the world for Movie Star Muscle Cars.

13          Q.    Do you make telephone calls?

14          A.    I --

15          Q.    Go ahead.

16          A.    That's it.

17          Q.    In your capacity as the president of  
18          Movie Star Muscle Cars, do you make business  
19          telephone calls out of your home in Coral  
20          Springs, Florida?

21          A.    Occasionally, I do, yes.

22          Q.    And as president of Movie Star Muscle  
23          Cars, do you send e-mails, business e-mails on  
24          behalf of Movie Star Muscle Cars from Coral  
25          Springs, Florida?

1 A. I believe I do, occasionally.

2 Q. So you take action on behalf of Movie  
3 Star Muscle Cars from your home in Coral Springs,  
4 Florida?

5 A. I don't think e-mails would be  
6 considered actions. I don't do contracts.

7 Q. Have you ever done business with Richard  
8 Pankz?

9 MR. BOCKSTEIN: I believe that any  
10 of the business dealings that he had has  
11 nothing to do with venue and  
12 jurisdiction. That's limited to this  
13 deposition.

14 MR. O'SHEEHAN: Mr. Bockstein,  
15 we've already served the 57.105 motion  
16 in this case as to your client and  
17 yourself if you're going to keep this  
18 up.

19 MR. BOCKSTEIN: Ask the question.

20 BY MR. O'SHEEHAN:

21 Q. Have you ever conducted business with  
22 Robert McClelland?

23 A. Who?

24 Q. Robert McClelland.

25 A. Have I ever done business with him? No.

1 Q. Has Movie Star Muscle Cars ever done  
2 business with him?

3 A. No, no.

4 Excuse us for one second.

5 (Thereupon, a recess was taken, after  
6 which the following proceedings were  
7 held:)

8 THE WITNESS: Ask the question  
9 again, so I understand it.

10 BY MR. O'SHEEHAN:

11 Q. Have you individually or under a d/b/a,  
12 doing business as, or under the corporation of  
13 Movie Star Muscle Cars, conducted business with  
14 Robert McClelland, who is a Florida resident?

15 A. Have I done business, yes. I didn't  
16 personally do business with him. I represented  
17 Movie Star Muscle Cars in a brokered deal, which  
18 I didn't do directly with him.

19 Q. Where did that --

20 A. Go ahead.

21 Q. Where did that take place?

22 A. Where did the deal take place?

23 Q. Yes.

24 A. I never paid him. He didn't pay me.

25 The cars were bought in just outside of Orlando,

1 Florida.

2 Q. Did you go to Orlando, Florida?

3 A. Yes, I did.

4 Q. What was your part of the transaction?

5 A. I was a broker. I brokered the deal.

6 Q. On behalf of who?

7 A. Movie Star Muscle Cars.

8 Q. And who was your client?

9 A. Who was my client? Styles.

10 Q. Did Movie Star Muscle Cars earn money  
11 from this transaction?

12 A. Yes.

13 Q. How was the money paid to Movie Star  
14 Muscle Cars?

15 A. I believe a check.

16 Q. A check to Movie Star Muscle Cars?

17 A. Or to Dan Pronman. I'm not sure.

18 Q. Under Canadian law, if you know --

19 A. Okay.

20 Q. -- can you make checks payable to a  
21 person when the money is supposed to go to a  
22 corporation?

23 A. I'm not a Canadian lawyer. I couldn't  
24 answer that question.

25 Q. Do you know if the money that gets paid

1 to Dan Pronman gets reported on the Movie Star  
2 Muscle Cars income tax?

3 A. You have to ask Dan Pronman how the  
4 money was reported.

5 Q. Do you know if Dan Pronman deposited  
6 those monies into a U.S. bank or a Canadian bank?

7 A. Again, you have to ask Dan Pronman that  
8 question.

9 Q. The checks that were made payable to Dan  
10 Pronman that were delivered to you, did you  
11 deposit those checks on behalf of Dan Pronman?

12 A. Nothing was delivered to me.

13 Q. Were the checks either delivered by mail  
14 to your house?

15 A. I don't remember how the checks were  
16 received. I know I picked up some checks at  
17 Styles' house. I don't remember.

18 Q. What did you do with those checks?

19 A. I don't recall.

20 Q. Same question with regard to Stephen  
21 Fox. Have you ever, individually, or on behalf  
22 of Movie Star Muscle Cars conducted business with  
23 Stephen Fox?

24 A. I honestly don't recall.

25 Q. Same question for Phil Silva.

1           A.    For Phil Silva, did I ever do business  
2           for Movie Star Muscle Cars for Phil Silva, on  
3           behalf of Movie Star Muscle Cars?

4           Q.    Yes.

5           A.    I negotiated a deal for a client of  
6           mine, but I wasn't paid by Phil Silva, no.

7           Q.    Were you paid by anyone?

8           A.    I wasn't paid personally, no.

9           Q.    Who was paid?

10          A.    The company was paid.

11          Q.    Where did that transaction take place?  
12          Where were the cars?

13          A.    The cars were in Oklahoma.  Again,  
14          nothing to do with this case.

15          Q.    Have you, individually, or doing  
16          business, d/b/a, or under Movie Star Muscle Cars  
17          bought, cosigned or transacted business -- -

18                   MR. STYLES:  Consigned.

19          BY MR. O'SHEEHAN:

20          Q.    -- consigned with any auction companies?

21          A.    Repeat that again.

22          Q.    Have you done business with any auction  
23          companies?

24          A.    Yes.  Not me personally, but Movie Star  
25          Muscle Cars.

1 Q. Any of those within the State of  
2 Florida?

3 A. Within the State of Florida? I don't  
4 know how the paperwork was done, but we've had  
5 cars sold at auctions in the State of Florida.  
6 The companies are owned through Canada, as a  
7 Canadian company. That was an auction in  
8 Florida. So I'm not exactly sure how the  
9 paperwork is done.

10 Q. Has Movie Star Muscle Cars ever sold a  
11 car through the Barrett-Jackson auction in West  
12 Palm Beach?

13 A. Has Movie Star Muscle Cars ever sold a  
14 car through Barrett-Jackson auction in West Palm  
15 Beach? I don't recall. I don't recall.

16 Q. Has Movie Star Muscle Cars ever owned a  
17 white Z28?

18 A. That may be my personal car. I have to  
19 check the records on that car. I'm sorry. I  
20 don't know if it's a Movie Star Muscle Cars.

21 That was a personal car. That was a  
22 personal car.

23 Q. And whether it was owned by Movie Star  
24 Muscle Cars or you personally, did that car sell  
25 at the Barrett-Jackson auction in West Palm

1 Beach?

2 A. That's possible, yes, but I don't  
3 remember.

4 Q. Would you have records to show whether  
5 it was yours personally?

6 A. I believe that was my personal car. It  
7 wasn't a Movie Star Muscle Cars' car.

8 Q. I thought you said earlier you only do  
9 business through Movie Star Muscle Cars?

10 A. I'm allowed to own personal vehicles.  
11 What does that have to do with anything? You're  
12 getting off the topic and that's personal stuff.

13 Q. Did you make a profit when you sold that  
14 car?

15 A. Absolutely not. I think I lost money.

16 Q. Have you conducted business on behalf of  
17 Movie Star Muscle Cars with Brian Styles in the  
18 State of Florida?

19 A. No, not in the State of Florida. Not  
20 that I'm aware of.

21 MR. BOCKSTEIN: Have you conducted  
22 business with Brian Styles in the State  
23 of Florida on behalf of Movie --

24 THE WITNESS: Oh, yes, on behalf of  
25 Movie Star Muscle Cars. Not me

1           personally, yes.

2           BY MR. O'SHEEHAN:

3           Q.    Did you drive with him from Broward  
4           County up to --

5           A.    Orlando or close to it.

6           Q.    -- Orlando?

7           A.    Yes.  I already said that.

8           Q.    You have spoken to him on the phone in  
9           Florida?

10          A.    Yes.

11          Q.    With regard to Brian Styles' attempt to  
12          purchase the 1969 Super Bee vehicle, did you  
13          communicate directly with Brian about the  
14          vehicle?

15          A.    Did I communicate directly with --

16          Q.    With Brian?

17          A.    Can you clarify what you mean exactly?

18          Q.    Did you speak with him about the  
19          vehicle?

20          A.    We spoke.  I believe we spoke.  There  
21          were e-mails back and forth.  Yes.

22          Q.    Do you know if anyone else communicated  
23          directly with Brian about the vehicle?

24          A.    I believe my brother did, also.  You'll  
25          have to ask him that question.

1 Q. With your communications with him, what  
2 communications did you have, by what means?

3 A. We did phone conversation and e-mail.

4 Q. Anything in person?

5 A. I don't recall.

6 Q. Do you know why Brian was purchasing  
7 this vehicle or was interested in this particular  
8 vehicle?

9 A. Yes. He was -- like I said, he had  
10 money that he got from selling his company, as I  
11 was told, and he was looking to put his money  
12 into work to buy and sell vehicles to make a  
13 profit.

14 Q. Do you know if he was buying this  
15 vehicle for his own personal collection?

16 A. What I know -- as far as I know, if he's  
17 buying vehicles, it was to buy and sell as a  
18 profit. Everything that he discussed with me was  
19 always on a buy and sell basis and it was always  
20 for a profit.

21 MR. BOCKSTEIN: What do you mean by  
22 "buy and sell basis."

23 THE WITNESS: He wanted to buy the  
24 vehicle and make a profit and resell it.

25 BY MR. O'SHEEHAN:

1 Q. Are you aware of Mr. Styles selling any  
2 cars in the last two years?

3 A. Oh, yes.

4 Q. What cars?

5 A. Oh, there's a '69 Z28 from that first  
6 five-car deal through McClelland.

7 Q. The Z28, did he sell that car?

8 A. Yes, he did.

9 Q. And that car was his car?

10 A. His car?

11 Q. It was titled in his name?

12 A. I don't know who had title. The car was  
13 bought for him. As a package to buy and sell  
14 cars, he offered me -- when we initiated this, he  
15 offered me -- the reason we worked on this  
16 brokerage fee is because I've known him for many  
17 years.

18 He asked me to help him get into the  
19 business of buying and selling so he can make a  
20 profit. He said that anything that he would buy  
21 he would pay me additional money to resell for  
22 him. So that was all due to the reasons that I  
23 worked with him initially on this brokerage fee,  
24 because that's not usually how I work with  
25 people.

1 Q. How many cars have you resold for him  
2 and gotten a fee for?

3 A. What happened is that the deal had  
4 changed. He tried to sell them all on his own.  
5 That's why I'm asking for additional money on the  
6 first five-car deal as the initial agreement was  
7 five percent.

8 As the deal evolved and he reneged on  
9 his part of the deal for us to sell them, so we  
10 agreed to sell those first five cars at five  
11 percent.

12 Q. How many cars have you sold for  
13 Mr. Styles and received payment from him for  
14 selling them?

15 A. How many cars I've sold for him  
16 personally? None.

17 Q. You mentioned you are seeking additional  
18 money. How are you seeking additional monies?

19 A. Additional monies. Monies owed to me on  
20 the five-car deal. The balance of the five  
21 percent that I never received.

22 Q. How are you seeking that money?

23 A. I have invoices. He hasn't paid me.

24 Q. Are you taking any action to recover  
25 that money, any court action?

1           A.    At this point -- pardon.  At this point,  
2    no.

3           Q.    Do you have any evidence that Brian  
4    Styles sold any cars in the last two years?

5           A.    Evidence?

6           Q.    Yes.

7           A.    He told me, himself, personally that he  
8    sold the Z28 four or five days later after he  
9    picked it up.  He told me he sold other cars.  
10   He's advertising cars on many websites.  He's in  
11   the business of buying and selling cars.

12          Q.    When you say he told you that he sold  
13   the Z28, where did that conversation take place?

14          A.    Where did that conversation -- I think  
15   that conversation took place at his house when I  
16   picked up one of the checks, I believe.

17          Q.    When was that?

18          A.    I don't remember the exact date, but it  
19   was shortly after we bought the first five cars.  
20   So I have to check my timeline to give you an  
21   exact date.  I don't remember the exact date.  
22   But it was shortly after the first five cars.

23          Q.    Was anyone else present for those  
24   conversations?

25          A.    I believe his girlfriend and a friend

1 was with me.

2 Q. Who was with you?

3 A. A guy named Ralph. Person that drove me  
4 over to his house at the time.

5 Q. What's Ralph's last name?

6 A. Tucci, T-u-c-c-i.

7 Q. What city does he live in?

8 A. I don't know the city. He's an  
9 acquaintance. He told me that he sold the car,  
10 but, again, I'm not exactly sure when he told me,  
11 but he told me that within a few days after we  
12 did the deal. That's the best of my  
13 recollection.

14 Q. Now, that Z28, do you have any evidence  
15 that that was his car or titled in his name?

16 A. I don't have evidence that he titles  
17 anything in his name. It seems to me that  
18 everything is a mystery, where the money comes  
19 from, where the money goes and in what form the  
20 money is distributed. Maybe it will all become a  
21 non-mystery as this case evolves.

22 Q. Other than the Z28, you're saying  
23 Mr. Styles has told you that he is in the  
24 business of buying and selling cars?

25 A. Not other than the Z28. In all and

1 every deal that we did or attempted to do, that  
2 was always the case. He wanted to buy cars  
3 because the market was low to turn around and  
4 resell them at a high to make a profit. In every  
5 case, all cars.

6 Q. If that's true, then what cars has he  
7 sold? You mentioned the Z28. What other cars  
8 has he sold?

9 A. He's attempting to sell the GTX, and I  
10 don't know what else he is attempting to sell.  
11 There's ads in a few different websites. I don't  
12 have it on hand. We have some information.

13 Q. Do you have any evidence that the GTX is  
14 Mr. Styles' car?

15 A. I don't have any evidence that the GTX  
16 is Mr. Styles' car, other than Mr. Styles, in my  
17 presence, paid McClelland the deposit and claimed  
18 them to be his card. Told me he was buying it  
19 for himself, to buy and sell. Other evidence  
20 than that, unless he wants to tell you  
21 differently.

22 DAN PRONMAN: He has the checks,  
23 too.

24 THE WITNESS: Yeah.

25 BY MR. O'SHEEHAN:

1 Q. Do you know what checking account the  
2 money came out of to buy those cars?

3 A. I don't know that offhand.

4 Q. Do you know whose money it was that was  
5 used to buy those cars?

6 A. I believe it was his.

7 Q. Do you know?

8 A. I was made under the impression that it  
9 was his.

10 Q. Do you have any proof or evidence?

11 A. You have a proof of that check that was  
12 deposited to Mr. McClelland. I don't know which  
13 account it came out of or where it came out of or  
14 where it went. But maybe we have to get some  
15 independent government agency to inspect all  
16 these transactions and find out where and where  
17 everything is coming from and where it's all  
18 going.

19 MR. BOCKSTEIN: We're getting a  
20 little far from the venue or  
21 jurisdiction in this case. I let it go  
22 for a while, but let's see if it goes  
23 back on track.

24 BY MR. O'SHEEHAN:

25 Q. What printed publications have you or

1 you, on behalf of Movie Star Muscle Cars,  
2 advertised or placed classified ads in?

3 A. Printed publications?

4 Q. Magazines.

5 A. Canadian Classics, Mopar Collectors  
6 Guides, Hemmings, Motor News. That's the best of  
7 my recollection.

8 Q. Do you know if any of those publications  
9 are distributed in Florida?

10 A. I don't work for any of those  
11 publications. I have no idea where and when they  
12 sell their magazines.

13 Q. Do you know if they can be bought in a  
14 bookstore or newsstand in Florida?

15 A. I believe most magazines can be bought  
16 anywhere in the United States and Canada.

17 Q. Do you know if any of the ads have  
18 websites for Movie Star Muscle Cars mentioned in  
19 them?

20 A. I don't recall offhand.

21 Q. Do you know who would know that?

22 A. The magazines. The ads may have it; may  
23 not have it. I don't recall offhand. Sometimes  
24 they post them. This doesn't have to do with  
25 anything.

1 Q. Who would have the information for what  
2 was provided by Movie Star Muscle Cars to the  
3 magazines?

4 THE WITNESS: Where is he going  
5 with this crap?

6 MR. BOCKSTEIN: I'm going to  
7 object. I don't see where it has to do  
8 with venue or jurisdiction.

9 MR. O'SHEEHAN: If Movie Star  
10 Muscle Cars advertises products for sale  
11 in magazines that are distributed to  
12 Florida that gives rise to jurisdiction  
13 and venue.

14 THE WITNESS: How does --

15 MR. BOCKSTEIN: He already said  
16 that he advertised in those magazines.  
17 He's not sure where they distribute.  
18 And he said they probably are  
19 distributed in the United States and in  
20 Canada, to the best of his knowledge.

21 BY MR. O'SHEEHAN:

22 Q. But what I want to know, whether in  
23 those magazines, what Movie Star Muscle Cars is  
24 claiming, it is doing business always as Movie  
25 Star Muscle Cars, correct?

1 A. To the best of my knowledge, yes.

2 Q. So then someone from Movie Star Muscle  
3 Cars creates an ad or creates language to send to  
4 the magazine?

5 A. Okay.

6 Q. Who does that?

7 A. Who does it?

8 Q. Yes.

9 A. It could be myself or my brother.

10 Q. And would Movie Star Muscle Cars have  
11 records of what was sent?

12 A. No.

13 Q. How would it be created, on computer,  
14 handwritten?

15 A. It could be handwritten. It could be a  
16 phone. It could be a fax. It could be an  
17 e-mail. I don't recall.

18 Q. And you don't have any business records  
19 for Movie Star Muscle Cars?

20 A. Not on the ads. I have to check.

21 Q. Do you have to pay money to run these  
22 ads?

23 A. Sometimes you do and sometimes you  
24 don't.

25 Q. Which ones do you have to pay that you

1 know of?

2 A. I don't recall. Excuse me, I have to go  
3 to the washroom.

4 (Thereupon, a recess was taken, after  
5 which the following proceedings were  
6 held:)

7 THE WITNESS: In reference to the  
8 questions of Steve Fox, yes, I believe  
9 in the past, we did conduct some  
10 business as Movie Star Muscle Cars.

11 MR. O'SHEEHAN: I'd like to mark  
12 some ads as Exhibits 3, 4 and 5.

13 (Plaintiff's Exhibit Nos. 3 through  
14 5 were thereupon marked for  
15 Identification.)

16 BY MR. O'SHEEHAN:

17 Q. Exhibit 3, what is that an advertisement  
18 for?

19 A. Movie Star Muscle Cars' restorations.

20 Q. Is there a vehicle that you're  
21 advertising?

22 A. No, no, just restorations is being  
23 advertised.

24 Q. Does it have an abbreviation of a state  
25 in there?

1           A.    I don't know why it has it.  Maybe I  
2    paid it with my credit card or gave my address  
3    for my credit card.  I don't know why they put  
4    that in.  You can see the telephone number is my  
5    cell phone number, but it's definitely from my  
6    company, which I use my cell phone number as it  
7    is easier to get in contact with me.  Same ad,  
8    same thing.

9           Q.    The phone number, is that 514 number  
10   from Canada?

11          A.    No, that's my 561 phone number, cell  
12   phone.

13          Q.    From here in Florida?

14          A.    Correct.

15          Q.    So if somebody would want to contact  
16   Movie Star Muscle Cars, they would call that 561  
17   number?

18          A.    It's easier to get me on my cell phone  
19   number than to get me in the office.

20          Q.    What office?

21          A.    My Montreal office.

22          Q.    How often are you at the Montreal  
23   office?

24          A.    Occasionally.  I don't remember.  Can't  
25   give you the exact number or days.

1 Q. If somebody called you on the 561  
2 number, would you not conduct business and would  
3 you say, you have to wait until you go to  
4 Montreal and have them call you up there?

5 A. I can answer questions on my cell phone  
6 about anything. And if they need a quote or they  
7 need a contract or they need something, it would  
8 be generated from my Montreal office.

9 Q. But you're soliciting them to call you  
10 in Florida, correct?

11 A. No, I use that telephone number as a  
12 convenience.

13 Q. What about Exhibit 4, what is that an ad  
14 for?

15 A. Exhibit 4, I don't know what you're  
16 talking about. Is it this one?

17 Q. The highlighted one on Exhibit 4.

18 A. I can't see that small. It says my name  
19 and telephone number. And it says, "GP" -- I  
20 can't read it.

21 DAN PRONMAN: I'll read it.

22 MR. STYLES: You want to read it  
23 out loud so it can be transcribed, if  
24 you can?

25 DAN PRONMAN: I'll read what I can.

1 "Hemi Charger R/T, '69, very rare black  
2 on black, 4-speed, NOM, non-vinyl top"  
3 something "car." I can't read it.

4 "Radio delete, broadcast sheet, just  
5 completed. No expenses spared, nut and  
6 bolt rotisserie restoration, serious  
7 offers." It says to call Gary with his  
8 phone number.

9 MR. O'SHEEHAN: What phone number?

10 DAN PRONMAN: It say (561)  
11 445-0649. That's his cell number and  
12 then it says to e-mail -- a Florida  
13 e-mail and the Florida e-mail address is  
14 GPmusclecars@aol.com.

15 And then it says, "Complete resto  
16 photos and all information at  
17 Moviestarmusclecars.com."

18 BY MR. O'SHEEHAN:

19 Q. And it says, "Florida e-mail address,"  
20 correct?

21 A. No, it says "Florida."

22 DAN PONMAN: It doesn't say,  
23 "Florida e-mail."

24 THE WITNESS: That's from Hemmings.  
25 They have my address in Florida from my

1 billing of the credit card.

2 DAN PRONMAN: You know, that's why  
3 they put it on.

4 MR. BOCKSTEIN: You don't generate  
5 it?

6 THE WITNESS: I don't generate  
7 that. He generates that.

8 That's based on the credit card  
9 that I paid with and I did it from my  
10 personal credit card. I paid for those  
11 ads from my personal credit card and  
12 that's why they have "Florida" on there.

13 BY MR. O'SHEEHAN:

14 Q. How do you know that to be true?

15 A. That's the only way they can have that  
16 because I didn't give them any address. So I  
17 guess that's the only way they would have taken  
18 it.

19 They need the billing address for my  
20 credit card when they take it over the phone, so  
21 that's the only way I can explain that.

22 Q. In which publication is that?

23 A. I believe that's Hemmings.

24 Q. And do you know that that's how they put  
25 the state location based on the billing address

1 on the credit card?

2 A. I believe that's what they did.

3 Q. Do you know that or you're just  
4 surmising?

5 A. I said I believe that's what they did.  
6 I don't know for a fact what they do.

7 MR. BOCKSTEIN: Are we talking  
8 about Exhibit 5 now?

9 THE WITNESS: All the exhibits.

10 MR. O'SHEEHAN: Four.

11 THE WITNESS: They are all the  
12 same. The car is definitely not in  
13 Florida, so I don't know why they would  
14 have a Florida, Fl, other than because  
15 they are using my credit card address.

16 BY MR. O'SHEEHAN:

17 Q. Where were you located?

18 A. Where was I located?

19 Q. Yes.

20 A. I don't know where I was located when I  
21 did it. But I probably used my Florida credit  
22 card when I paid for it.

23 Q. Where is the phone number?

24 A. That phone number is my cell phone  
25 number.

1 Q. And you've been taking calls on behalf  
2 of Movie Star Muscle Cars at that number from  
3 that ad?

4 A. I'll take calls from anyone who calls me  
5 on that number.

6 Q. Can you read Exhibit 5, please, the  
7 highlighted portion?

8 A. I thought I just did.

9 DAN PRONMAN: That was four.

10 THE WITNESS: That's the same one.

11 DAN PRONMAN: That's the one I just  
12 read. Five, sorry. Did we miss four?

13 THE WITNESS: Three and four are  
14 the same, just different dates, but the  
15 same ad. I didn't see that.

16 DAN PRONMAN: Yeah, this is just  
17 restoration for the shop.

18 THE WITNESS: It's a different  
19 month.

20 DAN PRONMAN: As you can imagine,  
21 it's not done in Coral Springs.

22 THE WITNESS: It's just --

23 BY MR. O'SHEEHAN:

24 Q. Who pays for those ads?

25 A. The company pays for it. I might have

1 given my credit card out of convenience so they  
2 put it up because they asked for a credit card  
3 instead of sending them a check.

4 MR O'SHEEHAN: Mark the next  
5 Exhibit Number 6.

6 (Plaintiff's Exhibit No. 6 was  
7 thereupon marked for Identification.)

8 BY MR. O'SHEEHAN:

9 Q. What is that an advertisement for?

10 A. That's an advertisement for a '71 Hemi  
11 Cuda.

12 Q. And where does it say it's located?

13 A. No, that's just the address of the  
14 website.

15 MR. O'SHEEHAN: Can you please give  
16 it back to Gary, please?

17 THE WITNESS: That's fine. This ad  
18 was to be disguised because of the  
19 intentional harassment done by Brian  
20 Styles in an intention to ruin our  
21 business and cause us much havoc. So  
22 that's why we had to generate that  
23 e-mail address and post it as you see it  
24 to avoid anybody knowing who was selling  
25 the car.

1 BY MR. O'SHEEHAN:

2 Q. Who is advertising that car for sale?

3 A. Who is advertising that car for sale?

4 The company is posted by Zrarecars. That's a  
5 website.

6 Q. Is that a corporation?

7 A. No.

8 Q. Who owns that website?

9 A. Nobody. It's an e-mail address. It's  
10 just a name.

11 Q. You said, "The website."

12 A. No, it's not a website. Excuse me.

13 That was a mis-explanation.

14 Q. Is that a fictitious ad?

15 A. Is that a fictitious ad?

16 Q. Does that car exist?

17 A. Yes, the car exists.

18 Q. Who has that car?

19 A. A customer of mine has the car. He  
20 asked me to post it for him.

21 Q. Were you brokering it?

22 A. I was a broker in the car, yes.

23 Q. Why was the location Parkland, Florida?

24 A. That was just for ad purposes. The car  
25 was in Minneapolis, not in Florida. Again, to

1 divert recognition as per Mr. Styles attempting  
2 to defraud and ruin my business. I did it in an  
3 attempt not to be -- so nobody would know that it  
4 was Movie Star Muscle Cars, and it would come  
5 back to this website that Mr. Styles posted  
6 online.

7 Q. What website is that?

8 A. Garypronman.com.

9 Q. How did you become aware of that  
10 website?

11 A. How did I become aware of that website?  
12 Customers of mine calling me and asking me what  
13 this was about.

14 Q. Do you know where you were when you  
15 first saw the website?

16 A. No, I don't.

17 Q. Have you ever viewed that website from  
18 outside of the United States?

19 A. Have I ever viewed that website from  
20 outside of the United States? Yes.

21 Q. From where?

22 A. Montreal, Canada, I believe.

23 MR. BOCKSTEIN: I'm going to  
24 object. We're getting a little far.  
25 Where are we going with this?

1 BY MR. O'SHEEHAN:

2 Q. Let's go back to Exhibit 6. Why does it  
3 say, "Parkland, Florida" as location?

4 A. Typo. Who knows. I don't remember.  
5 Again, to divert the ownership of the car.

6 What does this have to do with anything?

7 Q. So neither you or your brother, Dan,  
8 live in Parkland, Florida?

9 A. I don't live in Parkland, Florida.

10 Q. Does your brother, Dan, live in  
11 Parkland, Florida?

12 A. My brother lives in Montreal and  
13 Florida. Ask Dan where he lives.

14 Q. Where in Florida when he lives in  
15 Florida?

16 A. Ask him. You can interview him.

17 Q. I'm asking you.

18 A. He lives at 11575, I believe is his  
19 address. I don't know the exact address, other  
20 than that.

21 Q. What street?

22 A. I don't know what street.

23 Q. What city?

24 A. I don't know. Oh, it's Parkland? Okay.  
25 It's in Parkland, Florida.

1 Q. Do you have any business cards with you?

2 A. No.

3 Q. Do you have business cards?

4 A. Yes.

5 Q. What do they say on them?

6 A. I don't know. I don't have them in  
7 front of me.

8 Q. You don't have any in your wallet?

9 A. No.

10 DAN PRONMAN: Do you have one?

11 MR. STYLES: I'm retired. Why  
12 would I have a business car?

13 THE WITNESS: You're retired from  
14 buying and selling cars?

15 MR. BOCKSTEIN: Stop. Just answer  
16 questions.

17 MR. O'SHEEHAN: That's all the  
18 questions I have. Do you have any  
19 questions?

20 MR. BOCKSTEIN: I have no further  
21 questions.

22 MR. STYLES: I would like a comment  
23 on that.

24 (Plaintiff's Exhibit No. 7 was  
25 thereupon marked for Identification.)

1 BY MR. O'SHEEHAN:

2 Q. One more exhibit, number 7. Do you know  
3 what publication or website that article is from?

4 A. Okay. As you can see, they ask me where  
5 I live.

6 MR. BOCKSTEIN: What publication?

7 BY MR. O'SHEEHAN:

8 Q. What publication?

9 A. Mopar Muscle is the magazine.

10 Q. Were you interviewed?

11 A. I don't remember if I was interviewed.  
12 If I can read it all, I can tell you a little bit  
13 more.

14 Q. Okay.

15 A. Okay. All it says is that I have a  
16 Coral Springs address and Dan named Danny  
17 Pronman, which is obviously a misprint. We  
18 didn't generate it. There's just writing about  
19 us.

20 Q. What's the date? Is there a date on  
21 that?

22 A. February, 2009.

23 Q. What does the highlighted portion say?

24 A. "Gary and Danny Pronman of Coral  
25 Springs, Florida." I didn't write it.

1 MR. BOCKSTEIN: Let him ask  
2 questions.

3 BY MR. O'SHEEHAN:

4 Q. Were you interviewed for that article?

5 A. I don't remember being interviewed for  
6 that article. If I read the full thing, I can  
7 tell you.

8 Q. They're talking about the car.

9 MR. BOCKSTEIN: Just wait for the  
10 question.

11 THE WITNESS: No, I don't remember.

12 Ask me the question, sir. Go ahead.

13 BY MR. O'SHEEHAN:

14 Q. What car is that article about?

15 A. This is a car that we owned five years  
16 ago, four, five years ago.

17 Q. When you say, "we," what do you mean?

18 A. Movie Star Muscle Cars.

19 Q. What car is it?

20 A. It's a '71 Hemi Cuda.

21 Q. And did you sell that car?

22 A. Did we sell that car? Yeah, we sold  
23 that car.

24 Q. Do you recall being interviewed for  
25 this?

1           A.    Not really.  It's a long time ago, to be  
2 honest with you.

3           Q.    What is the date on the publication?

4           A.    I don't know.  When they published it,  
5 it was February, 2009.  This, like I said, I  
6 don't know when they wrote this article.  They  
7 had this for years.  This is an old car that was  
8 sold.  It's been traded hands a few times  
9 already.

10          Q.    When did you sell it?

11          A.    When did we sell this car?  Sometime  
12 around 2003, I'd say, 2004, in that range.

13                DAN PRONMAN:  I can verify.  It's  
14 been a long time.

15                THE WITNESS:  I would guess at that  
16 time.

17                MR. O'SHEEHAN:  All right.  Any  
18 questions?

19                MR. BOCKSTEIN:  No, no questions.  
20 You finished?

21                MR. O'SHEEHAN:  Yes.

22                MR. BOCKSTEIN:  Read or waive?  Are  
23 you ordering this?

24                MR. O'SHEEHAN:  We're going to  
25 order this.

1           MR. BOCKSTEIN: So if you want, we  
2           can read this whole thing to make sure  
3           that everything comes out right or you  
4           can waive it and trust that she's taking  
5           it down right.

6           THE WITNESS: She seems  
7           trustworthy.

8           DAN PRONMAN: If there is a  
9           mistake, we can say it.

10          MR. BOCKSTEIN: Waive it. I'll let  
11          you know if I want a copy.

12          (Thereupon, the deposition was  
13          concluded at 12:35 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  
GARY PRONMAN personally appeared before me and  
was duly sworn.

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

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MARIA ISABEL FERNANDEZ

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

