

IN THE SUPERIOR COURT OF OCONEE COUNTY  
STATE OF GEORGIA

GLENDAL. OCHOA  
Plaintiff,

v.

JOHN ERNEST SNOWDEN, NEW SOUTH  
TRUCKING, LLC, LAD TRUCK LINES,  
INC., and PROTECTIVE INSURANCE  
COMPANY

Defendants.

CIVIL ACTION  
FILE NO.: SUCV2022000043

**MOTION TO HOLD YASHA HEIDARI, ESQ.**  
**IN CONTEMPT OF COURT**

COME NOW Defendants and hereby move that Yasha Heidari, Esq. be held in contempt of court for his defiance of this Court's "Rule Nisi" order issued on October 7, 2025. Defendants show as follows:

**SHORT SUMMARY OF ARGUMENT**

This Court ordered Ortho Sport & Spine's attorney, Yasha Heidari, to identify the individuals behind the shell companies his client has created and destroyed in an ongoing effort to evade discovery. In a signed legal filing, Mr. Heidari disclaimed the knowledge requested. As shown herein, Mr. Heidari's office was directly involved in the creation of those entities, even issuing payment to the Georgia Secretary of State to set up the most recent shell, Premier Medical Consultants, LLC d/b/a "Maranex" a/k/a "Fortress Data Solutions" – which was also registered to a street address owned by Ortho Sport. This means that Mr. Heidari has knowingly signed a false document in an attempt to perpetrate a fraud upon this court. Accordingly, Defendants request that sanctions be entered against Mr. Heidari, that this matter be referred to the State Bar for disciplinary investigation, and request further relief as described herein.

## **FACTUAL BACKGROUND**

Defendants were aware of the involvement of Ortho Sport & Spine Physicians, LLC in Plaintiff's lawsuit before this case was filed, based on the demand correspondence her counsel sent. Defendants also had prior familiarity with Ortho Sport's "phantom damages"-based business model.<sup>1</sup> Accordingly, Defendants raised the affirmative defense of fraud in their Answer.

As this case progressed, Defendants served non-party discovery requests upon both Ortho Sport itself, and also upon a series of "shell companies" with which it has historically done business, seeking materials going to Ortho Sport's phantom damages business model and this lien clinic's business relationship with the law firms involved in Plaintiff's case. This Court issued orders compelling Ortho Sport and its shell companies (primarily going by the moniker "Medernix, LLC" in this particular case) to produce relevant materials. Ortho Sport and Medernix both appealed, but this Court's order was upheld on appeal, with one modification that the Court of Appeals referred back to this court for further proceedings.<sup>2</sup>

### **1. Yasha Heidari's claims that Ortho Sport and "Medernix" were purportedly at arm's length, and therefore that Ortho Sport has produced "everything" it has.**

Throughout this case, Ortho Sport has, via its principal counsel Yasha Heidari, Esq., as well as via other lawyers employed by Mr. Heidari's firm, maintained the fiction that there is an arm's-length relationship between Ortho Sport and the Medernix entities, who purportedly handle all interactions with personal injury lawyers in Ortho Sport cases. This alleged distinction was one of the principal bases for Ortho Sport's claims that it has "produced everything it has," which Mr.

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<sup>1</sup> See *Omni Healthcare, LLC v. Stacy Young Excavation, Inc.*, A25A1411, 2025 WL 2778111, at \*2 (Ga. Ct. App. Sept. 30, 2025) ("As set forth above, the defendants seek to prove that Omni and its medical provider partners are 'building claims' based upon 'phantom damages,' and the pricing information is relevant to this issue.")

<sup>2</sup> *Medernix, LLC v. Snowden*, 372 Ga. App. 48, 48-49, 903 S.E.2d 728 (2024).

Heidari has repeatedly made on the record. For example:

23 THE COURT: So what has been produced?  
24 MR. MATTHEWS: Bills and records. That's it. Same  
25 thing they give in every case, even though they've been  
1 ordered by multiple courts to turn over more than that.  
2 MR. HEIDARI: **Everything in our system, Your Honor**  
3 **So if we have it, Mr. Matthews should have it. And the**  
4 **fact...**  
5 MR. MATTHEWS: That is not true.  
6 MR. HEIDARI: **...that he's crying that he wants more**  
7 **doesn't mean that more exists. And that's a problem. I**  
8 **mean, and that's going to be the problem with the data base**  
9 **report, too, once we get into it.** But it sounds like Your  
10 Honor wants to wait and see what the Supreme Court is going  
11 to do about that.

Transcript of hearing on October 15, 2024 at PP21-22.

This subterfuge has been going on throughout this whole case. For example, in the hearing on Defendants' original motion to compel on July 26, 2022, Mr. Heidari stood next to Medernix's then-counsel Mr. John Webb and heard Mr. Webb argue that Medernix could not produce requested information, because "you're talking about forcing a non-party to invade a client's software to generate a report that ostensibly would be used against them." (Transcript of hearing, July 26, 2022, P39, LL8-9). Mr. Heidari said nothing to correct Mr. Webb's argument or otherwise indicate that Medernix was anything other than a third-party vendor, with no direct relationship to Ortho Sport's ownership or to its counsel.

Later, in the hearing on June 20, 2025, Mr. Heidari directly contested Defendants' argument that Medernix was simply a shell company set up by Ortho Sport, in the following colloquy:

1 MR. MATTHEWS: You know, Judge, what's really going on  
2 here is that Ortho Sport has created a series of shell  
3 companies and Medernix was one of them. They keep...  
4 **MR. HEIDARI: I'm going to object.**  
5 MR. MATTHEWS: ...changing names...

6 **MR. HEIDARI: It's a mischaracterization, Your Honor.**  
7 MR. MATTHEWS: ...and they're in the same location and  
8 they're still doing business.

Transcript of hearing on June 20, 2025, at P14, LL1-8.

During that same hearing, the issue of Medernix's principals and their identities came up. This Court correctly noted that an LLC which ceases doing business does not automatically become immune from discovery; rather, the principals of that LLC still stand answerable for ongoing proceedings. Mr. Heidari was again present, as Medernix's counsel Mr. Webb made the following statements to the Court, but again did nothing to correct the record:

2 MR. WEBB: Well, I would like for Medernix to be  
3 excused from this whole thing because they have no access  
4 to anything, they have no employees.  
5 THE COURT: **Who's the head of the company if you had**  
6 **to -- I mean, that would still be subject to the discovery**  
7 **prior to dissolution?**  
8 MR. WEBB: **I couldn't tell you.** Mr. Stubblefield told  
9 me about a year ago that he was leaving Medernix but that  
10 he wanted me on behalf of Medernix to just close out those  
11 cases that were still pending. There are only, like, four  
12 of them and this is one of them.

Transcript of hearing on June 20, 2025, at P42, LL2-12.

While these issues were playing out in this case, other courts had begun recognizing that Ortho Sport has indeed been playing a true shell game with the Medernix entities. For instance, after reviewing dozens of exhibits (discussed below), Judge Brian Fortner of Douglas County found as follows:

A party may request that another party produce discoverable documents that are within the "possession, custody, or control of the party upon whom the request is served" pursuant to OCGA § 9-11-34 (a) (1) and OCGA § 9-11-34 (c) (1) establishes that the same rule applies to requests made to nonparties. The Defendants have made such requests from Ortho Sport and the Ortho Contract Companies. **What has followed has not been the broad free flowing exchange of information that is customary and provided for under Georgia's Civil Practice Act. Instead, it resembled a legal shell game of sorts.** Ortho Sport and

the Ortho Contract Companies have conflicting positions as to who has the relevant discovery and who should be required to provide it. This issue has become a major obstacle in the normal progress of cases and has resulted in extreme delay. This legal posturing must end, and legally authorized discovery must be exchanged.

Several things are clear from the record in this case. Ortho Sport has employed multiple companies in recent years to document its files, track patients and law firms involved with its patients, communicate with plaintiffs' lawyers about medical liens and surgical estimates, negotiate bills and approve or deny certain medical treatments, manage and track accounts receivable, and run reports on the patient accounts. It is clear that such companies have authority to access Ortho Sport's information and records in carrying out their job duties. It is undisputed that all the records sought involve Ortho Sport, Ortho Sport's treatment of the Plaintiff and similarly situated patients and Ortho Sport's relationship with Plaintiffs law firm. Ortho Sport can be required to obtain the discoverable material from the Ortho Contract Companies, because Ortho Sport has the legal right to obtain the documents and information at issue. There is no legal and sufficient argument otherwise. Ortho Sport can also be compelled to extract data from its medical billing and records software program, eClinicalWorks, and translate that data into a report, even if it does not regularly create such a report as part of its business. Such discovery is authorized as held by the Court of Appeals in *Medernix, LLC v. Snowden*, 372 Ga. App. 48 (2024).

[...]

The Court reserves ruling on the Defendant's request for Attorney Fees and the Defendants Motion to depose Attorney John Webb. The Court does note that this order is an attempt to resolve the ongoing discovery dispute involving Ortho Sport and the Defendants. **If the shell game continues then this Court will consider ordering the depositions of individuals affiliated with Ortho Sport and the Court will consider the extreme sanction of exclusion of evidence related to Ortho Sport's treating physician and the treatment of the Plaintiff.**

Order of Douglas County, entered March 28, 2025, previously filed.

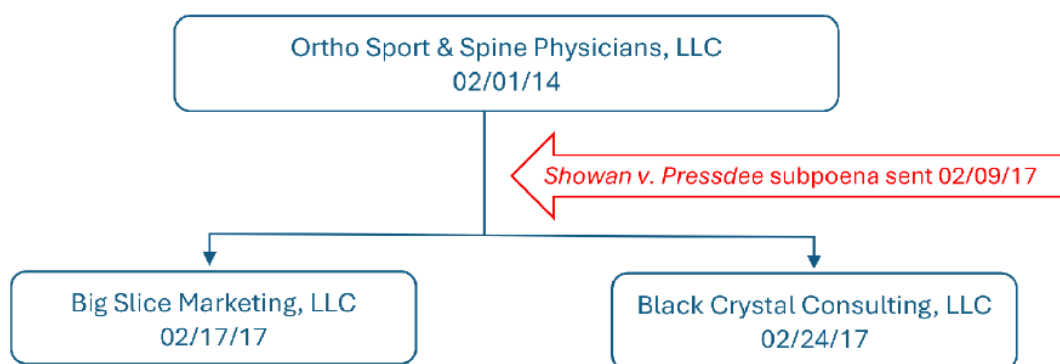
Judge Fortner reviewed the Timeline of Ortho Sport's Shell Companies exhibit, with supporting documentation, which Defendants have dubbed "Ex. T" throughout this case. That exhibit is already of record, but a brief review of the most pertinent facts is worthwhile here.

**2. Ortho Sport's timeline of shells demonstrates Mr. Heidari's direct involvement in Ortho Sport's discovery subterfuge, making him a material witness.**

As shown in Ex. T, Ortho Sport was first confronted with discovery requests going to its

relationships with personal injury law firms back in 2017, in the case that became the 11<sup>th</sup> Circuit's landmark *Showan v. Pressdee* decision. See *Showan v. Pressdee*, 922 F.3d 1211, 1218 (11th Cir. 2019) (pre-tort reform Collateral Source Rule did not bar experts from analyzing amounts paid as part of reasonable value analysis).

**Figure 1 – Timeline of Ortho Sport's Corporate Shell Game**



*Fig. 1 – Ortho Sport's original shells*

Mere days after being confronted with what were apparently some uncomfortable subpoenas, Ortho Sport spun off two shell entities for the first time, while that case was still active. The first shell company was called Black Crystal Consulting, LLC, and it started the “Medernix” line of “case manager” shells, that principally handle lawyer communications for Ortho Sport. The first entity in the other line of shells was “Big Slice Marketing,” which started an equivalent line of fake companies, handling marketing duties to personal injury firms for Ortho Sport.

Notably, Mr. Heidari was personally involved in the creation of these entities. We know this because he was listed as the registered agent for both shells when they were created:

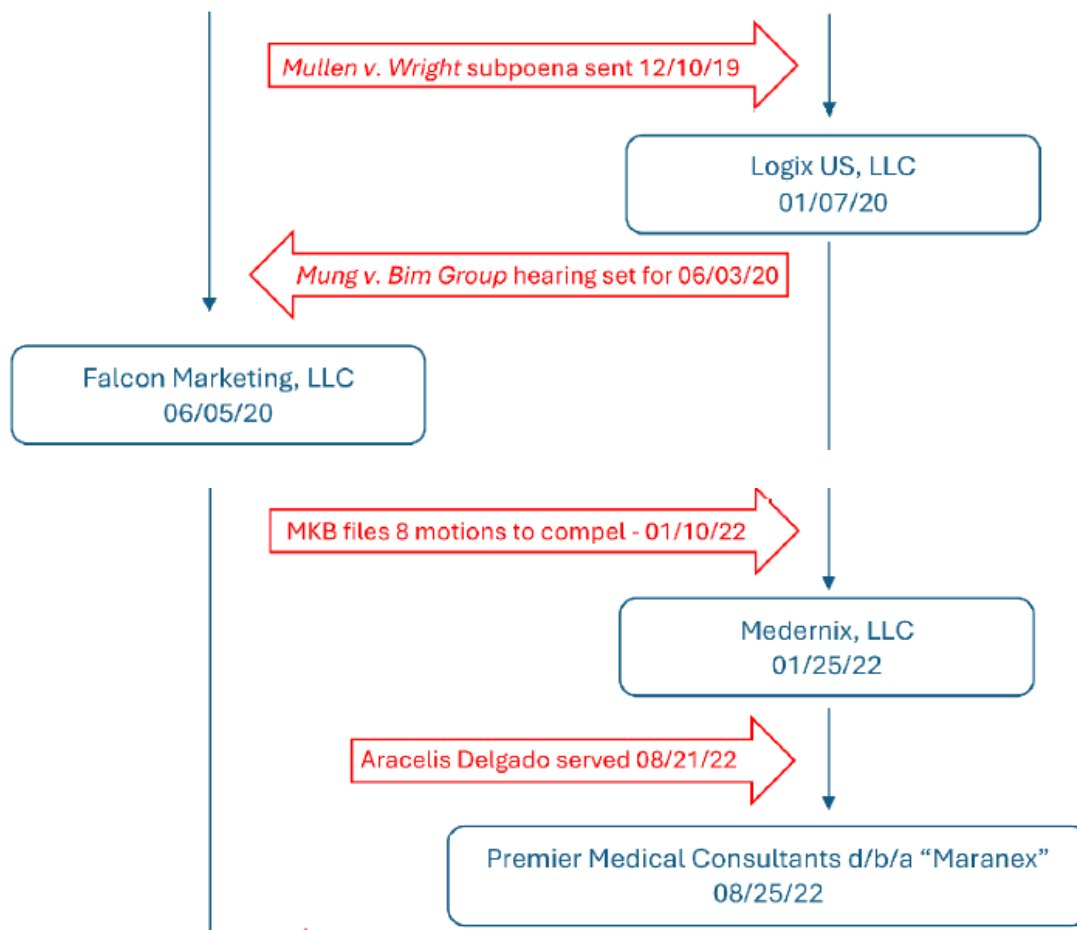
### **Article III**

The name and Florida street address of the registered agent is:

**YASHA HEIDARI**  
**6330 N ANDREWS AVE.**  
**SUITE 109**  
 FORT LAUDERDALE, FL. 33309

*Fig. 2 – Registered Agent listing from Florida Secretary of State.*

Mr. Heidari had to know who the owner(s) of his clients were, so he could forward any legal papers to that person’s attention. As Ortho Sport’s cases developed, it began closing and/or abandoning its shell companies whenever defendants served requests to each one.



*Fig. 3 – Creation and destruction of subsequent shells and precipitating events.*

Each time Ortho Sport was confronted with a new subpoena indicating that defense firms had caught on to its most recent shell, that shell was shut down and a new entity was created. In the “Black Crystal” line of case manager shells, Ortho Sport first set up “Logix US, LLC” on January 7, 2020. Payment was made by Mr. Heidari personally, according to the records of the Georgia Secretary of State (and the entity was identified as “LogIX Solutions, LLC” initially):

## RECEIPT

### Filer Information

Yasha Heidari  
PO Box 79217  
Atlanta, GA 30357

### Transaction Details

Product Description	Business Name	Control No.	Shipped	Order Date	Item Cost	Expedite Fee	Service Charge	Total
Business Formation	LogIX Solutions LLC	N/A	Online	01/07/2020	100.00	250.00	0.00	350.00

Invoice Total: \$350.00

### Payment Details

Payment Type	Check/Reference No.	Amount
Credit Card - American Express	####	350.00

*Fig. 4 – Logix US, LLC payment receipt by Yasha Heidari, utilizing American Express card*

Undersigned counsel's law firm simultaneously filed motions to compel as to Ortho Sport and the Logix US, LLC shell in eight different matters in January 2020. As those motions rolled in, Ortho Sport once again scrambled to set up a new shell – this time “Medernix, LLC” (and that was the name of its “case manager” shell when this case started, which was still operational when Defendants served their subpoenas in this matter).

To this point, every shell in the “Medernix” line had been set up by Mr. Heidari directly. He was Black Crystal Consulting's registered agent, and he even paid the fees to create its successor Logix US, LLC. Of note, Black Crystal Consulting had also been claimed as an asset by Ortho Sport's owner Dr. Armin Oskouei, when he filed his divorce paperwork:

(2) Husband holds an interest in Ortho Sport & Spine Physicians LLC, Ortho Sport and Spine Physicians LLC, AvoTek Capital LLC, as well as their affiliates and subsidiaries, which includes but is not limited to Summit Pharmacy, LLC, AVO Aviation, LLC, AVO Airlines, LLC, SuperSpeed Motorsports, LLC, AVO Real Estate Holdings, LLC, Big Slice Marketing, LLC, Ortho Sport Holdings, LLC, Ortho Sport & Spine Physicians Decatur, LLC, Ortho Sport & Spine Physicians South Atlanta,



LLC, Black Crystal Consulting, LLC, Elysium Yacht Ventures, LLC, Diamond Star Transportation

*Fig. 5 – Armin Oskouei divorce settlement agreement executed June 1, 2019*

Moreover, the marketing shell “Big Slice Marketing” was also listed, along with a host of other owned entities, including Ortho Sport itself, among Dr. Oskouei’s assets.

However, when Medernix was set up, Ortho Sport employed a third party service for the first time, called URS Agents, to create the entity. URS Agents was also initially listed as the registered agent for that entity. Someone named “Christian Eubanks” was listed as the “member or authorized representative” of Medernix on the Florida Secretary of State paperwork.<sup>3</sup>

### **Article III**

The name and Florida street address of the registered agent is:

URS AGENTS, LLC  
3458 LAKE SHORE DRIVE  
TALLAHASSEE, FL. 32312

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

Registered Agent Signature: CHRISTIAN EUBANKS

### **Article IV**

The effective date for this Limited Liability Company shall be:

01/20/2022

Signature of member or an authorized representative

Electronic Signature: CHRISTIAN EUBANKS

*Fig. 6 – Medernix registration with Florida Secretary of State*

URS Agents quickly abandoned Medernix, filing paperwork to withdraw as its registered agent with the Florida Secretary of State only three months into Medernix’s existence, citing a complete lack of client contact:

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<sup>3</sup> A search of the Florida SunBiz directory confirms Mr. Eubanks is associated with URS Agents itself (not with Ortho Sport), and apparently serves as registered agent or authorizer for multiple URS Agents clients.

Re: Document Number L22000045283

The Resignation of the Registered Agent for MEDERNIX, LLC, a Florida limited liability company, was filed on March 31, 2022.

This document was electronically received and filed under FAX audit number H22000118002.

*Fig.7 – Resignation of URS Agents as Medernix’s registered agent only three months after creation*

The fact that there are no publicly-available documents showing Mr. Heidari’s involvement with Medernix’s creation does not end this inquiry, however, nor does it excuse Mr. Heidari’s conduct in this case. That is because there *is* documentation of Mr. Heidari’s firm’s involvement with the next successor shell, dubbed Premier Medical Solutions, LLC d/b/a Maranex, which succeeded Medernix as Ortho Sport’s “case manager”.

The “Premier Medical Solutions / Maranex” shell was created on August 25, 2022, mere months after Medernix’s registered agent withdrew. More notably, it was created only four days after Medernix employee Aracelis Delgado was served with the subpoena for her deposition (more about Ms. Delgado below). And, most notably, **the Premier Medical Solutions / Maranex successor was created and paid for by Mr. Heidari’s law office.** Specifically, four days after Aracelis Delgado was served, Heidari Power Law Group associate Evan Smith, using the address 5755 Dupree Drive, NW, Atlanta, GA 303275 (which is an address owned by Ortho Sport & Spine Physicians, LLC itself) paid to file the Articles of Organization for Premier Medical Consultants, LLC d/b/a Maranex with the Georgia Secretary of State:



## STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

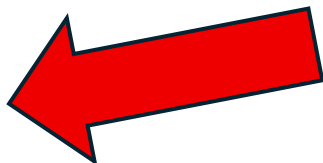
2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

## RECEIPT

### Filer Information

Evan Smith  
5755 Dupree Drive, NW  
Atlanta, GA 30327



### Transaction Details

Product Description	Business Name	Control No.	Shipped	Order Date	Item Cost	Expedite Fee	Service Charge	Total
Business Formation	Premier Medical Consultants, LLC	N/A	Online	08/25/2022	100.00	250.00	0.00	350.00

Invoice Total: \$350.00

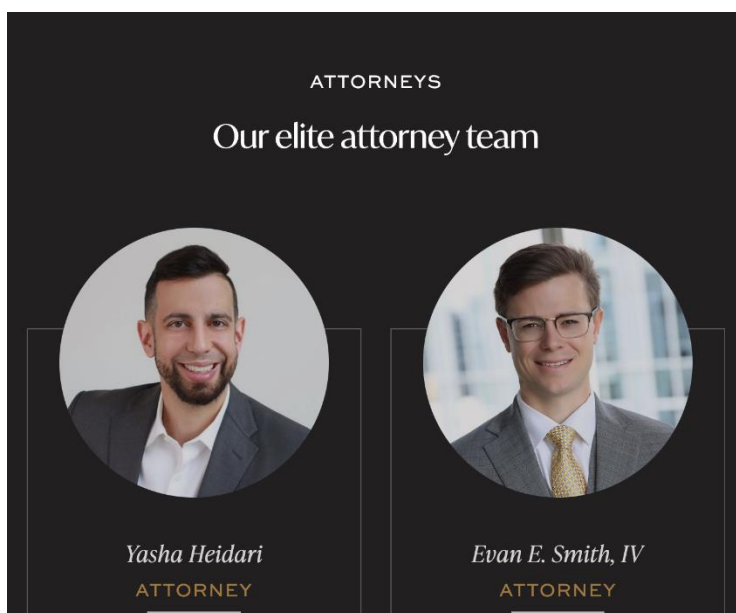
### Payment Details

Payment Type	Check/Reference No.	Amount
Credit Card - American Express	####	350.00

Payment Total: \$350.00

*Fig. 8 – Premier Medical Consultants, LLC’s Registration, showing address of 5755 Dupree Drive, paid by Evan Smith again using American Express card.*

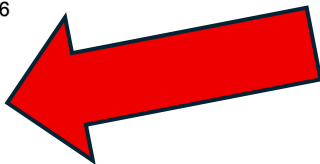
Mr. Smith is still employed by Mr. Heidari, but Mr. Heidari’s law firm has changed names. It was formerly “Heidari Power Law Group,” but has now rebranded as “Delgado Heidari.” Its website is <https://www.dhlawteam.com/>, but it does not have an office address. Rather, Mr. Heidari appears to be practicing law out of his home address. (This is notable given that Mr. Heidari



*Fig. 9 – Mr. Heidari’s law firm website identifying Mr. Smith.*

is listed as registered agent for multiple companies at many addresses with the Secretary of State's corporate registration database, including several at his home address).

<b>Detail by Entity Name</b>	
Florida Limited Liability Company	
ORTHO SPORT AND SPINE PHYSICIANS, LLC	
<b>Filing Information</b>	
<b>Document Number</b>	L21000478110
<b>FEI/EIN Number</b>	NONE
<b>Date Filed</b>	11/04/2021
<b>Effective Date</b>	11/04/2021
<b>State</b>	FL
<b>Status</b>	INACTIVE
<b>Last Event</b>	ADMIN DISSOLUTION FOR ANNUAL REPORT
<b>Event Date Filed</b>	09/23/2022
<b>Event Effective Date</b>	NONE
<b>Principal Address</b>	
3138 KENNERLY RD SUITE 102 JACKSONVILLE, FL 32216	
<b>Mailing Address</b>	
5755 DUPREE DRIVE SUITE 200 ATLANTA, GA 30327	



*Fig. 10 – Florida Sunbiz registration for Ortho Sport & Spine Physicians, LLC, listing 5755 Dupree Drive (Premier Medical Consultants' registered address) as Ortho Sport's address.*

PARID: P20220000662	NBHD: N/A
OTHRO SPORT AND SPINE PHYSICIANS LLC	5755 DUPREE DR
Owners	
Owners:	OTHRO SPORT AND SPINE PHYSICIANS LLC

*Fig. 11 – Fulton County Board of Assessors property parcel records for 5755 Dupree Dr., showing Ortho Sport's ownership of the real estate at which Premier Medical Consultants was registered.*

Ms. Delgado, whose deposition subpoena precipitated the change from Medernix to Premier Medical Consultants, has since been deposed on two occasions. In her first deposition (taken right after Medernix was propped up), she confirmed she was at that time working for

Medernix, but she also stated that “the same company” had previously been known as Logix US, and before that as Black Crystal Consulting:

23 Q. Okay. Are you currently employed by

24 Medernix?

25 A. Yes.

Depo. Delgado, Sept. 27, 2022, at P9.

21 Q. Okay. What is Black Crystal Consulting?

22 MR. WEBB: Is -- I need to be clear. Is

23 Black Crystal Consulting a predecessor to

24 Medernix?

25 THE WITNESS: That was the name back then.

Depo. Delgado, Sept. 27, 2022, at P15.

2 Q. (By Mr. Glavinos) Medernix and Logix have  
3 different names, right?

4 A. They were different names, but the same  
5 company.

6 Q. Right. So you can be the same company and  
7 have different names, right?

8 A. It was the -- we were explaining they just  
9 changed the name from one to the other.

Depo. Delgado, Sept. 27, 2022, at P76, attached as Ex. “A”.

Thus, as of September 2022, Ms. Delgado’s testimony was that she was presently working for Medernix. Almost immediately after that deposition, Medernix morphed into “Premier Medical Consultants” (after Yasha Heidari’s associate Evan Smith filed and paid for that entity’s corporate registration, as discussed above). Almost immediately after it was set up, Premier Medical Consultants formally filed a “d/b/a” registration request with the Fulton County Superior Court to use the trade name “Maranex”:

**APPLICATION TO REGISTER A BUSINESS  
TO BE CONDUCTED UNDER A TRADE NAME**

**STATE OF GEORGIA  
COUNTY OF FULTON**

Business 67 Ps 629  
Filed and Recorded Sep-09-2022 10:55am  
2022-0294980  
**CATHELENE ROBINSON**  
Clerk of Superior Court  
Fulton County, Georgia

The undersigned hereby certifies that (they are) (it is) (he is) (she is) conducting a business

in the City of Atlanta, County of Fulton,

State of Georgia, under the name: Maranex

TRADE NAME

and the nature of the business is: Revenue Cycle Management

and that said business is composed of the following ( ) person (X) corporation ( ) partnership:

Name:

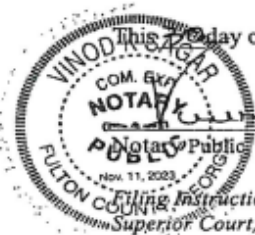
Address:

Premier Medical Consultants, LLC

8343 Roswell Road #348

Atlanta, Georgia 30350

This affidavit is made in compliance with GA Code Annotated, Title 10, Chapter 1, Section 490.  
Sworn and subscribed before me.



This day of Aug in the year 2022.

Stephen W. Imax  
Applicant

[Signature]  
Applicant GADL# 2988

Filing Instructions: Mail the original notarized application to: Cathelene Robinson, Clerk of Superior Court, Attention: Recording Division, 136 Pryor St., SW, Atlanta, GA 30303. The filing fee is \$171.00 payable to The Fulton County Clerk of Superior Court. If you have questions about the filing process, please call the Clerk's Office at 404-613-5371. Publication is required by law. If you have questions about publication, contact the Fulton County Daily Report at 404-521-1227.

Fig. 12 – Premier Medical Consultants’ d/b/a registration for trade name “Maranex”

To recap: As soon as Ms. Delgado’s deposition was noticed the first time, Medernix was folded, and Mr. Heidari’s firm paid for Premier Medical Consultants to be registered with the State in its place (Fig. 8), apparently using the same American Express firm credit card that Mr. Heidari had previously used to set up Logix US, LLC (compare Fig. 4). Premier Medical Solutions then immediately registered to rename itself “Maranex,” which brings us to the next deposition of Aracelis Delgado.

Aracelis Delgado was deposed for a second time on March 19, 2025, only two and a half

years after her September 2022 deposition. In the second deposition, she testified that she was then employed by “Maranex.” And, she confirmed that she had been employed by “Maranex” for five years by that point:

- 2 Q. How long have you worked for Maranex?
- 3 A. About five years.
- 4 Q. And in that five-year window, have you
- 5 worked for any other companies besides Maranex?
- 6 A. No.
- 7 Q. What is your title at Maranex?
- 8 A. Case manager.

Depo. Delgado, March 19, 2025, at P12.

That timeline would take Ms. Delgado’s period of employment back to at least March 2020, which covers the entire time period in which Black Crystal Consulting, LLC morphed into Logix US, LLC, then into Medernix, LLC, followed by Premier Medical Solutions, LLC d/b/a Maranex. She always worked for the same employer, and she had already testified: “They were different names, but the same company.” *Supra*. By 2025, however, Ortho Sport had added yet another layer of subterfuge to the stack, this time by registering a web server (complete with a fake, back-dated website) to a fictional entity called “Fortress Data Solutions,” which seems to have no legitimate corporate existence anywhere. See <https://fortressdatasolutions.com/>. This was Ms. Delgado’s testimony on that front:

- 4 Q. All right. She works for Maranex?
- 5 A. Yes.
- 6 Q. All right. But we see here she has a
- 7 Fortress Data Solutions email address, right?
- 8 A. I’m seeing it.
- 9 Q. And a signature line of Fortress Data
- 10 Solutions, right?
- 11 A. I’m seeing it.
- 12 Q. Why does she have those indications when
- 13 she works for Maranex?
- 14 A. I don’t know.
- 15 **Q. Okay. And your email address also has**

16 **Fortress Data Solutions, correct?**  
17 **A. Correct.**  
18 Q. But your testimony is you don't work for  
19 them, you work for Maranex, right?  
20 A. Correct. We are the contractor.  
21 **Q. Okay. But why do you use a Fortress**  
22 **Data Solutions email instead of a Maranex email?**  
23 **A. I don't know.**

Depo. Delgado, March 19, 2025, at P57, attached as Ex. "B".

3 Q. Since you started working at Maranex  
4 approximately five years ago, have you always had  
5 a Fortress Data Solutions email address?  
6 A. No.  
7 Q. What was your other one you had, if any?  
8 A. I don't remember exactly. It's always  
9 A. Delgado.  
10 Q. But was one of them @Maranex at the end?  
11 A. I don't remember.  
12 Q. Do you recall whether your signature  
13 block ever said Maranex instead of Fortress Data  
14 Solutions?  
15 A. I don't remember.  
16 Q. Did your -- did your signature block  
17 ever say anything except for Fortress Data  
18 Solutions?  
19 A. I don't remember.  
20 Q. Okay. You believe it has but you can't  
21 remember the name of the other company, correct?  
22 A. I cannot remember the name.  
23 Q. But you agree that it was another name  
24 at some point, right?  
25 **A. I agree.**

Depo. Delgado, March 19, 2025, at P58.

In sum, Ms. Delgado's testimony links up the entire chain. She has worked for Black Crystal Consulting, LLC, Logix US, LLC, Medernix, LLC, Premier Medical Solutions, LLC, "Maranex" and is now using the fake email address "FortressDataSolutions.com." All of these entities are the same company. And all of them have been affiliated at one level or another with Mr. Heidari and his law firm. Heidari personally set up Black Crystal, then Logix US. His firm



also paid to create and set up Premier Medical Consultants, which immediately registered as Maranex.

And, most notably, there has not been a legal successor-in-interest filed in any jurisdiction since Premier Medical Consultants, LLC was registered by Mr. Heidari's associate Evan Smith using the firm American Express card. Ms. Delgado testified that she still works for that entity, albeit going by its d/b/a name, Maranex, but using the adelgado@fortressdatasolutions.com email address.

This brings us to Mr. Heidari's contempt of court.

### **3. Yasha Heidari's lack of candor to this tribunal.**

This Court ordered Yasha Heidari as follows:

Yasha Heidari is directed to identify the past and present members and principals of Medernix, LLC and its successors-in-interest, including but not limited to, Maranex, Premier Medical Solutions and Fortress Data Solutions, within seven (7) days of the filing of this order so that service of the Motion for Contempt and this Rule Nisi may be effectuated upon the appropriate parties.

As set forth in detail above, Mr. Heidari's firm paid the corporate registration fee for Premier Medical Consultants, LLC<sup>4</sup> to be registered with the State of Georgia. (*Fig. 8*). "Maranex" is merely a d/b/a of that entity, meaning it necessarily has the same ownership. "Fortress Data Solutions" is nothing more than a fake website and a web server, which is also currently associated with the same entity that Yasha Heidari's firm paid to create.

The Georgia bar rules stipulate as follows:

---

<sup>4</sup> Defendants note that there is a typo in the Court's order identifying "Premier Medical Consultants, LLC" as "Premier Medical *Solutions*, LLC." Throughout this case, that entity has been referenced by both names. This is a distinction without a difference given that the Court's order also captured the d/b/a "Maranex," (which is the same exact entity as a matter of law), and given that Mr. Heidari knows perfectly well which entity the Court was referencing.

*RULE 1.4. COMMUNICATION.*

*A lawyer shall:*

- (a) promptly inform the client of any decision or circumstance with respect to which the client's informed consent, as defined in Rule 1.0 (n), is required by these rules;*
  - (1) reasonably consult with the client about the means by which the client's objectives are to be accomplished;*
  - (2) keep the client reasonably informed about the status of the matter;*
  - (3) promptly comply with reasonable requests for information; and*
  - (4) consult with the client about any relevant limitation on the lawyer's conduct when the lawyer knows that the client expects assistance not permitted by the Georgia Rules of Professional Conduct or other law.*
- (b) A lawyer shall explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation.*

*The maximum penalty for a violation of this rule is a public reprimand.*

This rule means, at its most basic level, that a lawyer must communicate with a client **and that means the lawyer must know who the client is**. And, of course, Georgia lawyers are not allowed to represent persons or entities who have not consented to such representation, even if someone else is paying the lawyer for his services. See Ga. R. Prof. Cond. 1.8 (f).

Likewise, the Rules of Professional Conduct provide that a lawyer is not allowed to attempt to deceive a Court:

*RULE 3.3 CANDOR TOWARD THE TRIBUNAL*

*A lawyer shall not knowingly:*

- (a) make a false statement of material fact or law to a tribunal;*
  - (1) fail to disclose a material fact to a tribunal when disclosure is necessary to avoid assisting a criminal or fraudulent act by the client;*
  - (2) fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel; or*
  - (3) offer evidence that the lawyer knows to be false. If a lawyer has offered material evidence and comes to know of its falsity, the lawyer shall take*

*reasonable remedial measures.*

*(b) The duties stated in paragraph (a) continue to the conclusion of the proceeding, and apply even if compliance requires disclosure of information otherwise protected by Rule 1.6.*

*(c) A lawyer may refuse to offer evidence that the lawyer reasonably believes is false.*

*(d) In an ex parte proceeding, other than grand jury proceedings, a lawyer shall inform the tribunal of all material facts known to the lawyer that the lawyer reasonably believes are necessary to enable the tribunal to make an informed decision, whether or not the facts are adverse.*

*The maximum penalty for a violation of this rule is disbarment.*

In response to the Court's order of October 8, 2025, Mr. Heidari made a filing that falsely stated as follows:

#### **COUNSEL'S NOTICE**

Pursuant to this Court's Order entered on October 7, 2025, undersigned counsel provides the following information:

(1) Undersigned counsel cannot state who is the member or principal of Medernix LLC, but can state that David Garcia, who was in Miami, Florida, inquired about hiring undersigned counsel several years ago to represent Medernix.

(2) Undersigned counsel does not believe that any other entity is a successor-in-interest to Medernix LLC

(3) Putting aside whether any entities are successors-in-interest, undersigned counsel is unaware who are the past and present members and principals of Maranex, Premier Medical Solutions, and Fortress Data Solutions, and counsel's knowledge is limited to the information in the public filings referenced in the record.

Respectfully submitted this 14th day of October, 2025.

/s/ Yasha Heidari  
Yasha Heidari  
Georgia Bar No. 110325

DELGADO HEIDARI LLC  
2997 Cobb Parkway #724615  
Atlanta, Georgia 31139  
tel: 404-939-2742  
fax: 404-601-7852

In sum, Mr. Heidari claims that he does not know who the principals of “Maranex, Premier Medical Solutions, and Fortress Data Solutions” may be.

**That cannot be true, because Mr. Heidari’s firm paid the filing fees to create the entity (Premier Medical Consultants, LLC) using those trade names.** Pursuant to Ga.R.Prof.Cond. 1.4, Mr. Heidari’s firm had a legal duty to communicate with the client who hired them to create that entity. Likewise, Mr. Heidari has repeatedly been shown, by the record, to have direct involvement in the creation and destruction of the predecessor entities to Premier Medical Consultants d/b/a Maranex a/k/a Fortress Data Solutions.

Mr. Heidari does attest that someone named “David Garcia” approached him about representing Medernix, which is worth further exploration. Medernix has purportedly been at arm’s length from Ortho Sport this entire time. As shown above, Mr. Heidari sat next to Medernix’s counsel John Webb in multiple hearings while Mr. Webb disclaimed any ownership connection or control by Ortho Sport over Medernix. Mr. Heidari never once mentioned that he, too, had been asked to represent Medernix, nor does he offer any explanation in his filing of who “David Garcia” is, or why he would be asking counsel of record for Ortho Sport to simultaneously represent Medernix.

There is also the issue of the use of multiple fictitious persons by the Ortho Sport entities

to cover their shell company registration tracks. Mr. Heidari offers no identifying information for “David Garcia” whatsoever – not a phone number, not an address, not an email address. This is extremely similar to the situation surrounding “Cris Ortega,” who purportedly was a Portuguese national, who allegedly owned Falcon Marketing, LLC, which is one of the shells Ortho Sport set up on the marketing side (it was the shell that followed “Big Slice Marketing, LLC,” which Dr. Oskouei had claimed as one of his owned assets in his divorce). The State Court of Hall County, Judge Kelley Robertson, has been litigating the issue of whether an individual named Cris Ortega even exists in yet another Ortho Sport matter before that Court – and to date no such individual has ever stepped forward to identify himself or be deposed. (And, as with so many of Ortho Sport’s other shells, Mr. Heidari also paid the corporate registration personally for Falcon Marketing, LLC, specifically on January 2, 2024). *See* Ex. T-39 (receipt reflecting payment by Mr. Heidari).

The icing on the cake here is that Falcon Marketing, LLC listed as its registered agent a fictitious person known as “Riley Park,” which has been the subject of national investigative reporting by Wired Magazine. *See* Exs. T-18 and Ex. T-19, Wired article “The Secrets Factory” (pg. 3) (specifically listing “Riley Park” as an alias). Multiple names have appeared in Ortho Sport’s shell company registrations who seem to have no online or public records presence. These include Riley Park, Cris Ortega, and David Roberts – all of whom may or may not be real people. Now Mr. Heidari has added another name, David Garcia, to the list of Ortho Sport affiliates who may or may not be real people.

Notably, Mr. Heidari did not identify Matthew Stubblefield, who has not only been identified by Medernix’s counsel John Webb as that entity’s “manager,” but who also appears in the public Annual Registration filings for Premier Medical Consultants, LLC as the “Authorized Person” for that entity:

## ANNUAL REGISTRATION

\*Electronically Filed\*  
Secretary of State  
Filing Date: 3/3/2023 10:57:06 AM

### BUSINESS INFORMATION

**CONTROL NUMBER** 22181386  
**BUSINESS NAME** Premier Medical Consultants, LLC  
**BUSINESS TYPE** Domestic Limited Liability Company  
**EFFECTIVE DATE** 03/03/2023  
**ANNUAL REGISTRATION PERIOD** 2023

### PRINCIPAL OFFICE ADDRESS

**ADDRESS** 8343 Roswell Road #348, Atlanta, GA, 30350, USA

### REGISTERED AGENT

NAME	ADDRESS	COUNTY
C T Corporation System	289 South Culver Street, Lawrenceville, GA, 30046, USA	Gwinnett

### AUTHORIZER INFORMATION

**AUTHORIZER SIGNATURE** Matt Stubblefield  
**AUTHORIZER TITLE** Authorized Person

*Fig. 13 – 2023 Annual Registration for Premier Medical Consultants d/b/a Maranex identifying Matt Stubblefield as Authorized Person*

One thing is quite clear: Mr. Heidari has obviously defied this Court's order. He is capable, unless he has been violating the Bar rules on client representation willy-nilly, of identifying the person who hired him to create and register Premier Medical Consultants d/b/a Maranex. He is more likely than not also in possession of that entity's Articles of Incorporation and other corporate records demonstrating who its owner is, given that his office was the one that created it and paid for it to be registered using an American Express card.

It is also a matter of public record that the only identified owner of the Ortho Sport shells to date was Dr. Armin Oskouei himself, who claimed Black Crystal Consulting as well as Big Slice Marketing in his divorce papers. He also owns Ortho Sport, meaning Mr. Heidari absolutely has direct access to inquire of his client Dr. Oskouei what shells he owns presently. And if, as

seems likely, Dr. Oskoeui does have ownership in the subsequent shells created and destroyed after Black Crystal and Big Slice, then it will become quite clear that Ortho Sport, Dr. Oskoeui, Mr. Heidari, the other lawyers who have represented this company and its affiliates have all sought to perpetrate a fraud upon this Court, evidently with the chief goal of concealing discoverable evidence.

### **ARGUMENT AND CITATION OF AUTHORITY**

This Court has broad contempt powers to govern the conduct of litigants before it, and that is particularly true for members of the Bar, who are officers of this Court:

Significantly, attorneys are officers of the court, see *In re Willis*, 259 Ga.App. 5, 6(1), 576 S.E.2d 22 (2002), and courts have broader contempt powers in cases of “[m]isbehavior of any of the officers of the courts in their official transactions” pursuant to OCGA § 15-1-4(a)(2).

If OCGA § 15-1-4(a)(2) is construed to apply only to the disobedience by an officer of the court to a written order, this provision of our Code is rendered meaningless; it would be entirely duplicative of the provisions of OCGA § 15-1-4(a)(3) and therefore redundant.

OCGA § 15-1-4(a)(2) is intended to impose upon officers of the courts engaged in their official transactions a higher duty to the court than is demanded of the broader group of individuals listed in OCGA § 15-1-4(a)(3) who are arguably subject to the contempt powers only for failure to comply with those commands of the court spread upon the record in written form. Surely the interrelationship between the court and its officers is of such a complex and on-going nature as to render impractical any requirement that the court must render into a writing spread upon the record of the court any direction to an officer as a prerequisite to compelling obedience to its commands.

*In re Beckstrom*, 295 Ga. App. 179, 182–83, 671 S.E.2d 215, 218 (2008).

Here, Mr. Heidari has been ordered in writing to reveal the owners of multiple entities that are closely affiliated with (and quite possibly also owned by) his own client. He certainly knows the names of the people who hired his law firm to set up Premier Medical Consultants d/b/a Maranex a/k/a Fortress Data Solutions. His office is almost guaranteed to be in possession of the

corporate registration documents for all of these entities, since there is no indication whatsoever that any other law firm has ever been involved in creating or destroying them.

It is abundantly obvious that Mr. Heidari possesses, but is actively shielding, that information. He is apparently willing to flirt with jail time by doing so, which underscores the importance of this information to the defense.

The greatest probability is that the Ortho Sport shells are (quite predictably) still owned by the person who owned them in the first place, namely Dr. Armin Oskoeui, who also owns Ortho Sport. The revelation that Dr. Oskoeui has owned and/or controlled the shell companies all along would be tantamount to admitting that Mr. Heidari and his client have been perpetrating a fraud upon this court – providing ample motive to disobey this Court’s order. That should also give this Court ample reason to make sure Mr. Heidari actually complies with its orders.

#### **REQUESTED REMEDY**

Accordingly, Defendants request the following remedy:

- (1) A written order compelling Heidari Power Law Group attorney **Evan Smith, Esq.** to answer the questions previously posed to Mr. Heidari, on pain of jail time, given that he was the one who paid to file Premier Medical Consultants, LLC’s corporate registration;
- (2) A written order compelling Heidari Power Law Group n/k/a Delgado Heidari to produce for the Court’s inspection all documentation pertaining to the corporate creation and/or dissolution of Black Crystal Consulting, LLC, Logix US, LLC, Medernix, LLC, Premier Medical Consultants, LLC, “Maranex,” “Fortress Data Solutions,” Big Slice Marketing, LLC, and Falcon Marketing, LLC, with the owners of same to be identified on the docket;



- (3) A written order finding Mr. Heidari in contempt of court and assessing an appropriate fine and/or jail time;
- (4) Reimbursement of Defendants' fees and expenses incurred in pursuing this discovery; and (perhaps most importantly)
- (5) Referral of Mr. Heidari's "shell game" stratagem to the State Bar for disciplinary investigation.

Defendants also move that Mr. Heidari be disqualified from any further representation in this matter, as he is quite clearly a material witness to the case, who will be called to the stand at trial. Should this case proceed to that point, Defendants also request permission to take Mr. Heidari's deposition as a material witness.

SO MOVED this 16th day of October, 2025.

MCMICKLE, KUREY & BRANCH, LLP

/s/ Zach M. Matthews

ZACH M. MATTHEWS

Georgia Bar No: 211231

LUKE R. KENNEDY

Georgia Bar No: 750299

***Attorneys for Defendants***

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**CERTIFICATE OF SERVICE**

This is to certify that on this date I have electronically filed the foregoing **MOTION TO HOLD YASHA HEIDARI, ESQ. IN CONTEMPT OF COURT** with the Clerk of the Court using the *PeachCourt* e-Filing system, which will automatically send a notification attaching same thereon to the following counsel of record:

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**Attorneys for Non-Party  
Ortho Sport and Spine Physicians, LLC**

This 16th day of October 2025.

/s/ Zach M. Matthews  
ZACH M. MATTHEWS  
For the Firm

# **EXHIBIT “A”**

IN THE SUPERIOR COURT OF EFFINGHAM COUNTY  
STATE OF GEORGIA

JOHN JONES,

Plaintiff,

CIVIL ACTION

FILE NO.

vs.

SUCV2020000071

BENJAMIN FRANKS and

ASHLEY'S BUSINESS

SOLUTIONS, INC.,

Defendants.

~~~~~

REMOTE VIDEOTAPED DEPOSITION OF

ARACELIS DELGADO

1:10 p.m.

September 27, 2022

Susan M. Pitts, CCR-B-1806, RPR

APPEARANCES OF COUNSEL

On behalf of the Plaintiff:

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(By Remote)

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On behalf of Aracelis Delgado:

JOHN P. WEBB, ESQ.

SMITH WELCH WEBB & WHITE

280 Country Club Drive

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(770) 389-4864

Videographer:

Ms. Sierra Hoskins

- - -

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(Original Exhibits 1 through 12 have been attached to the original transcript.)

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CERTIFICATION OF QUESTION

STATE OF GEORGIA  
COUNTY OF FULTON:

In the hereinafter transcript, the following  
question was requested to be certified by counsel for  
the defendant:

At Page 11, Line 21: So are you paying  
Mr. Webb's bills?

SUSAN M. PITTS, CCR-B-1806, RPR

1 REMOTE VIDEOTAPED DEPOSITION OF ARACELIS DELGADO

2 September 27, 2022

3  
4 (Reporter disclosure made pursuant to Article 8.B. of  
5 the Rules and Regulations of the Board of Court  
6 Reporting of the Judicial Council of Georgia.)

7 THE VIDEOGRAPHER: Today's date is  
8 September 27th, 2022, and the time is 1:10 p.m.

9 This will be the videotaped deposition of  
10 Aracelis Delgado.

11 Will counsel please identify themselves  
12 for the record?

13 MR. GLAVINOS: Paschal Glavinos for  
14 Ashley's Business Solutions and Benjamin Franks.

15 MR. TILLER: This is Gary Tiller on behalf  
16 of the plaintiff.

17 MR. WEBB: This is John Webb on behalf of  
18 Ms. Delgado.

19 THE VIDEOGRAPHER: Will the court reporter  
20 please swear in the witness?

21 ARACELIS DELGADO, having been first duly  
22 sworn was examined and testified as follows:

23 MR. GLAVINOS: This will be the deposition  
24 of Aracelis Delgado. It is being taken pursuant  
25 to subpoena and agreement of the parties for all



1           lawful purposes.

2                   Counsel, I suggest at this time we reserve  
3           all objections except those going to the form of  
4           the question or responsiveness of the answer  
5           until first use of the deposition. Is that  
6           agreeable?

7                   MR. TILLER: It is.

8                   MR. WEBB: It is, except for -- to the  
9           extent the questions ask for privileged  
10          information or information that's subject to a  
11          non-disclosure agreement.

12                  MR. TILLER: It's agreeable with the  
13          plaintiff.

14                  MR. GLAVINOS: Okay.

15          EXAMINATION

16          BY MR. GLAVINOS:

17          Q.       Ms. Delgado, have you ever been deposed  
18          before?

19          A.       Yes.

20          Q.       Okay. So they probably went over a few  
21          ground rules with you just to make the deposition  
22          flow better. The court reporter here is taking down  
23          everything we say, so please try your best to let me  
24          finish the question before providing an answer; and  
25          I'll do my best to let you finish an answer before I

1 start with the next question. Please make sure that  
2 any responses are verbal. I know in everyday  
3 communication we say "uh-huh," "huh-uh." But "yes,"  
4 "no" or whatever response you would like to provide  
5 verbally.

6 And if for any reason you need to take a  
7 break, let me know, I'm happy to do that. I just ask  
8 that if there's a question on the table, that you  
9 provide an answer to that question before we take a  
10 break, okay?

11 A. Okay.

12 Q. Okay. So if you could, just start with  
13 your full legal name, please?

14 A. Aracelis Delgado.

15 Q. And are you on any medication or do you  
16 have any problems that would prevent you from  
17 remembering or testifying truthfully today?

18 A. No.

19 Q. Okay. And you understand that you are  
20 here to testify under oath, correct?

21 A. Yes.

22 Q. Okay. And prior to this deposition, has  
23 anyone told you to make any representations that you  
24 know to be false?

25 A. Can you repeat the question?

1           Q.     Prior to this deposition, has anyone told  
2     you to make any representations that you know to be  
3     false?

4           A.     No.

5           Q.     Okay. And you indicated you had been  
6     deposed before, right?

7           A.     Yes.

8           Q.     Okay. When was that?

9           A.     Long time ago. I don't remember exactly.

10          Q.     Okay. Was it more than five years ago?

11          A.     Probably.

12          Q.     Okay. What was -- in what capacity did  
13     you provide that deposition?

14          A.     Lien coordinator.

15          Q.     Okay.

16                 THE REPORTER: Excuse me. Can you repeat  
17     that, please?

18                 THE WITNESS: Lien coordinator.

19          Q.     (By Mr. Glavinis) And were you employed  
20     at that time?

21          A.     Was I what? Sorry.

22          Q.     Employed?

23          A.     Yes, I was.

24          Q.     Okay. And who was your employer?

25          A.     Premier NeuroSurgical.

1           Q.       Okay. And did you testify as a corporate  
2 representative of Premier Surgical [sic] or was it  
3 just in your individual capacity as a lien  
4 coordinator?

5           A.       I don't remember.

6           Q.       Okay. All right. And about a month ago  
7 you were served with a subpoena for this deposition,  
8 right?

9           A.       Yes.

10          Q.       Okay. Who was the first person you told  
11 about that subpoena?

12                   THE WITNESS: Can I answer the question?

13                   MR. WEBB: I think you can answer that  
14 question.

15                   THE WITNESS: My manager.

16          Q.       (By Mr. Glavinos) Okay. And who is your  
17 manager?

18          A.       Matt Stubfield [ph] .

19          Q.       Is that Matt Stubblefield?

20          A.       Yes.

21          Q.       And so your manager at what company?

22          A.       Medernix.

23          Q.       Okay. Are you currently employed by  
24 Medernix?

25          A.       Yes.

1 Q. And what's your title?

2 A. Case manager.

3 Q. Okay. And what's Matt Stubblefield's  
4 title?

5 MR. WEBB: Object to that. That's subject  
6 to a non-disclosure agreement.

7 MR. GLAVINOS: His job title is subject to  
8 a non-disclosure agreement?

9 THE WITNESS: Yes, it is.

10 MR. GLAVINOS: Okay. Who is the  
11 non-disclosure agreement between?

12 MR. WEBB: The non-disclosure agreement is  
13 between Ms. Delgado and her employer Medernix.

14 MR. GLAVINOS: Okay.

15 MR. WEBB: Hold on. Let me put this on  
16 vibrate.

17 MR. GLAVINOS: Is the actual NDA  
18 privileged or can that be produced?

19 MR. WEBB: I don't know.

20 Q. (By Mr. Glavinos) How long have you known  
21 Matt Stubblefield.

22 MR. WEBB: You can answer that.

23 THE WITNESS: I don't remember exactly,  
24 but probably two years or three.

25 Q. (By Mr. Glavinos) How long have you

1 worked for Medernix?

2 A. About three years.

3 Q. You've been employed by Medernix, LLC for  
4 three years?

5 A. About that time.

6 Q. Okay. About that time?

7 A. Uh-huh.

8 Q. Is it less than two years?

9 A. No, it's not less than two years.

10 Q. Okay. We will circle back to that. And  
11 Mr. Webb is your attorney, correct?

12 A. Yes.

13 Q. Okay. Did you retain Mr. Webb or just  
14 your employer retain Mr. Webb?

15 MR. WEBB: Do you have a fee agreement  
16 with me, an employment contract with me? If you  
17 don't recall, that's okay.

18 THE WITNESS: No, I don't recall.

19 MR. WEBB: Okay. She does have an  
20 agreement with me that she signed but that's --

21 Q. (By Mr. Glavinos) So are you paying  
22 Mr. Webb's bills?

23 MR. WEBB: Objection. That's not  
24 relevant.

25 MR. GLAVINOS: It absolutely is relevant.

1 If the employer is paying the bills for the  
2 attorney, then that is absolutely relevant and  
3 discoverable.

4 MR. WEBB: I don't think it is.

5 MR. GLAVINOS: Okay. Are you instructing  
6 her not to answer?

7 MR. WEBB: Uh-huh.

8 MR. GLAVINOS: Okay. We'll certify the  
9 question. And I'm going to object to the  
10 responsiveness of the answer.

11 Q. (By Mr. Glavinos) Are you retained by --  
12 are you represented by any lawyers other than  
13 Mr. Webb?

14 A. No.

15 Q. Okay. Okay. Let's start with some  
16 background information. What's your county of  
17 residence?

18 A. Cherokee.

19 Q. Okay. And do you have a college  
20 education?

21 A. Yes.

22 Q. Okay. Where from?

23 A. Puerto Rico.

24 Q. Okay. What year did you graduate?

25 A. Oh, 1993 or '92, about that.

1 Q. Okay. Any education in the United States?

2 A. Yes. Yes.

3 Q. Okay. Where was that?

4 A. Kennesaw State.

5 Q. Okay. Okay. What year did you graduate  
6 from Kennesaw, assuming you graduated?

7 A. It was just a certificate.

8 Q. Okay.

9 A. Like continuing education.

10 Q. Okay. Got you. What year was that  
11 certificate?

12 A. Pardon me?

13 Q. What year did you receive the certificate?  
14 Ballpark is fine.

15 A. I'm trying to remember. I'm sorry. It's  
16 been a long time.

17 Q. That's okay.

18 A. I think it was about, what, 2014, I would  
19 say, about that time. I don't remember exactly.

20 Q. Okay. And you indicated that you were  
21 deposed when you were working for Premier  
22 NeuroSurgical Institute, right?

23 A. Yes.

24 Q. Okay. How long did you work for them?

25 A. I think it was -- I think it was about



1 three years. That's what I think. I don't remember  
2 exactly.

3 Q. Okay. Do you remember the approximate  
4 month and year that you stopped working for Premier?

5 A. I will do my best to remember. I think it  
6 was summer -- about summer of 2019, I will say.

7 Q. Okay. What about before Premier  
8 NeuroSurgical, where did you work?

9 A. Before Premier, it was a law firm.

10 Q. Okay. What law firm?

11 A. Cruz and Associates.

12 Q. Okay. What did you do for Cruz?

13 A. Legal assistant.

14 Q. Okay. And you said with Premier  
15 NeuroSurgical you were a lien coordinator?

16 A. Yes.

17 Q. Okay. What does that mean?

18 A. Filing liens with the court.

19 Q. Okay. That's it? Anything else you did?

20 A. I don't remember exactly my description  
21 back then.

22 Q. Okay. Did you communicate with any  
23 lawyers of patients of Premier NeuroSurgical  
24 Institute in that role?

25 A. Yes.

1 Q. Okay. Do you do that now?

2 A. Yes.

3 Q. Okay. So you left Premier Surgical summer  
4 2019. Where did you work next?

5 A. With Medernix.

6 Q. Okay. So your testimony is from your time  
7 at Premier NeuroSurgical, you went straight to work  
8 for Medernix?

9 A. I think I worked for probably a month with  
10 an attorney, but he was like in between jobs, only  
11 like a month or so.

12 Q. Okay. Have you ever heard of Black  
13 Crystal Consulting?

14 A. Yes.

15 Q. Okay. Did you work for them?

16 A. That was the name of the company at that  
17 time.

18 Q. Okay. When did you start with Black  
19 Crystal Consulting?

20 A. That summer when I finished with Premier.

21 Q. Okay. What is Black Crystal Consulting?

22 MR. WEBB: Is -- I need to be clear. Is  
23 Black Crystal Consulting a predecessor to  
24 Medernix?

25 THE WITNESS: That was the name back then.

1 MR. WEBB: Oh, I see. To the extent you  
2 can answer that question based on what's public  
3 knowledge, you can certainly do that.

4 THE WITNESS: It was the name of the  
5 company back then.

6 Q. (By Mr. Glavinos) When did you sign a  
7 non-disclosure agreement?

8 A. I don't remember.

9 Q. Okay. Your attorney is taking the  
10 position that the non-disclosure agreement applies to  
11 Medernix.

12 My position is that Medernix did not  
13 corporately exist until early 2022; therefore, a  
14 non-disclosure agreement as to Medernix could not  
15 have been signed until 2022. So anything prior to  
16 2022 would not be privileged or subject to a  
17 non-disclosure agreement.

18 MR. WEBB: Sure, it would.

19 MR. GLAVINOS: What's the basis for that?

20 MR. WEBB: Sure. So the non-disclosure  
21 agreement deals with what Medernix's trade  
22 secrets are, what the proprietary information  
23 is, what their methods of operation are, all  
24 that kind of stuff.

25 To the extent you are going to try to

1        assert the non-disclosure agreement would not  
2        apply to a predecessor interest would -- would  
3        be in violation of the non-disclosure agreement,  
4        that's just a matter of semantics. I mean, she  
5        has agreed to this. I would have to go back and  
6        pull the agreement, which I'm happy to do if  
7        y'all want to take a break and, you know, just  
8        confirm that, but I'm pretty sure that it would.

9                MR. GLAVINOS: Yeah. Let's take a short  
10       break and take a look at the NDA.

11               MR. WEBB: Okay.

12               THE VIDEOGRAPHER: The time is 1:22 p.m.,  
13       and we are off the record.

14       (Recess taken from 1:22 p.m. to 1:36 p.m.)

15               THE VIDEOGRAPHER: The time is 1:36 p.m.,  
16       and we are on the record.

17               MR. GLAVINOS: John, is there an objection  
18       or a clarification you wish to make about the  
19       NDA?

20               MR. WEBB: Yes. To the extent that any  
21       questions would require my client to violate a  
22       non-disclosure agreement, I'm going to instruct  
23       her not to respond. That information is  
24       privileged. Doesn't matter whether the entity  
25       was Black Crystal or whether or not the entity

1 is Medernix. To the extent that Medernix  
2 employs the same business practices as Black  
3 Crystal did, that would require her to violate  
4 the agreement. Furthermore, we think that there  
5 is a non-disclosure agreement with Black  
6 Crystal. I just don't have that.

7 MR. GLAVINOS: So --

8 MR. WEBB: Wait, wait. And also prior to  
9 this deposition I sent you an e-mail requesting  
10 a list of topics so my client could be prepared;  
11 and if necessary, I could then file a motion for  
12 protective order. I was not given a list of  
13 topics. I was told my client was to testify  
14 about her personal knowledge, which she can do,  
15 but she can not do it if it requires her to  
16 violate a non-disclosure agreement.

17 MR. GLAVINOS: Okay. I'll note that you  
18 weren't -- you did not advise prior to this  
19 deposition that any personal testimony may be  
20 subject to a non-disclosure agreement. So I  
21 would add that. If that would have been  
22 included in your e-mail about topics, that may  
23 have changed the calculation. Trying to  
24 transform a fact witness's deposition into a  
25 30(b)(6) deposition I don't think is proper.

1 And I also don't think these objections to  
2 standard discovery questions are proper, whether  
3 they -- an NDA exists or not.

4 And I'll also note an objection to any  
5 objections related to a Black Crystal NDA that  
6 you have stated you do not even know if it  
7 exists. So now you are making -- or instructing  
8 the client not to answer questions on the basis  
9 of an NDA that you've never seen nor can even  
10 confirm that such agreement exists.

11 So here is what I'll propose on the  
12 record, that we can enter a confidential order  
13 as to this deposition to prevent her from  
14 violating any kind of improper NDA disclosure.

15 MR. WEBB: Absolutely not. This issue  
16 needs to be briefed and heard by a judge. I  
17 have had -- we don't have an agreement in place.  
18 It would have to be reviewed. I would have to  
19 go back to her employer, make sure that they are  
20 not going to raise any objections to it. This  
21 is proprietary information that does not belong  
22 to her. It's proprietary information that  
23 belongs to a non-party that she has entered into  
24 a contract with to protect. So to -- you know,  
25 to try to force her to enter into some sort of a

1            confidentiality agreement without a judge  
2            signing off on it, without us being able to  
3            fully negotiate it, without her employer being  
4            able to negotiate and have him put on it, then  
5            certainly we cannot agree to do that.

6            MR. GLAVINOS: Mr. Tiller, anything?

7            MR. TILLER: No.

8            Q. (By Mr. Glavinos) Okay. Well, let's  
9            proceed. What is your job title at Medernix?

10          A. Case manager.

11          Q. Does Medernix employ assistant case  
12          managers?

13          MR. WEBB: If you know. If you know.

14          THE WITNESS: Yes.

15          Q. (By Mr. Glavinos) Okay. Do they report  
16          to you?

17          MR. WEBB: Objection to that. That would  
18          be a violation of the non-disclosure agreement.

19          Q. (By Mr. Glavinos) Do you have a copy of  
20          the non-disclosure agreement here with you?

21          A. No.

22          MR. GLAVINOS: Mr. Webb, do you? If I  
23          want to call the Court and get the Court on the  
24          phone to opine on the validity of this  
25          non-disclosure agreement, do you have a copy

1 with you that we can review today?

2 MR. WEBB: I do not have a hard copy with  
3 me. I can access one.

4 MR. GLAVINOS: Okay. So you can print one  
5 out?

6 MR. WEBB: I could probably print one out.

7 MR. GLAVINOS: Okay. We will hold off on  
8 that for now.

9 Q. (By Mr. Glavinos) Do you have managerial  
10 or supervisory responsibilities at Medernix?

11 A. Basically what I do is I'm a liaison.

12 Q. Okay. Do you have managerial or  
13 supervisory responsibilities of anybody else at  
14 Medernix?

15 MR. WEBB: You can answer that.

16 THE WITNESS: I'm more in charge of being  
17 a liaison between the medical provider, my  
18 client, and the attorney's office.

19 Q. (By Mr. Glavinos) Okay. So do you have  
20 any managerial or supervisory responsibilities at  
21 Medernix?

22 A. At this time not.

23 Q. Okay. So there is no one at Medernix who  
24 reports to you?

25 A. No.



1 Q. Okay. What other job titles do people  
2 hold at Medernix?

3 MR. WEBB: I'm going to object to that.

4 Q. (By Mr. Glavinos) Are you going to take  
5 your attorney's advice and refuse to answer questions  
6 under subpoena?

7 A. He is my attorney.

8 Q. Okay. Is that a yes, you are going to  
9 refuse to answer questions under subpoena?

10 MR. WEBB: Yes, if it's a violation of the  
11 non-disclosure agreement. And if you are going  
12 to try to threaten my client in this way, then  
13 I'm going to have to stop the deposition, I'm  
14 going to have to file a motion with the court  
15 for a protective order that will limit the scope  
16 of what you can ask.

17 Q. (By Mr. Glavinos) Okay. To be clear,  
18 there were no threats made. It was a question that  
19 is a very easy question to answer. And so I'll say  
20 the question again: Are you going to refuse to  
21 answer questions under subpoena?

22 MR. WEBB: She has answered that question.

23 MR. GLAVINOS: She didn't answer the  
24 question. You answered the question.

25 MR. WEBB: I'm instructing her not to

1           violate the non-disclosure agreement. And that  
2           means I object because it's -- it would require  
3           you to violate the non-disclosure agreement,  
4           then don't answer the question.

5           Q.       (By Mr. Glavinos) What are the parameters  
6           of the non-disclosure agreement?

7                   MR. WEBB: I'm going to object to that.

8           Q.       (By Mr. Glavinos) So does the  
9           non-disclosure agreement apply to anything related to  
10          your job at Medernix?

11          A.       I'm not understanding the question. I'm  
12          sorry.

13          Q.       Who is Yasha Heidari?

14          A.       I don't know.

15          Q.       Have you ever spoken with Yasha Heidari?

16          A.       No.

17          Q.       Who is Armin Oskouei?

18          A.       He's a doctor.

19          Q.       How do you know that?

20          A.       Because he's a doctor.

21          Q.       Okay. Well, there is lots of doctors in  
22          the world, right?

23          A.       Yes.

24          Q.       Okay. How do you know that Armin Oskouei  
25          is a doctor?

1 MR. WEBB: It's --

2 Q. (By Mr. Glavinos) Where do you know  
3 Dr. Oskouei from?

4 A. I know he is a doctor at Ortho  
5 Sport & Spine.

6 Q. Okay. Where did you come to understand he  
7 was a doctor at Ortho Sport & Spine?

8 MR. WEBB: Objection. Once again, I will  
9 tell you that the non-disclosure agreement does  
10 include identity of clients. To the extent that  
11 he may or may not be a client or the practice  
12 may or may not be a client, then I would  
13 instruct her not to respond.

14 Of course, you are going to wind up --  
15 you're going to get the answer to that by  
16 response anyway, because if she says, "I can't  
17 tell you," then you are going to know that he  
18 probably is a client because I'm objecting under  
19 the non-disclosure agreement.

20 So do I need to assert my objection to  
21 that? Do you understand what I'm saying?

22 THE WITNESS: No.

23 MR. WEBB: Okay. Can I step outside with  
24 my client real quick? You are going to get the  
25 answer you want.

1 MR. GLAVINOS: Yeah.

2 THE VIDEOGRAPHER: The time is 1:43 p.m.,  
3 and we are off the record.

4 (Recess taken from 1:43 p.m. to 1:45 p.m.)

5 THE VIDEOGRAPHER: The time is 1:45 p.m.  
6 and we are on the record.

7 Q. (By Mr. Glavinos) The question was: How  
8 do you know Dr. Armin Oskouei?

9 MR. WEBB: Instruct my client not to  
10 respond because that would violate her  
11 non-disclosure agreement.

12 MR. GLAVINOS: Okay. This is abusive  
13 discovery practices. You haven't produced a  
14 copy of the NDA. You don't even know if another  
15 NDA exists. So I'm just going to put on the  
16 record that I'm going to put you guys both on  
17 notice. I'm going to seek sanctions against  
18 both of you for the abusive discovery practices.

19 MR. WEBB: Well, I'm going to put on the  
20 record that I requested a list of topics before  
21 the deposition. I was not given a list of  
22 topics before the deposition. A non-disclosure  
23 agreement exists. We can postpone the  
24 deposition right now so that I can file a motion  
25 and we can get an order. I don't think there is

1 anything abusive about my client honoring her  
2 commitment to a non-disclosure agreement, which  
3 has certain privileges that can be and must be  
4 asserted.

5 So you can seek whatever sanctions you  
6 want. I can also seek sanctions. I don't think  
7 that's very productive. I think the thing to do  
8 at this point, if you insist on going down this  
9 line of questioning, which is going to get a  
10 series of objections, would be to simply  
11 postpone the deposition so I can file a motion  
12 and get an order from the Court. And we will  
13 let the Court decide the scope of the  
14 deposition.

15 MR. GLAVINOS: If you would have provided  
16 me with the professional courtesy of letting me  
17 know that you were going to rely on an  
18 unidentified and undisclosed non-disclosure  
19 agreement to instruct your client to refuse to  
20 answer any questions before I drove an hour and  
21 20 minutes down here to a deposition that you  
22 insisted to be in person, then I would probably  
23 have agreed with you.

24 But since that professional courtesy was  
25 not extended, I'm going to go through every

1 question I have, and you can levy objections and  
2 that way we are perfectly clear with the Court  
3 as to what objections were levied and whether  
4 those were proper under the non-disclosure  
5 agreement. So with that, let's proceed.

6 Q. (By Mr. Glavinos) So right now you are a  
7 case manager with Medernix, right?

8 A. Yes.

9 Q. Okay. What are your job duties?

10 A. I'm liaison between medical providers and  
11 attorneys' offices for those patients who are  
12 represented.

13 Q. How many medical providers does Medernix  
14 provide services to?

15 MR. WEBB: Objection. It's protected by  
16 the non-disclosure agreement.

17 MR. GLAVINOS: The number of their clients  
18 is protected by the non-disclosure agreement?

19 MR. WEBB: Uh-huh.

20 Q. (By Mr. Glavinos) Does anyone other than  
21 Ortho Sport & Spine Physicians, LLC utilize Medernix  
22 for their services?

23 THE WITNESS: Can I answer that question?

24 MR. WEBB: I think it was phrased  
25 generally enough to where you can.

1 THE WITNESS: Yes.

2 Q. (By Mr. Glavinos) Okay. Are any of those  
3 other practices not subsidiaries of Ortho  
4 Sport & Spine Physicians, LLC?

5 MR. WEBB: If you know.

6 THE WITNESS: I don't know.

7 Q. (By Mr. Glavinos) What are other  
8 providers other than Ortho Sport & Spine Physicians,  
9 LLC that Medernix provides services to?

10 MR. WEBB: Objection. That would be in  
11 violation of her non-disclosure agreement.

12 Q. (By Mr. Glavinos) Do you know if Medernix  
13 provides services to anyone other than Ortho  
14 Sport & Spine Physicians, LLC?

15 MR. WEBB: Yeah, you can answer that.

16 THE WITNESS: Yes.

17 Q. (By Mr. Glavinos) Yes, you know that they  
18 do provide services to anyone other than Ortho  
19 Sport & Spine Physicians, LLC?

20 A. Yes.

21 Q. Okay. Backing up to summer of 2019, you  
22 started to work for Black Crystal, right?

23 A. Yes.

24 Q. When I say Black Crystal, you know I mean  
25 Black Crystal Consulting, right?

1 A. (Witness nods head.) Yes.

2 Q. Yes?

3 A. I'm sorry.

4 Q. That's okay.

5 A. I forgot.

6 Q. That's all right. And who did you report  
7 to at Black Crystal?

8 A. I don't remember.

9 Q. You don't know?

10 A. I don't remember.

11 Q. Okay. So you don't remember who you  
12 reported to about two and a half years ago?

13 A. No, I don't remember.

14 Q. Okay. Was it Matt Stubblefield?

15 A. No, it was not him.

16 Q. Was it an employee at Ortho Sport & Spine  
17 Physicians?

18 A. I don't remember.

19 Q. Have you ever received a paycheck from  
20 Ortho Sport & Spine Physicians?

21 A. I don't remember.

22 Q. You don't remember if you've ever received  
23 a check from a certain entity?

24 A. I get direct deposit to my account.

25 Q. Okay. Who do you bank with?



1 THE WITNESS: Do I have to answer who is  
2 my bank?

3 MR. WEBB: Yeah. I don't think he can  
4 require you to give your account number or  
5 anything, but you can tell him who you bank  
6 with.

7 THE WITNESS: Bank of America.

8 Q. (By Mr. Glavinos) Okay. And I assume you  
9 have an app for Bank of America, right?

10 A. Yes, I do.

11 Q. Okay. And in your app you can check  
12 account statements, right?

13 A. Back to a certain time, yes.

14 Q. Okay. What is your pay period? Are you  
15 paid twice a month?

16 A. I think so, twice a month.

17 Q. Okay. And you are paid via direct  
18 deposit, right?

19 A. Yes.

20 Q. Okay. And what entity's name is next to  
21 the credit that's applied to your account when you  
22 receive a direct deposit?

23 A. Right now it's Medernix.

24 Q. Okay. And is that verbatim, it says  
25 verbatim Medernix, just Medernix?

1 A. That's what I recall --

2 Q. Okay.

3 A. -- at this point.

4 Q. Okay. We can take a break and go off the  
5 record so you can take a look. I don't want to look  
6 at it or see it, but I do want to have accurate  
7 testimony about this.

8 MR. GLAVINOS: So let's go off the record  
9 for a moment so she can take a look.

10 MR. WEBB: Sure.

11 THE VIDEOGRAPHER: The time is 1:51 p.m.  
12 and we are off the record.

13 (Recess taken from 1:51 p.m. to 2:02 p.m.)

14 THE VIDEOGRAPHER: The time is 2:02 p.m.  
15 and we are on the record.

16 MR. WEBB: All right. While we were on a  
17 break I was able to ascertain that there is a  
18 non-disclosure or confidentiality agreement with  
19 Black Crystal as well.

20 As far as the -- revealing the  
21 non-disclosure/confidentiality agreements with  
22 both Black Crystal and with Medernix, I have no  
23 problem producing those to the Court for an in  
24 camera inspection.

25 It is my understanding from speaking with

1 the employer, who is Medernix, they are taking  
2 the position that the non-disclosure and  
3 confidentiality agreements are themselves  
4 subject to a non-disclosure agreement; and,  
5 therefore, I cannot produce those absent a court  
6 order.

7 Once again, I'm happy to present those to  
8 the Court for an in camera inspection, but I can  
9 not do that absent -- I mean, I can do that, but  
10 I can't produce those to opposing counsel  
11 without a Court order.

12 MR. GLAVINOS: Is Ms. Delgado subject to  
13 any other non-disclosure agreements from any  
14 other entity whatsoever?

15 MR. WEBB: I cannot answer that. I don't  
16 know. I have the Black Crystal and I have the  
17 Medernix.

18 MR. GLAVINOS: Okay. So are you aware,  
19 sitting here today, whether she is going to  
20 claim being subject to any other NDAs or are you  
21 going to wait until I bring up another entity to  
22 claim there is an NDA in place?

23 MR. WEBB: I don't know if there's another  
24 NDA in place.

25 MR. GLAVINOS: Okay. So we can agree that

1           you're not going to claim that there's any other  
2           NDAs in place besides the NDA with Medernix, LLC  
3           and Black Crystal Consulting, LLC?

4           MR. WEBB: Those are the two that I've  
5           seen.

6           MR. GLAVINOS: Okay. Great. Everybody  
7           ready?

8           Q. (By Mr. Glavinos) What's Logix US, LLC?

9           A. That was the prior name to Medernix.

10          Q. How do you know that's a prior name to  
11          Medernix?

12          A. Because they changed the name again.

13          Q. Why did they change the name?

14          A. It was the name of another company, and  
15          they tell us that we cannot use that name anymore.

16          Q. What company?

17          A. I don't know.

18          Q. Okay. Why did Black Crystal change to  
19          Logix?

20          A. I don't know.

21          Q. Did you find -- did you ask why that  
22          happened?

23          A. No, I didn't.

24          Q. Okay. When did Black Crystal change to  
25          Logix?

1 A. I don't remember exactly.

2 Q. Did you change your e-mail address?

3 A. I think they change it.

4 Q. Okay. So whoever is behind Black Crystal,  
5 Logix, Medernix is all the same?

6 A. I don't know.

7 Q. Do you have any reason to doubt that they  
8 are all the same?

9 A. I can at least tell you that I began with  
10 Black Crystal, then they changed the name to Logix  
11 and then to Medernix.

12 Q. Okay. Who is "they"?

13 A. Whomever. I don't know.

14 Q. So you don't know who is changing the name  
15 of the company you work for?

16 A. No, I don't know.

17 Q. Do you think it's important to ask that  
18 question?

19 MR. WEBB: Objection. How is she supposed  
20 to know subjectively by what you mean by what's  
21 important to ask a question?

22 MR. GLAVINOS: Okay. Your objection is  
23 noted.

24 Q. (By Mr. Glavinos) Please answer.

25 MR. WEBB: If you know how -- if you know

1           what he means.

2                   THE WITNESS: I'm sorry. Could you please  
3           repeat the question?

4           Q.       (By Mr. Glavinos) You indicated that they  
5           changed the name from Black Crystal to Logix and  
6           Logix to Medernix, right?

7           A.       Yes.

8           Q.       Okay. Who is "they" you are talking  
9           about?

10          A.       The company.

11          Q.       Okay. What company?

12          A.       Well, Black Crystal changed the name to  
13          Logix and then to Medernix.

14          Q.       Okay. We agree that corporations are run  
15          by people, right?

16          A.       Yes, they are.

17          Q.       Okay. So what people were responsible for  
18          the name change?

19          A.       I don't know.

20          Q.       Okay. You indicated that Matt  
21          Stubblefield is who is your direct report for  
22          Medernix, right?

23          A.       Yes.

24          Q.       Okay. Who was your direct report at  
25          Logix?

1 A. I think it was him.

2 Q. Okay. Who was your direct report at Black  
3 Crystal.

4 A. I don't remember.

5 Q. Was it Matt Stubblefield who made the  
6 decision to change the name?

7 A. I don't know who made the decision.

8 Q. Okay. Who is above Matt Stubblefield?

9 A. Pardon me?

10 Q. Who is above Matt Stubblefield in the  
11 chain of command?

12 MR. WEBB: Actually, that would be in  
13 violation of the non-disclosure agreement as  
14 well.

15 Q. (By Mr. Glavinis) Okay. Who else works  
16 for Medernix?

17 A. What do you mean? I'm sorry.

18 Q. Who are some other employees that you  
19 know?

20 MR. WEBB: Actually, that is also subject  
21 to the non-disclosure agreement.

22 MR. GLAVINOS: That's okay. It's public  
23 records so we can go through it.

24 MR. WEBB: Okay. To the extent it's  
25 public record, she can answer that.

1 MR. GLAVINOS: Thank you.

2 Q. (By Mr. Glavinos) I'll represent to you  
3 that this is the LinkedIn profile for Brittany Kovel.  
4 Do you know Brittany?

5 A. Yes. I know Brittany.

6 Q. How do you know Brittany?

7 A. From the office.

8 Q. What office?

9 A. Well, we worked at Premier, and then we  
10 work with -- at this company.

11 Q. Okay. Is Brittany above or below you on  
12 the chain of command at Medernix?

13 A. She is above.

14 Q. She is above, okay. So do you report to  
15 Brittany?

16 A. Not sure if that will be like the chain of  
17 command.

18 MR. WEBB: I think you can go that far.  
19 If you -- if you -- if any part of your job  
20 requires you to report to Brittany, I don't  
21 think that would -- that would be a breach. If  
22 you report to Brittany, you can tell him that.

23 THE WITNESS: It's just that I'm not sure  
24 if I report to her. She has a higher --

25 MR. WEBB: Okay.



1 THE WITNESS: -- a higher position than my  
2 position. That's what I mean by that.

3 Q. (By Mr. Glavinos) Okay. What position  
4 does she have?

5 MR. WEBB: No. She can't say that. If  
6 it's public information, she can, but I don't  
7 know that she knows it's public information.

8 So if you have that, you can present it to  
9 her and ask her, that's fine. But the  
10 management structure is subject to the  
11 confidentiality agreement or the non-disclosure  
12 agreement.

13 Q. (By Mr. Glavinos) Okay. Right below her  
14 name on this LinkedIn page there is a job title, if  
15 you will look at that. What does that say?

16 A. Where? At the end?

17 Q. No. Right at the beginning under her  
18 name.

19 A. Case manager.

20 Q. Okay. Is that your understanding that  
21 Brittany Kovel is a case manager?

22 THE WITNESS: Can I answer that?

23 MR. WEBB: Yes.

24 THE WITNESS: Right now she is not a case  
25 manager.

1 MR. WEBB: Okay.

2 Q. (By Mr. Glavinos) Okay. What is she?

3 MR. WEBB: That she can't tell you.

4 Q. (By Mr. Glavinos) Okay. Are you going to  
5 listen to your lawyer's instructions and refuse to  
6 answer this question? And you are sure this  
7 information is protected under a non-disclosure  
8 agreement?

9 MR. WEBB: Yes. I'm sure it's protected  
10 under a non-disclosure agreement.

11 MR. GLAVINOS: Okay.

12 Mr. Tiller, I'll do my best to send you  
13 all of these exhibits afterwards. A lot of them  
14 are LinkedIn profiles.

15 MR. TILLER: Sure.

16 Q. (By Mr. Glavinos) Have you ever seen this  
17 before? Ms. Delgado, have you ever seen this before?

18 A. Yes.

19 Q. Okay. Is this your LinkedIn profile?

20 A. Yes, it is.

21 Q. Okay. Any reason to dispute anything in  
22 here? Take your time and look at it.

23 MR. GLAVINOS: While we are waiting, I'll  
24 go ahead and mark these. Brittany Kovel's  
25 LinkedIn profile will be marked as Exhibit

1           Number 1 for identification purposes.

2           (Defendants' Exhibit 1 was marked for  
3           identification.)

4           MR. GLAVINOS: And the LinkedIn profile of  
5           Aracelis Delgado will be marked as Exhibit  
6           Number 2 for identification purposes.

7           (Defendants' Exhibit 2 was marked for  
8           identification.)

9           Q.       (By Mr. Glavinos) Did you have an  
10          opportunity to review the printout of your LinkedIn  
11          profile?

12          A.       Yes.

13          Q.       Okay. Any reason to dispute anything  
14          that's in there?

15          MR. WEBB: You can answer.

16          THE WITNESS: Other than I had also a  
17          confidentiality agreement with this company,  
18          Premier NeuroSurgical.

19          Q.       (By Mr. Glavinos) Okay. I'm not asking  
20          you about that. I'm just asking if this is accurate,  
21          if your LinkedIn profile printout that's marked as  
22          Defendants' Exhibit 2 is accurate? And I'll  
23          represent to you that all we did was print it off  
24          from the Website.

25          MR. WEBB: There is nothing wrong with

1           that. I mean, this is public information. So  
2           to the extent anything in here at one time was  
3           protected by a confidentiality agreement, it no  
4           longer is so . . .

5           Q.       (By Mr. Glavinos) So is that a yes, that  
6           that information is accurate?

7           A.       Yes. That's what is there in my LinkedIn.

8           Q.       Okay. And I want to be clear. I'm not  
9           here to trick you or to get you to say something you  
10          don't want to say, I just want the truth, okay?  
11          That's why I'm here, all right? So I just want the  
12          truth and the honest truth, that's it. And this will  
13          go quick. If, you know, we don't have to argue about  
14          every single question, this will go a lot quicker if  
15          we do. All right.

16                 I'll show you another one. Do you know  
17          who Bethani Sanders is?

18                 MR. WEBB: I take it this is Number 3?

19                 MR. GLAVINOS: Yeah, we will mark this as  
20          Defendants' Exhibit Number 3 for identification  
21          purposes?

22                 (Defendants' Exhibit 3 was marked for  
23          identification.)

24                 Q.       (By Mr. Glavinos) Do you know who Bethani  
25          Sanders is?

1 MR. WEBB: You can say whether or not you  
2 know who she is.

3 THE WITNESS: I know who she is.

4 Q. (By Mr. Glavinos) Okay. Who is she?

5 A. She works on scheduling surgeries.

6 Q. Okay. Who does she schedule surgeries  
7 for?

8 A. For a client.

9 Q. For one client?

10 MR. WEBB: Do you know?

11 THE WITNESS: As far as I know, yes.

12 Q. (By Mr. Glavinos) Okay. Do you know what  
13 client that is?

14 MR. WEBB: She cannot disclose that.

15 MR. GLAVINOS: I didn't ask her to  
16 identify the client, I asked her if she knew who  
17 it was?

18 MR. WEBB: Okay. All right. You can  
19 answer whether or not you know who it is, you  
20 just can't tell him who it is.

21 THE WITNESS: Yes, I know.

22 Q. (By Mr. Glavinos) Okay. And you are  
23 refusing to provide that answer under subpoena?

24 MR. WEBB: Yes. I'm instructing her to  
25 refuse to provide that information absent a

1 protective order.

2 MR. GLAVINOS: Okay. I want to hear her  
3 say it.

4 Q. (By Mr. Glavinos) And you are refusing to  
5 answer that question under subpoena, yes?

6 A. My attorney is advising me to not answer  
7 at this time.

8 Q. Okay. And you are going to rely on that  
9 advice?

10 A. Yes, sir.

11 Q. Okay. Thank you. Like I said, I'm here  
12 to get your testimony, not Mr. Webb's.

13 A. Thank you.

14 Q. Do you know Vivian Assis?

15 A. Yes.

16 Q. Okay. How do you know her?

17 A. Work.

18 Q. Work at Medernix?

19 A. Yes.

20 Q. Okay. What about, have you ever worked  
21 anywhere else with Vivian?

22 A. Right now we work at Medernix.

23 Q. Okay. Have you ever worked anywhere else  
24 with Vivian?

25 A. I think we work with -- under another

1 name.

2 Q. Okay. What other name?

3 MR. WEBB: Well, can I see what you have  
4 there?

5 MR. GLAVINOS: No.

6 MR. WEBB: Okay. Well -- so once again, I  
7 don't know whether or not that would violate --  
8 if it's public information, then clearly she can  
9 talk about it. But I don't know whether it's  
10 public information or not and she doesn't know  
11 whether it's public information or not. So  
12 there's a possibility it would violate a  
13 non-disclosure agreement. I don't know, because  
14 I don't know what it is that you are looking at.  
15 And so if she was an employee of either the  
16 entities that we know of that was subject to a  
17 non-disclosure agreement, she is not supposed to  
18 talk about that. But --

19 MR. GLAVINOS: We've already established  
20 that job titles at this company are public  
21 information.

22 MR. WEBB: Sure, that's right.

23 MR. GLAVINOS: Okay.

24 MR. WEBB: Uh-huh. For those two  
25 individuals, that's right.

1 MR. GLAVINOS: Okay.

2 MR. WEBB: Uh-huh.

3 MR. GLAVINOS: So I'm not clear. You are  
4 saying you don't know if her testimony that I've  
5 solicited is protected?

6 MR. WEBB: No. I know that this is not  
7 protected because it's public information.

8 MR. GLAVINOS: Okay.

9 MR. WEBB: Okay. I'm asking whether or  
10 not what you are asking about now is public  
11 information or not.

12 Q. (By Mr. Glavinos) Okay. Well, my  
13 question was: Where else did you work with Vivian  
14 Assis?

15 MR. WEBB: Okay.

16 MR. GLAVINOS: So is her relationship with  
17 Vivian Assis subject to a non-disclosure  
18 agreement?

19 MR. WEBB: I'm not sure if Vivian Assis  
20 was an employee of Black Crystal.

21 MR. GLAVINOS: Well, you are not here --  
22 you are not here to assert NDAs on behalf of  
23 Vivian Assis.

24 MR. WEBB: No. I'm here to protect my  
25 client. If my client is subject to a



1 non-disclosure agreement, I don't want her to  
2 get in trouble by violating that non-disclosure  
3 agreement.

4 MR. GLAVINOS: Sure.

5 MR. WEBB: Okay? Why don't you give me  
6 just a minute. I'll step outside with my  
7 client. I'll try to confirm whether it is or  
8 it's not. If it's not, then certainly you can  
9 ask for that information. If it is, but it's  
10 been waived, then you can ask her that too, but  
11 I just need to know it's been waived.

12 Q. (By Mr. Glavinos) Okay. Have you ever  
13 been employed by Ortho Sport & Spine Physicians?

14 A. No.

15 MR. GLAVINOS: Okay. So anything about  
16 Ortho Sport & Spine Physicians, would that be  
17 subject to an NDA?

18 MR. WEBB: Not for her.

19 MR. GLAVINOS: Okay. Great.

20 Q. (By Mr. Glavinos) Okay. So other than  
21 Medernix and Black Crystal, who you've just asserted  
22 objections under an NDA for, did you work with Vivian  
23 Assis anywhere else?

24 A. There was in between name Logix.

25 Q. Okay. So you worked with her at Logix?

1           A.     No, no. I remind you that Logix is the  
2 other name in between that I worked for and I'm  
3 subject to that same --

4           Q.     No. We agreed earlier that the only NDAs  
5 your attorney is aware of was Medernix and Black  
6 Crystal.

7                   MR. WEBB: Yeah, that's right. Those are  
8 the only two I'm aware of.

9                   MR. GLAVINOS: Okay. So there is no Logix  
10 NDA objections.

11                  MR. WEBB: No. There is no Logix NDA  
12 objections, except if to the extent that Logix  
13 is now Medernix, then I would assert that  
14 objection. If it's the same entity just going  
15 by a different name, then yes.

16                  MR. GLAVINOS: No one -- I don't think  
17 anyone has testified to that.

18                  MR. WEBB: I thought she did. I thought  
19 she said that it's basically the same entity  
20 that started as Black Crystal, had to change its  
21 name to Medernix, and then had to change its  
22 name to -- I mean, had to change the name to  
23 whatever the one you just said was.

24                  THE WITNESS: Logix.

25                  MR. WEBB: Logix, that then had to change

1       their name to Medernix. And so, you know, we  
2       can try to figure all of this out. Okay. My  
3       job is to protect my client. Okay. And she has  
4       these non-disclosure agreements that are subject  
5       to, you know, penalties if she violates them.  
6       So . . .

7               MR. GLAVINOS: What's the expiration date  
8       on these NDAs?

9               MR. WEBB: I don't know. I don't know  
10       that there is an expiration date.

11              MR. GLAVINOS: Okay. Are you saying --

12              MR. WEBB: I requested -- I requested -- I  
13       called her manager when we were on break. I  
14       said, was there a non-disclosure agreement with  
15       Black Crystal? He said, I think so. And when  
16       we took another break he forwarded me the  
17       non-disclosure agreement that she had with Black  
18       Crystal. Okay.

19              And so my understanding is that those  
20       non-disclosure agreements themselves are subject  
21       to the non-disclosure -- the most recent  
22       non-disclosure agreement. However, as I told  
23       the employer, and as I am telling you right now,  
24       I'm happy to submit these non-disclosure  
25       agreements to a judge for an in camera

1 inspection, have the judge tell us what we  
2 should and should not disclose pursuant to those  
3 and get any necessary protections that go with  
4 that.

5 And, you know, if you will tell me what it  
6 is you are looking for here, I can find out  
7 whether or not it's protected or not. And  
8 certainly if it's not protected, if it's public  
9 information, if it's something like that, then  
10 she can certainly testify to it.

11 Q. (By Mr. Glavinos) Okay. So how did you  
12 first come to know Vivian Assis?

13 A. When I began with Black Crystal.

14 Q. Okay.

15 (Defendants' Exhibit 4 was marked for  
16 identification.)

17 Q. (By Mr. Glavinos) This will be  
18 Defendants' Exhibit 4 for identification purposes.  
19 And based on this, Vivian went from working at Ortho  
20 Sport & Spine Physicians to Black Crystal Consulting,  
21 right?

22 A. I don't know.

23 Q. Well, let's open it up and take a look.  
24 Page 2, please. This is Defendants' Exhibit 4. So  
25 according to her LinkedIn profile, she worked for

1 Ortho Sport & Spine prior to working for Black  
2 Crystal Consulting; is that right?

3 A. According to this document, that's what it  
4 says there.

5 Q. Okay. And what is Vivian's title with  
6 Medernix?

7 A. Well, according to this page, it's case  
8 manager.

9 Q. Okay. Do you have any reason to dispute  
10 that it's still case manager?

11 A. No, I don't.

12 Q. Okay. Is that the same position you have?

13 A. Yes.

14 Q. Okay. And generally what are your duties  
15 and responsibilities as a case manager for Medernix?

16 A. I'm a liaison between my clients, medical  
17 providers, and attorneys' offices for those patients  
18 who are represented.

19 Q. Do you get PTO at Medernix?

20 A. Yes.

21 Q. Okay. Who do you submit PTO requests to?

22 MR. WEBB: You can answer that.

23 THE WITNESS: It's through the app,  
24 through the system.

25 Q. (By Mr. Glavinos) Okay. What app is

1 that?

2 A. I don't remember the name of it right now,  
3 but it's -- it's online. It's like online.

4 Q. Okay. Is it Paycom?

5 A. It doesn't make -- ring any bell, that  
6 name.

7 Q. Is it ADP?

8 A. No, it doesn't sound like that.

9 Q. Okay. Earlier you stepped out to look at  
10 your bank account and to give me the identity of the  
11 entity that direct deposits your checks into your  
12 account, right?

13 A. Yes.

14 Q. Okay. What's -- did you find out what the  
15 entity's name is?

16 A. So it comes through a company that process  
17 the payroll.

18 Q. What company is that?

19 A. Inspirity.

20 Q. How do you spell that?

21 A. I think it's I-n-s-p-i-r-i-t-y.

22 Q. Okay. And has that been the company that  
23 provides your direct deposit throughout your  
24 employment with Medernix, Black Crystal and Logix?

25 A. I don't think so.

1 Q. Okay. Who was it prior to Inspirity?

2 A. I don't remember.

3 Q. Okay. Who would you call if you are sick  
4 and you can't make it to work?

5 MR. WEBB: You can answer that.

6 THE WITNESS: To Chinua.

7 Q. (By Mr. Glavinos) How do you spell that?

8 A. I will do my best. C-h-i-n-u-a.

9 Q. Is that a last name?

10 A. No. That is a first name.

11 Q. Okay. What's Chinua's last name?

12 A. I think it's Gibson.

13 Q. Who is Chinua employed by?

14 A. Medernix.

15 Q. Okay. Is that who you report to?

16 A. He's the one I call if I'm sick or --

17 Q. Okay. So he's like HR?

18 A. -- or if I have any problem that I cannot  
19 go to the office.

20 Q. Okay. Is this individual kind of the HR  
21 person, human resources?

22 MR. WEBB: You just described a human  
23 resources job so . . .

24 THE WITNESS: I don't think his title is  
25 human resource.

1           Q.       (By Mr. Glavinos) Okay. What's his  
2 title?

3           A.       I don't know exactly his title, but . . .

4           Q.       Okay. But he performs human resources  
5 functions?

6           A.       I cannot tell that. But he is the one I  
7 have to call if I'm sick or if something happens at  
8 the job site.

9           Q.       Okay. Does anyone report to you?

10          A.       Sorry?

11          Q.       Does anyone report to you or do you  
12 oversee anybody?

13                 MR. WEBB: Well, that has been asked and  
14 answered. That was one of the first things you  
15 asked her.

16          Q.       (By Mr. Glavinos) Okay. Remind me.

17          A.       At this point, not.

18          Q.       Do they employ any assistant case  
19 managers?

20                 MR. WEBB: I think she has answered that  
21 as well.

22                 THE WITNESS: Yes, they do.

23                 MR. GLAVINOS: Okay. So she can give some  
24 job titles?

25                 MR. WEBB: Well, she can tell you



1 generally whether or not there's a case manager  
2 and assistant case manager, but she can't give  
3 you the business structure of the organization.

4 MR. GLAVINOS: Well, you said earlier that  
5 she couldn't give me job titles.

6 MR. WEBB: When you are talking about job  
7 titles and descriptions of upper management,  
8 that's different than saying you have a case  
9 manager. That's like -- or an assistant case  
10 manager. That's like saying, well, if you have  
11 a receptionist. Well, certainly if you have a  
12 receptionist, that's not going to give away the  
13 corporate structure.

14 MR. GLAVINOS: Okay. I'm just trying to  
15 understand the NDA. So does the NDA only apply  
16 to officers and directors or does it apply to  
17 anybody -- I mean, I just don't understand the  
18 distinction.

19 MR. WEBB: It applies to the corporate  
20 structure and the methods of operation. So if  
21 it touches on methods of operations, then, no,  
22 she can't do that. I think that she can do it  
23 as far as, you know, the types of things that  
24 are disclosed on the Website. So their Website  
25 discloses a lot of stuff as far as what the

1 business does and what their model is and that  
2 kind of stuff, but she can't go beyond that.

3 MR. GLAVINOS: Well, we have a  
4 disagreement about that.

5 Q. (By Mr. Glavinos) Do you receive health  
6 insurance benefits?

7 A. Yes.

8 Q. Okay. Were those health insurance  
9 benefits, have they been the same from Black Crystal,  
10 Logix and Medernix?

11 A. They have changed.

12 Q. Okay. Did they change when the names  
13 changed?

14 A. Not necessarily.

15 Q. Okay. But they have just changed at some  
16 point over time; the employers decide to use a  
17 different program than they had been using  
18 previously?

19 A. Yes.

20 Q. Okay. So the changes in your health  
21 insurance didn't coincide with the changes to the  
22 name of your employer; is that right?

23 A. Not necessarily.

24 Q. Okay. When the employer changed names,  
25 what changed for you on a day-to-day basis, if

1 anything?

2 A. Only the name of the company.

3 Q. Okay.

4 A. Like the main name of the company.

5 Q. Your e-mail address changed, right?

6 A. Oh, that's right. Yes.

7 Q. Did you have to send out e-mails to all of  
8 your contacts to let them know that your e-mail  
9 address had changed?

10 A. I don't think so.

11 Q. So the e-mails are probably just auto  
12 forwarded from prior e-mail addresses to new e-mail  
13 addresses?

14 A. Not sure.

15 Q. Okay. For all you know is that now you  
16 get e-mails from people who only had your Logix  
17 e-mail address?

18 A. Not sure how that works, but I'm receiving  
19 e-mails.

20 Q. Okay. So somehow they knew to contact you  
21 at this new e-mail address, right?

22 A. Yeah, they are contacting me.

23 Q. Okay. That's all I'm trying to understand  
24 is how they knew. Like if I changed my e-mail  
25 address, people wouldn't know to contact me at that

1 e-mail address, right, if I didn't tell them? Right?

2 A. I don't know how that happened, but they  
3 are contacting me on my new e-mail.

4 Q. Okay. That's all I'm trying to understand  
5 is that you had an e-mail for Black Crystal, right?

6 A. Yes.

7 Q. And then you had an e-mail for Logix,  
8 right?

9 A. Yes.

10 Q. And you had an e-mail from Medernix,  
11 right?

12 A. Yes.

13 Q. Okay. And somehow the people who  
14 contacted you or people who were clients of yours at  
15 Medernix knew to then contact the Logix e-mail  
16 address, right, or -- you don't know how they got in  
17 touch with you, you just know they you were receiving  
18 e-mails at the Logix e-mail address that you were  
19 previously being sent to the Black Crystal e-mail  
20 address?

21 A. Yes.

22 Q. Okay. I'm just trying to understand how  
23 the transition worked. So were files when -- you  
24 know, you had Black Crystal files. Were those  
25 physically transferred to Logix, or was it just the

1     only thing that changed was the name?

2           A.     I think the only thing that changed was  
3     the name.

4           Q.     Okay.  So you noticed zero changes on a  
5     day-to-day basis between Logix -- between Black  
6     Crystal and Logix?

7           A.     I don't think so.

8           Q.     Okay.  What about from Logix to Medernix,  
9     any changes in the day-to-day operations?

10          A.     I don't think so.

11          Q.     Okay.  So whoever started Black Crystal is  
12     behind the scenes for Medernix?

13          A.     I don't know.

14          Q.     Has Medernix been sold or has -- strike  
15     that.

16                   Has -- are you aware that Black Crystal  
17     was sold to someone else?

18          A.     I don't know.

19          Q.     Okay.  Do you have any reason to suspect  
20     that it was?

21          A.     No, I don't know.  Honestly, I don't know.

22          Q.     Okay.  Did you report to different people  
23     at Logix and Medernix than you did at Black Crystal?

24          A.     I believe so.

25          Q.     Okay.  Who were they?

1           A.     I don't remember the exact people, but I  
2     -- it changed a little bit.

3           Q.     Okay. How did it change?

4           A.     Just -- just the name.

5           Q.     Okay. Who? Just the name of the company?

6           A.     The name of the company.

7           Q.     Okay. Did the name of the person you  
8     report to change?

9           A.     I know I was -- it changed, but I don't  
10    remember exactly the names.

11          Q.     Okay. From your perspective, is there any  
12    distinction between Medernix, Black Crystal, and  
13    Logix, other than the names being different?

14          A.     That's the only thing I'm aware of.

15          Q.     Okay. So we are clear, the name of the  
16    entity is the only thing you are aware of changing?

17          A.     I think so.

18          Q.     Okay. Did you work in person for Black  
19    Crystal Consulting?

20          A.     Yes, I did.

21          Q.     Okay. That's pre-COVID, right?

22          A.     Yes.

23          Q.     And we were all in person back then,  
24    right?

25          A.     Yes.

1 Q. Okay. Where did you go to work at Black  
2 Crystal?

3 A. I don't remember the exact address. It  
4 was Atlanta.

5 Q. Is it the same location you now go to work  
6 at Medernix?

7 A. No.

8 Q. Okay. You have no idea where you went to  
9 work when you were working at Black Crystal?

10 A. I don't remember the address right now.

11 Q. Okay.

12 A. Only remember it was in Atlanta.

13 Q. Okay. Is it 5788 Roswell Road?

14 A. Doesn't sounds like it.

15 Q. Okay. Was Black Crystal Consulting ever  
16 within the building of Ortho Sport & Spine  
17 Physicians, LLC?

18 A. I didn't see it there.

19 Q. Okay. Do you have -- do you have any  
20 information that would lead you to believe that Black  
21 Crystal Consulting was ever operated within the Ortho  
22 Sport & Spine Physicians' building?

23 A. I don't know.

24 Q. Do you consider Black Crystal Consulting  
25 to be a separate entity than Ortho Sport & Spine

1 Physicians, LLC?

2 A. I believe so.

3 Q. Why do you believe that?

4 A. I don't have any reason to believe  
5 otherwise.

6 Q. Earlier you said you've never heard of  
7 Yasha Heidari; is that right?

8 A. You asked me if I know him. I don't know  
9 him. If I have spoken with him, I have not spoken  
10 with him.

11 Q. But you've heard of him?

12 A. I have heard his name.

13 Q. Okay. Where did you hear his name?

14 A. At the office.

15 Q. What office?

16 A. Medernix.

17 Q. Okay. What context did Yasha Heidari's  
18 name come up at Medernix?

19 A. I only overheard the name.

20 Q. What else did you overhear?

21 A. Nothing else.

22 Q. So you don't recall ever speaking to Yasha  
23 Heidari or sending e-mails to or from Yasha Heidari;  
24 is that correct?

25 A. I don't recall sending any e-mails to that



1 person.

2 Q. Okay. So you don't recall is a different  
3 answer than you haven't done it, right? Do we agree  
4 with that?

5 MR. WEBB: I think we can all agree that  
6 "don't recall" does not mean the same thing as  
7 "never happened".

8 Q. (By Mr. Glavinos) Okay. So your  
9 testimony is that you don't recall communicating with  
10 Yasha Heidari; is that right?

11 A. Yes, sir.

12 Q. Okay. So it could have happened, you  
13 could have communicated with Yasha Heidari; is that  
14 right?

15 A. I don't remember communicating with him.

16 Q. Okay. How about Steve Youd, Y-o-u-d, ever  
17 heard of him?

18 A. Steve? No, I don't remember that name.

19 Q. Okay. How about Zach Braswell?

20 A. Yes, I remember his name.

21 Q. Okay. How do you remember his name?

22 MR. WEBB: You can answer that.

23 THE WITNESS: He was an employee.

24 Q. (By Mr. Glavinos) Of?

25 A. Medernix.

1 Q. Okay. Was an employee. So he is no  
2 longer employed there?

3 A. No, he is no longer employed there.

4 Q. Do you know what led to his leaving  
5 Medernix?

6 A. I don't know.

7 Q. Okay. Does Medernix ever have joint  
8 events with any of their clients?

9 MR. WEBB: I'm going to object to that.  
10 That would be subject to a non-disclosure  
11 agreement. That would be under methods of  
12 operation and marketing.

13 Q. (By Mr. Glavinos) Okay. So do you know  
14 if they have ever had events with clients.

15 A. I don't know.

16 Q. You don't know? Do you recall ever going  
17 to an event with a client at Medernix?

18 MR. WEBB: Object again. I mean,  
19 that's -- that's -- well --

20 MR. GLAVINOS: I asked her if she recalled  
21 it.

22 MR. WEBB: Woah, woah, woah. Just give me  
23 a minute to think through this, okay? I'm not  
24 going to object to that. I'm going to withdraw  
25 that objection.

1 Did you ever go to an event where both the  
2 client and Medernix were there?

3 THE WITNESS: Yes.

4 MR. WEBB: Okay.

5 Q. (By Mr. Glavinos) Okay. What event was  
6 that?

7 MR. WEBB: I'm going to object if it  
8 requires my client to disclose any type of a  
9 marketing event or anything like that, if it has  
10 -- outside of that, then I don't have a problem  
11 with it.

12 Do you know what I'm saying?

13 Q. (By Mr. Glavinos) I don't want the name  
14 of the client. I just want to know what type of  
15 event it was?

16 A. A Christmas party.

17 Q. Okay. How many clients of Medernix were  
18 at this Christmas party?

19 A. I don't remember.

20 Q. Okay. Are you aware of any common  
21 acronyms for Ortho Sport & Spine Physicians?

22 A. I don't remember.

23 Q. Okay.

24 A. Is OSSP something that case managers at  
25 Medernix use to identify Ortho Sport & Spine

1 Physicians?

2 MR. WEBB: You can answer that.

3 THE WITNESS: That is the acronym of that  
4 particular company.

5 Q. (By Mr. Glavinos) Okay. And so how many  
6 events have you attended with Medernix and other  
7 clients?

8 A. Not much.

9 Q. Just one?

10 A. That I recall at this time, that is the  
11 one I recall at this time.

12 Q. Okay. Just a Christmas party?

13 A. Yes. That is the only one I recall at  
14 this time.

15 Q. Okay. When was that?

16 A. It was December last year.

17 (Defendants' Exhibit 5 was marked for  
18 identification.)

19 Q. (By Mr. Glavinos) All right. This will  
20 be -- we are up to 5? -- Defendants' Exhibit 5. This  
21 is a social media profile for Mr. Zach Braswell who  
22 is a former employer at Medernix per your testimony.

23 If you look at page 2 there is a post.  
24 And I'll represent to you it says, quote: Amazing  
25 holiday party at Ventanas Venue in ATL. Go Medernix

1 & OSSP, hashtag holiday season, hashtag Ortho  
2 Sport & Spine Physicians, hashtag Medernix, hashtag  
3 holiday party 2021. Is this the Christmas party?

4 A. I think so.

5 Q. Okay. This appears to an ignorant  
6 observer that it's a joint Christmas party between  
7 two companies. Is that an accurate description of  
8 it?

9 A. It's not my post, so I don't know. I'm  
10 just reading what you brought me.

11 Q. You were there, right?

12 A. Yes, I was there.

13 Q. Okay. So was it a joint annual Christmas  
14 party between Medernix and Ortho Sport & Spine?

15 A. I was invited.

16 Q. Okay. Ms. Delgado, please just answer the  
17 question I'm asking, okay? Was this a joint annual  
18 Christmas party between Medernix and Ortho  
19 Sport & Spine? Is that your understanding?

20 MR. WEBB: If you know the answer to the  
21 question, you can answer. If you don't know the  
22 answer to the question, you don't have to.

23 THE WITNESS: I don't know.

24 Q. (By Mr. Glavinos) Okay. But you were  
25 there?

1 A. Yes, I was there.

2 Q. Okay. Why did you go?

3 A. Because I was invited.

4 Q. Who invited you?

5 A. I don't remember exactly who invited me,  
6 like the person who exactly invited me. I don't  
7 remember.

8 Q. Was it a Medernix employee?

9 A. I'm trying to remember.

10 Q. Do you remember if it was a Medernix  
11 employee or not?

12 A. No, I don't remember.

13 Q. Okay. Who is the individual on page 2  
14 looking at the camera?

15 A. Looks like Bethani.

16 Q. Okay. And you know Bethani from working  
17 at Medernix, right?

18 A. I just know Bethani.

19 Q. From working at Medernix?

20 A. From working.

21 Q. Where?

22 A. Yes, I worked at Medernix.

23 Q. Is that where you know Bethani Sanders  
24 from?

25 A. That's how I relate with her.

1 Q. Okay. Do you know who arranged the party?  
2 Did Medernix arrange the party for Ortho  
3 Sport & Spine?

4 A. I don't know who did the arrangements.

5 Q. Okay. Do you have any reason to suspect  
6 that Medernix arranged it for Ortho Sport & Spine  
7 because that's -- well, let's ask that question  
8 first. So did Medernix arrange the Christmas party  
9 for Ortho Sport & Spine?

10 A. I don't know.

11 Q. Okay. Because Medernix -- Ortho Sport is  
12 Medernix's client, right?

13 MR. WEBB: Once again, that would be in  
14 violation of her non-disclosure agreement.

15 MR. GLAVINOS: John, they obviously have a  
16 business relationship. It's public record that  
17 they have joint parties. So I think the  
18 question is entirely in bounds. It doesn't  
19 betray any confidential -- it's not a trade  
20 secret.

21 MR. WEBB: I understand that. And, you  
22 know, you already know the answer to your  
23 question, so --

24 MR. GLAVINOS: Are you telling me that  
25 that's a yes? Do you know that? I mean, help

1 me out a little bit. This is --

2 MR. WEBB: I mean, clearly -- clearly, you  
3 have some knowledge there. And, you know,  
4 look -- do you want to -- let's go off the  
5 record real quick.

6 MR. GLAVINOS: Well, no. You know,  
7 respectfully, I want to keep it on the record,  
8 John, so let's -- tell me what you are going to  
9 tell me and --

10 MR. WEBB: Technically that would be a  
11 violation of the non-disclosure agreement for  
12 her to answer that question.

13 MR. GLAVINOS: Okay. You indicated  
14 earlier that the NDAs don't have an end date; is  
15 that right?

16 MR. WEBB: I said I don't know whether  
17 they do or not.

18 MR. GLAVINOS: Okay. Are you able to  
19 confirm that?

20 MR. WEBB: Sure.

21 MR. GLAVINOS: Okay. Let's go find out if  
22 they have a termination date.

23 MR. WEBB: All right.

24 THE VIDEOGRAPHER: The time is 2:43 p.m.  
25 and we are off the record.



1 (Recess taken from 2:43 p.m. to 2:54 p.m.)

2 THE VIDEOGRAPHER: The time is 2:54 p.m.  
3 and we are on the record.

4 MR. WEBB: So the answer to your question  
5 is that there are certain provisions within the  
6 non-disclosure agreement with Medernix that  
7 would terminate 24 months after she no longer  
8 works for them; but she does work for them, so  
9 will continue in full force and effect right  
10 now.

11 I did not notice anything in the  
12 confidentiality agreement she had with Black  
13 Crystal that had any type of a termination date,  
14 only that it continued after her termination.

15 MR. GLAVINOS: Do we agree that Georgia  
16 law is clear that NDAs without a time limitation  
17 are void and unenforceable?

18 MR. WEBB: No, because I would have to  
19 take a look and see.

20 MR. GLAVINOS: Okay. I'll represent to  
21 you that that's the law, and that it's very,  
22 very clear in Georgia that that's the law.

23 Are you going to instruct her not to  
24 answer questions about an unenforceable NDA with  
25 Black Crystal?

1 MR. WEBB: I'm not going to instruct her  
2 to answer questions regarding Black Crystal for  
3 the same reason I told you previously, which is  
4 that she's already told you that Black Crystal  
5 is a predecessor interest to whatever the one  
6 that was in between, which now is Medernix. To  
7 answer those questions would necessarily require  
8 her to violate the non-disclosure agreement with  
9 Medernix.

10 So regardless of whether or not your legal  
11 argument is correct, she still wouldn't be able  
12 to answer those questions.

13 Q. (By Mr. Glavinos) All right. Do you go  
14 to the same office now for Medernix that you went to  
15 for Black Crystal and Logix?

16 A. Not to the same one as Black Crystal, but  
17 the same one as Logix.

18 Q. Okay. And if we look back at Defendants'  
19 Exhibit 5, page 3 --

20 A. This one?

21 Q. Yes. Flip to the next page, though. Is  
22 that the building that Medernix is housed in?

23 A. I believe so.

24 Q. Okay. Are you in this picture? I think  
25 that's you with the elf hat on, huh?

1           A.       Yes, I am.

2           Q.       That's all right. We all like doing a  
3 Christmas party. So this is at Medernix?

4           A.       This is the front of Medernix.

5           Q.       Okay. And this is a different Christmas  
6 party than the Ortho Sport & Spine and Medernix  
7 Christmas party we talked about earlier?

8           A.       What I remember, this was just a PJ day.

9                   THE REPORTER: Say that again, please.

10                  THE WITNESS: The PJ day, the pajamas day  
11 at the office.

12           Q.       (By Mr. Glavinos) Okay. So this is an  
13 office Christmas party, whereas the Medernix-Ortho  
14 Sport & Spine Christmas party was an after-hours  
15 Christmas party?

16           A.       That -- the first one was after hours.  
17 This was the day we designated to wear  
18 like pajamas and have lunch together.

19           Q.       Okay. If we flip to page 4, another  
20 photograph time at Medernix, looks like maybe a  
21 Secret Santa or a white elephant type event at  
22 Medernix?

23           A.       What I recall from this picture, it was a  
24 like -- I don't remember exactly the name of it, but  
25 like a gift exchange or something like that.

1 Q. Sure. And this was -- was Ortho  
2 Sport & Spine involved in the gift exchange or was it  
3 just Medernix?

4 A. It was Medernix.

5 Q. Is there any distinction to you between  
6 Medernix and Ortho Sport & Spine or are they the same  
7 entities?

8 MR. WEBB: She's already answered that  
9 question.

10 Q. (By Mr. Glavinos) Refresh my  
11 recollection.

12 A. They are separate. That's my knowledge.

13 Q. Okay. What informs your knowledge that  
14 they are separate?

15 MR. WEBB: That's asking her to disprove a  
16 negative. I mean . . .

17 MR. GLAVINOS: No. She made a  
18 representation that they were separate, so I'm  
19 asking what informs that representation.

20 MR. WEBB: Do you understand what he is  
21 asking you? I mean, can you -- do you want to  
22 go through the laundry list of every possible  
23 reason under the earth that they are not the  
24 same legal entity?

25 MR. GLAVINOS: I don't care whether she

1 wants to go through it or not. She is here  
2 under subpoena, and I have questions that need  
3 to be answered. Are you asserting an objection  
4 or --

5 MR. WEBB: I am asserting an objection.  
6 The question is ridiculous. You are asking her  
7 to disprove a negative.

8 MR. GLAVINOS: Okay. So his objection  
9 that the question is ridiculous is noted for the  
10 record, although I don't -- I'm not sure that's  
11 a proper objection.

12 Q. (By Mr. Glavinos) So the question is:  
13 What informs your knowledge that Ortho Sport & Spine  
14 is not the same corporate entity as Medernix, because  
15 my position is that they are corporate alter egos?  
16 So I'm asking you to tell me why Ortho Sport & Spine  
17 and Medernix are not the same?

18 A. I don't --

19 MR. WEBB: If you are asking her to make a  
20 legal distinction, I mean --

21 MR. GLAVINOS: No, I'm not.

22 MR. WEBB: I doubt she even knows what an  
23 alternate ego -- or alter ego is.

24 MR. GLAVINOS: I didn't ask her what that  
25 was. I gave her my position and I'm asking her

1 to provide knowledge about the representation  
2 she previously made to me.

3 MR. WEBB: Yeah. Well, you're saying  
4 legal entities. This is a layperson.

5 MR. GLAVINOS: I agree.

6 MR. WEBB: Okay. So when you are asking  
7 her why are two separate entities separate  
8 entities --

9 MR. GLAVINOS: I didn't ask her that.  
10 That's not my question.

11 MR. WEBB: All right. Fine.

12 MR. GLAVINOS: If you have an objection,  
13 please note it so we can move forward, John.

14 MR. WEBB: I don't mind you asking her do  
15 they -- do they write you -- do they sign your  
16 paycheck? You know, are they in the same  
17 building? I've allowed you to ask those kinds  
18 of questions. But to ask this layperson to  
19 explain to you why your theory of corporate  
20 alter egos is not correct, that's beyond the  
21 scope of what she would be able to do. I just  
22 think that's . . .

23 To the extent you can answer the question,  
24 fine, but . . .

25 THE WITNESS: Well, the only thing I know

1 is that they have different names.

2 Q. (By Mr. Glavinis) Medernix and Logix have  
3 different names, right?

4 A. They were different names, but the same  
5 company.

6 Q. Right. So you can be the same company and  
7 have different names, right?

8 A. It was the -- we were explaining they just  
9 changed the name from one to the other.

10 Q. I got it. So you indicated that  
11 Medernix -- let me ask this: Is Medernix related at  
12 all to Ortho Sport & Spine Physicians, LLC?

13 MR. WEBB: Objection to the extent it  
14 calls for violation of the non-disclosure  
15 agreement.

16 MR. GLAVINOS: Okay. Are you saying that  
17 they are, John?

18 MR. WEBB: No. I'm saying if they are. I  
19 mean, if they are -- if they are part of the  
20 corporate structure, if they are a client, I  
21 don't know.

22 MR. GLAVINOS: Well, then she can answer.  
23 If you don't know that they are, then she can  
24 answer.

25 MR. WEBB: I'm just telling her if they --

1 if they are part of the corporate structure, if  
2 they are a client, she can't answer that  
3 question as to what their relationship is.

4 Q. (By Mr. Glavinos) So is Medernix  
5 different than Ortho Sport & Spine, or are they the  
6 same? It's a very straightforward question. It's  
7 absolutely not protected under a NDA.

8 MR. WEBB: I think she has already  
9 answered that question.

10 MR. GLAVINOS: What was the answer?

11 MR. WEBB: To her knowledge, they are not  
12 the same. She has no reason to think they are  
13 the same.

14 Q. (By Mr. Glavinos) You have no reason to  
15 suspect that Medernix and Ortho Sport & Spine are the  
16 same; is that right?

17 A. I don't have any reason to suspect that.

18 Q. Okay. Do you have access to Ortho  
19 Sport & Spine eClinicalWorks software?

20 MR. WEBB: I'm going to object to that,  
21 too. That would fall under methods of operation  
22 if it applies.

23 Q. (By Mr. Glavinos) Do you have access to  
24 patient PHI? Do you know what PHI is?

25 A. No, I'm sorry, I don't.



1 Q. PHI is patient health information under  
2 HIPAA. Do you have any idea what PHI is?

3 THE WITNESS: Can I answer that?

4 MR. WEBB: Yeah, if you know what it is.

5 THE WITNESS: Sorry. Could you please  
6 repeat? Sorry, can you please repeat?

7 Q. (By Mr. Glavinos) Do you know what PHI  
8 is?

9 A. Just told me that it's information.

10 Q. Right. Patient protected health  
11 information that we have to keep private, right?

12 A. Right.

13 Q. If I go to a doctor, those records are  
14 protected, right?

15 A. Yes.

16 Q. Okay. So as part of your job with  
17 Medernix, do you have access to patient health  
18 information?

19 MR. WEBB: You can --

20 THE WITNESS: Can I --

21 MR. WEBB: -- tell him if you have access  
22 to patient health information.

23 THE WITNESS: Yes.

24 Q. (By Mr. Glavinos) Okay. How do you  
25 access that?

1 MR. WEBB: Yeah. You can answer that.

2 You can answer that.

3 THE WITNESS: Through the system.

4 Q. (By Mr. Glavinos) What system? I'll tell  
5 you what, I'll just tell you. It's eClinicalWorks,  
6 right?

7 A. Yes, it is.

8 Q. Okay. And you also use Salesforce with  
9 Medernix, right?

10 THE WITNESS: Can I answer that?

11 MR. WEBB: Hold on. I think you can  
12 answer that.

13 THE WITNESS: Yes.

14 Q. (By Mr. Glavinos) Okay. And so if you  
15 had to just, at a very high level, describe  
16 Medernix's business model, how would you do that?

17 MR. WEBB: She absolutely cannot do that.

18 MR. GLAVINOS: Okay. And again, I think  
19 that's an improper objection.

20 Q. (By Mr. Glavinos) What is your experience  
21 with medical billing compliance?

22 A. I don't do billing.

23 Q. Okay. What is your experience from  
24 protecting clients from claims fraud accusations?

25 A. I don't do that type of work.

1 Q. Oh, you don't do that either, okay. Do  
2 you do anything with compliance at Medernix?

3 A. Compliance?

4 Q. To prevent allegations of billing fraud  
5 against your clients? Do you check billing codes?

6 MR. WEBB: If you do, you do. If you  
7 don't, you don't.

8 THE WITNESS: Sorry. Go ahead again.

9 Q. (By Mr. Glavinos) Do you review billing  
10 codes to make sure that they are compliant?

11 A. Compliant with what?

12 Q. The law.

13 A. Oh, I don't know what that is.

14 Q. No? And you don't do any kind of work  
15 ensuring that there is no claims fraud accusations  
16 against clients?

17 A. No, I don't do that type of job.

18 Q. Okay. What do you do with accounts  
19 receivables -- strike that.

20 What kind of knowledge and experience do  
21 you have with accounts receivables?

22 A. I just make sure that my clients get paid.

23 Q. Okay. Your clients, meaning the medical  
24 providers?

25 A. Correct.

1 Q. Who do you make sure they get paid by?

2 MR. WEBB: You can answer that.

3 THE WITNESS: By the law offices.

4 Q. (By Mr. Glavinos) Okay. The law offices  
5 who represent the patients of the clinics?

6 A. Correct.

7 Q. Okay. Do you know what secure socket  
8 layer technology is?

9 A. Pardon me?

10 Q. Do you know what secure socket layer  
11 technology is?

12 A. No, I don't.

13 Q. Okay. Do you know what system  
14 organization controls are?

15 A. I don't.

16 Q. Do you know what a business associate  
17 agreement is?

18 A. Business what?

19 Q. Business associate agreement, do you know  
20 what that is?

21 A. No.

22 Q. Okay. What kind of training have you  
23 received about protecting patient health information?

24 THE WITNESS: Can I answer that?

25 MR. WEBB: Yeah.

1 THE WITNESS: Online.

2 Q. (By Mr. Glavinos) Okay. So did you  
3 receive any training from Black Crystal about  
4 protecting patient health information?

5 A. Yes.

6 Q. Okay. Did you receive any training from  
7 Logix about protecting patient health information?

8 A. Yes.

9 Q. Okay. Were those trainings different?

10 A. I don't remember exactly.

11 Q. But you remember you were trained at each  
12 of those entities?

13 A. Yes.

14 Q. Okay. Even though they are the same, they  
15 trained you again?

16 A. Yes.

17 Q. Okay. And then did you receive training  
18 again when they changed the name to Medernix?

19 A. That is not the order of the things, but I  
20 have received refresher -- refreshers on those  
21 trainings.

22 Q. Okay.

23 MR. WEBB: My understanding is they have  
24 to.

25 Q. (By Mr. Glavinos) What does Medernix have

1 to do with data?

2 MR. WEBB: Okay. I'm going to object to  
3 that question. It's extremely vague.

4 Q. (By Mr. Glavinos) Okay. I mean, just  
5 very high level, what do you use data for at  
6 Medernix? Do you do any kind of analytics?

7 A. Analytics of what? I'm sorry.

8 Q. I'm not sure. I'm confused, too. We will  
9 go ahead and do an exhibit. I think we can do an  
10 exhibit now, if I can find my other copies. Maybe  
11 this is the same copy. It's only one copy. Here we  
12 go. This will be Defendants' Exhibit 6 for  
13 identification purposes.

14 (Defendants' Exhibit 6 was marked for  
15 identification.)

16 Q. (By Mr. Glavinos) I'll represent to you  
17 that these are some printouts from Logix and  
18 Medernix's Websites. So if we look at page 2 of what  
19 I handed you, at the top of it you will see a  
20 highlighted address, 8215 Roswell Road, Building 800,  
21 Atlanta, Georgia 30350. Was that the address that  
22 Logix was at?

23 A. I think so.

24 Q. Okay. Is that the address you go to for  
25 Medernix?

1 A. Yes.

2 Q. Is that Medernix's principal place of  
3 business or main office?

4 A. That's what I think.

5 Q. How many other offices does Medernix have?

6 A. I'm not aware of any other office.

7 Q. Okay. So as far as you know, the only  
8 Medernix office is located at 8215 Roswell Road,  
9 Building 800?

10 A. That's where I work.

11 Q. Okay. So as far as you know, that's the  
12 only Medernix office?

13 A. Yes.

14 Q. Okay. So if we go to page 4 here -- have  
15 you ever looked at Medernix's Website?

16 A. No.

17 Q. No. Okay. So let's go through this. If  
18 you could, just read the first sentence for me.

19 A. Medernix is your team of claims resolution  
20 and accounts receivable experts that specialize in  
21 serving hospitals, medical groups, and all the other  
22 health care providers.

23 Q. Okay. You can stop right there. Are you  
24 assigned to serve any hospitals?

25 MR. WEBB: You can answer that. You can't

1           give any names, but you can answer that.

2           THE WITNESS: Right now, no.

3           Q.       (By Mr. Glavinos) Have you ever been  
4 assigned to serve any hospitals at Black Crystal,  
5 Logix or Medernix?

6           A.       No.

7           Q.       Okay. Let's go to the next sentence, if  
8 you could.

9           A.       We -- I'm sorry.

10          Q.       Diligently. That's okay.

11          A.       -- diligently maximize the return of  
12 claims and manage the claims process utilizing a  
13 highly skilled and trained team of employees focused  
14 solely -- solely on this mission.

15          Q.       Okay. What does that mean? How does that  
16 relate to your day-to-day job?

17          A.       (No response.)

18          Q.       I'll unpack it a little bit more than  
19 that. Okay. It says you diligently maximize the  
20 return on claims, right?

21          A.       That's what it says there.

22          Q.       Okay. What claims?

23                  MR. WEBB: You can answer that.

24                  THE WITNESS: Well, claims, I don't know.

25          Q.       (By Mr. Glavinos) You don't know what



1       claims you maximize the return on in your job?

2           A.       It could be the same as AR.

3           Q.       I'm sorry?

4                   MR. WEBB:   She said it could be the same  
5       as AR.   She didn't write this, obviously, so she  
6       hasn't seen it before.   But if you ask her  
7       whether or not her job is to try to collect ARs,  
8       she'll be happy to answer that question.

9                   MR. GLAVINOS:   Okay.   My question is about  
10      what her company does based on her company's  
11      representation to the public, which is not --  
12      this is not protected by the NDA.

13                  MR. WEBB:   I absolutely agree that if she  
14      knows.   But what I'm telling you is, first of  
15      all, there's a little bit of a language issue  
16      here.   That's not a word that she uses in her  
17      practice.

18                  MR. GLAVINOS:   Okay.

19                  MR. WEBB:   So to try to infer that she  
20      must know what the person that wrote this meant  
21      is a little bit unfair to her.

22                  MR. GLAVINOS:   I assume that she knows  
23      what her company's statement means.

24                  MR. WEBB:   She understands what her job  
25      is, okay?   She didn't -- she is not in

1 marketing. She is not in advertising. She  
2 didn't write this.

3 MR. GLAVINOS: Well, let's -- you know, I  
4 appreciate it, but I don't want to put off --

5 MR. WEBB: She's also --

6 (Cross-talking.)

7 MR. GLAVINOS: -- that you are coaching  
8 her on how to respond.

9 MR. WEBB: She is also not a 30(b)(6)  
10 representative.

11 MR. GLAVINOS: I'm not asking her to  
12 speak --

13 MR. WEBB: Yes, you are.

14 MR. GLAVINOS: I'm not asking her to speak  
15 for the company. I'm asking her to provide her  
16 understanding about what this is. Because she  
17 just testified that she has no idea what a lot  
18 of this stuff is.

19 MR. WEBB: Right.

20 MR. GLAVINOS: So I'm going to ask  
21 questions about it, so let's proceed so we can  
22 get done with it.

23 MR. WEBB: You can, but --

24 MR. GLAVINOS: You can object.

25 MR. WEBB: I'm objecting when you are

1       trying to say, well, you don't know what your  
2       company means when your company says this and  
3       this is not a 30(b)(6) deposition.

4               MR. GLAVINOS: The record will speak for  
5       itself.

6       Q.       (By Mr. Glavinos) Okay. Do you know what  
7       a claim is?

8       A.       I know what a claim is.

9       Q.       Okay. What is your understanding of what  
10      a claim is?

11      A.       A claim is something like when I open --  
12      I'm going to give an example because I'm not --

13      Q.       Yeah.

14      A.       -- I'm not sure how to explain it.

15      Q.       That's perfect.

16      A.       A claim could be something that, for  
17      example, during a storm, my house got a hole because  
18      of a tree that fell on it. So I file a claim to  
19      that up to my insurance to fix it.

20      Q.       Okay. That's makes perfect sense. So do  
21      you guys do any work on property damage claims at  
22      Medernix?

23      A.       No.

24      Q.       Okay.

25      A.       At least I don't.

1 Q. Not you? You don't do any resolution of  
2 property damage claims for Medernix, right?

3 A. No, I don't.

4 Q. Okay. So what kind of claims do you work  
5 on?

6 A. I won't call it claims.

7 Q. What would you call it?

8 A. What I work with is AR.

9 Q. Okay.

10 A. Accounts receivable.

11 Q. Okay. Of claims? Because -- okay. Let's  
12 continue through this -- you know what? Let's -- so  
13 you work only in AR. Do you have any idea what the  
14 underlying claim is about for your accounts  
15 receivable?

16 A. I'm not understanding, I'm sorry.

17 Q. Okay. You said that all you do is you  
18 work on accounts receivable, right, as far as claims  
19 are concerned?

20 MR. WEBB: I object to that because I  
21 think that's a misrepresentation of what she  
22 said. She said --

23 MR. GLAVINOS: Okay. So let's back up.  
24 That's fine.

25 MR. WEBB: Because you are inserting your

1 definition for claims --

2 MR. GLAVINOS: No. I am going on with  
3 what she just defined.

4 MR. WEBB: But she didn't say that the  
5 accounts receivables were claims. You did.

6 MR. GLAVINOS: No. That's what the  
7 company does. That's what they do.

8 MR. WEBB: I understand. This is not a  
9 30(b)(6) deposition.

10 MR. GLAVINOS: I agree with that. But  
11 this is a deposition of an employee and she can  
12 talk about what she does within the context of  
13 what's public record.

14 MR. WEBB: Right. I understand.

15 MR. GLAVINOS: She knows what a claim is.  
16 We have established that. So --

17 MR. WEBB: But that doesn't necessarily  
18 mean what she does is the same thing as claims.

19 MR. GLAVINOS: That's fine.

20 Q. (By Mr. Glavinos) Do you have any idea  
21 what the underlying subject matter is of your  
22 accounts receivable? Is it -- is it car accident  
23 victims or is it murder victims? What are we talking  
24 about as far as claims go for Medernix?

25 A. The accounts receivable I'm talking about

1 is the bills from my clients.

2 Q. Okay. From the medical providers?

3 A. Correct.

4 Q. Okay. And do you require any patients'  
5 lawyers to give you background information about  
6 their claim?

7 MR. WEBB: I'm going to object to that.  
8 It goes to methods of operation.

9 MR. GLAVINOS: Okay.

10 Q. (By Mr. Glavinos) Okay. So let's see.  
11 Let's go to the first sentence of paragraph 2 and  
12 I'll read it for you.

13 Our specialty lies in the extensive  
14 database of metrics we have compiled and analyzed  
15 that effectively minimizes risks while maximizing  
16 your claims percentages.

17 We agree that's what that says?

18 A. That's what it says there.

19 Q. Okay. What extensive database of metrics,  
20 just very generally, is this talking about? Do you  
21 have any idea?

22 A. I don't have an idea.

23 Q. No idea. Okay. Next sentence says: Data  
24 never lies; and for Medernix, it's all about the  
25 data.

1 Does that mean anything to you?

2 A. Well, I can tell you what I understand  
3 from that.

4 Q. Because that sentence, "Data never lies;  
5 and for Medernix, it's all about the data," does that  
6 mean anything to you?

7 A. It's talking about the data.

8 Q. What data?

9 A. It doesn't say there.

10 Q. What do you think it's talking about?

11 A. I cannot assume.

12 Q. You can't assume what your company web  
13 page is talking about when it references data and it  
14 says, "To Medernix, it's all about the data." But  
15 you don't have any idea what data it's talking about;  
16 is that right? If you don't, you don't. That's  
17 fine. I'm just trying to understand.

18 A. Well, I'm not sure what they are talking  
19 about.

20 Q. Okay. That's fine. All right. The next  
21 sentence: Superior data and personnel allows us to  
22 ensure your coding and claims compliance.

23 I already asked some questions about  
24 compliance. Do you have any idea what that sentence  
25 is talking about?

1           A.     No, sir.

2           Q.     No? Okay. Next sentence: This keeps you  
3 protected from claims fraud accusations that can stem  
4 from mistakes.

5                   What -- what -- we've already established,  
6 I think, that you don't know anything about claims  
7 fraud accusations, right?

8           A.     No, I do not.

9           Q.     So does that sentence make any sense to  
10 you?

11          A.     I don't know.

12          Q.     Okay. So far, I think generally, would  
13 you say that this is pretty unfamiliar to you as far  
14 as describing what you do on a day-to-day basis?

15          A.     I don't -- I don't understand this. I  
16 don't --

17          Q.     Okay. Does this sound like it describes  
18 someone else's job at Medernix, it would just be  
19 someone else doing it, not you?

20          A.     I don't know.

21          Q.     Okay. Next sentence: Our growing team of  
22 professionals are extensively trained and  
23 knowledgeable about the current coding and billing  
24 compliance regulations and how to follow them while  
25 increasing your claims percentages.



1                   So what's the current coding and billing  
2 compliance regulations? What is that talking about?

3           A.       I don't know anything about coding.

4           Q.       Okay. Who at Medernix -- let me ask it  
5 this way: Do you know of anyone at Medernix who  
6 works in coding and billing compliance?

7           A.       I don't know.

8           Q.       Okay. Tell me, about how many employees  
9 does Medernix have?

10                  MR. WEBB: If you know, you can answer  
11 that.

12           Q.       (By Mr. Glavinos) I mean, just a general  
13 ballpark figure is fine.

14           A.       Okay. I'm trying to --

15           Q.       Yeah.

16           A.       I got tangled here.

17           Q.       Is it 25? More than 25? Less than 25?

18           A.       Probably about 25 or so.

19           Q.       Okay. Do you feel like you know everybody  
20 that works at Medernix?

21           A.       Well, I see them in the office.

22           Q.       Sure. And you go to parties with them. I  
23 think it's -- I mean, is it fair to say you know  
24 everybody that works there fairly well?

25           A.       At least I have seen them there.

1           Q.     Okay. And you pretty much know  
2     everybody's names. If you see them in the hallway,  
3     you know people's names?

4           A.     Yes.

5           Q.     Okay. Any of those folks -- do you know  
6     if any of those folks do coding and billing  
7     compliance?

8           A.     I don't know.

9           Q.     Okay. Next sentence: At Medernix, we  
10    know healthcare and fully understand claims  
11    processing. Healthcare is an increasingly complex  
12    industry. Scores of strict procedures and privacy  
13    guidelines combine to form a tangled web of potential  
14    confusion and mistakes.

15                Do you know anything about the strict  
16    procedures or privacy guidelines that could lead to  
17    confusion and mistakes?

18          A.     I don't know.

19          Q.     Okay. Does that sound familiar to  
20    anything related to Medernix to you?

21          A.     (No response.)

22          Q.     Ma'am?

23          A.     I'm trying to understand. I'm sorry.

24          Q.     Yeah, me, too. So fair to say you are not  
25    really sure about what that means either?

1           A.     No.

2           Q.     Okay. Last sentence I'll read is:  
3 Medernix is your medical billing compliance expert  
4 team.

5                   And we agree you don't do anything related  
6 to medical billing compliance, right?

7           A.     No. I don't know what that means.

8           Q.     Okay. Do you know anybody at Medernix  
9 that does medical billing compliance?

10          A.     I don't know.

11          Q.     Okay. So why don't you just take a look  
12 very briefly at the rest -- well, I'm not going to do  
13 that. I'll strike that.

14                   Do you send -- strike that.

15                   Okay. Earlier you described your position  
16 as a liaison between plaintiffs' lawyers and medical  
17 providers; is that accurate?

18          A.     My clients who happen to be medical  
19 providers, yes.

20          Q.     Okay. Do you have any clients that are  
21 not medical providers?

22          A.     No.

23          Q.     Okay. When you communicate with  
24 plaintiffs' lawyers, what is the form of those  
25 communications? Is it e-mail, text message, fax?

1 MR. WEBB: I think you can tell him that.

2 THE WITNESS: Usually phone or e-mail.

3 Q. (By Mr. Glavinos) Okay. Do you guys use  
4 Outlook?

5 A. Yes.

6 Q. Okay. And in Outlook, there is usually a  
7 search bar at the top of your in-box, right, where  
8 you can type in a name and it will pull up every  
9 e-mail related to that name; is that right?

10 A. There is a feature in Outlook that does  
11 that.

12 Q. Okay.

13 THE REPORTER: Say that again, please.

14 THE WITNESS: Sorry. There is a feature  
15 in Outlook that does that.

16 Q. (By Mr. Glavinos) So if you wanted to,  
17 you could type in a patient name and it will pull up  
18 every e-mail you have related to that patient or that  
19 mentions that patient name, right?

20 MR. WEBB: If it hadn't been deleted,  
21 but . . .

22 THE WITNESS: It has the ability of doing  
23 that.

24 Q. (By Mr. Glavinos) Okay. Do you have a  
25 policy of deleting e-mails?

1 THE WITNESS: Can I answer that?

2 MR. WEBB: Yeah, I think so.

3 THE WITNESS: There is a policy.

4 Q. (By Mr. Glavinos) What's the policy?

5 A. I think it's 90 days.

6 Q. Okay. Do you have an understanding about  
7 whether any of those e-mail communications between  
8 Medernix and plaintiffs' lawyers are subject to  
9 discovery, meaning that you have to turn them over if  
10 someone asks for them? Do you have any understanding  
11 about that?

12 A. Answer -- well, I think so.

13 Q. Do you do your work from a personal  
14 computer or is it a computer provided by the company?

15 A. It's the company's.

16 Q. Okay. Is that a hard -- is that a desktop  
17 or like a laptop, you know, a desk type like the old  
18 one with a big tower? Which is it?

19 A. It's a laptop.

20 Q. Okay. What kind of laptop is it? HP,  
21 Dell, Mac?

22 A. I don't remember the brand.

23 Q. Okay. Well, you know the difference  
24 between a PC and a Mac, right?

25 A. Yes.

1 Q. Okay. Is it a PC or is it a Mac?

2 A. It's a PC.

3 Q. Okay. Thank you. Was this the same  
4 computer you were provided by Black Crystal or did  
5 you get a new one from Medernix?

6 A. It's different.

7 Q. Okay. When did you receive this different  
8 computer?

9 A. I think it was this year.

10 Q. Okay. And prior to that, did you do work  
11 on a Logix computer or was it a personal computer  
12 before that?

13 A. It was a company's computer.

14 Q. Okay. The company being who?

15 A. I don't remember. It's just that I don't  
16 remember -- it was -- I don't think it was because we  
17 changed company that the computer got upgraded.

18 Q. Okay. Ortho Sport & Spine didn't give you  
19 a computer, did they?

20 A. No.

21 Q. Okay. Do you have any log-in credentials,  
22 any Ortho Sport & Spine domains or accounts?

23 MR. WEBB: If you know.

24 THE WITNESS: Only to the eClinical we  
25 already mentioned.

1 Q. (By Mr. Glavinos) Okay. So anytime you  
2 need to do something, you can open up eClinicalWorks,  
3 right?

4 A. Yes.

5 Q. Okay. So you have complete access to  
6 Ortho Sport & Spine eClinicalWorks software; is that  
7 right?

8 A. I'm not sure. I can enter there.

9 Q. Okay. Are there -- have you ever tried to  
10 access something and were unable to access it because  
11 of some limitation?

12 A. I don't remember.

13 Q. Okay. Would you remember being rejected  
14 from access to something?

15 A. I don't remember that.

16 Q. Okay. Let's see. So I'll represent to  
17 you that these were produced by the plaintiff in this  
18 case, and this will be Defendants' Exhibit 7.

19 (Defendants' Exhibit 7 was marked for  
20 identification.)

21 Q. (By Mr. Glavinos) And it's actually Bates  
22 stamped Defendants 000169. So at the top of this  
23 page, there are the initials lower case e, capital C,  
24 capital W, and in parenthesis, Delgado, Aracelis; is  
25 that right?

1 A. That's what I'm reading there.

2 Q. What does that mean? Why is your name on  
3 the top of this?

4 A. I don't know, but it's there.

5 Q. Does that mean that you were the person  
6 who accessed this and retrieved the file?

7 A. Probably.

8 Q. Okay. So if we look at the second stapled  
9 packet, there is a surgical estimate. Do you see  
10 surgical estimates from Ortho Sport & Spine  
11 Physicians regularly in your capacity at Medernix?

12 THE WITNESS: Can I answer that?

13 MR. WEBB: Well, I think that -- hold on a  
14 second. Let me look at it.

15 All right. So I think at this point,  
16 enough has been disclosed already, that would no  
17 longer be protected, so you can answer that  
18 question.

19 THE WITNESS: Could you please --

20 Q. (By Mr. Glavinos) Repeat it? Yeah, I got  
21 you. Do you regularly access and convey surgical  
22 estimates of your clients and provide those to  
23 plaintiffs' lawyers?

24 A. Yes.

25 Q. Okay. If we flip to the last page of



1 that -- second to last page, I'm sorry, some kind of  
2 informational table, what -- what is this that we are  
3 looking at? Have you seen anything like this before?

4 MR. WEBB: Are you talking about the page  
5 that has "contact" in the upper left-hand corner  
6 and "contact e-mail"?

7 MR. GLAVINOS: Yes, sir. It's Bates  
8 stamped IMD 000191.

9 MR. WEBB: Okay.

10 Q. (By Mr. Glavinos) Is this from the  
11 Medernix Salesforce software?

12 A. Not sure.

13 Q. Okay. Do you guys maintain contacts for  
14 the attorney that represents a patient in your  
15 Salesforce software?

16 A. Yes.

17 Q. Okay. Do you maintain the law firm that  
18 represents a patient of one of your clients in your  
19 Salesforce software?

20 A. Yes.

21 Q. Okay. Do you maintain the address of the  
22 law firm that represents patients of your clients in  
23 your Salesforce software?

24 A. Yes.

25 Q. Okay. Do you maintain the phone number of

1 the patient and/or attorney that represents patients  
2 of your clients in the Salesforce software?

3 A. So wait, wait. I got confused there.

4 Q. That's okay.

5 A. What you said?

6 Q. Same question as the previous just as to  
7 phone numbers, do you maintain that information in  
8 Salesforce software?

9 A. The attorney's contact phone number?

10 Q. Yes.

11 A. Yes.

12 Q. Okay. And you obviously have a spot where  
13 you can talk about how you heard about the service, a  
14 referral type indication; is that correct?

15 A. I don't know.

16 Q. No? Okay. And you maintain the patient's  
17 name in your Salesforce software, right?

18 A. Yes.

19 Q. Okay. What about claim information at the  
20 bottom? There's a spot that says policy limits. Do  
21 you maintain that information in your Salesforce  
22 software?

23 A. Yes.

24 Q. Okay. Do you maintain an estimated case  
25 value in your Salesforce software?

1 A. I don't remember.

2 Q. Okay. Well, right here it says estimated  
3 case value \$3 million. Do you see that?

4 A. Yes, I see it.

5 Q. Okay. But you are not sure if that's  
6 maintained in your Salesforce software?

7 A. No.

8 Q. Okay. What about the date of loss or date  
9 of injury, is that maintained in your Salesforce  
10 software?

11 A. Yes.

12 Q. Okay. What about case summary, is that  
13 maintained in your Salesforce software?

14 A. Could be.

15 Q. Okay. So here the case summary provides  
16 rear-ended by vehicle that was rear-ended. \$1,680.88  
17 PD, in parentheses, no visible damage, end  
18 parentheses. Do you see that?

19 A. Yes, I can see that.

20 Q. Okay. Is that a summary of this case?

21 A. According to this piece of paperwork, it's  
22 under case summary.

23 Q. Okay. Is that what's maintained in  
24 Medernix's Salesforce software?

25 A. It could be.

1 Q. Okay. It could be? So do you guys  
2 maintain case summaries of the litigation cases  
3 related to your clients' accounts receivables.

4 A. We could do that.

5 Q. You could or you do?

6 A. We could.

7 Q. Okay. So you don't know either way if you  
8 do?

9 A. Obviously there's a field for that.

10 Q. Okay. So you -- do we agree that Medernix  
11 maintains in its Salesforce software case summaries  
12 outlining the factual circumstances of the underlying  
13 claims?

14 A. We could.

15 Q. You could?

16 A. Yes.

17 Q. I'm sorry, I'm not understanding. Either  
18 you do, you don't or you don't know, right? I don't  
19 know that you could is really a responsive answer  
20 here, so --

21 MR. WEBB: Can I ask a question?

22 MR. GLAVINOS: Sure.

23 MR. WEBB: I just want some clarification.

24 So these previous cases -- previous pages have  
25 her name at the top, it says eCW and then in

1           parentheses it has her name.

2                   MR. GLAVINOS: Uh-huh.

3                   MR. WEBB: Okay. This last page here does  
4 not. I don't know whether it was generated from  
5 the same software, whether it came from some  
6 other source. I don't know where it came from.

7                   MR. GLAVINOS: Yep. Me neither. That's  
8 why I'm asking these questions.

9                   MR. WEBB: Well --

10                  MR. GLAVINOS: This was produced to me.

11                  MR. WEBB: Okay.

12                  MR. GLAVINOS: I know what you know, John.

13                  MR. WEBB: Well, then you can ask her  
14 whether she knows. If she doesn't know, she  
15 doesn't know.

16                  MR. GLAVINOS: That's fine. That's all  
17 I've been doing.

18                  MR. WEBB: Okay. I think her testimony is  
19 they have the capability to do it.

20           Q.        (By Mr. Glavinos) Okay. Is it part of  
21 your job responsibilities to put in case summaries  
22 about your clients' claims?

23           A.        I can.

24           Q.        Okay. But is it expected of you to do  
25 that?

1 MR. GLAVINOS: Do I have to answer that?

2 MR. WEBB: Uh-huh.

3 THE WITNESS: Sorry. Go ahead.

4 Q. (By Mr. Glavinos) Is it expected of you  
5 to maintain case summaries for your clients' claims  
6 in your Salesforce software?

7 A. I could.

8 Q. Is that a yes or a no?

9 MR. WEBB: It's okay. It's not even what  
10 Key Health or anybody else does, if that's part  
11 of your job description. If it's not part of  
12 your job description, tell him that's not part  
13 of my job description.

14 Q. (By Mr. Glavinos) I'm not saying there is  
15 anything wrong with doing it or not doing it. I'm  
16 just trying to understand what it is because I get  
17 these documents and I've got to figure out what they  
18 mean and what's going on. So that's why we're here.  
19 So all I want to know is: Is it part of your job  
20 description to provide case summaries for your  
21 accounts receivable for your clients?

22 A. I don't remember.

23 Q. Did somebody tell you not to provide  
24 information about whether or not there were case  
25 summaries pertaining to your clients in your

1 software?

2 A. I mean, there's a field for that and if --  
3 if -- I can do it.

4 Q. Do you do it for your cases?

5 A. Sometimes.

6 Q. Okay. Don't you think that's important  
7 information to know if you are working on the  
8 accounts receivables that you know what the facts are  
9 of the case so you can help analyze the data and the  
10 analytics like the job description talks about,  
11 right?

12 A. It would be helpful.

13 Q. Yeah. So Medernix wants the information,  
14 like the property damage and the mechanism of injury  
15 in their Salesforce file, isn't that right, because  
16 it would be helpful?

17 A. It will be helpful.

18 Q. Okay. We agree. So do you ever require  
19 that information in order to sign a patient up to  
20 have treatment?

21 A. I'm not involved in the process of signing  
22 patients.

23 Q. Okay. So you don't ever send e-mails  
24 about recommended procedures?

25 A. Yes, I do.

1 Q. And are you aware of any e-mails that  
2 require certain information before a procedure can be  
3 performed?

4 MR. WEBB: That's kind of pushing it. I  
5 think that does get into the methods and  
6 business practices. I think generally, though,  
7 you can answer the question. I just don't think  
8 you can tell him anything specific. In other  
9 words, I don't want you to tell him what  
10 specific information you guys think is important  
11 because that is part of your methods and  
12 practices. But if you do consider information,  
13 I don't think that violates your non-disclosure.  
14 Do you see what I'm saying?

15 THE WITNESS: If I think it is important?

16 MR. WEBB: That's good enough. You can  
17 say that.

18 THE WITNESS: I think that will be helpful  
19 to have.

20 Q. (By Mr. Glavinos) Okay. Why is that  
21 helpful?

22 A. Because of the accounts receivable.

23 Q. Right. Because you want to understand the  
24 value of the account receivable, right?

25 A. Yes.



1           Q.     All right. So to understand the value of  
2     the account receivable, you have to know the facts of  
3     the claim underlying the account receivable, right?

4           MR. WEBB: It's okay. You can say yes.

5           You just can't tell him which specific facts you  
6     guys value more than others and things like  
7     that.

8           THE WITNESS: Yes.

9           Q.     (By Mr. Glavinos) Okay. And so as part  
10    of -- let's pause there.

11           So as part of that, we agree that there is  
12    certain information that you will want before a  
13    patient can be signed up for care with one of your  
14    clinics -- your clients? I'm sorry.

15          A.     I said that it would be helpful.

16          Q.     Do you ever say we can't treat them until  
17    they give us certain information? Does Medernix have  
18    a policy like that?

19          MR. WEBB: Well, Medernix doesn't treat  
20    anybody.

21          Q.     (By Mr. Glavinos) Well, does Medernix  
22    ever make decisions about whether or not a patient  
23    can receive treatment or not?

24          MR. WEBB: I'm going to object to that.

25          MR. GLAVINOS: You don't know the answer

1 to that.

2 MR. WEBB: No. But if you are asking what  
3 their methods of -- methods of operations and  
4 business practices are. But clearly, I mean, I  
5 haven't seen any indication that Medernix is a  
6 treatment provider. Her specific knowledge is  
7 accounts receivable for providers.

8 Q. (By Mr. Glavinos) Okay. So does Medernix  
9 do any kind of negotiation with plaintiffs' lawyers  
10 on behalf of clinics about the amount to be accepted  
11 in satisfaction of a lien?

12 MR. WEBB: You can answer that. You just  
13 can't go into the specifics of it.

14 THE WITNESS: Yes.

15 Q. (By Mr. Glavinos) Okay. So you negotiate  
16 bills for your clients?

17 A. I can do that.

18 Q. Okay. And what kind of oversight do your  
19 clients get? Do they give you a specific percentage  
20 or number that you can accept of the total bill?

21 MR. WEBB: Going to object to that.

22 MR. GLAVINOS: It's very general  
23 knowledge.

24 MR. WEBB: If it goes into their methods  
25 of operation and business practices, I

1           can't allow her to discuss that, absent a court  
2           order.

3           Q.       (By Mr. Glavinos)   So a minute ago, we  
4           were talking about approving treatment or refusing to  
5           schedule treatment. Does Medernix participate in the  
6           scheduling of any treatment of its clinics -- of its  
7           patients at clinics? I'm sorry.

8           A.       What do you mean, like specifically  
9           scheduling?

10          Q.       Uh-huh.

11          A.       I don't do scheduling.

12          Q.       Does anybody at Medernix do scheduling?

13          A.       Not sure.

14          Q.       Okay. Let's do an exhibit. This will be,  
15          I believe, Defense Exhibit 8.

16                   (Defendants' Exhibit 8 was marked for  
17          identification.)

18          Q.       (By Mr. Glavinos) Let's start at the back  
19          of this e-mail chain. You can go back before the  
20          blue page, actually. Go back after the blue page in  
21          a moment.

22                   MR. WEBB: Well, you have several blue  
23          pages.

24                   MR. GLAVINOS: Oh, I do. We will go to  
25          the last blue page and then go two pages

1 forward.

2 MR. WEBB: This is an e-mail from Adriana  
3 Velazquez -- Velazquez -- whatever?

4 Q. (By Mr. Glavinis) Adriana Velazquez to  
5 Marina Santos on Tuesday, February 3rd [sic], 2021.  
6 Actually, we are going to go one back. This is an  
7 e-mail from MarinaSantos at LogixUS.com to Lucy  
8 Orantes with Cruzfirm.com and Gisselle Pinon at  
9 Cruzfirm.com. And cc'd on this e-mail is Aracelis  
10 Delgado, ADelgado@LogixUS.com, right? All of that  
11 was accurate?

12 A. February 23rd?

13 Q. We are right here. We are on the bottom.  
14 All right. So do we agree that it was  
15 from who I said it was from and to who I said it was  
16 to and you are cc'd on it?

17 A. That's what I'm seeing here.

18 Q. Okay. And the subject line is OSSP  
19 Procedure Recommendations, right?

20 A. Yes.

21 Q. And we agree that OSSP means Ortho  
22 Sport & Spine Physicians, right?

23 A. Yes.

24 Q. Okay. So the e-mail reads: Good  
25 afternoon. Blank was seen February 22 and has been

1 recommended for the following procedures. There's  
2 two injections. At this time OSSP does not feel  
3 comfortable moving forward with the recommended  
4 injections. Patient is scheduled currently for a  
5 three-week follow-up with Dr. Flood on March 15th at  
6 9:00 a.m. The patient's estimated balance at OSSP is  
7 \$330,893.87; is that accurate?

8 A. That's what I'm seeing there.

9 Q. So this is a Logix employee e-mailing  
10 employees of a law firm, right?

11 A. That's what I'm seeing there.

12 Q. And they are telling the law firm that  
13 Ortho Sport & Spine is not going to do anymore  
14 injections, right?

15 A. What I'm seeing is that don't feel  
16 comfortable at this time.

17 Q. Okay. Why? Do you know why?

18 A. It doesn't say there.

19 Q. Okay. Have you ever sent an e-mail saying  
20 OSSP doesn't feel comfortable doing something?

21 A. I don't remember.

22 Q. Have you ever sent any e-mails to any  
23 clinic doesn't feel comfortable doing certain  
24 treatment?

25 A. I don't remember.

1 Q. Would you remember telling someone's  
2 lawyer that they can't get treatment at a clinic  
3 that's a client of yours?

4 A. (No response.)

5 Q. You don't think that's a memorable moment?

6 A. Yes.

7 Q. I'm sorry. Yes to what?

8 A. Yes, it is -- so can you repeat again?

9 Q. Have you sent e-mails letting lawyers know  
10 that certain patients are not approved for treatment  
11 at one of your client's clinics?

12 MR. WEBB: That's okay. It happens all  
13 the time.

14 THE WITNESS: Yes.

15 Q. (By Mr. Glavinos) Okay. Does it happen  
16 all the time?

17 A. It happens.

18 Q. Okay. What's the most common reason that  
19 that happens?

20 A. Coverage.

21 Q. Coverage, what does that mean?

22 MR. WEBB: You can explain it.

23 THE WITNESS: Not enough coverage.

24 Q. (By Mr. Glavinos) Not enough coverage?

25 A. Policy limits.

1 Q. Okay. So you need to know before a  
2 patient can be treated what the policy limits are of  
3 the underlying claim?

4 A. It is really helpful.

5 Q. Okay. Why is that helpful?

6 A. For the accounts receivable.

7 Q. Right. Because you need to make sure that  
8 the policy limits can support the treatment that's  
9 being rendered, right?

10 A. Yes.

11 Q. Okay. So the response is from  
12 Ms. Velazquez to Marina Santos, who is a Logix  
13 employee -- and, again, you are cc'd on this e-mail,  
14 right, at the top of page?

15 A. That's what I'm seeing there.

16 Q. Okay. Subject line still OSSP Procedure  
17 Recommendations, right?

18 A. Yes.

19 Q. And we agree OSSP is Ortho Sport & Spine  
20 Physicians, right?

21 A. Yes.

22 Q. Okay. Okay. This says: Thank you for  
23 the update. Can you please provide us with an  
24 updated bill? The last bill we have is for treatment  
25 until July of 2020. We are getting ready to send the

1 demand and would like the most recent bill. Would  
2 you also please send us the referral for the joint  
3 injections? Right?

4 A. That's what it says.

5 Q. Okay.

6 We will discuss this treatment with our  
7 client and look to see if funding through Omni would  
8 be a good option? That's what that says?

9 A. Yes.

10 Q. Okay. What does that mean, to see if  
11 funding through Omni would be a good option?

12 MR. TILLER: Object to form.

13 Q. (By Mr. Glavinos) You can answer.

14 THE WITNESS: That they are going to speak  
15 with their client and see if Omni would be an  
16 option.

17 Q. (By Mr. Glavinos) Okay. And what would  
18 Omni do?

19 A. Don't know.

20 Q. Have you ever heard of Omni Funding?

21 A. Yes.

22 Q. You are on this e-mail, right?

23 A. Yes, I am.

24 Q. Why are you cc'd on this e-mail?

25 A. As a case manager.



1 Q. Okay. Are you overseeing what's going on  
2 with this case? Is that why you are cc'd on there?

3 A. To provide information.

4 Q. Okay. But even though you are cc'd on  
5 this e-mail, you don't know what Omni Funding is?

6 A. Well, it looks like it's a funding  
7 company.

8 Q. Yeah. So what's your understanding of  
9 what a funding company is?

10 A. I'm not real familiar with funding  
11 companies.

12 Q. Okay. Well, if I represented to you that  
13 funding companies give loans to plaintiffs to  
14 treat -- to provide treatment, does that sound right?

15 A. Sounds Logix.

16 Q. Okay. We can go two pages forward. And  
17 when I say forward, I mean backwards.

18 MR. WEBB: Okay.

19 Q. (By Mr. Glavinos) So we are looking at  
20 Friday, June 12th, 2020, at 9:24 a.m. Are we all on  
21 the same page? Looks like it. This is after the  
22 last e-mail on February 23rd about Omni Funding.  
23 Maybe not. No, I'm sorry, we're going backwards in  
24 time. Excuse me.

25 So we will start with the e-mail from

1 Aracelis Delgado sent Tuesday, June 9th, 2020 at 9:01  
2 a.m. to Adriana Velazquez with the Cruz Firm.  
3 Subject line is, again, OSSP Surgical Recommendation,  
4 right?

5 A. Yes.

6 Q. Okay. The e-mail reads: Good morning. I  
7 hope everything is well with you. Blank is  
8 recommended to have the following surgery. And there  
9 is some description. Then it says: Blank's pending  
10 estimated balance is 133,837.77. It says: Based on  
11 the information we have on file, we do not feel  
12 comfortable moving forward on lien basis with the  
13 recommended surgery. If you have questions or  
14 require additional information, feel free to contact  
15 me. Signed, Aracelis Delgado.

16 Is that right?

17 A. Yes.

18 Q. Okay. So what's going on in this e-mail?

19 A. What I'm seeing here is that a person was  
20 recommended for a surgery. I see an estimated  
21 balance. And based on some information, we didn't  
22 feel comfortable moving forward on a lien basis.

23 Q. Okay. What information was that you were  
24 relying upon in making that determination?

25 A. At this time, I don't know because I don't

1 have the file.

2 Q. Would it be the policy limits?

3 A. Could be.

4 Q. Okay. What other information would you be  
5 looking at to make that determination?

6 THE WITNESS: Can I answer that?

7 MR. WEBB: No, you can't, because that  
8 gets into their methods of operation.

9 You've established that one of the things  
10 they look at is the policy limits because that  
11 was disclosed in information you already had.  
12 So that's no longer confidential and that's no  
13 longer protected.

14 Clearly, she does look at other  
15 information, but I think that under the  
16 non-disclosure agreement, she is not supposed to  
17 disclose her methods, and that would include  
18 what specific types of information she relies  
19 upon, unless you already have it, which is fine,  
20 and how they go about doing whatever  
21 calculations they do.

22 Q. (By Mr. Glavinos) Okay. We can go to the  
23 top of the page. This e-mail is to you from Adriana  
24 Velazquez and it appears to be in response to your  
25 e-mail. Subject line is, again, OSSP Surgical

1 Recommendation. Do we agree with that?

2 A. I'm seeing that there.

3 Q. Okay. It says: Our client is very much  
4 interested in moving forward with the recommended  
5 surgery. Our client has the available coverage of  
6 \$1 million. Is there any reason y'all won't move  
7 forward with the lien? Please let me know what is  
8 needed for us to get the surgery moving forward.

9 Do we agree with that?

10 A. Yeah.

11 Q. Okay. You get a lot of e-mails like that,  
12 lawyers saying their patients want to move forward,  
13 let us know what information we have to give to get  
14 our client some treatment?

15 A. Sometimes.

16 Q. Okay. All right. Let's go back to the  
17 last page here. This is an e-mail from Vivian Assis,  
18 subject line OSSP Case Update Request, right?

19 A. Correct.

20 Q. Okay. Content of the e-mail, it says: I  
21 hope you are well. Just following up on these cases  
22 to see if any have settled. If there is anything I  
23 can do to assist in the matter, please let me know.  
24 Please also feel free to reach out to me with your  
25 reduction requests on any of your clients' cases when

1 settled.

2 Do you agree that's what it says?

3 A. That's what it says.

4 Q. What is Ms. Assis talking about here?

5 A. I think she is asking for an update.

6 Q. Okay. And she is also encouraging them to  
7 reach out with requests for reductions of the  
8 patients' bills, right?

9 A. Yes, she is.

10 Q. Okay. And part of your job is maintaining  
11 the accounts receivables for clients, right?

12 A. Yes.

13 Q. And that includes resolving accounts  
14 receivables for clients, right?

15 A. Correct.

16 Q. Okay. And you obviously track what a  
17 client's accounts receivable is, right?

18 A. Correct.

19 Q. And what we are talking about is you track  
20 what a patient's balance is, right?

21 A. Yes.

22 Q. Okay. And then so by tracking the  
23 patient's balance, you are able to communicate that  
24 to the plaintiff's lawyers, right?

25 A. Yes.

1           Q.     Okay. And then you also necessarily have  
2 to track, then, the amount that the bills are reduced  
3 by, right?

4           A.     Sorry. I'm not understanding the  
5 question.

6           Q.     That's okay. I'll back up. So we agreed  
7 that Medernix tracks its clients' accounts  
8 receivables --

9           A.     Yes.

10          Q.     -- right? And you negotiate your clients'  
11 accounts receivables with the payors, right?

12          A.     Yes, I can.

13          Q.     Okay. And so to keep track of those  
14 negotiations, you have to keep track of the amounts  
15 that are paid to those accounts receivables, right?

16                 MR. TILLER: Object to form.

17                 MR. WEBB: Yeah, that doesn't -- that's  
18 not the same thing.

19                 MR. GLAVINOS: Okay. Well, she can  
20 answer.

21                 MR. WEBB: Do you understand what his  
22 question is?

23                 THE WITNESS: If I track it?

24          Q.     (By Mr. Glavinos) Uh-huh. So you  
25 track -- you track the account receivable, the

1 balance that's owed, right?

2 A. Yes.

3 Q. Okay. And do you know when a balance is  
4 paid in full?

5 A. Yes, I know.

6 Q. How do you know that?

7 MR. WEBB: If --

8 MR. GLAVINOS: Let her -- let her --

9 MR. WEBB: Okay.

10 MR. GLAVINOS: I know.

11 THE WITNESS: It's just that I don't want  
12 to, you know, violate my --

13 MR. GLAVINOS: You are not.

14 MR. WEBB: It's not a violation of the  
15 agreement. Look, if the case is over because  
16 the client has been paid or at least satisfied  
17 with what they have been paid, then clearly you  
18 would know, I mean, if that's what it is. I'm  
19 not trying to put words in your mouth. That's  
20 all he is asking. That's not a violation of any  
21 agreement, okay?

22 THE WITNESS: Okay. Yes, I know if they  
23 have been paid. I do know.

24 Q. (By Mr. Glavinos) Okay. Do you track  
25 that they have been paid, that your clients have been

1 paid?

2 A. Yes.

3 Q. Yes. Okay. And then so do you also track  
4 the amount -- let me back up.

5 Okay. Let's look at this e-mail real  
6 quick. There is some kind of rows and columns, looks  
7 like a spreadsheet, it says patient, date of birth,  
8 DOI, OSSP Balance across the top, right?

9 A. Yes.

10 Q. Have you ever seen anything like that  
11 before?

12 A. Yes, I have.

13 Q. Okay. Where did you see that?

14 A. On the e-mails.

15 Q. On the e-mails?

16 A. (Witness nods head.)

17 Q. Okay. Is this a cutout of some other  
18 document that you've seen?

19 A. It looks like an e-mail --

20 Q. Okay.

21 A. -- sent.

22 Q. What I'm specifically talking about,  
23 though, is the columns: Patient, DOB, DOI, OSSP  
24 Balance. I'm asking about this little table or chart  
25 in the middle, right? And you said you may have seen



1 something like that before, right?

2 A. Yes.

3 Q. Okay. Have you ever seen that outside of  
4 the e-mails?

5 A. I don't remember.

6 Q. Okay. Does this look like the method or  
7 means by which you track the accounts receivables?

8 A. (No response.)

9 Q. To me, this looks like a good way to stay  
10 organized and to keep track of what's going on,  
11 right, like a summary of the cases. Is that -- is  
12 that what that is?

13 A. It's like an update.

14 Q. Okay. This table is an update?

15 MR. WEBB: That's literally what the  
16 e-mail says it is.

17 MR. GLAVINOS: I know. I get that. I get  
18 that.

19 Q. (By Mr. Glavinos) Well, I just want to  
20 understand what this table is. And you said you've  
21 seen something like that before.

22 A. For me, it's a summary.

23 Q. Right. So where is the summary kept?

24 A. Sorry. Why?

25 Q. Where.

1           A.       Where?

2           Q.       Is it saved in Outlook? Is it saved in  
3   Microsoft Excel? Is it saved in another place?  
4   Where is this summary kept?

5           THE WITNESS: Can I answer that?

6           MR. WEBB: Yeah.

7           THE WITNESS: When we review.

8           Q.       (By Mr. Glavinos) Okay. When you review  
9   what? When you review a case, you create a summary?

10          MR. WEBB: Can I help you out for a  
11   minute? Okay. It's okay if this is in your  
12   eClinicalWorks software or if it's a separate  
13   spreadsheet that you maintain in Excel or if  
14   each individual case manager has their own way  
15   of doing it, it's okay. If you don't know how  
16   Ms. Assis did it, then you don't need to  
17   speculate on how Ms. Assis did it. But if you  
18   do know because you create the same kind of  
19   spreadsheets, it's okay to answer that question.

20          THE WITNESS: Well, I take it from the  
21   system if I'm going to do it.

22          Q.       (By Mr. Glavinos) Okay. So this little  
23   spreadsheet is pulled from a system, right?

24          A.       Yes.

25          Q.       Okay. What system is that pulled from?

1 Is it eClinicalWorks or is it another system or is it  
2 Salesforce?

3 A. It is -- the balance is there in  
4 eClinical.

5 THE REPORTER: Sorry, I can't hear you.

6 THE WITNESS: The balance is there in  
7 eClinical.

8 Q. (By Mr. Glavinos) Okay. So that's where  
9 you track the accounts receivable is eClinical?

10 A. The balance is there.

11 Q. Okay. I just want to be perfectly clear.  
12 The balance is maintained in eClinicalWorks, right?  
13 This isn't a trick question. This is something you  
14 do every day at work, Ms. Delgado.

15 A. Yes.

16 Q. And your attorney is telling you that  
17 you're not -- you don't need to worry about the NDA.  
18 So is this spreadsheet and the balance maintained in  
19 eClinicalWorks?

20 A. I see it from there.

21 Q. Okay. So yes, this balance and the  
22 spreadsheet is maintained in eClinicalWorks?

23 A. Yes.

24 Q. Okay. Thank you. Okay. So the balance  
25 is maintained in there and payments would also be

1 maintained in eClinicalWorks; is that right?

2 A. Well, they have to be processed.

3 Q. Right. You have to keep track of what's  
4 coming in on your accounts receivables, right?

5 A. Yes.

6 Q. Okay. And so are the payments reflected  
7 in eClinicalWorks as well as the balance?

8 A. Yes.

9 Q. Okay. Is that true just all of your  
10 experience with eClinicalWorks, not any specific  
11 client, but just eClinicalWorks, that's the way it  
12 works for all your clients?

13 A. Yes.

14 Q. Okay. And then if the client is willing  
15 to accept something less than the full payment, it  
16 would reflect the difference in the payment and the  
17 outstanding balance. Would that be reflected as a  
18 write-off or as a reduction?

19 MR. TILLER: Object to form.

20 Q. (By Mr. Glavinos) You can answer.

21 A. Obviously, if the check is received, it  
22 has to be posted. It has to be there.

23 Q. Right. And if the check is less than the  
24 full balance -- is the check ever less than the full  
25 balance that you receive?

1 MR. TILLER: Same objection.

2 THE WITNESS: Sometimes.

3 Q. (By Mr. Glavinos) Okay. And in those  
4 situations, is there also a write-off or reduction  
5 reflected in eClinicalWorks?

6 MR. WEBB: If you know.

7 THE WITNESS: I think it is, yeah.

8 Q. (By Mr. Glavinos) I think it's fair that  
9 it would just need to be. You would need to track  
10 what's coming in, what you are accepting, and what  
11 you are writing off, right? As a business, you have  
12 to do that, right?

13 A. Yes.

14 Q. Okay. Let's go back. I'm sorry I'm  
15 jumping around. I'm kind of a scatterbrain. We will  
16 go back to the first page of this exhibit that we  
17 just went through.

18 Okay. Now we are back in 2019, so all the  
19 e-mails are Black Crystal Consulting. Is that about  
20 the time period you recall working for Black Crystal?

21 A. Yes.

22 Q. Okay. So E. Vargas at  
23 Blackcrystalconsulting.com sent an e-mail on Monday,  
24 November 18th, 2019 to Gisselle at the Cruz firm; is  
25 that right? That's what that says?

1 I'm on page 2, if you flip to the next  
2 page. I'm sorry. I'm at the bottom of that page  
3 looking at the from and to, E. Vargas at Black  
4 Crystal to Gisselle at Cruz Firm, Monday, November  
5 18th, right?

6 A. Yes.

7 Q. Same subject, OSSP Procedure  
8 Recommendation, right?

9 A. Correct.

10 Q. Okay. E-mail reads: Hello, again,  
11 Gisselle. Hope this finds you well. Blank has been  
12 recommended to have the following procedure. There  
13 is a procedure listed. As of to date, his pending  
14 balance is 78,000 and some change. Please let us  
15 know how we may proceed?

16 Why would Black Crystal be asking lawyers  
17 how they should proceed?

18 A. I don't know because it didn't come from  
19 me.

20 Q. Yeah. Have you ever sent e-mails to  
21 plaintiff's counsel asking for approval of treatment?

22 A. I don't recall that.

23 Q. Could you have done that?

24 A. I don't remember.

25 Q. You don't remember -- your entire career

1 working for Medernix, Logix, Black Crystal, Premier  
2 NeuroSurgical Institute, you don't ever remember  
3 sending an e-mail asking for a lawyer to approve  
4 treatment for a client; is that your testimony?

5 A. I don't remember.

6 Q. Okay. So after Black Crystal says,  
7 "Please let us know how we may proceed", question  
8 mark, Gisselle responds on November 20th, 2019: Good  
9 morning. Attached is the police report of the  
10 client's accident and a photograph of his vehicle  
11 damage. His 2012 Nissan Sentra was deemed a total  
12 loss and was solved for \$4,384 and some change.

13 Is that correct, as far as what it says?

14 A. Correct.

15 Q. Okay. Thank you. He has pending bills  
16 from blank averaging around 14,000, an unknown  
17 balance from blank, and MRIs from blank are around  
18 2,000. His liability limits are \$1 million. That's  
19 what that says?

20 A. Yes.

21 Q. Okay. Please let me know your decision  
22 regarding the client's recommended procedures based  
23 on this information.

24 Right?

25 A. That's what it says.

1 Q. Okay. So this is the Cruz Law Firm asking  
2 Black Crystal Consulting to make a decision regarding  
3 their client's recommended procedures, right?

4 MR. WEBB: Well, I'm going to object to  
5 this point. First of all, the document speaks  
6 for itself. But she's new [ph] to Ms. Pinon or  
7 Orantes -- I think it's unfair to ask her to  
8 speculate exactly what that means. But clearly,  
9 the words are there.

10 Q. (By Mr. Glavinos) And your time at Black  
11 Crystal, did you ever send an e-mail -- strike that.

12 Okay. So John said the e-mail speaks for  
13 itself. It says, quote, Please let me know your  
14 decision regarding the client's recommended  
15 procedures based on this information.

16 Okay. And this e-mail was sent to an  
17 employee of Black Crystal Consulting, right?

18 A. It looks like that.

19 Q. Okay. And the subject line is OSSP  
20 Procedure Recommendation, right?

21 A. That's what it says.

22 Q. Okay. Do we agree that this is a lawyer  
23 for a client asking if the Black Crystal employee  
24 will approve treatment?

25 MR. WEBB: If you know.



1           THE WITNESS: What I'm seeing here is an  
2           e-mail from a legal assistant at a firm telling  
3           -- telling -- telling a person to let her know  
4           the decision about the recommended procedures,  
5           is what I'm reading there.

6           Q.       (By Mr. Glavinos) That's fair. And what  
7           person are they -- are they sending that to? It's an  
8           employee of Black Crystal, right?

9           A.       It looks like it.

10          Q.       Okay. So is part of Black Crystal, Logix,  
11          Medernix, part of the scope for your clients, is that  
12          approving or rejecting authorization to provide  
13          treatment?

14          THE WITNESS: Can I answer that?

15          MR. WEBB: Uh-huh, if you know.

16          THE WITNESS: They might do it.

17          Q.       (By Mr. Glavinos) Okay. Do you have any  
18          concerns about losing your job because of this  
19          testimony? I know you are under an NDA. You just  
20          seem more nervous than anybody I've seen do this. It  
21          may be just that -- it's a deposition, I get it, but  
22          I just want to make sure I'm clear. Do you have any  
23          concerns about --

24          A.       I'm not a public speaker.

25          Q.       I know. I know. I know this isn't easy,

1 but I just want to get something clear for myself  
2 that -- do you have any concerns about losing your  
3 job if you give certain testimony today?

4 A. No. I want to respect my contract.

5 Q. Okay. That's fair. Thank you.

6 All right. So first page of that whole  
7 big exhibit --

8 A. At some point can we take a little break  
9 to go to the restroom?

10 MR. GLAVINOS: Right now is the perfect  
11 time to do that. Let's do it.

12 THE VIDEOGRAPHER: The time is 4:12 p.m.,  
13 and we are off the record.

14 (Recess taken from 4:12 p.m. to 4:20 p.m.)

15 THE VIDEOGRAPHER: The time is 4:20 p.m.,  
16 and we are on the record.

17 MR. GLAVINOS: Very briefly, when we were  
18 off the record, there was an exchange about  
19 coordinating a Medernix 30(b)(6) deposition.  
20 John, I would just like to certify that on the  
21 record, that that's what was represented, that  
22 you can coordinate that.

23 MR. WEBB: Yes. What was represented was  
24 we had a discussion about how much longer this  
25 deposition was going to take and that also that

1 we needed to try to resolve any of the discovery  
2 dispute issues that arose earlier in the  
3 deposition.

4 And I stated -- and I'm going to  
5 paraphrase here because I don't have a  
6 photographic memory -- something to the effect  
7 of it seems to me that most of the questions you  
8 are asking that are objected to on the grounds  
9 of being subject to the confidentiality  
10 agreement would be 30(b)(6)-type questions; and  
11 if that is the case, then let's go ahead and  
12 talk about a 30(b)(6) deposition, and at that  
13 point, I can file my objections or motion for  
14 protective order to allow the court to tell us  
15 what we can and cannot respond to and what the  
16 conditions of that would be. At which time, I  
17 was informed that there is a service issue on  
18 30(b)(6) due to the lack of a registered agent,  
19 in which case I said, well, I can probably -- I  
20 can probably facilitate, you know, the subpoena  
21 and acknowledging receipt of the subpoena,  
22 whatever lawfully it is I have to do to  
23 effectuate that happening. Did I accurately  
24 state that?

25 MR. GLAVINOS: I think so. Just so we are

1 clear, are you saying that you can accept  
2 subpoenas for Medernix?

3 MR. WEBB: I'm saying that I'll encourage  
4 my client to allow me to accept on behalf of  
5 Medernix.

6 MR. GLAVINOS: Okay.

7 MR. WEBB: And I will attempt to resolve  
8 that issue. But without my client being here, I  
9 can't answer that question. But I will tell you  
10 that I'll recommend to my client --

11 MR. GLAVINOS: Okay.

12 MR. WEBB: -- that they allow me to do  
13 that.

14 MR. GLAVINOS: Okay. Thank you.

15 Q. (By Mr. Glavinos) We were looking at  
16 Defendants' Exhibit 8.

17 MR. WEBB: Is that the one that has the  
18 blue slips?

19 MR. GLAVINOS: That's right.

20 Q. (By Mr. Glavinos) I want to go back to  
21 the last page very briefly. Looking at this page,  
22 the e-mail suggests to me that Medernix has the  
23 authority to negotiate bills on behalf of its client;  
24 is that accurate?

25 A. Yes.

1           Q.       Okay. Without telling me specific  
2       metrics, is there a given percentage of clients'  
3       bills that you are authorized to accept or is it left  
4       to Medernix's total discretion?

5                   MR. WEBB: I can object to that.

6           Q.       (By Mr. Glavinos) Does Medernix have a  
7       position about reasonableness or customary medical  
8       bills or whether any bills are reasonable, or do they  
9       just not have a position about that?

10          A.       I don't --

11                  MR. WEBB: I'm going to object to the  
12       extent that calls for a legal conclusion. When  
13       you are talking about reasonable and necessary,  
14       even lawyers disagree on what that means, okay?  
15       To ask a layperson to do that and then try to  
16       use that somehow to try to establish what's  
17       reasonable and necessary, I think, is unfair.  
18       She is a layperson. She is not a lawyer. She  
19       doesn't really know what we mean when we say  
20       reasonable and necessary.

21                  MR. GLAVINOS: Sure. Well, I'm just  
22       trying to understand where and how Medernix  
23       obtains its authority to accept bills in --  
24       payments in satisfaction.

25                  MR. WEBB: That would be in violation of

1 the non-disclosure agreement.

2 MR. GLAVINOS: Okay. Well, we've already  
3 established that they do do that. We  
4 established that.

5 MR. WEBB: Any -- any -- we established  
6 that what they do is try to collect debt or  
7 account receivables on behalf of medical  
8 providers. Logically, if you are trying to  
9 collect an outstanding debt, there is going to  
10 be some level of negotiation that goes on.  
11 That's the same way with Key Health. That's the  
12 same way it is with any debt collector. That's  
13 why we buy and sell mortgages.

14 I don't know when my bank -- when First  
15 Third Bank sells my mortgage to somebody else, I  
16 have no idea what that buyer pays for my  
17 mortgage, but I still owe it regardless. I  
18 still have to make the same monthly payments  
19 because I'm obligated on that note. It's the  
20 same thing with this. So reasonable and  
21 necessary --

22 MR. GLAVINOS: We moved past that  
23 question.

24 MR. WEBB: Okay. All right.

25 MR. GLAVINOS: So are you going to

1           instruct her not to answer any questions about  
2           the metrics that inform the accepting --

3           MR. WEBB: Yes. That would be a violation  
4           of the non-disclosure agreement.

5           MR. GLAVINOS: Okay. I do think we are  
6           entitled to that. I think there is good case  
7           law that shows that that is actually  
8           discoverable information, so that will be one of  
9           those items we can take up after the fact.

10          Q.       (By Mr. Glavinos) Okay. Page 1 of  
11       Defendants' Exhibit 8, this is from an individual  
12       with Cruz Firm again, sent Friday, December 6th, 2019  
13       to two employees of Black Crystal Consulting. We  
14       agree?

15               MR. WEBB: Which one?

16               MR. GLAVINOS: Bottom. I'm sorry.

17               MR. WEBB: Okay.

18               THE WITNESS: Here (indicating)?

19          Q.       (By Mr. Glavinos) That's correct. Lucy  
20       Orantes to Vargas and Kovel at Black Crystal  
21       Consulting on December 6th, 2019; is that correct?

22          A.       That's the sender, the date on that  
23       e-mail.

24          Q.       Okay. And the subject is, again, OSSP  
25       Procedure Recommendation, right?

1           A.       Yes.

2           Q.       Okay. And this e-mail reads: On November  
3       20th, Gisselle -- who is the employee of Cruz --  
4       provided you with the information below. Our client  
5       called today. He said he was informed by Ortho that  
6       his treatment was not approved.

7                   Is that correct what that says? That's  
8       what that says?

9           A.       That's what it says.

10          Q.       Okay. As you may know, we can't approve  
11       nor deny treatment; however, we can provide you  
12       information regarding the case for you all to  
13       determine if you will continue treatment under the  
14       lien. Please let us know if you'll continue treating  
15       our client at your earliest convenience.

16                   Right? That's what it says?

17          A.       That's what it says.

18          Q.       And do you see any -- any entities' e-mail  
19       addresses other than Cruz firm or Black Crystal  
20       Consulting on this page?

21          A.       That's all I see.

22          Q.       Okay. So we agree there's no providers  
23       that are included on this e-mail chain, right? It's  
24       just Black Crystal and the Cruz firm?

25          A.       That's what I'm seeing.



1 Q. Okay. And she is asking the Black Crystal  
2 employees if Ortho Sport will continue treating; is  
3 that right?

4 A. It says Ortho.

5 Q. Okay. We agree that OSSP means Ortho  
6 Sport & Spine?

7 A. At the top, yes, it says Ortho Sport &  
8 Spine.

9 Q. Okay. So what they are talking about,  
10 they are asking Black Crystal to say whether Ortho  
11 Sport will treat their client; is that right?

12 A. Treatment was not approved.

13 Q. Right. Treatment was not approved by who?  
14 And looking at the prior e-mails we know that it  
15 wasn't approved by Black Crystal or Logix; is that  
16 right?

17 MR. WEBB: Well, I'm going to object to  
18 the extent you are asking my client to  
19 speculate. She -- she wasn't copied on this  
20 e-mail and she wasn't a participant to this  
21 e-mail. It doesn't -- I have no way of knowing.  
22 It doesn't appear that this particular person is  
23 the plaintiff in this case. I don't know  
24 whether it is or not.

25 But you are asking her to comment on what

1 the intent was in a communication with other  
2 people on somebody who may or may not have even  
3 been a party to this case.

4 MR. GLAVINOS: I'm not asking her intent.  
5 I'm just asking her if the e-mail means what it  
6 purports to mean. But that's not something  
7 that's consistent with --

8 MR. WEBB: She's not a party to this  
9 e-mail. You can read it. You can infer  
10 whatever it is you want to infer to it.

11 MR. GLAVINOS: Well, I'm asking her.

12 MR. WEBB: Yeah. You can ask --

13 MR. GLAVINOS: I can ask her to do that.

14 MR. WEBB: But it's not her job to infer  
15 what other people mean.

16 MR. GLAVINOS: Well, it is today because  
17 she is under subpoena and I've got questions  
18 about e-mails involving her business and her --  
19 and her former employer, so I'm --

20 MR. WEBB: Well, I'm going -- I'm going to  
21 object to the extent it calls for speculation.

22 GLAVINOS: Okay.

23 MR. WEBB: Having said that, you know, you  
24 can answer the question. If you know what these  
25 people meant, then, sure, go ahead and answer

1           it. If you don't know what these people meant,  
2           then you can say that.

3           Q.       (By Mr. Glavinos) So the question is: To  
4           you, after reading the e-mail with everybody, is this  
5           an e-mail from a plaintiff's law firm asking Black  
6           Crystal to approve Ortho Sport & Spine treatment?

7           A.       What I'm seeing here is an e-mail from a  
8           legal office stating that they cannot approve or deny  
9           treatment.

10          Q.       Right. The legal office can't. I agree.  
11          Well, then they ask, quote: If you will not continue  
12          treating our client at your earliest convenience.  
13          Right? That's what it says, correct?

14          A.       What is -- that's what it says there.

15          Q.       Okay.

16          A.       That's the only thing I know.

17          Q.       Is that something standard for Black  
18          Crystal to be asked to approve or deny treatment for  
19          Ortho Sport & Spine Physicians?

20          A.       I think they could do it, they could  
21          approve -- could approve.

22          Q.       Have you ever done that, approved or  
23          denied treatment for Ortho Sport & Spine Physicians?

24                  THE WITNESS: Can I answer that?

25                  MR. WEBB: Yeah, I think you can answer

1           that.

2                   THE WITNESS:   Yes.

3           Q.       (By Mr. Glavinos)   Okay.   And so is it  
4   expected that Black Crystal, Logix, Medernix, that's  
5   one of their duties to their clients is to approve or  
6   deny treatment for the clients?

7           A.       It's more like --

8                   MR. WEBB:   Go ahead.

9                   THE WITNESS:   -- evaluate the case.

10          Q.       (By Mr. Glavinos)   Okay.   What do you mean  
11   -- what do you mean by that, evaluate the case?

12                  MR. WEBB:   You can speak in general terms.  
13   You can't tell him specifically the methodology  
14   that you use.

15                  THE WITNESS:   Well, as we said before, the  
16   policy limits, that's something we already  
17   mentioned.

18          Q.       (By Mr. Glavinos)   Okay.   So Black  
19   Crystal, Logix, Medernix evaluates cases for Ortho  
20   Sport & Spine?

21                  MR. WEBB:   I think we have established at  
22   this point that Ortho Sport & Spine is a client.  
23   So you can say that, whether or not that's one  
24   of the things you would do for your --

25                  MR. GLAVINOS:   And let me say this.   Ortho

1 Sport & Spine has put in pleadings all across  
2 the state that Medernix is its vendor. So it's  
3 not a secret that Medernix is -- works with  
4 Ortho Sport & Spine. And I --

5 MR. WEBB: If you'd let me know that in  
6 the first place, I wouldn't have ever raised  
7 that objection.

8 But in any event, yes, you can -- you can  
9 answer it if that is, generally speaking, you  
10 know, one of the things you do in your capacity  
11 of acting as a liaison between your client and  
12 the law firm.

13 MR. GLAVINOS: So let me -- let me just  
14 read something into the record. This is from  
15 the affidavit of Steve Youd filed in the United  
16 States District Court, Northern District of  
17 Georgia, Atlanta Division in Civil Action File  
18 No. 1:21-CV-01183-SEG. And it states, in  
19 pertinent part, Ortho -- speaking of Ortho  
20 Sport & Spine -- does not have the ability to  
21 obtain the documents from Medernix or its other  
22 vendors and does not control its vendors'  
23 methods of operations.

24 So that very clearly indicates in public  
25 pleadings that Medernix is a vendor of Ortho

1 Sport & Spine and they have some business  
2 relationship.

3 Do we agree that that's not now subject to  
4 the NDA?

5 MR. WEBB: Assuming that wasn't --  
6 assuming that that wasn't subject to some sort  
7 of a protective order, then, yeah, I do agree.  
8 If that's public -- if that's out there, if I  
9 can pull it up on PACER or whatever --

10 MR. GLAVINOS: Absolutely.

11 MR. WEBB: -- then, yes, I would agree with  
12 that.

13 MR. GLAVINOS: Okay. And I'll represent  
14 to you, as an officer of the court --

15 MR. WEBB: Okay.

16 MR. GLAVINOS: -- that I've read numerous  
17 pleadings that say that Ortho Sport can't  
18 produce Medernix materials because Medernix is  
19 their vendor and they don't have control over  
20 their vendor.

21 Q. (By Mr. Glavinos) So we know that  
22 Medernix has a client called Ortho Sport, right?

23 A. Right.

24 MR. WEBB: I think that's already been  
25 established in these e-mails.

1 MR. GLAVINOS: Okay. Well, I want to make  
2 sure because all -- there's -- nothing is  
3 established from my perspective from this  
4 company.

5 Okay. Now I've forgot where I was.

6 Q. (By Mr. Glavinos) Does Medernix -- strike  
7 that.

8 A. Sorry.

9 Q. No, you're good.

10 A. Thank you.

11 Q. Does Medernix have the authority to  
12 negotiate bills on behalf of Ortho Sport & Spine?

13 A. Yes.

14 Q. Okay. I don't want to know what it is,  
15 but is there a written agreement between Medernix and  
16 Ortho Sport & Spine that outlines the standards for  
17 determining the acceptance amount? Let me strike --  
18 let me ask it a different way.

19 How do you know how much to accept on a  
20 certain file?

21 MR. WEBB: I'm going to object to the  
22 extent that that calls her to get into business  
23 practices. I mean, if there's -- I'm sure they  
24 have a method. I mean, any business does.

25 MR. GLAVINOS: Well, that's not

1 necessarily true.

2 MR. WEBB: Well --

3 MR. GLAVINOS: They may -- they may not  
4 have a method. It may be arbitrary. But that's  
5 why we are entitled to find out.

6 Q. (By Mr. Glavinos) Do you have any -- have  
7 you ever seen a document that gives you any kind of  
8 guidelines about what amount to accept? I don't want  
9 to know specific details. I just want to know if  
10 there is a written policy that outlines the amount  
11 that you're supposed to -- that you are entitled to  
12 accept on behalf of Ortho Sport & Spine?

13 A. I have not seen such document.

14 Q. Okay. So what do you rely upon in  
15 determining what amount to accept on behalf of Ortho  
16 Sport & Spine?

17 MR. WEBB: I'm going to object to that.

18 MR. GLAVINOS: Okay. And I think it goes  
19 to the reasonableness in assessing the medical  
20 bills. I think it's absolutely discoverable,  
21 but we'll --

22 MR. WEBB: I understand. But it's also --  
23 it's also a trade secret. So --

24 MR. GLAVINOS: John, it's no more a trade  
25 secret than if I list my Honda Civic for a



1 million dollars and I accept \$10,000 on it.  
2 That's not a trade secret. What goods and  
3 services are exchanged for, the value of goods  
4 and services is not a trade secret.

5 MR. WEBB: The methodology that they use  
6 in determining what a -- how to get the best  
7 results for their client certainly would be a  
8 trade secret.

9 MR. GLAVINOS: Okay.

10 MR. WEBB: Trade secrets include formulas,  
11 patterns, compilations, programs, financial  
12 data, financial methods. All of that would fall  
13 within the O.C.G.A. definition of trade secret.  
14 Okay? And so it's not the same thing as listing  
15 your Ford or your Honda, or whatever it is, for  
16 a million dollars.

17 MR. GLAVINOS: Well, I have a disagreement  
18 about that and we can sort that out.

19 This is a good one. I think we are up to  
20 Exhibit 9.

21 THE WITNESS: Uh-huh.

22 (Defendants' Exhibit 9 was marked for  
23 identification.)

24 Q. (By Mr. Glavinos) These are some more  
25 e-mails. Let me find where I want to start here.

1                   And I'm giving you the full context of it.  
2                   I'm not going to go over all of them.

3                   Okay. Let's go to the bottom of page 10.  
4                   All right. The bottom of page 10 is an e-mail from  
5                   chall@forthepeople.com to Aracelis Delgado,  
6                   adelgado@logix-us.com.

7                   That's you, right?

8                   A.       That was my e-mail.

9                   Q.       Okay. This was sent on Friday, February  
10                  21st, 2020. Someone named Kathy Smith is cc'd here.

11                  Do you know who that is?

12                  A.       I don't remember.

13                  Q.       Okay. That's okay. So the e-mail body  
14                  reads: Good afternoon, Aracelis, exclamation point.  
15                  Could someone please get back to Kathy regarding  
16                  Mr. Jones' treatment plan as soon as possible?

17                  That's right?

18                  A.       That's what I'm seeing there.

19                  Q.       Okay. Do you have any recollection of  
20                  receiving this specific e-mail?

21                  A.       It was 2020.

22                  Q.       Is that a no?

23                  A.       I don't remember. It's here.

24                  Q.       That's okay. That's okay. I don't  
25                  remember my e-mails from two years ago either.

1           In response -- well, would you normally  
2 forward an e-mail like this to someone else to  
3 respond to? Because I'll represent that you didn't  
4 respond to that e-mail.

5           Kathy -- I'm sorry. Brittany Kovel  
6 responds to that e-mail about an hour later. So is  
7 it normal for you to forward Brittany e-mails to  
8 handle? Brittany -- Brittany on this subject line  
9 has the title assistant case manager, right?

10          A.     That's what it says under her signature.

11          Q.     Right. So is it normal for you to forward  
12 e-mails like this to your assistant case managers to  
13 help you out?

14          A.     I'm not sure how she got it.

15          Q.     Well, if it was sent to you, a Logix  
16 employee, and it ends up with Brittany, a Logix  
17 employee, is it fair to assume that you sent it to  
18 her to respond to?

19          A.     I cannot assume that.

20          Q.     Okay. Do you ever forward e-mails to  
21 assistant case managers to handle tasks for you?

22          A.     They can assist me.

23          Q.     Okay. I mean, yeah, I mean, I know I ask  
24 my paralegal to do stuff. I'm sure John has  
25 associates and paralegals he assigns stuff to.

1           Is that a similar way that it works with  
2     assistant case managers, the case manager will e-mail  
3     them stuff to handle and respond to?

4           A.     From time to time. But I cannot say it  
5     was this particular one.

6           Q.     Yeah, that's fine. I'm just asking  
7     generally that your case -- your assistant case  
8     managers will receive assignments from you?

9           A.     They could.

10          Q.     Okay. Are you in a supervisory role of  
11     these assistant case managers?

12          A.     It's more like collab -- oh, my goodness.

13                 MR. WEBB: Collaborative.

14                 THE WITNESS: Collaborative.

15          Q.     (By Mr. Glavinos) Okay. So you wouldn't  
16     follow up -- you wouldn't follow up with Brittany to  
17     make sure that she sent a responsive e-mail to this?

18          A.     Not necessarily.

19          Q.     Okay. All right. So Brittany's response  
20     on February 21st at 1:40 p.m. says: Patient -- and  
21     this is talking about John Jones. I'll represent  
22     that to you.

23                 Patient was recommended a discogram but  
24     was unable to proceed because of his A1C levels being  
25     elevated. He has since been to his PCP and started

1 on medication to get it under control. After  
2 reviewing the blood work at his last appointment,  
3 Dr. Flood thought it was best to hold off until there  
4 is documentation evidence of improvement in his  
5 diabetes from his PCP. He should be following up  
6 with his PCP and is scheduled for his follow up with  
7 OSSP on 3/3 at 1 p.m. At the visit Dr. Flood will  
8 make a decision on the discogram. Is this the info  
9 you are needing?

10 That's what it says, right?

11 A. That's what it says.

12 Q. Okay. So this is a Logix's employee, I  
13 guess reading from some Ortho Sport records to  
14 provide an update. Generally, is that what this is?

15 A. I'm not sure where she got that  
16 information from.

17 Q. Okay. If you were looking for that  
18 information, where would you get it from?

19 A. I would read the record.

20 Q. EClinicalWorks, right?

21 A. Yes.

22 Q. Okay. Let me ask you this: When you --  
23 do you have to log into eClinicalWorks at the  
24 beginning of the day to access it?

25 A. Yes, I have to log in to access.

1 Q. Okay. What's your user name?

2 THE WITNESS: Do I have --

3 MR. WEBB: You can give him your user  
4 name.

5 THE WITNESS: I think it's A Delgado.

6 Q. (By Mr. Glavinos) Okay.

7 THE REPORTER: Excuse me. Would you  
8 repeat that, please?

9 THE WITNESS: Sorry. I think it's A  
10 Delgado.

11 Q. (By Mr. Glavinos) Do you have access to  
12 eClinicalWorks for all of your clients?

13 MR. WEBB: Do you? It's okay.

14 THE WITNESS: If they have that.

15 Q. (By Mr. Glavinos) Is that a yes if they  
16 have that?

17 A. Why are you asking me if I use eClinical  
18 for any other medical provider?

19 Q. Trying to understand the business  
20 operations. I just -- it's a very simple question,  
21 if you use eClinicalWorks for every client?

22 A. Not for every client.

23 Q. Okay. But you do have more than  
24 one client -- Ortho Sport & Spine is not Medernix's  
25 only client? And when I say Ortho Sport & Spine, I

1 mean every Ortho Sport & Spine entity: Orthopedic  
2 Surgery Center of Sandy Springs; Ortho Sport & Spine  
3 Physicians, Savannah; Ortho Sport & Spine Physicians,  
4 Decatur; Ortho Sport & Spine Physicians, South  
5 Atlanta. I consider those as one. Okay?

6 So when I'm asking you does Medernix have  
7 more than one client, I mean more than one other than  
8 Ortho Sport and all of its entities. Okay?

9 A. Yes.

10 Q. And the answer is yes, Medernix has more  
11 than one client or has -- let me strike that.

12 Medernix has clients that are not Ortho  
13 Sport entities; is that right?

14 A. Yes.

15 Q. Okay. Thank you.

16 Okay. So this Kathy Jackson Smith  
17 responds to Brittany Kovel on February 21st, 2020, at  
18 2:43 p.m. So this is all in the course of an  
19 afternoon.

20 Kathy's signature block says Occupational  
21 Consulting, LLC. Do you see that?

22 A. (Indicating?)

23 Q. That's right.

24 A. Yes.

25 Q. Okay. Do you know what Occupational

1 Consulting, LLC is?

2 A. Not exactly.

3 Q. Okay. Does Medernix communicate with  
4 experts hired by plaintiffs' lawyers?

5 A. If they authorize me.

6 Q. Okay. So you have? You have spoken with  
7 experts for plaintiffs' lawyers in some of your  
8 cases?

9 A. I don't recall that.

10 Q. Okay. But it could happen?

11 A. Well, if it comes to the situation, we  
12 will have to handle. But if it -- right now it would  
13 be speculating.

14 Q. Well, I'm not asking you to speculate.  
15 I'm just asking if you've ever communicated with  
16 people you know to be experts hired by a patient's  
17 lawyer?

18 A. I don't remember.

19 Q. Okay. Do you know what an expert is? Do  
20 you know what that means when I say that? Like a lot  
21 of times injured people will hire someone to say they  
22 are going to need this much care in the future, and  
23 this care is going to cost this amount.

24 Is that your understanding of what an  
25 expert could be?



1           A.       Sounds like.

2           Q.       Okay. Have you ever communicated with an  
3 expert like that who is trying to figure out future  
4 value of care or future needed treatment?

5           A.       I don't recall that.

6           Q.       Okay. All right. So Kathy responds to  
7 Brittany's e-mail and says: If he proceeds with  
8 surgery, what amount of medication and physical  
9 therapy would he likely require after surgery? Also,  
10 what pain medication would likely be prescribed for  
11 the 6 to 12 weeks or so after surgery, and in what  
12 amounts? It's a preliminary report, so we are trying  
13 to put a dollar amount to postsurgical care. Thank  
14 you for your help in this matter.

15                   That's what it says, right?

16          A.       Yes.

17          Q.       Okay. So have you ever responded to  
18 e-mails from experts like this that are asking for  
19 information about future care?

20          A.       I don't recall.

21          Q.       Okay. Is Logix, Medernix, Black Crystal  
22 expected to consult with experts hired by plaintiffs  
23 that seek treatment from their clinics?

24          A.       Sorry. I'm not understanding.

25          Q.       Yeah. It was a bad question. Let me

1 reask it.

2 Is Medernix, Logix, Black Crystal, those  
3 entities and those employers -- employees of those  
4 entities, are they expected to work with experts who  
5 are hired by the lawyers who represent their patients  
6 to help them figure out future care and things like  
7 that?

8 A. I'm not sure.

9 Q. Okay. All right. So you responded on  
10 February 24th, 2020, on page 8, and said: Hope  
11 everything is going well with you. I do not see a  
12 surgery recommendation for Mr. Jones. What he was  
13 recommended is a lumbar discogram for diagnosis.

14 Is that right?

15 A. That's what it says.

16 Q. Okay. So this is you communicating with  
17 this person named Kathy, right?

18 A. Yes.

19 Q. Okay. And we've already agreed that you  
20 are not sure who Kathy Jackson Smith is of  
21 Occupational Consulting, LLC?

22 A. I'm seeing her signature there.

23 Q. Yeah. Do you know who she is?

24 A. I don't know her personally.

25 Q. Okay. Do you know why she is involved in

1     this case?

2           A.     Probably she was hired or that company was  
3     hired to -- to do the consulting part or the  
4     occupational part of it, from what I'm seeing from  
5     her title.

6           Q.     Okay. And what I'm just trying to  
7     understand, is it normal for you to be getting  
8     requests from consultants or experts about a  
9     patient's treatment or treatment plan?

10          A.     Could happen.

11          Q.     Okay. Would you consider regular -- that  
12     it happens regularly or is it rare?

13          A.     Really rare.

14          Q.     Okay. But it does happen?

15          A.     From what I'm seeing here, it happens.

16          Q.     Okay. Okay. So next e-mail Kathy  
17     replies, she says, On December 3rd, 2019, Dr. Flood  
18     evaluated Mr. Jones for lower back pain. Dr. Flood  
19     stated: I recommended L4-5 discogram to rule out the  
20     discogenic lumbar pain. Explained the patient that  
21     he's a candidate for lumbar spinal fusion at L4-5,  
22     and his diagnostic tests with discogram prior to the  
23     lumbar fusion is mandatory, end quotation.

24                 So we were trying to determine if he  
25     undergoes a lumbar fusion what the follow-up care

1 would be postsurgery, question mark. PT amounts,  
2 pain meds, et cetera.

3 It doesn't look like -- well, that's what  
4 that says, right?

5 A. That's what it says.

6 Q. Okay. It doesn't look like there was a  
7 response to this. And so on February 27th, 2020,  
8 Kathy e-mailed you again asking: Did you all have a  
9 chance to see what postop care would be if this  
10 surgery was performed? Right? That's what it says?

11 A. That's what I'm seeing on this piece of  
12 paper.

13 Q. Okay. And if we go to the next e-mail, it  
14 looks like there still hadn't been a response from  
15 you, and that Cami Hall, with Morgan & Morgan says:  
16 Aracelis and Brittany, please get this information to  
17 Kathy as soon as possible. Right?

18 A. That's what it says.

19 Q. Okay. Who is Cami Hall?

20 A. What I'm seeing there, she's the case  
21 manager.

22 Q. Okay. Do you know who she works for?

23 A. She works for Morgan & Morgan.

24 Q. Okay. Do you know, outside of this  
25 e-mail, that she works for Morgan & Morgan, or you

1     only know that because of this e-mail?

2           A.     I know she is one of the case managers at  
3     Morgan & Morgan.

4           Q.     Okay. Have you ever worked with her  
5     before?

6           A.     Well, to -- with the case that she is  
7     assigned to.

8           Q.     Okay. So you have worked with Cami on  
9     other cases that you've been assigned to?

10          A.     Yes.

11          Q.     Okay. How are you assigned to cases? Is  
12     it by the treating doctor? By a clinic?

13                 MR. WEBB: I think you can answer that.  
14     When cases -- when cases come in to Medernix  
15     from a client, does the client specifically ask  
16     for you or do they just -- you get assigned to  
17     it by somebody higher up?

18                 THE WITNESS: It's my firm.

19                 MR. WEBB: In other words, a firm may  
20     specifically ask for you?

21                 THE WITNESS: No, no, no, no. Assigned.

22          Q.     (By Mr. Glavinos) So you are assigned to  
23     specific law firms?

24          A.     Yes.

25          Q.     Okay. So you have all the Morgan & Morgan

1 patients who have treated at your clinics that are  
2 Medernix clients?

3 A. Yes.

4 Q. Okay. Is that true across the board for  
5 Medernix, the case managers are assigned to specific  
6 law firms?

7 THE WITNESS: Can I answer that?

8 MR. WEBB: I think so.

9 THE WITNESS: Yes.

10 Q. (By Mr. Glavinis) Okay. What other law  
11 firms are you assigned to?

12 A. I don't have a list with me.

13 Q. What are the big ones?

14 THE WITNESS: Do I have to?

15 MR. GLAVINOS: Now, see, now I'm really  
16 starting to get the vibe that she doesn't want  
17 to answer this, not because of an NDA, but  
18 because you are worried about it.

19 MR. WEBB: Well, no, she's worried about  
20 it, because she is subject to an NDA, okay?  
21 Just give me a second here.

22 MR. GLAVINOS: Sure.

23 MR. WEBB: Yeah, you can answer that --  
24 you cannot answer who your clients are, but if  
25 you work with other law firms other than Morgan

1           & Morgan, there's nothing wrong with disclosing  
2           that.

3           THE WITNESS: Yes, I work with other firms  
4           other than Morgan & Morgan.

5           Q.       (By Mr. Glavinos) Okay. What other  
6           firms?

7           A.       Well, if I have to. I don't remember  
8           everything from the top of my mind.

9           Q.       Well, who is the biggest? Probably Morgan  
10          & Morgan, right?

11          A.       Yes, Morgan & Morgan is the biggest.

12          Q.       How many cases do you have with Morgan &  
13          Morgan?

14          A.       I don't remember.

15          Q.       Is it more than five?

16          A.       I think so.

17          Q.       Is it more than 10?

18          A.       It could be more than 10.

19          Q.       Is it more than 15?

20          A.       I don't remember the exact number.

21          Q.       Do you think it's more than 15?

22          A.       It could be.

23          Q.       Is it more than 50?

24          A.       I don't remember.

25          Q.       Okay. If you were going go get me an

1 answer to this question, where would you go look?

2 A. I will have to look at my system.

3 Q. Okay. What system would you go look at?

4 A. Salesforce.

5 Q. Salesforce. Okay.

6 And in Salesforce it maintains your list  
7 of patients, right?

8 A. Yes.

9 Q. Okay. And it maintains the law firm  
10 associated with that patient, right?

11 A. Correct.

12 Q. Okay. Are you able to perform a search in  
13 the Salesforce software? Like if you say, oh, I just  
14 thought about X case, I need to find X case. Are you  
15 able to look up that patient name that just popped  
16 into your head if it happened?

17 A. Well, if I need to review a case, I have  
18 the ability to key in the name of the patient and  
19 look for it.

20 Q. Okay. Could you also key in the name of  
21 the law firm and look for that?

22 A. The system has the ability.

23 Q. Okay. And so you could pull up all cases  
24 for a specific law firm if you wanted to, right?

25 A. If I have to, yes.



1 Q. Okay. Have you ever ran a search like  
2 that before?

3 A. Yes.

4 Q. Okay. When did you do that?

5 A. When I'm asked for it.

6 Q. Okay. Was it in litigation like this?  
7 Were you requested in discovery to produce it?

8 A. It was more like in the day-to-day  
9 business --

10 Q. Okay.

11 A. -- operation.

12 Q. Okay. You think you are the busiest case  
13 manager there?

14 A. No, I don't think so.

15 Q. Okay. Where would you rank yourself as  
16 far as being busy?

17 A. What? On a scale?

18 Q. Yeah. Number of cases, amount of time you  
19 spend working?

20 A. Well, I work Monday through Friday, pretty  
21 much 8:00 to 5:00.

22 Q. Okay. Do you handle Ken Nugent files?

23 A. No.

24 Q. Do you handle John Foy files?

25 A. No.

1 Q. Do you handle Bater Scott files?

2 A. No.

3 Q. Do you handle Smith Webb Welch & White  
4 files?

5 A. No.

6 Q. You can't remember any files you handle  
7 besides Morgan & Morgan firm?

8 MR. WEBB: First of all, let me interject.  
9 This is the first time my firm has ever been  
10 mentioned in the same parrot of questioning as  
11 John Foy, Morgan & Morgan -- who else?

12 MR. GLAVINOS: I'm sorry.

13 MR. WEBB: Well, you named every big  
14 billboard firm in town.

15 MR. GLAVINOS: Well, I don't know what you  
16 do, John. So I know you said you had a  
17 plaintiff trial coming up.

18 MR. WEBB: I do.

19 MR. GLAVINOS: So I don't know how busy  
20 you guys are.

21 MR. WEBB: We are plenty busy. I just  
22 have never been compared to those folks before.

23 MR. GLAVINOS: Well, it wasn't comparing.  
24 It was just who I could think of off the top of  
25 my mind.

1 MR. WEBB: That's okay. That's all right.  
2 Just thought it was amusing, that's all. We  
3 also represent the Board of Education in several  
4 different municipalities, several different  
5 counties, Water Authority. But that's beside  
6 the point.

7 Q. (By Mr. Glavinos) So you know Morgan &  
8 Morgan is one of the firms you are assigned to?

9 A. Correct.

10 Q. You can't think of a single other one that  
11 you are assigned to? How about Cruz & Associates?

12 A. Well, it was my firm but not any longer.

13 Q. Okay. Who makes the decision about who  
14 has what firm?

15 A. I'm not sure.

16 Q. Okay. Who told you that you don't have  
17 Cruz & Associates any longer?

18 A. I don't remember.

19 Q. Was it Matt Stubblefield?

20 A. I don't remember.

21 Q. Could it have been anyone other than Matt  
22 Stubblefield?

23 A. I don't remember how the decision was  
24 made.

25 Q. Who would have conveyed the decision to

1     you?

2           A.     No one.   Simply work on what I have on the  
3     system assigned to me.

4           Q.     Okay.   Do you guys maintain patient  
5     balances in Salesforce, too?

6           A.     Yes.

7           Q.     Okay.   Do you maintain patients' payments  
8     in Salesforce.

9           A.     Once payment is received at the end.

10          Q.     Okay.   And you typically only receive  
11     payment at the end?

12          A.     Usually.

13          Q.     Okay.   As you get some -- well, strike  
14     that.

15                 MR. WEBB:   No, that's right, because, I  
16     mean, for instance, if you had a liability  
17     limit -- you had multiple tortfeasors, you could  
18     get a payment from one and then get a payment  
19     from another later.   You could have a situation  
20     where you've got a tortfeasor and then you've  
21     got a UM and you could get the tortfeasor first  
22     and the UM later.   There are all kinds of ways  
23     you could get it, with that being all being at  
24     the end.

25          Q.     (By Mr. Glavinos)   Well, but that's a

1 great point. So how -- how does Medernix determine  
2 whether to close a file? Is it just whenever you  
3 receive the first payment? As John indicated, you  
4 could receive payments after the first payment.

5 So at what point does Medernix say this  
6 file is closed?

7 A. When final payment is received.

8 Q. Okay. And how do you know it's final  
9 payment?

10 A. Once everything has been negotiated.

11 Q. Okay. And how do you know when everything  
12 has been negotiated?

13 A. It's part of the -- of the conversation  
14 and the negotiation process.

15 Q. Okay. So are you just relying on what  
16 plaintiffs' counsels will tell you as far as this  
17 case is resolved, there's no more money coming in,  
18 this is all we have got, and that's . . .

19 A. Yes.

20 Q. Okay. That's fine. I'm just trying to  
21 understand. I just don't know.

22 MR. WEBB: It's the same thing Medicare  
23 does. It's the same thing Blue Cross Blue  
24 Shield does. It's the same thing Humana does.

25 Q. (By Mr. Glavinos) Sure. And so you get a

1 payment, you see it's called final payment. And if  
2 the payment is less than the full balance, is that  
3 reflected in Salesforce?

4 A. Yes.

5 Q. Okay. And so is there a reduction or a  
6 write-off of whatever balance is left over that's  
7 reflected in Salesforce?

8 A. What I remember is I see the payment  
9 posted.

10 Q. Okay. And then is the balance zeroed out  
11 after that, or do you close the file? I'm just  
12 trying to understand what happens after you get final  
13 payment. In this situation final payment is less  
14 than the outstanding balance, but you know it's final  
15 payment. What happens to the rest of that balance?

16 MR. TILLER: Object to the form.

17 Q. (By Mr. Glavinos) You can answer.

18 A. I'm not exactly sure. It's more like a  
19 check mark on the system that I finish with that  
20 case.

21 Q. Okay. Can you organize the files by check  
22 marks or that -- so you know there's closed and  
23 there's open.

24 A. It can be clarified.

25 Q. Okay. So you could go in and determine

1 I've got this many closed files and I've got this  
2 many open files?

3 A. I think I can know if a file is still  
4 active or is not active anymore.

5 Q. Okay. And if it's not active, is there a  
6 zero balance indicated on that matter?

7 A. Honestly, I don't remember.

8 Q. Okay. That's okay. But we say if it is  
9 open, then there is definitely a balance that's  
10 reflected in there, right?

11 A. Exactly.

12 Q. Okay. Okay. What's an Armin report,  
13 A-r-m-i-n?

14 A. Sorry?

15 Q. An Armin report, A-r-m-i-n report?

16 A. I'm not sure what that is.

17 Q. I'm not either. So you've never heard of  
18 an Armin report throughout your employment with Black  
19 Crystal, Logix, Medernix?

20 A. I'm not sure about what that is.

21 Q. Okay. See if we can figure it out.

22 MR. GLAVINOS: This will be Defendants'  
23 Exhibit 10. No. Sorry.

24 (Defendants' Exhibit 10 was marked for  
25 identification.)

1           Q.       (By Mr. Glavinis) And we will just -- we  
2 will just start on page 1. Well, actually we  
3 probably need to start on page 2 for some context.

4           Okay. So this is an e-mail sent from Ivy  
5 Hibbert at CastroLaw.com.

6           Have you ever heard of them, Castro Law?

7           A.       I have heard of Castro Law.

8           Q.       Are they one of your clients or law firms  
9 that you are assigned to?

10          A.       I don't think so.

11          Q.       Okay. So from Ivy on July 22nd, 2020 to  
12 Catherine Castillo at Logix US, and Sofia Pajares,  
13 P-a-j-a-r-e-s, at Logix. Do you know them? Do you  
14 know Catherine and Sofia?

15          A.       Yes.

16          Q.       Okay. Do they still work for Medernix?

17          A.       Yes.

18          Q.       Okay. So they sent this to Dan Castro at  
19 Castro Law asking -- oh, I'm sorry. I read it  
20 backwards. Yeah, it's from Ivy at Castro e-mailing  
21 Logix employees at -- saying: Can you please advise  
22 about these reports and appointments? 7/21/20,  
23 Armin, A-r-m-i-n, report ready, question mark? Do  
24 you know what that means?

25          A.       No, I don't know what that means.



1 Q. Never heard of an Armin report?

2 A. No.

3 Q. Okay. The e-mail above in response is  
4 same thing, Armin report ready, question mark. The  
5 report is not ready, period. She is scheduled on  
6 July 28th, '20, at 2:30 for a surgical consult with  
7 Dr. Flood.

8 That's what it says, right?

9 A. That's what it says.

10 Q. Okay. Given that context, are you able to  
11 discern anything about what an Armin report might be?

12 A. No.

13 Q. Okay. Are there any reports that Logix,  
14 Medernix, Black Crystal will send to plaintiffs'  
15 lawyers on a regular basis?

16 A. The only thing I can think of -- and again  
17 I could be speculating -- is like the office notes  
18 could be called also a report.

19 Q. Okay. What about the word "Armin," does  
20 that mean anything?

21 A. No. I'm not sure what this means.

22 Q. Okay. So are there specific reporting  
23 requirements you have to your law firm that you are  
24 assigned to?

25 A. No.

1 Q. Do you require updates from the law firms  
2 on a specific basis or time period?

3 A. Could you please repeat? I'm sorry.

4 Q. Absolutely. Do you require reports or  
5 updates from law firms about the status of cases?

6 A. If a firm can contact me for an update on  
7 treatment?

8 Q. Okay.

9 A. Is that what you are saying?

10 Q. I'm asking if you require the firm to  
11 provide you an update on the case?

12 A. Sometimes I ask them for an update on the  
13 case.

14 Q. Okay. Why would you ask that?

15 A. Just to know to -- for my tracking and  
16 that AR that's still pending.

17 Q. Okay. How do you -- you know, it sounds  
18 like you have quite a number of cases, right?

19 A. Yes, I have.

20 Q. More than you can remember?

21 A. I have cases.

22 Q. Okay. A number that you can't recall?

23 A. No. At this point I cannot recall a  
24 specific amount.

25 Q. Yeah. And if it was three cases you could

1 probably tell us the number, right?

2 A. Probably would be three only, probably I  
3 would remember.

4 Q. Okay. Is it fair to say that it's a  
5 fairly large number of cases that you manage? Just  
6 to you, fairly large to you?

7 A. Enough like for a full-time job.

8 Q. Yeah. Okay. How do you keep the time  
9 straight with that? How do you know that you are not  
10 letting a case fall through the cracks that you  
11 haven't followed up in six months? How do you keep  
12 that straight?

13 A. Well, I calendar myself.

14 Q. Okay. So you maintain on your calendar  
15 reminders to request updates for certain cases?

16 A. I run my report and remember in that way.

17 Q. Okay. What report do you run?

18 MR. WEBB: It's okay.

19 THE WITNESS: Well, I -- it depends on  
20 what I'm working on. If I need -- if I need to  
21 track my AR so I don't forget like to collect on  
22 payment, so there is a report that I need to  
23 make sure, you know, you follow up on that.

24 Q. (By Mr. Glavinos) Okay. Well, I mean --

25 A. I just run reports, different reports to

1 keep track of my accounts.

2 Q. Okay. So you have -- you can run a report  
3 that has all of your accounts on it?

4 A. Not sure if all the accounts --

5 Q. Okay.

6 A. -- at the same time.

7 Q. Okay. What kind of reports can you run  
8 that you know of?

9 A. Probably by category.

10 Q. Okay.

11 A. If a patient is treating, if a patient is  
12 not treating.

13 Q. Okay. Could you run a report by category  
14 of law firm?

15 A. Probably.

16 Q. Okay. Have you ever tried?

17 A. Don't recall, but probably could if the  
18 system has the ability. I'm not sure.

19 Q. Okay. Okay. And how would that populate  
20 as? Would it -- would it be like little -- each case  
21 would be a line or would it be -- I'm just trying to  
22 understand what that kind of report would look like.

23 A. It depends on the report, but they are  
24 like lists.

25 Q. Okay. Okay. So you can run and

1 tell it -- a report that just populates a list of all  
2 the ARs you are overseeing for Morgan & Morgan?

3 A. Probably.

4 Q. Okay. Any reason that you couldn't do  
5 that, functionally speaking about the software?

6 A. Well, if the software has the ability and  
7 there's a report created for that, probably I can do  
8 it.

9 Q. Okay. Do you have a primary contact at  
10 your law firms you are assigned to?

11 A. Not necessarily.

12 Q. Okay. It just depends on -- is it case by  
13 case? Even though you have a bunch of Morgan &  
14 Morgan cases, it could be a different case manager  
15 with Morgan & Morgan that you are assigned to -- or  
16 that is assigned to that file that you have to  
17 communicate with?

18 A. Exactly. It just depends on the structure  
19 of the -- of the firm.

20 Q. Right. And your contact person would be  
21 maintained in Salesforce so that you can pull it up  
22 and know who to call or e-mail, right?

23 A. Or determine patient.

24 Q. Okay.

25 THE REPORTER: Say that again, please.

1 THE WITNESS: Or determine patient. Yes.

2 Q. (By Mr. Glavinos) Okay. When you  
3 exchange e-mails with the law firm, what do you --  
4 what do you do to remind yourself that you have had  
5 this communications so the next time you look at the  
6 file you remember that, oh, I followed up two weeks  
7 ago or three weeks ago? Where is that recorded at?

8 A. For that, probably I will need to tell you  
9 how we operate.

10 MR. WEBB: Okay. Then don't do it. But  
11 if there -- look, if you have a particular  
12 software program --

13 THE WITNESS: Uh-huh.

14 MR. WEBB: -- that's not going to violate  
15 the non-disclosure agreement, okay? So, for  
16 instance, I've got a practice master calendar,  
17 okay? I can just click a button and an alarm  
18 will go off next month to remind me to do  
19 something. There is nothing wrong with that.  
20 That's not -- that's not disclosing my practices  
21 and procedures above and beyond what any normal  
22 layperson would do. That's not a trade secret  
23 that's going to -- my other law firm across town  
24 is going to say, oh, oh, Mr. Webb has a software  
25 program where an alarm goes off in a month,

1           okay? So he is asking the same kind of thing.  
2           That kind of thing you can answer.

3                   THE WITNESS: I know that I need to follow  
4           up certain time of the month, so I remember that  
5           I need to do that report and do it because it's  
6           required.

7                   MR. WEBB: There you go.

8           Q.       (By Mr. Glavinos) Okay. That's fine. So  
9           do you save your e-mails about patients anywhere or  
10          are they just usually in your in-box?

11          A.       In the in-box.

12          Q.       Okay. Do you put any notes in  
13          eClinicalWorks that you followed up with plaintiffs'  
14          lawyers or that they are asking about approval or  
15          something or anything like that in e-mails?

16          A.       No.

17          Q.       Okay. What if you have a phone call with  
18          a case manager for a plaintiff's firm, do you record  
19          notes about that phone call in any systems?

20          A.       Just that we talked.

21          Q.       Okay. Where would you record that at?

22          A.       Salesforce.

23          Q.       Okay. Is there a specific tab that that  
24          would be under?

25          A.       Just the call.

1 Q. A call? Okay.

2 What are the -- I've never used  
3 Salesforce, so I don't know anything about it. I  
4 know there's a big building in Buckhead with a  
5 Salesforce sign on it. What other tabs do they have  
6 that you could do? How does that software function?  
7 You said call is one.

8 MR. WEBB: Can you repeat that question  
9 again?

10 MR. GLAVINOS: Yeah. I'm just trying to  
11 understand -- she said there is a call tab or a  
12 call something. I'm just trying to understand  
13 what other sort of dialogue boxes or means of  
14 storing information are within Salesforce.

15 MR. WEBB: Yeah, you can answer that if  
16 you know.

17 THE WITNESS: Well, Salesforce is a  
18 software that you can put, you know, like the  
19 call or the name of the patient, the name of the  
20 attorney, the -- the phone number.

21 Q. (By Mr. Glavinos) Case information?

22 A. Could be.

23 Q. Okay. Is there anything in there about  
24 insurance policy limits; is that in Salesforce?

25 A. I think it has the ability.



1 Q. Okay. What about estimated case value, is  
2 that in Salesforce?

3 A. Not sure. I don't use that field.

4 Q. Okay. Do you ever -- you know, when you  
5 are communicating with, say, Morgan & Morgan about a  
6 patient of Ortho Sport & Spine, do you ever cc anyone  
7 at Ortho Sport & Spine to keep them in the loop about  
8 what's going on?

9 A. They don't need to.

10 Q. Okay. Why not?

11 A. They are my client.

12 Q. Okay. So they rely completely on you to  
13 handle scheduling and --

14 A. I don't do scheduling.

15 Q. Okay. So that's what I'm trying to figure  
16 out, is what does Ortho Sport handle and what does  
17 Medernix handle?

18 A. Ortho Sport & Spine is a medical provider.  
19 They treat the patients.

20 Q. Right.

21 A. That is all they do.

22 Q. Okay.

23 A. As far as I know.

24 Q. They don't -- they don't track their own  
25 bills that you know of?

1 A. No, I don't know.

2 Q. Okay. So Ortho Sport & Spine doesn't care  
3 about you-all approving or denying treatment; all  
4 they care about is when people show up?

5 A. I'm not sure what they care about.

6 Q. Okay. Do you approve or deny treatment  
7 for your clients and say this plaintiff is approved  
8 to have this procedure?

9 A. Yes, I have done that.

10 Q. Okay. And does Ortho Sport ever question  
11 that?

12 A. I don't remember receiving something like  
13 that.

14 Q. Okay. They rely on you-all to vet, I  
15 guess, the case, and then determine whether treatment  
16 is approved?

17 A. I think so.

18 Q. Okay. Do you have a different  
19 understanding than that as far as just the way that  
20 that works insofar as approving treatment?

21 A. Could you please repeat?

22 Q. Yeah. I'm sorry. I worded that really  
23 poorly.

24 You indicated that you've approved or  
25 denied treatment for your clients, right?

1           A.       I have done that.

2           Q.       Okay. And when I say your clients, I'm  
3 talking about the medical providers, right?

4           A.       Yes.

5           Q.       Okay. And so what we are saying is you  
6 will, Medernix will, determine if certain patients  
7 are approved or denied to treat with Ortho  
8 Sport & Spine?

9           A.       We could.

10          Q.       Okay. Is that a regular practice?

11          A.       Yes.

12          Q.       Okay. And what criteria goes into  
13 determining whether to approve or deny?

14               MR. WEBB: Can't answer that.

15          Q.       (By Mr. Glavinos) Okay. We know that  
16 policy limits go into that, right?

17          A.       We can take that in consideration.

18          Q.       Okay. Based on the earlier e-mail, we  
19 know that property damage goes into that, right? The  
20 value of the damage to someone's vehicle, will that  
21 go into it?

22          A.       I don't remember.

23               MR. WEBB: If that is one of the factors  
24 you consider, because it indicated in a  
25 previously disclosed e-mail that is one of the

1 factors that you considered, you can disclose  
2 that. What you cannot disclose is how much you  
3 take that into consideration, whether or not  
4 there are other things you take into  
5 consideration as well.

6 THE WITNESS: So you've already presented  
7 me with that?

8 MR. WEBB: Yes.

9 Q. (By Mr. Glavinos) I showed you an e-mail  
10 with a property damage valuation number on it. I  
11 did.

12 A. Yes. That could be one of the factors.

13 Q. We'll wrap up this topic and just say are  
14 there a list of factors that you are provided to  
15 review to make a valuation?

16 A. There are certain things that I take in  
17 consideration.

18 Q. Okay. And is that your decision to take  
19 those into consideration or is that a direction of  
20 Medernix to take those into consideration?

21 My real question is: Is it Medernix -- do  
22 they have one uniform policy for considering that or  
23 is it each individual case manager has their own  
24 valuation process.

25 A. I would say is -- is the process. It's a

1 process.

2 Q. Okay. But whose process is it? Is it  
3 your personal process or is it Medernix's process  
4 that told you to do it?

5 A. It's the company process.

6 Q. Okay. When did you first learn of this  
7 process?

8 A. When I was trained.

9 Q. Okay. When were you trained? When you  
10 started with Black Crystal?

11 A. We continuously train.

12 Q. Okay.

13 A. We continuously train.

14 Q. Is this the same policy that you had with  
15 Premier NeuroSurgical Institute?

16 A. No, they were different.

17 Q. Okay. What was Premier NeuroSurgical  
18 Institute's policy?

19 A. We had an in-house attorney. And  
20 basically we were more like working on the lien  
21 process, like filing, modifying, cancelling and all  
22 of that stuff.

23 Q. Okay. Would you at Premier NeuroSurgical  
24 participate in negotiating on behalf of Premier  
25 NeuroSurgical as far as bills, acceptance is

1 concerned?

2 A. I -- I had, but I had guidelines. And  
3 pretty much it was not like too much that I could do  
4 about the bill. It was more on the attorneys -- the  
5 in-house attorney's scope of --

6 Q. Okay. What were the guidelines? Was  
7 there a given percentage of the billed amount?

8 A. It was case to case.

9 Q. Okay. What were some of the factors that  
10 they would look at?

11 A. I was more -- more like getting the facts  
12 and just conveying them.

13 Q. Okay. And the decision-making about  
14 accepting certain amounts was by the lawyers at  
15 Premier NeuroSurgical, not you?

16 A. He was the supervisor of that area.

17 Q. Okay. Okay. And now that you went to  
18 Medernix, Logix, Black Crystal, the decision about  
19 negotiations falls to the case managers?

20 A. Within the guidelines.

21 Q. Okay. Within your guidelines. And are  
22 those written guidelines?

23 A. I don't remember reading a guideline.

24 Q. Okay. How do you know what the guidelines  
25 are?

1 A. Because I have been told.

2 Q. Okay. Who told you?

3 A. Don't remember specifically, but it's  
4 something that is provided.

5 Q. Okay. Was it Matt Stubblefield?

6 A. I don't really remember.

7 Q. Have those guidelines changed since you  
8 were Black Crystal, Logix, Medernix, or have they  
9 always been the same?

10 A. I don't remember specifically.

11 Q. Are the guidelines the same for all  
12 clinics you represent or are they specific to the  
13 clinic?

14 A. Pretty much the same factors, I think, I  
15 would use to evaluate.

16 Q. Okay. Do you ever accept zero and close  
17 out a file?

18 A. Yes.

19 Q. Okay. How often?

20 A. Not very often.

21 Q. Okay. But it does happen?

22 A. Well, if med -- someone can say that has  
23 never lost a case would be really . . .

24 Q. Yeah, I agree. I agree.

25 A. Yeah.

1 Q. So in those situations where they lose a  
2 case, do they ever pursue the injured person for the  
3 rest of the bills?

4 A. Not sure.

5 Q. Okay. Have you ever heard of that  
6 happening?

7 A. Not sure.

8 Q. Okay. But that's not part of your job,  
9 right? You don't call the patient later after the  
10 lawsuit is over and ask them for more money, do you?

11 MR. TILLER: Object to form.

12 Q. (By Mr. Glavinos) You can answer.

13 A. I deal with the attorney's office.

14 Q. Okay. Do you ever communicate with the  
15 patients directly?

16 A. Yeah, from time to time.

17 Q. Okay. Are you aware of any patients that  
18 your clients treat that don't have lawyers?

19 A. I don't have any like that.

20 Q. Okay. So every client -- every file you  
21 work on involves a lawyer?

22 A. Yes.

23 Q. Okay. Do you have any cases that aren't  
24 car accidents?

25 A. I have cases with car accidents.



1 Q. Okay. Is that the majority of your cases?

2 A. I would say so.

3 Q. Okay. Well, do any of your clients accept  
4 health insurance to pay these bills?

5 MR. TILLER: Object to form.

6 MR. WEBB: Do you know whether or not any  
7 of your clients also accept health insurance?

8 THE WITNESS: I'm not sure.

9 Q. (By Mr. Glavinos) Okay. Have you ever --  
10 have you ever handled any receipt of health insurance  
11 payments for any of your files?

12 A. I don't have --

13 MR. TILLER: Object to the form.

14 MR. WEBB: That's okay. You can answer.

15 THE WITNESS: I don't work with health  
16 insurance.

17 Q. (By Mr. Glavinos) Okay. Do you know --

18 A. Sorry.

19 Q. Okay. Okay. Medicare, Medicaid, do you  
20 work with those?

21 A. No.

22 Q. Okay. Do you know anything about a policy  
23 to ask patients who have health insurance to waive  
24 their health insurance?

25 A. No.

1 MR. TILLER: Object to form.

2 MR. WEBB: She answered, so -- she said  
3 no, she was not aware.

4 MR. GLAVINOS: Are you objecting to the  
5 form of my question or what's the basis of the  
6 objection so I can try to cure it?

7 MR. TILLER: I mean, it's going into the  
8 collateral source rule.

9 MR. GLAVINOS: No, it's not. I'm not  
10 asking about health insurance payments made to  
11 this patient. I'm talking about third-party  
12 health insurance payments, which are not  
13 collateral source. And that's --

14 MR. TILLER: Well, I think it's just kind  
15 of a back-door workaround, you know,  
16 inquiring --

17 (Attorneys talking over one another.)

18 MR. GLAVINOS: Well, the objection to  
19 admissibility is a whole another objection. You  
20 reserved all of those objections except form and  
21 responsiveness.

22 MR. TILLER: Which is why I've been  
23 objecting to the form.

24 MR. GLAVINOS: But it's not form.

25 MR. WEBB: Look, look. Unfortunately I

1 deal with these guys all the time, okay? And so  
2 there are certain battles that we fight. And  
3 rest assured we are going to have that battle in  
4 this case. But for discovery purposes, I'm  
5 pretty sure he can ask whether or not she knows,  
6 which she doesn't know, whether or not any  
7 providers also accept health insurance. I don't  
8 think that would violate the collateral source  
9 rule, so that's why I'm not objecting to those  
10 lines of questions.

11 The reason why I'm telling you that is I  
12 deal with this every single freaking day just  
13 about, and I want to get through this. But his  
14 arguments and your arguments about collateral  
15 source are going to weep -- are going to seep  
16 into this on down the road. But for purposes of  
17 this deposition, you can object, but I'm not  
18 objecting to the --

19 MR. GLAVINOS: Well, and I know this isn't  
20 your case. I'll tell you there's no insurance  
21 involved in this case, as I think the majority  
22 of these cases are. So there is no collateral  
23 source issue. We will proceed.

24 Q. (By Mr. Glavinos) Did you find Mr. Webb  
25 on your own or did somebody help you find him?

1 MR. WEBB: Yeah, you can answer that.

2 THE WITNESS: I got help.

3 Q. (By Mr. Glavinos) Okay. Who helped you?

4 A. The company.

5 Q. Okay. Who at the company?

6 MR. WEBB: I'll tell you. Matt -- Matt --  
7 what's Matt's last name?

8 THE WITNESS: Stubblefield.

9 MR. WEBB: Okay. So I will state Matt  
10 Stubblefield contacted me because she had  
11 received the subpoena. And then you had asked  
12 me am I representing her or am I representing  
13 the company.

14 MR. GLAVINOS: Uh-huh.

15 MR. WEBB: So then I had a communication  
16 with both of them -- and I'm not going to tell  
17 you what we said because it's privileged and  
18 confidential.

19 MR. GLAVINOS: Agreed.

20 MR. WEBB: But I will tell you that she  
21 and I have an agreement that I will represent  
22 her. I also have an agreement with the company  
23 and I will represent them.

24 MR. GLAVINOS: Okay.

25 MR. WEBB: I also explained potential

1 conflicts of interest that could potentially  
2 arise that have not arisen yet, and I had them  
3 agree on a waiver of any conflicts. However, if  
4 we get to a situation where I perceive that --  
5 and I'll stand that way with the conflicts --  
6 could inure to -- against one party or the  
7 other, then I'll stop at that point, and I'll  
8 ask that we suspend the deposition, and then I  
9 will consult with my clients as to how they want  
10 to resolve that.

11 But, yes --

12 MR. GLAVINOS: I appreciate your candor.

13 MR. WEBB: -- that is exactly how it  
14 happened.

15 MR. GLAVINOS: That answers the question.

16 MR. WEBB: I don't think it's relevant one  
17 bit, but . . .

18 MR. GLAVINOS: Well, I think it just goes  
19 back to the nonexistence of this entity. And I  
20 think that that's what the question goes to, is  
21 there's serious questions about that. But I  
22 appreciate your candor.

23 Q. (By Mr. Glavinos) Okay. I think we are  
24 on to the last little bit here.

25 Have you ever heard of the Orthopedic

1 Surgery Center of Sandy Springs?

2 A. I think it's one of the facilities.

3 Q. Okay. Do you know anything about a  
4 dispute between them and the Department of Community  
5 Health?

6 A. No, I don't know anything about that.

7 Q. Have you ever heard anything about that?

8 A. No.

9 Q. Has Medernix -- have you ever sent any  
10 communications about the dispute between Orthopedic  
11 Surgery Center of Sandy Springs and the Department of  
12 Community Health?

13 A. I don't recall anything like that. I  
14 don't know about that.

15 (Defendants' Exhibit 11 was marked for  
16 identification.)

17 Q. (By Mr. Glavinos) Okay. This will be  
18 Defendants' Exhibit 11, and there's two documents.  
19 The first document, I'll represent to you, is a  
20 document from the Department of Community Health to  
21 Orthopedic Surgery Center of Sandy Springs ordering  
22 them to cease and desist operations. The second  
23 document is an order on Orthopedic Surgery Center of  
24 Sandy Springs' appeal of that cease and desist letter  
25 in which the cease and desist was upheld.

1 MR. WEBB: May I see that, please?

2 MR. GLAVINOS: Yes, definitely.

3 And, again, this is Exhibit 11, these two  
4 documents.

5 Q. (By Mr. Glavinos) So we will go down to  
6 halfway down --

7 MR. WEBB: Hold on. Hold on. If you  
8 would, give me a minute to read through it.

9 MR. GLAVINOS: Sure. Sure.

10 MR. WEBB: Have you ever seen this before?

11 THE WITNESS: I think I heard something  
12 about this now that I read the document.

13 MR. WEBB: Okay.

14 THE WITNESS: Not exactly what happened  
15 or -- but I heard something.

16 MR. GLAVINOS: Well, I guess I -- I barely  
17 understand what is happening. It's a lot of  
18 legalese and very technical medical regulatory  
19 language.

20 Q. (By Mr. Glavinos) What is your  
21 understanding of what happened?

22 A. Apparently they -- somebody wants to close  
23 the clinic because Dr. Oskouei didn't have like  
24 something they were requiring.

25 Q. Okay. Where did you -- where did you come

1 to this understanding from?

2 A. From this document.

3 Q. Okay. But you said prior to this document  
4 you heard something about it, right?

5 MR. WEBB: Is this number -- Exhibit  
6 Number 11, by the way?

7 MR. GLAVINOS: Yes, sir.

8 MR. WEBB: Okay.

9 THE WITNESS: I think somebody called me  
10 or --

11 Q. (By Mr. Glavinos) Okay. And don't you  
12 think it's important for Medernix to know if its  
13 clients are authorized to operate or not under the  
14 law?

15 A. I guess so.

16 Q. Do you think that you would want to know  
17 that?

18 A. Yes.

19 Q. Okay. Have you ever sent or received any  
20 communications about this facility being shut down?

21 A. No.

22 Q. Okay. So you are not aware of the  
23 communication sent to Morgan & Morgan or other  
24 plaintiffs' law firms about this cease and desist?

25 A. I don't recall receiving an e-mail.



1 Q. Okay. Or sending one, right?

2 A. Or sending one. I don't recall that.

3 Q. Okay. Do you recall anyone asking about  
4 it?

5 A. I think somebody asked me about it.

6 Q. Okay. Do you remember -- you probably  
7 don't remember their name. Do you remember if it was  
8 a lawyer?

9 A. I think so.

10 Q. Okay. What were they asking you about it?

11 A. If I knew something about this.

12 Q. Okay. And what did you say?

13 A. That I didn't know.

14 Q. Okay. Did you ask anybody at your company  
15 about it and let them know, hey, someone asked about  
16 this facility being shut down? Did you ask anyone  
17 else?

18 A. I think I -- I let someone know, but I  
19 don't remember exactly I spoke with.

20 Q. Okay. Who possibly would you have let  
21 known?

22 A. I don't remember exactly.

23 Q. Okay. Other than Matt Stubblefield,  
24 who -- who would you ever go to for anything like  
25 that?

1 A. Probably any other supervisor.

2 Q. Okay. Would you have asked Ortho  
3 Sport & Spine about it?

4 A. No, I didn't.

5 Q. Okay. Have you ever communicated with  
6 anybody at Ortho Sport & Spine?

7 A. In general?

8 Q. Uh-huh.

9 A. Some -- yes, I have spoken with people who  
10 are with Ortho Sport & Spine at some point.

11 Q. Okay. What would be the nature of those  
12 discussions?

13 A. If I have a question in certain treatment  
14 or something like that.

15 Q. Okay. Have you been told to say anything  
16 specific about this order if people asked for it --  
17 about it?

18 A. Not that I recall.

19 Q. Okay. Do you know anyone named Nitcha  
20 Lewis, N-i-t-c-h-a?

21 It's not -- it won't be in there.

22 A. The name sounds familiar, but not -- it's  
23 kind of I heard that name but not sure in what  
24 context.

25 Q. Okay. What about Faith Beltzhooover,

1 B-e-l-t-z-h-o-o-v-e-r.

2 A. Yes, I have heard of her.

3 Q. Okay. Who is that?

4 A. I think she is at the billing department.

5 Q. Where?

6 A. Ortho Sport & Spine.

7 Q. Okay. How do you know that she is at the  
8 billing department at Ortho Sport & Spine?

9 A. Because I know she is at that department.

10 Q. Okay. Do you communicate with her as part  
11 of your job with Medernix?

12 A. I have spoken with her.

13 Q. Okay. Was it a part of your job with  
14 Medernix when you spoke with her or was it for  
15 another reason?

16 A. It was for my job.

17 Q. What about Mike Maselli?

18 A. I know him.

19 Q. Okay. How do you know him?

20 A. He works with Ortho Sport & Spine.

21 Q. Okay. What does he do with Ortho  
22 Sport & Spine?

23 A. I'm not sure exactly what he does there.

24 Q. Okay. Is he a receptionist?

25 A. I don't think so.

1 Q. Okay. Is he a doctor?

2 A. I don't think he is a doctor either.

3 Q. Okay. What do you think he is?

4 A. Probably in the administrative part, I'll  
5 say. But he's -- I don't think he is a doctor over  
6 there.

7 Q. Okay. What interactions have you had with  
8 him?

9 A. Could be my job.

10 Q. Okay. What would be your job -- what in  
11 your job would require you to speak with Mike  
12 Maselli?

13 A. At this point I don't -- I'm not  
14 communicating with him or -- so I cannot remember  
15 exactly what would be an example of that.

16 Q. Okay. So no idea what you would have  
17 talked with Mike about?

18 A. At this point, no.

19 Q. Okay. Okay. Now, you indicated you are  
20 not aware of any other Medernix offices, right?

21 A. No.

22 Q. Okay. And you said their main office is  
23 at, I think -- we said it's 8215 Roswell Road,  
24 Building 800?

25 A. That's what I think.

1 Q. Okay. I'm sorry. Okay. Here we go.

2 (Defendants' Exhibit 12 was marked for  
3 identification.)

4 Q. (By Mr. Glavinos) This will be  
5 Defendants' Exhibit 12. Okay. I'll represent to you  
6 that this is the information page from the Florida  
7 Secretary of State, Division of Corporations. And on  
8 this document it says that the principal address is  
9 936 Southwest 1st Avenue, No. 869, Miami, Florida  
10 33130.

11 Will you agree that's what that says?

12 A. That's what this piece of paper says.

13 Q. Okay. Same mailing address as the  
14 principal address, right?

15 A. Yes.

16 Q. Okay. Do you accept mail at 8215 Roswell  
17 for Medernix?

18 A. Not sure.

19 Q. Okay. Do you guys ever get things in the  
20 mail at your office?

21 A. I don't know.

22 Q. How do you get checks?

23 A. To a different address.

24 Q. Okay. What address is that?

25 A. I don't remember from the top of my mind,

1 but it's not the office address.

2 Q. Okay. Is it this address in Miami?

3 A. Never -- I have never seen this address  
4 before.

5 Q. Okay. And then under registered agent  
6 name and address, 0it says none, registered agent  
7 resigned March 31st, 2022? Right?

8 A. That's what it says.

9 Q. And this says on the top that it's a  
10 Florida limited liability company, and it identifies  
11 Medernix, LLC, right?

12 A. That's what it says.

13 Q. Okay. And do you know anybody that works  
14 for Medernix that is an officer or director of the  
15 corporation?

16 A. Pardon me?

17 Q. Do you know anybody that works for  
18 Medernix that is an officer or director of Medernix?

19 A. Not sure.

20 Q. Okay. Who is the highest person at  
21 Medernix that you can possibly think of in the chain  
22 of command?

23 A. Matt.

24 Q. Matt Stubblefield?

25 A. Yes.

1 Q. Okay. Is he the owner of Medernix?

2 A. I'm not sure who the owners is.

3 Q. You just know Matt as the primary person  
4 for Medernix?

5 A. Yes.

6 Q. Okay. And you indicated earlier -- I just  
7 want to make sure we are clear -- that you don't have  
8 any supervisory or managerial role with Medernix at  
9 all. Is that accurate?

10 A. At this point.

11 Q. Okay. What does -- what do you mean "at  
12 this point"? Did you use to?

13 A. Well, the roles -- you know, companies  
14 change. They are active entities. So from time to  
15 time they review our duties, and they can change that  
16 if -- it's something that an organization can do.

17 Q. Okay. So when did you -- did you use to  
18 have managerial responsibilities?

19 A. At some point, yes.

20 Q. Okay. When did that change?

21 A. It was recently.

22 Q. Okay. How recent?

23 A. I don't remember exactly, but this year I  
24 would say. But I don't remember exactly.

25 Q. Okay. When you received my subpoena in

1 this case, did you sign any NDAs after receiving that  
2 subpoena?

3 A. No.

4 Q. Okay.

5 A. That I remember.

6 Q. Okay. And do you remember being served  
7 with a subpoena in this case? I think it was spring,  
8 maybe, of this year. It was several, several months  
9 ago, more than six months ago probably.

10 A. I remember receiving another subpoena.

11 Q. Okay. And when you received that  
12 subpoena, did you also go talk to Matt Stubblefield  
13 about that?

14 A. Yes.

15 MR. GLAVINOS: Okay. Okay. So I've got  
16 to propose serving some documents here for  
17 Medernix -- on Medernix. So I don't have to do  
18 it on the record, but I can do it on the record.

19 MR. WEBB: Let's do everything on the  
20 record. And I -- and by the way, I am -- have  
21 not been authorized to accept service, okay? I  
22 will try to accommodate resolving those types of  
23 issues. I don't believe in raising dumb  
24 objections to things that are going to wind up  
25 happening anyway.



1           We will have our battles to be sure, but I  
2           have to talk to my client first before I can  
3           tell you that I'm authorized to receive them.  
4           But you can give me whatever you want to give  
5           me. I do represent to you that I've been  
6           retained by Medernix, so I am their attorney.  
7           Whether or not that constitutes valid service or  
8           not, I don't know.

9           MR. GLAVINOS: Me neither. All I know is  
10          there is no other earthly way to serve them. We  
11          have hired investigators. We have done  
12          everything we can do to serve them. So now, as  
13          we sit here today, I have an attorney before me  
14          who says he has been retained by Medernix. So  
15          as an officer of the court, sir, I'm going to  
16          hand you several documents.

17          MR. WEBB: And I will provide those to my  
18          client and we will discuss what to do about  
19          them.

20          MR. GLAVINOS: Okay. So just for the  
21          record, just so we are clear, I'm going to go  
22          through some of these.

23          This first one is a Hall County subpoena  
24          that I have to apparently fill out. It is 0--  
25          I'm just going to put your law firm name. Is

1           this the office it would known as?

2           MR. WEBB:   Smith Welch Webb & White.

3           MR. GLAVINOS:   The time is 6:23.

4           MR. WEBB:   Good Lord, it's not that late.

5           MR. GLAVINOS:   No, 5:23.   I'm sorry.

6           MR. WEBB:   I've got 5:53.

7           MR. GLAVINOS:   Oh, it is 5:53.   Good Lord.

8           MR. WEBB:   No wonder I have a headache.

9           MR. GLAVINOS:   Okay.   We can go off.

10          THE VIDEOGRAPHER:   The time is 5:51 p.m.

11          and we are off the record.

12          (Recess taken from 5:51 p.m. to 5:52 p.m.)

13          THE VIDEOGRAPHER:   The time is 5:52 p.m.

14          and we are on the record.

15          MR. GLAVINOS:   I have no further questions  
16          for Ms. Delgado; however, John and myself are  
17          going to do an exchange on the record about  
18          service.

19          MR. WEBB:   And other -- and other things.

20          THE WITNESS:   Am I excused?

21          MR. WEBB:   Yes.   Yes, you are excused.

22          THE VIDEOGRAPHER:   This concludes the  
23          videotaped deposition.   The time is 5:52 p.m.,  
24          and we are off the record.

25          (Off video record.)

1 MR. GLAVINOS: The first subpoena is in  
2 the State Court of Hall County, Civil Action  
3 File Number 2021SV139.

4 MR. WEBB: Okay. So this appears to be a  
5 witness subpoena directed to Medernix, LLC in  
6 care of myself. And it says and/or employee  
7 with managerial responsibility.

8 MR. GLAVINOS: Which she confirmed she  
9 does not have.

10 MR. WEBB: Yeah. Southside Injury  
11 Attorneys. Now, let's see. So Medernix is  
12 asked to appear at 1 p.m. on Friday, October  
13 28th, at a defendants' law office in Alpharetta,  
14 pursuant to 9-11-30(b)(6) and other statutes.  
15 Asked to designate an agent and to produce  
16 certain documents and things as subject areas to  
17 be covered in the deposition. And it has, I  
18 presume, documents to be produced. Okay.

19 So this is what I was asking about earlier  
20 when we were off the record, so let's do this on  
21 the record, which is to say that I believe that  
22 most of the things that my client was not -- if  
23 not everything my client was asked to testify  
24 about today that I did not allow her to testify  
25 about as being in violation of the

1 non-disclosure agreement would be presumably  
2 answered or covered by the topics that are set  
3 forth in this 30(b)(6) notice.

4 Am I correct in that?

5 MR. GLAVINOS: I have no idea.

6 MR. WEBB: Well, we need to resolve the  
7 outstanding dispute, which is that I have  
8 instructed my client not to violate the  
9 non-disclosure agreement. You contended that  
10 that was abusive behavior and that I should not  
11 have forced you to come down here to depose my  
12 client for almost five hours today and  
13 threatened us with a motion for sanctions,  
14 notwithstanding the fact that she did answer the  
15 vast majority of your questions.

16 MR. GLAVINOS: I will say in the timeline  
17 of events that the outline of motion for  
18 sanctions was made before any kind of  
19 substantive testimony was provided. That was at  
20 about 20 minutes into five hours.

21 MR. WEBB: Okay.

22 MR. GLAVINOS: So I think my position is  
23 that -- you know, I'm not going to take a motion  
24 for sanctions off the table pending review of  
25 the non-disclosure agreement. I can't waive

1           that before I know what it says. But I would be  
2           happy to confer with you further about the  
3           discovery dispute.

4           MR. WEBB: Well, that's part of the  
5           discovery dispute, okay? Now, I've offered to  
6           allow the Court to review the non-disclosure  
7           agreement, and I will continue to allow the  
8           Court to review the non-disclosure agreement.

9           What I suggest we do is we handle it all  
10          at the same time because I guarantee you that my  
11          client will want me to file a motion for  
12          protective order pursuant to this, which will  
13          probably necessarily require me to submit the  
14          non-disclosure agreement to the Court for the  
15          Court's review, okay. I just want to handle  
16          everything at the same time.

17          So if you -- if you still believe that you  
18          may want to have to redepose Ms. Delgado even  
19          after we get an order from the Court  
20          establishing what the things are, fine. I just  
21          want to make sure we handle this all at the same  
22          time so that I don't have to face a motion to  
23          compel and a motion for sanctions when we should  
24          be able to resolve all of this at the same time.

25          MR. GLAVINOS: Yeah, I don't see any

1 reason why we can't confer without filing  
2 motions. I see no problem with that.

3 Again, my position is with respect to  
4 Medernix that we have never been able to do  
5 anything with respect to them before. And so  
6 this is --

7 MR. WEBB: Right.

8 MR. GLAVINOS: -- what we are left to do.  
9 So let me finish getting these and then we can  
10 confer about that.

11 The next three are non-party requests for  
12 production of documents. The first is in the  
13 State Court of Douglas County, Action Number  
14 21SV00317.

15 The second is in the State Court of Hall  
16 County, Action Number 2021SV456Z.

17 The third is in the State Court of Hall  
18 County, Civil Action Number 2021SV139.

19 All right. The next stack is a non-party  
20 request -- actually, it's a subpoena for  
21 production of documents in the United States  
22 District Court for the Northern District of  
23 Georgia, Action Number 1:21-CV-01183-SEG.

24 The next is a non-party request for  
25 production of documents in the Action Number

1 22A01561 in the State Court of DeKalb County.

2 The next one is in the State Court of  
3 Fulton County, Civil Action Number 21EV002611.

4 The next one is in the State Court of  
5 Clayton County, 2022CV01272.

6 The next one is in the State Court of  
7 Gwinnett County, Civil Action Number  
8 22-C-03527-S2.

9 The next one is in this action, pending in  
10 the Superior Court of Effingham County, Action  
11 Number SUCV2020000071.

12 The next one is in the United States  
13 District Court for the Middle District of  
14 Georgia, Action Number 1:22-CV-0058-LAG.

15 The next one is also in the United States  
16 District Court for the Middle District of  
17 Georgia, Civil Action Number 1:22-CV-0059-LAG.

18 The next one is in the Superior Court of  
19 Oconee County Georgia, Civil Action Number  
20 SUCV2022000043.

21 The next one is in the State Court of  
22 DeKalb County, Action Number 21A02142.

23 The next one is in the State Court of Cobb  
24 County, Action Number 19-A-4187.

25 The next one is in the State Court of

1 Chatham County, Action Number STCV22-00312.

2 The next one is also in the State Court of  
3 Chatham County, Civil Action Number  
4 STCV22-00313.

5 The next one is in the State Court of Hall  
6 County, Civil Action Number 2022SV430N.

7 The next one is in the State Court of  
8 DeKalb County, Action Number 21A05275.

9 And the last one is in the State Court of  
10 DeKalb County, Action Number 21A02134.

11 Thank you. Is there anything else you  
12 would like to address on the record?

13 MR. WEBB: No. I think that's it. So I  
14 will confer with my client regarding their  
15 authorizing me to accept these, and I will get  
16 back to you.

17 You handed me a whole bunch of different  
18 cases here, and I was not able to follow them as  
19 you were announcing them into the record, so I  
20 would appreciate a follow-up correspondence. It  
21 can be an e-mail with just a list of the cases  
22 that I need to respond to you on --

23 MR. GLAVINOS: Certainly.

24 MR. WEBB: -- so that we are all on the  
25 same page, and then I will proceed accordingly.



1           MR. GLAVINOS: And I will note that there  
2           is a cover page for each stack that does list  
3           it, but I'll compile a master list for you.

4           MR. WEBB: Okay. All right.

5           MR. GLAVINOS: Mr. Tiller, anything you  
6           would like to add on the record?

7           MR. TILLER: No.

8           MR. GLAVINOS: All right. I have nothing  
9           further.

10           (Deposition concluded at 6:08 p.m.)

11           (Pursuant to Rule 30(e) of the Federal  
12           Rules of Civil Procedure and/or OCGA 9-11-30(e),  
13           signature of the witness has been reserved.)

14

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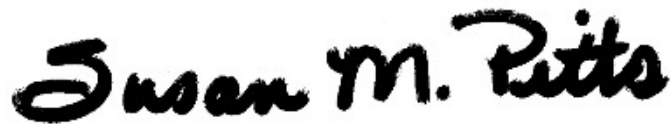
C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 214 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

This, the 28th day of September, 2022.

A handwritten signature in black ink that reads "Susan M. Pitts". The signature is written in a cursive, slightly stylized font.

SUSAN M. PITTS, CCR-B-1806

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1 September 28th, 2022

2 To: John P. Webb, Esq.

3 Re: Signature of Deponent Aracelis Delgado

4 Greetings:

5 The deponent has reserved the right to read and sign.  
6 Have the deponent review the attached PDF  
transcript, noting any changes or corrections on the  
7 PDF errata. The deponent may fill out the  
errata electronically or print and fill out manually.

8  
9 Once the errata is signed by the deponent and  
notarized, please mail it to the offices of Veritext  
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11  
12 When the signed errata is returned to us, we will  
seal and forward to the taking attorney to file with  
the original transcript. We will also send copies of  
13 the errata to all ordering parties.

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15 If the signed errata is not returned within the time  
above, the original transcript may be filed with the  
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17 Please send completed Errata to:

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I, the undersigned, do hereby certify that I have  
read the transcript of my testimony, and that

\_\_\_ There are no changes noted.

\_\_\_ The following changes are noted:

Pursuant to Rule 30(7)(e) of the Federal Rules of  
Civil Procedure and/or OCGA 9-11-30(e), any changes  
in form or substance which you desire to make to your  
testimony shall be entered upon the deposition with a  
statement of the reasons given for making them. To  
assist you in making any such corrections, please use  
the form below. If additional pages are necessary,  
please furnish same and attach.

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\_\_\_\_\_  
DEPONENT'S SIGNATURE

Sworn to and subscribed before me this \_\_\_\_ day of

\_\_\_\_\_, \_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_

|                             |                        |                        |                         |
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| <b>x</b> 165:14,14                                                                                                                                                                                                                                                                                                                                          | <b>z</b>                                                                                                                                                                                                                                      |
| <b>y</b>                                                                                                                                                                                                                                                                                                                                                    | <b>z</b> 200:1<br><b>zach</b> 62:19 65:21<br><b>zachary</b> 3:12<br><b>zero</b> 58:4 172:6<br>188:16<br><b>zeroed</b> 171:10                                                                                                                  |
| <b>y</b> 51:21 62:16<br><b>y'all</b> 17:7 121:6<br><b>yasha</b> 23:13,15<br>61:7,17,22,23<br>62:10,13<br><b>yeah</b> 17:9 25:1<br>28:15 30:3<br>41:19 47:7<br>56:22 75:3 78:4<br>79:1 81:25<br>88:13 94:15<br>95:24 98:2<br>101:20 108:13<br>118:8 121:10<br>123:17 127:6<br>130:7 131:20<br>143:12 144:25<br>147:7 152:23<br>153:6 158:25<br>159:23 163:23 |                                                                                                                                                                                                                                               |

Georgia Code

Title 9, Chapter 11

Article 5, Section 9-11-30

(e) Review by witness; changes; signing.

If requested by the deponent or a party before completion of the deposition, the deponent shall have 30 days after being notified by the officer that the transcript or recording is available in which to review the transcript or recording and, if there are changes in form or substance, to sign a statement reciting such changes and the reasons given by the deponent for making them. The officer shall indicate in the certificate prescribed by paragraph (1) of subsection (f) of this Code section whether any review was requested and, if so, shall append any changes made by the deponent during the period allowed. If the deposition is not reviewed and signed by the witness within 30 days of its submission to him or her, the officer shall sign it and state on the record that the deposition was not reviewed and signed by the deponent within 30 days. The deposition may then be used as fully as though signed unless, on a motion to suppress under paragraph (4) of subsection (d) of Code

Section 9-11-32, the court holds that the reasons given for the refusal to sign require rejection of the deposition in whole or in part.

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COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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# **EXHIBIT “B”**



**ALFRED NORRINGTON vs DAVID AKINS AND BLAIR LOGISTICS, LLC**  
**Aracelis Delgado on 03/19/2025**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

|                       |   |                   |
|-----------------------|---|-------------------|
| ALFRED NORRINGTON,    | ) | CIVIL ACTION NO.  |
|                       | ) | 1:22-cv-00441-MLB |
| Plaintiff,            | ) |                   |
|                       | ) |                   |
| vs.                   | ) |                   |
|                       | ) |                   |
| DAVID AKINS AND BLAIR | ) |                   |
| LOGISTICS, LLC,       | ) |                   |
|                       | ) |                   |
| Defendants.           | ) |                   |
| <hr/>                 | ) |                   |

The remote videoconference deposition of  
ARACELIS DELGADO taken pursuant to Notice and  
agreement of counsel for any and all purposes  
allowed under the Georgia Civil Practice Act; the  
reading and signing of the deposition is being  
waived; taken before Morgan Spriggs, Certified  
Court Reporter, Certified Verbatim Reporter and  
Notary Public in and for the State of Georgia to  
commence at 5:30 P.M. on the 19th day of March,  
2025. All parties in attendance appeared via  
remote videoconference.

**ALFRED NORRINGTON vs DAVID AKINS AND BLAIR LOGISTICS, LLC**  
**Aracelis Delgado on 03/19/2025**

| Page 2 |                                   | Page 4 |                                                   |
|--------|-----------------------------------|--------|---------------------------------------------------|
| 1      | APPEARANCES OF COUNSEL:           | 1      | P R O C E E D I N G S                             |
| 2      |                                   | 2      | 5:37 P.M.                                         |
| 3      | ON BEHALF OF PLAINTIFF:           | 3      | THE COURT REPORTER: Before I swear in             |
| 4      | ADEWALE ODETUNDE, ESQ.            | 4      | the witness, does all counsel agree to the remote |
| 5      | Witherite Law Group Atlanta, LLC  | 5      | swearing of the witness?                          |
| 6      | 600 Peachtree Street, Northeast   | 6      | MR. O'DANIEL: Yes.                                |
| 7      | Suite 4010                        | 7      | MR. ODETUNDE: Yes.                                |
| 8      | Atlanta, Georgia 30308            | 8      | (Whereupon,                                       |
| 9      | adewale.odetunde@witheritelaw.com | 9      | ARACELIS DELGADO                                  |
| 10     | ON BEHALF OF DEFENDANTS:          | 10     | was called as a witness and                       |
| 11     | CLAY O DANIEL, ESQ.               | 11     | having been first duly sworn                      |
| 12     | O'Daniel McDonald, LLC            | 12     | was examined and testified                        |
| 13     | 9040 Roswell Road                 | 13     | as follows:)                                      |
| 14     | Suite 500                         | 14     | THE WITNESS: I swear.                             |
| 15     | Atlanta, Georgia 30350            | 15     | THE COURT REPORTER: Thank you.                    |
| 16     | (404) 419-6300                    | 16     | MR. O'DANIEL: This will be the remote             |
| 17     | codaniel@odmclaw.com              | 17     | deposition of Aracelis Delgado taken pursuant to  |
| 18     |                                   | 18     | agreement of counsel and subpoena and confirmed   |
| 19     |                                   | 19     | by notice. It is to be used for all purposes      |
| 20     |                                   | 20     | under the Federal Rules of Civil Procedure.       |
| 21     |                                   | 21     | If it's agreeable, we can reserve all             |
| 22     |                                   | 22     | objections except to the form of the question and |
| 23     |                                   | 23     | the responsiveness of the answer until time of    |
| 24     |                                   | 24     | use of the deposition.                            |
| 25     |                                   | 25     | MR. ODETUNDE: Agreed.                             |

| Page 3 |                                    | Page 5 |                                                  |
|--------|------------------------------------|--------|--------------------------------------------------|
| 1      | C O N T E N T S                    | 1      | MR. O'DANIEL: Ms. Delgado, my name is            |
| 2      | E X A M I N A T I O N              | 2      | Clay O'Daniel. I represent a truck driver named  |
| 3      |                                    | 3      | David Akins, as well as his employer, Blair      |
| 4      | Proceedings..... 4                 | 4      | Logistics, and this is in regard to a personal   |
| 5      | Examination by Mr. O'Daniel..... 8 | 5      | injury lawsuit that was brought by a gentleman   |
| 6      |                                    | 6      | named Alfred Norrington. Mr. Odetunde is         |
| 7      |                                    | 7      | Mr. Norrington's attorney. He's on this as well. |
| 8      | E X H I B I T S                    | 8      | Do you recognize the name Alfred Norrington?     |
| 9      |                                    | 9      | THE WITNESS: Probably I have seen it             |
| 10     | Defendants' Page                   | 10     | before.                                          |
| 11     | Exhibit Description Marked         | 11     | MR. O'DANIEL: Okay. I understand you             |
| 12     | 1 Subpoena..... 9                  | 12     | work for a company called Fortress Data          |
| 13     | 2 Email: February 13, 2023..... 56 | 13     | Solutions; is that correct?                      |
| 14     | 3 LinkedIn..... 79                 | 14     | THE WITNESS: Maranex.                            |
| 15     |                                    | 15     | MR. O'DANIEL: Maranex?                           |
| 16     |                                    | 16     | THE WITNESS: Yes.                                |
| 17     |                                    | 17     | MR. O'DANIEL: How do you spell that?             |
| 18     |                                    | 18     | THE WITNESS: M-a-r-a-n-e-x.                      |
| 19     |                                    | 19     | MR. O'DANIEL: Okay. And there have               |
| 20     |                                    | 20     | been some emails produced in this case, I guess, |
| 21     |                                    | 21     | where you had been involved in -- to some degree |
| 22     |                                    | 22     | in Mr. Norrington's treatment. I'm going to ask  |
| 23     |                                    | 23     | you about those, as well as some of your -- your |
| 24     |                                    | 24     | background.                                      |
| 25     |                                    | 25     | Have you ever had your deposition taken          |

**ALFRED NORRINGTON vs DAVID AKINS AND BLAIR LOGISTICS, LLC**  
**Aracelis Delgado on 03/19/2025**

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1 before like this?

2 THE WITNESS: Yes, I believe so.

3 MR. O'DANIEL: How many total times?

4 THE WITNESS: Two.

5 MR. O'DANIEL: Okay. Were they in the

6 context of your employment with Maranex?

7 THE WITNESS: One of them.

8 MR. O'DANIEL: Okay. And was that in

9 regard to a personal injury lawsuit?

10 THE WITNESS: It was regarding a

11 personal injury case.

12 MR. O'DANIEL: Okay. And what was the

13 other context?

14 THE WITNESS: It was with a previous

15 employer, but I don't remember very well. It was

16 a long time ago.

17 MR. O'DANIEL: Okay. That was some

18 employment-related issue?

19 THE WITNESS: It was related to a case.

20 MR. O'DANIEL: Another personal injury

21 case?

22 THE WITNESS: I believe so.

23 MR. O'DANIEL: Okay. The one that you

24 had more recently, how long ago did that take

25 place?

Page 7

1 THE WITNESS: I don't remember. It was

2 some time ago, but I don't remember exactly.

3 MR. O'DANIEL: Was it within the last

4 year?

5 THE WITNESS: I don't remember exactly.

6 MR. O'DANIEL: Okay. I understand. I

7 mean, was it more than five years ago?

8 THE WITNESS: I don't remember exactly,

9 unfortunately. I'm sorry.

10 MR. O'DANIEL: Okay. Do you recall the

11 patient's name that was involved in that case?

12 THE WITNESS: No, I don't recall the

13 name.

14 MR. O'DANIEL: Okay. Do you recall any

15 of the attorneys that were involved in that case?

16 THE WITNESS: No, I don't recall them.

17 MR. O'DANIEL: I understand you've had

18 a deposition before, but just to go over some

19 ground rules, if you don't understand a question

20 please let me know and I'll try to rephrase it,

21 okay?

22 THE WITNESS: Thank you.

23 MR. O'DANIEL: And you're already doing

24 a good job. If you do your best to answer with a

25 clear answer as opposed to the nod of the head or

Page 8

1 something like that, we're trying to do that to

2 get a clear transcript. I may remind you if

3 that's happening. I'm not trying to be rude,

4 just trying to make sure we get down a clear

5 transcript, okay?

6 THE WITNESS: Okay.

7 E X A M I N A T I O N

8 BY MR. O'DANIEL:

9 Q. All right. And would you please state

10 your full name for the record?

11 A. Aracelis Delgado.

12 Q. Do you have a middle name?

13 A. I don't.

14 Q. Have you gone by any other names?

15 A. Aracelis Berberena.

16 Q. How do you spell that?

17 A. B-e-r-b-e-r-e-n-a.

18 Q. And what time frame did you go by that

19 name?

20 A. Probably until ten years ago or so. I

21 cannot remember the exact date.

22 Q. Okay. What is your number -- phone

23 number?

24 A. Give me a second. It is (678) 400-6709.

25 Q. Okay. And is that the best way to get

Page 9

1 in touch with you if we need to reach out for

2 anything?

3 A. Yes.

4 Q. What about -- what is your home address?

5 A. 307 Hayden Circle, Woodstock, Georgia.

6 Q. And does anybody live with you at that

7 address?

8 A. Pardon me?

9 Q. Does anybody reside with you at that

10 address?

11 A. Yes. My husband.

12 Q. What is his name?

13 A. Juan Carlos Delgado.

14 Q. Okay. I'm going to show you real quick

15 and try to share my screen here.

16 Okay. Are you able to see a PDF that says

17 United States District Court at the top of it on

18 your screen?

19 (Defendants' Exhibit 1 was

20 marked and identified).

21 A. Yes.

22 Q. Okay. Do you recognize that as the

23 subpoena that was served on you in this case --

24 I'm going to scroll down it slowly -- in regard

25 to the deposition today?

**ALFRED NORRINGTON vs DAVID AKINS AND BLAIR LOGISTICS, LLC**  
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1 A. Yes.  
2 Q. And you acknowledge that it was served  
3 on you, correct?  
4 A. Pardon me?  
5 Q. The subpoena was served upon you,  
6 correct?  
7 A. It was given to my husband.  
8 Q. Okay. And he lives with you at the  
9 house?  
10 A. I was not in the house. He was in the  
11 house.  
12 Q. Okay. And just to confirm, you two  
13 lived together at the same house even though he  
14 was at home at the time?  
15 A. Correct. Yes, we lived together.  
16 Q. I understand. If you would, walk me  
17 through a little bit of your background education  
18 wise. Did you finish high school? Walk me  
19 through that.  
20 A. Yes. I have a bachelor degree.  
21 Q. Where did you obtain that?  
22 A. University of Puerto Rico.  
23 Q. Are you originally from Puerto Rico?  
24 A. I am from Puerto Rico. Yes, sir.  
25 Q. And did you have any other education or

Page 11

1 vocational training after you obtained your  
2 degree in Puerto Rico?  
3 A. I went -- I had a certificate on  
4 paralegal.  
5 Q. Okay. Where did you obtain that?  
6 A. Kennesaw University.  
7 Q. And what year was that?  
8 A. Oh, my goodness. I'm so sorry. I don't  
9 remember exactly.  
10 Q. Okay. More than five years ago?  
11 A. Yes, more than five years ago.  
12 Q. What about have you ever had any medical  
13 training?  
14 A. No.  
15 Q. Any other type of certificates you've  
16 gotten or degrees in any field?  
17 A. I also did a certificate on occupational  
18 health. I'm sorry. I was trying to find the  
19 words in English.  
20 Q. I understand. Where did you obtain  
21 that? What university or school was that from?  
22 A. It was also University of Puerto Rico.  
23 Q. Tell me -- you said you work for Maranex  
24 I understand. Do you currently work for any  
25 other companies?

Page 12

1 A. No.  
2 Q. How long have you worked for Maranex?  
3 A. About five years.  
4 Q. And in that five-year window, have you  
5 worked for any other companies besides Maranex?  
6 A. No.  
7 Q. What is your title at Maranex?  
8 A. Case manager.  
9 Q. And what type of work do you do for  
10 Maranex?  
11 A. I collect on AR.  
12 Q. Collect AR?  
13 A. Correct.  
14 Q. Okay. And is that always in regard to  
15 cases involving injured patients that have a  
16 lawsuit or a claim?  
17 A. It is regarding personal injury.  
18 Q. Okay. And does part of your work  
19 involve coordinating between doctor's offices and  
20 the patient's law firms?  
21 A. Can you explain a little bit, please?  
22 Q. Right. I guess you said you do  
23 collections for -- with AR, right? Accounts  
24 receivable?  
25 A. Correct.

Page 13

1 Q. Tell me more. What does your typical  
2 day involve? What type of things are you doing?  
3 A. I make phone calls.  
4 Q. And who are you making phone calls to?  
5 A. To attorney's offices.  
6 Q. Okay. And do you also coordinate with  
7 doctor's offices that the attorney's patients are  
8 treating with?  
9 A. Like what?  
10 Q. Like regarding procedures that need to  
11 be done or scheduling or anything along those  
12 lines?  
13 A. I don't do scheduling.  
14 Q. Okay. Does somebody that works at  
15 Maranex do that kind of stuff?  
16 A. We don't do scheduling.  
17 Q. Okay. I guess going back to my prior  
18 question, do you ever speak to anyone as part of  
19 your job at a doctor's office that's treating an  
20 injured patient?  
21 A. Can you kind of explain me a little bit,  
22 please?  
23 Q. I mean, it's pretty straightforward. I  
24 mean, as part of your job do you ever make calls  
25 to doctor's offices?

**ALFRED NORRINGTON vs DAVID AKINS AND BLAIR LOGISTICS, LLC**  
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1 A. I might do it.

2 Q. Okay. In what context would you be

3 calling a doctor's office?

4 A. Maybe to know the -- the date of an

5 appointment or something like that.

6 Q. Okay. Are you more often than not

7 speaking with the law firm -- people at the law

8 firm instead of the doctor's office or is it

9 50/50? How does that break down?

10 A. I would say it's mostly with attorney's

11 office.

12 Q. And if I understood you correctly, all

13 of your work is -- is always involving an injured

14 individual that has an attorney, right?

15 A. Correct.

16 Q. Who hires Maranex? Is it the law firm

17 that hires Maranex?

18 A. Who hires Maranex?

19 Q. Correct.

20 A. I don't know.

21 Q. You don't know who does that? You don't

22 know?

23 A. No.

24 Q. Okay. To your knowledge, is there a

25 contract signed between Maranex and any -- and

Page 15

1 any other party regarding the work you're doing?

2 A. What I understand is that Maranex is a

3 contractor.

4 Q. Okay. Who does Maranex as a contractor

5 have a contract with?

6 A. Fortress.

7 Q. Fortress? Is that Fortress Data

8 Solutions?

9 A. Correct.

10 Q. Okay. What does Fortress Data Solutions

11 do?

12 A. I'm not sure.

13 Q. Do you work for Fortress Data Solutions?

14 A. I work for Maranex.

15 Q. All right. I understand that. Do you

16 also work for Fortress Data Solutions?

17 A. My understanding is that Maranex is a

18 contractor from Fortress.

19 Q. And I'm just asking your understanding.

20 Is it your belief that you also work for Fortress

21 directly or no?

22 A. I don't understand.

23 Q. Okay. When you receive a paycheck, who

24 does it come from?

25 A. Maranex.

Page 16

1 Q. Has it ever come from Fortress Data

2 Solutions?

3 A. It doesn't come from them.

4 Q. And Fortress Data Solutions, what do you

5 understand them to do? What are they doing?

6 A. I don't know what they do.

7 Q. Okay. When you're contracting with

8 Fortress Data Solutions, what work are you doing

9 on behalf of Fortress Data -- Fortress Data

10 Solutions?

11 A. Well, I work for Maranex. I work for

12 Maranex.

13 Q. Yep. I think we said earlier that

14 Maranex is contracted with Fortress Data

15 Solutions, right?

16 A. Yes. We are their contractors.

17 Q. Okay. And I'm trying to understand what

18 work you're doing on behalf of Fortress Data

19 Solutions.

20 A. Collect on account receivables.

21 Q. Okay. And those are account receivables

22 for litigated injury claims, right?

23 A. For personal injury cases in general.

24 Q. Okay. Are you familiar with a company

25 called Ortho Sport & Spine?

Page 17

1 A. Yes.

2 Q. Is that a company that Maranex does

3 business with?

4 A. Yes.

5 Q. Does Maranex, in your experience, only

6 do work with that doctor's office or are there

7 other doctor's offices Maranex also works with?

8 A. There are other -- other providers.

9 Q. How many are we talking ballpark? One

10 or two more or dozens more or hundreds more?

11 A. I'm not sure.

12 Q. Okay. It's more than five?

13 A. I don't know.

14 Q. You can't say whether it's more than

15 five providers you've worked for?

16 A. No. I'm sorry. I cannot precise.

17 Q. Can you -- can you say it's more than

18 three?

19 A. I'm sorry. I can't.

20 Q. Why not?

21 A. Because I don't know.

22 Q. Okay. And you've been working with

23 Maranex how long?

24 A. About five years.

25 Q. And just to confirm your testimony, you

**ALFRED NORRINGTON vs DAVID AKINS AND BLAIR LOGISTICS, LLC**  
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1 can't say whether you've worked with three or  
2 more doctor's offices during that time period?  
3 A. Sorry?  
4 Q. Just to confirm, I want to make sure I  
5 understand your testimony. In that time period  
6 you worked with Maranex, you can't say whether  
7 you've worked for three or more -- worked with  
8 three or more doctor's offices during that time  
9 period?  
10 A. I cannot say exactly.  
11 Q. I'm not asking exactly. I'm asking  
12 whether there's more than three.  
13 A. I don't know. I'm sorry.  
14 Q. What about as far as your work goes with  
15 Ortho Sport & Spine, is it a majority of your  
16 work with that doctor's office or is it a  
17 majority with other ones?  
18 A. I would say it's majority with them.  
19 Q. With Ortho Sport & Spine?  
20 A. Correct.  
21 Q. Okay. And have you been working with  
22 Ortho Sport & Spine over the entire period you've  
23 been at Maranex?  
24 A. Sorry. I'm so sorry. Can you repeat?  
25 Q. I'll be glad to. I think you said

Page 19

1 you've been working at Maranex for about five  
2 years; is that right?  
3 A. Correct.  
4 Q. When you -- when did -- did you first  
5 start working with Ortho Sport & Spine five years  
6 ago when you started at Maranex?  
7 A. Yes. It's an account.  
8 Q. Okay. Who is your main contact at Ortho  
9 Sport & Spine?  
10 A. I don't have a main contact.  
11 Q. Who is -- who do you talk with over  
12 there?  
13 A. I barely talk to them.  
14 Q. Have you ever talked to anybody over  
15 there?  
16 A. I just dial the general number.  
17 Q. Okay. And then ask --  
18 A. I don't have a main point.  
19 Q. Who would you ask for when you dial the  
20 main number?  
21 A. It depends on what I need.  
22 Q. Okay. If you need information on  
23 account totals, who would you ask for at Ortho  
24 Sport & Spine?  
25 A. So sorry. Can you repeat?

Page 20

1 Q. Right. If you dial the main number and  
2 you are wanting to ask a question about an  
3 account balance, for example, who would you ask  
4 for at Ortho Sport & Spine in that example?  
5 A. I just check it online.  
6 Q. And how do you go about checking it  
7 online?  
8 A. I go to the system.  
9 Q. Is that their billing platform system?  
10 A. It's their system.  
11 Q. eClinicalWorks; is that correct?  
12 A. Correct.  
13 Q. Okay. Going back to when you call  
14 though, if you, for example -- you gave an  
15 example before, I think, of needing to talk to a  
16 doctor's office about what procedure might be  
17 scheduled; is that correct?  
18 A. No. I don't speak with doctors.  
19 Q. Okay. I'm talking about the office of  
20 Ortho Sport & Spine, regardless of whether it's a  
21 medical doctor or not.  
22 A. I said if I needed a date -- to know a  
23 date on an appointment.  
24 Q. Okay. In that example if you called up,  
25 who would you ask for on the phone?

Page 21

1 A. I don't ask for anyone. I just follow  
2 the prompt and go to the department that handles  
3 that, for example.  
4 Q. Whoever answers you talk to?  
5 A. It could be anyone on the line. They  
6 have multiple people.  
7 Q. Have you ever spoken with Mike Maselli  
8 before?  
9 A. I have.  
10 Q. What context did you speak with him?  
11 A. At this point I cannot remember. It has  
12 been a long time.  
13 Q. Did you speak to him at all in regard to  
14 this deposition?  
15 A. No.  
16 Q. How long ago did you speak with Mike  
17 Maselli?  
18 A. I don't remember.  
19 Q. Was it more than five years ago?  
20 A. I don't remember.  
21 Q. Have you ever spoken with Faith  
22 Beltzhoover before?  
23 A. Yes, I have.  
24 Q. How many times?  
25 A. I don't remember.

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1 Q. More than once?

2 A. Honestly, I don't remember.

3 Q. So you can -- you remember speaking to

4 her at least one time, but you can't say whether

5 you spoke to her more than one time?

6 A. Probably more than one time, but I don't

7 remember the exact amount.

8 Q. How long ago was the most recent one?

9 A. I don't remember.

10 Q. Was it within the last year?

11 A. I don't remember.

12 Q. Was it within the last month?

13 A. I don't remember.

14 Q. Have you ever spoken with an attorney

15 named Yasha Heidari?

16 A. No.

17 Q. Have you ever spoken with an attorney

18 that indicated they were representing Ortho Sport

19 & Spine?

20 A. Pardon me?

21 Q. Have you ever spoken with somebody who

22 identified themselves as an attorney for Ortho

23 Sport & Spine?

24 A. No.

25 Q. Are you familiar with the Witherite Law

Page 23

1 Firm?

2 A. Yes, I have heard of them.

3 Q. Okay. And Mr. Odetunde is with that

4 firm on the call here, okay?

5 Have you ever met Mr. Odetunde before?

6 A. No.

7 Q. Is Witherite Law Firm somebody that you

8 have dealt with in the past on cases?

9 A. Yes.

10 Q. How many other law firms have you dealt

11 with beyond the Witherite Law Firm during your

12 five years at Maranex?

13 A. I don't remember.

14 Q. Is it more than just the Witherite Firm?

15 A. Yes, more than them.

16 Q. Is Witherite Firm the majority of the

17 one you deal with, though?

18 A. No.

19 Q. Who is the one you most frequently deal

20 with?

21 A. I don't remember. I just go by a list I

22 get and I deal with what I get on the list.

23 Q. What is that list? Who gives you a

24 list?

25 A. The system does.

Page 24

1 Q. What system?

2 A. Our system of Fortress IQ.

3 Q. Say that again? Fortress IQ?

4 A. Yes, sir.

5 Q. And what does that -- it gives you a

6 list of attorneys?

7 A. No. It gives me a list of -- of what I

8 have to work on.

9 Q. And what is an example of a task of

10 something that you need to work on?

11 A. For example call to collect.

12 Q. Okay. And it would list the attorney

13 you need to contact for the collection?

14 A. Correct.

15 Q. And it would also list the doctor's

16 office that issued the bills to start with?

17 A. Correct.

18 Q. Who generates that list? Is that from

19 Fortress Data Solutions?

20 A. I'm not sure. It's just in the system.

21 Q. Do you get it via email or is it

22 something you access directly through a portal?

23 A. I enter into the system to get it.

24 Q. Okay. And who at Fortress is involved

25 with putting that list together?

Page 25

1 A. I don't know.

2 Q. Going back to the Witherite Law Firm,

3 are you familiar with a company called MedWrecks?

4 A. I have heard of them.

5 Q. Do you understand that company to be

6 associated with the Witherite Law Firm?

7 A. I'm not sure.

8 Q. Okay. You don't have an understanding

9 one way or the other?

10 A. I just work on the list and if they --

11 MedWrecks is there, I work with MedWrecks. If

12 Witherite is there, I work with Witherite or

13 whomever is on the list.

14 Q. Have you ever worked with another law

15 firm that's dealing with MedWrecks beyond the

16 Witherite Firm?

17 A. Pardon me?

18 Q. When you've been working with MedWrecks

19 on cases, has a law firm been involved other than

20 the Witherite Law Firm in those cases?

21 A. I don't know.

22 Q. You can't recall one way or the other?

23 A. I don't know the relationship between

24 them.

25 Q. Okay. Who is your contact at Witherite

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1 Law?

2 A. I call whomever is on the list.

3 Q. Okay. And that -- is that different

4 every time or is it usually the same person?

5 A. No, it could be different every time.

6 Q. Okay. Have you ever spoken with any

7 attorneys directly at the Witherite Law Firm?

8 A. I don't recall.

9 Q. Who is your main contact at MedWrecks?

10 A. I don't have a main contact.

11 Q. Can you name any contact at MedWrecks?

12 A. No. I don't remember.

13 Q. How many other employees work at

14 Maranex?

15 A. I don't have that number.

16 Q. Do you go to an office?

17 A. Yes, I do.

18 Q. Where is that office located?

19 A. In Roswell.

20 Q. What's the address?

21 A. I don't know the address.

22 Q. What street is it on?

23 A. Roswell Road.

24 Q. What is it close to in Roswell?

25 A. I would say close to the downtown.

Page 27

1 Q. Okay. Is it north or south of the

2 downtown?

3 A. I'm so sorry, sir. I don't know where

4 south or north is.

5 Q. Okay. Do you know where 120 is?

6 Highway 120?

7 A. No.

8 Q. Where is your -- you said your house is

9 in -- let's see. You told me earlier. What city

10 are you in?

11 A. Woodstock.

12 Q. When you drive to the office, how do you

13 get there? What road do you take?

14 A. I go back roads.

15 Q. Okay. And what back roads do you take?

16 A. Highway 92.

17 Q. Okay. So that's -- and then where do

18 you get off at Highway 92 at? Roswell Road?

19 A. Sometimes.

20 Q. Okay. And if you're going that way, how

21 far do you go -- it would be south on Highway --

22 on Roswell Road before you get to the office?

23 A. I'm not sure.

24 Q. What does the office look like?

25 A. It is located, like, in a building

Page 28

1 complex.

2 Q. There's other offices in the complex?

3 A. There's other -- there are other offices

4 around.

5 Q. Is it a high-rise or is it a

6 single-story building? Can you tell me more?

7 A. Single story.

8 Q. How many total businesses are in that

9 building?

10 A. In the building I am at?

11 Q. Right.

12 A. As far as I know it's only us.

13 Q. Okay. And who all -- what other -- how

14 many total employees are in that building with

15 you?

16 A. I don't know the exact number.

17 Q. I understand. How many approximately

18 are there? This is where you work every day,

19 right?

20 A. Yes, that's where I go.

21 Q. Okay. Tell me how many people you're

22 working with.

23 A. I don't know the exact number.

24 Q. Yeah, I'm asking for an approximate

25 number of the people you work with every day.

Page 29

1 A. Who goes to the office?

2 Q. Correct.

3 A. I would say it's around 15, but I cannot

4 say the exact number. 15, 20, I'm not sure.

5 Q. Understood. What other jobs do those

6 people do? I know you're involved with accounts

7 receivable. What other jobs do other Maranex

8 employees do?

9 A. As far as I know we are case managers.

10 Q. Case managers. And if you're doing AR,

11 what are the other employees -- what type of work

12 do they do as case managers?

13 A. I don't know.

14 Q. You don't know what any other employee

15 does at Maranex?

16 A. No.

17 Q. Do you have any employees -- do you have

18 any employees that work underneath you?

19 A. No.

20 Q. Who is your supervisor at Maranex?

21 A. Chinua Gibson.

22 Q. And can you spell that, please?

23 A. C-h-i-n-u-a.

24 Q. Gibson, G-i-b-s-o-n?

25 A. Yes.



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1 Q. Is that a male or a female?  
2 A. It is a male. Mr. Chinua.  
3 Q. And Mr. Gibson, does he work at the same  
4 office that you do in Roswell?  
5 A. He does.  
6 Q. To your knowledge, does Maranex have any  
7 other offices besides the Roswell office?  
8 A. I don't know.  
9 Q. You don't know of any other ones that  
10 they have?  
11 A. No, I don't know of any.  
12 Q. Who is the CEO or president or the top  
13 person at Maranex? Do you know?  
14 A. I believe it's Matt.  
15 Q. Matt?  
16 A. Sorry. His last name is kind of  
17 difficult for me. Stublefield.  
18 Q. Stublefield? Can you do your best to  
19 spell that?  
20 A. I believe it is, S-t-u-b-l-e-f-i-e-l-d,  
21 I will say. As I said, it's kind of difficult  
22 for me.  
23 Q. Understood. Does he work at the Roswell  
24 office or a different office?  
25 A. He works there.

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1 Q. Okay. Who was in charge of hiring  
2 people at Maranex?  
3 A. I don't know.  
4 Q. Who hired you?  
5 A. I don't remember.  
6 Q. You don't recall the person that hired  
7 you?  
8 A. No.  
9 Q. Do they still work there?  
10 A. I don't remember.  
11 Q. How is Maranex paid for their services?  
12 A. Can you please repeat or rephrase?  
13 Q. Let me -- I guess let me back up and  
14 start with this.  
15 In regard to you individually, are you paid  
16 a salary or are you paid by the hour?  
17 A. Salary.  
18 Q. Okay. Does any of your money that  
19 you're paid by Maranex, is it ever any part of  
20 that tied to the amount of recovery in a  
21 particular injury case?  
22 A. Pardon me?  
23 Q. For example, if there was a settlement  
24 in an injury case that settled for \$100,000,  
25 would you be compensated anything based upon that

Page 32

1 amount of settlement?  
2 A. I don't remember.  
3 Q. You don't remember how you're paid? Is  
4 that your testimony?  
5 A. I don't remember.  
6 Q. Is there anything you're adding to that?  
7 A. No.  
8 Q. Okay. Your testimony, just so I'm  
9 clear, you -- you don't know one way or the other  
10 whether part of your compensation is tied to the  
11 amount of a recovery on an injury case, true?  
12 A. I don't remember.  
13 Q. Okay. Have you ever received any type  
14 of accounting from Maranex showing how much you  
15 were owed beyond a flat salary rate?  
16 A. Can you please rephrase that?  
17 Q. Yes. Have you received any type of  
18 accounting documentation from Maranex that shows  
19 how much money you're owed beyond just a flat  
20 salary amount?  
21 A. I don't pay much attention to that.  
22 Q. I see. Who at Maranex is in charge of  
23 billing and sending out their own invoices?  
24 A. Would you please repeat? I'm so sorry.  
25 Q. Sure. Who at Maranex is in charge of

Page 33

1 sending out invoices so they get paid?  
2 A. I'm not sure.  
3 Q. Is it you?  
4 A. I don't send invoices.  
5 Q. Okay. You're not involved at all with  
6 -- I know you said you're accounts receivable,  
7 right?  
8 A. Correct.  
9 Q. In what context -- does that ever  
10 involve monies that Maranex is owed directly?  
11 A. It's my understanding that the money is  
12 owed to the provider.  
13 Q. Okay. Does Maranex not get a portion of  
14 that?  
15 A. I don't know how that works.  
16 Q. All right. So when you're working on  
17 accounts receivable and you contact somebody that  
18 say, owes \$100,000, for example, tell me how that  
19 works. Do they send you a check and then you  
20 send it to the doctor's office?  
21 A. Okay. Can you go slowly and walk me  
22 again through your question? I'm so sorry, sir.  
23 Q. Sure. And it -- and I'll ask it this  
24 way. I would like you to explain to me when  
25 you're doing accounts receivable how that

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1 logistically works. So if you're -- I presume  
2 somebody owes money, right? That's part of  
3 accounts receivable, right?  
4 A. Correct.  
5 Q. And you're going to contact, for  
6 example, a law firm saying we're owed -- for  
7 example, \$100,000 is owed. You follow me now?  
8 Yes?  
9 A. I'm following you.  
10 Q. Okay. And they say, okay, what happens  
11 next? Where does that payment go?  
12 A. It goes to an address.  
13 Q. What address?  
14 A. I don't remember exactly. It's in  
15 Florida.  
16 Q. Okay. An address that's a Maranex  
17 address?  
18 A. I don't know who that -- whose address  
19 is that. I just --  
20 Q. Okay. Well, they need to know who they  
21 make the check payable to. Who do you tell them  
22 to make the check payable to?  
23 A. Ortho Sport & Spine.  
24 Q. Okay. Always Ortho Sport & Spine?  
25 A. Whomever my provider is.

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1 Q. Okay. And is there any separate check  
2 given to Maranex?  
3 A. I don't know.  
4 Q. Have you ever seen a separate check  
5 issued to Maranex in that situation?  
6 A. I haven't and I don't know.  
7 Q. Does Maranex have a parent company?  
8 A. I don't know.  
9 Q. To your knowledge, does Fortress Data  
10 Solutions have a parent company?  
11 A. I don't know.  
12 Q. To your knowledge, does Fortress Data  
13 Solutions -- does it have a corporate name such  
14 as an Inc or an LLC?  
15 A. I don't know.  
16 Q. Do you know what state Fortress Data  
17 Solutions is based in?  
18 A. No, I don't know.  
19 Q. Who is your contact person at Fortress  
20 Data Solutions?  
21 A. I don't have a contact person over  
22 there.  
23 Q. You never speak to anybody there?  
24 A. No.  
25 Q. Not via email or anything like that?

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1 A. I don't recall at this time.  
2 Q. What services do you understand Fortress  
3 Data Solutions to provide?  
4 A. Can you please repeat?  
5 Q. What services do you understand Fortress  
6 Data Solutions does?  
7 A. I don't know what they do.  
8 Q. Who is responsible at Maranex for  
9 marketing?  
10 A. I don't know.  
11 Q. Do you have any knowledge as to whether  
12 or not Maranex markets to law firms?  
13 A. I don't know.  
14 Q. Have you personally ever been to a  
15 storing event with attorneys for anything?  
16 A. I don't recall doing that.  
17 Q. Have you ever been to dinners with  
18 attorneys before?  
19 A. No.  
20 Q. To your knowledge, does anybody at  
21 Maranex market to attorneys by entertaining them  
22 or taking any other actions?  
23 A. I don't know.  
24 Q. Have you ever heard of a company called  
25 Falcon Marketing?

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1 A. I think I have heard.  
2 Q. What context did you hear of them?  
3 A. I don't remember.  
4 Q. Do you know somebody named Amber Rushing  
5 there?  
6 A. I don't remember.  
7 Q. What about Kenny Flippin?  
8 A. I don't remember exactly.  
9 Q. Shermon Hunter? S-h-e-r-m-o-n.  
10 A. I don't remember.  
11 Q. Do you remember any individuals you've  
12 ever spoken to or know from Falcon Marketing?  
13 A. I don't remember.  
14 Q. Have you ever heard of a company called  
15 ASO Marketing?  
16 A. I don't remember.  
17 Q. Does Fortress Data Solutions -- I know  
18 your Maranex office is in Roswell. Do they have  
19 an office anywhere?  
20 A. I don't know.  
21 Q. You've never been to a Fortress Data  
22 Solutions office?  
23 A. No.  
24 Q. You don't know where they're  
25 headquartered?

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1 A. No.

2 Q. Changing gears. When you're getting a

3 new case in at Maranex, do you -- does Maranex

4 take information about the patient? About the --

5 the injured person?

6 A. I just work off the list.

7 Q. What list is that?

8 A. The list that is in the system.

9 Q. And that's the one -- the Fortress

10 System you told me about earlier?

11 A. Yes. The list -- whatever list I have

12 there, that's what I work on.

13 Q. And that list has the name of the

14 injured person, right?

15 A. Yes.

16 Q. It has the name of the attorney that's

17 working with them, right?

18 A. Correct.

19 Q. It has the name of the doctor that is

20 providing medical services, right?

21 A. I don't recall seeing that information.

22 Q. Okay. So you don't -- for example, you

23 don't see an Ortho Sport & Spine on that document

24 normally?

25 A. Probably.

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1 Q. Okay. So Ortho Sport & Spine in that

2 example. Do you see the account balance?

3 A. I might see the account balance.

4 Q. Okay. And then when a payment is made,

5 does it show it's ultimately received on payment?

6 A. I believe so.

7 Q. Okay. And that system you told me about

8 is a software platform you access through -- is

9 it through the cloud or is it a server at

10 Maranex?

11 A. I'm not so sure because it's already

12 there. I just click on and keep going.

13 Q. I gotcha. You got, like, a username and

14 a password you use to access it?

15 A. Yes.

16 Q. Okay. Is that list continually updated?

17 Like every day you go look at the list and then

18 see what your job is that day?

19 A. Correct.

20 Q. And if I understand you correctly, you

21 don't know who enters that information in or

22 where that comes from?

23 A. No, I don't know.

24 Q. Is there any other information on the

25 list beyond what we've talked about?

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1 A. That's all I remember.

2 Q. Does the list have any information about

3 who the adverse party is, the other party

4 involved in, for example, a car wreck?

5 A. I don't recall seeing that information.

6 Q. Is there any information on the list or

7 in the system, to your knowledge, about how much

8 insurance might be available regarding a

9 particular claim?

10 A. The system might have it.

11 Q. Okay. Have you ever -- do you ever run

12 any other reports besides this list we've been

13 talking about?

14 A. That's the list I go by.

15 Q. And does that list have a formal name?

16 Is it a report name? What is it -- you don't --

17 I mean, is it called something beyond the list?

18 A. No, I don't have any name.

19 Q. Okay. It doesn't have a title when you

20 run it at the top?

21 A. No, I don't recall seeing anything.

22 Q. And when you go into the system, do you

23 have to enter in parameters or how do you access

24 the list? Does it just pop up immediately or do

25 you have to go through some things you have to

Page 41

1 click first?

2 A. Probably I need to click.

3 Q. Okay. What things do you have to click?

4 A. I don't remember exactly, but I just

5 need to go in and click.

6 Q. All right. This is something you do

7 every day, right?

8 A. Basically, yes.

9 Q. But you can't remember how you go about

10 accessing lists?

11 A. It pop ups in my system.

12 Q. Okay. How many clicks does it take to

13 get to the list normally?

14 A. Pardon me?

15 Q. How many times do you have to click

16 something before you get the list on your

17 computer?

18 A. I don't remember.

19 Q. Do you know if anybody at Maranex is

20 involved with collecting the information on the

21 list?

22 A. I don't know.

23 Q. Don't know one way or the other?

24 A. No, I don't know.

25 Q. Is Maranex involved at all with

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1 referring doctors to patients?

2 A. Would you please repeat?

3 Q. Yes. Is Maranex ever involved -- for

4 example, if you're engaged with a law firm that

5 says, you know, we have this patient that's

6 injured, is Maranex ever involved with putting

7 the patient in touch with a -- for example, Ortho

8 Sport & Spine to do their medical work?

9 A. I don't know.

10 Q. You've never seen that happen?

11 A. I don't remember.

12 Q. Okay. Does Maranex -- is it ever

13 involved with approving or disapproving a medical

14 procedure for a patient?

15 A. We make recommendations.

16 Q. Okay. Based upon what are you making

17 recommendations?

18 A. On information gathered.

19 Q. And that information includes how much

20 insurance is available?

21 A. It could be one of the factors.

22 Q. What are some of the other factors?

23 A. Probably how an accident happened.

24 Q. Are those details on your list?

25 A. Probably.

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1 Q. Okay. All right. What other factors

2 would be considered in making recommendations for

3 procedures for a patient?

4 A. That's what I remember right now from

5 the top of my mind.

6 Q. Okay. Once a recommendation is made for

7 a procedure, what happens next?

8 A. We inform the attorney's office.

9 Q. Okay. And then who -- who normally

10 makes that decision, to your knowledge, as to

11 whether a procedure is done?

12 A. I don't know.

13 Q. But ultimately somebody will relay back

14 to you what the decision is?

15 A. No. I just make the recommendation.

16 Q. Okay. And your involvement ends at that

17 point as far as that procedure goes?

18 A. Pardon me?

19 Q. Is there any other involvement you have

20 after that point -- once you make a

21 recommendation for a procedure, is there any more

22 involvement you have or is that left to the law

23 firm and the doctors or however that plays out?

24 A. I don't know.

25 Q. As part of your job, for example, in a

Page 44

1 case that goes to a mediation, are you ever

2 involved with determining what the ultimate

3 number would be agreed upon for the total amount

4 owed on the bills?

5 A. Would you please repeat or rephrase?

6 Q. Yep. The question is -- I'm trying to

7 understand if you have any involvement with

8 negotiating the amount that's ultimately owed

9 for, for example, Ortho Sport & Spine.

10 A. Yes. I can't -- I'm not involved in

11 negotiation.

12 Q. All right. And so one example that I

13 think could happen in that is, for example, a

14 patient may have \$300,000 in bills from Ortho

15 Sport & Spine, okay? You follow me?

16 A. I'm following.

17 Q. All right. And the parties go to a

18 mediation. Are you familiar with what a

19 mediation is?

20 A. I have heard of it.

21 Q. Okay. When people sit down and try to

22 settle a case, okay?

23 A. Okay.

24 Q. And at that mediation there's numbers

25 exchanged between the parties. Am I correct that

Page 45

1 part of your job is discussing with the attorneys

2 how much can be accepted below that, in this

3 example \$300,000 to satisfy the bills?

4 MR. ODETUNDE: Form.

5 BY MR. O'DANIEL:

6 Q. You can answer.

7 A. Would you please repeat?

8 Q. Yep. In the example I gave --

9 A. Uh-huh. (Affirmative).

10 Q. -- where we had a mediation, in this

11 example Ortho Sport & Spine has bills totaling

12 \$300,000 there's negotiations to settle the case

13 at mediation and you're contacted, am I correct

14 that part of your job is to determine how much

15 below \$300,000 can be accepted in satisfaction of

16 the bills?

17 A. I make the recommendation.

18 Q. For a number?

19 A. Yes.

20 Q. And that is the same factors we talked

21 about earlier about what procedure to take, you

22 use those same factors in determining how much

23 money ultimately is accepted on a bill, correct?

24 A. Yes. It will be based on money

25 available.

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1 Q. Okay. And you keep track as part of  
2 your job how much is billed by a patient, right?  
3 To a patient?  
4 A. I am sorry.  
5 Q. Right. The system -- we talked about  
6 the list that shows how much is owed for a  
7 patient on the bills, right?  
8 A. Correct.  
9 Q. Is there a threshold amount that you are  
10 allowed to not go below in negotiating? For  
11 example, in our example of \$300,000, is there a  
12 number you can't go below or a percentage you're  
13 not allowed to go below in negotiating those?  
14 A. It is case to case.  
15 Q. All right. And that's your decision,  
16 though, how much to ultimately accept?  
17 A. I make a recommendation.  
18 Q. Okay. Is Ortho Sport & Spine, do they  
19 have any input in what is agreed to as a final  
20 number?  
21 A. I don't know.  
22 Q. You never get any input from them in  
23 your work though, right?  
24 A. I don't recall doing that.  
25 Q. Okay. You understand -- is it -- do you

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1 -- is it your understanding in these cases where  
2 patients are treated if they have -- keeping our  
3 example of \$300,000 bills, when you're handling  
4 those cases the patient hadn't -- has not paid  
5 anything of that \$300,000 in that example yet,  
6 correct?  
7 A. Okay. Can you please repeat?  
8 Q. Right. When you're dealing with these  
9 cases and there's a balance for a patient on the  
10 sheet -- on the list.  
11 A. Correct.  
12 Q. Okay. Do you agree that -- I guess is  
13 it your understanding that the patient has not  
14 yet paid anything towards that yet, right?  
15 A. Correct.  
16 Q. Okay. Instead, the normal business is  
17 that's recovered through a case via settlement or  
18 verdict or something along those lines, right?  
19 A. I'm sorry. I got lost.  
20 Q. Yep. When there's a -- let me ask it  
21 this way. When there's a balance on your list of  
22 an amount of bills owed --  
23 A. Uh-huh. (Affirmative).  
24 Q. -- is there ever any payment of those  
25 bills beyond a lawsuit in your experience?

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1 A. I don't understand. I'm so sorry.  
2 Q. Yep. The question I'm trying to get is  
3 when the balance is owed to, for example, Ortho  
4 Sport & Spine --  
5 A. Uh-huh. (Affirmative).  
6 Q. -- in your cases you're dealing with  
7 attorneys and negotiating a number that's  
8 ultimately accepted, right?  
9 A. Accepted?  
10 Q. Right. You make a recommendation let's  
11 say --  
12 A. Uh-huh. (Affirmative).  
13 Q. -- if that number is accepted, okay?  
14 A. Okay. Yes.  
15 Q. Then that money -- that's money that's  
16 paid through a lawsuit and not some -- not from  
17 the patient directly.  
18 A. It comes from the settlement money.  
19 Q. Right. Okay. And you're not aware of  
20 any other sources beyond settlement money that  
21 are paying for these bills that you're dealing  
22 with at Maranex, right?  
23 A. [Inaudible].  
24 Q. Yeah. Okay. Is anybody besides you at  
25 Maranex involved with analyzing a reduction

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1 recommendation on a bill?  
2 A. Probably the -- the rest of the case  
3 managers.  
4 Q. Okay. And how many case managers  
5 typically work on a case?  
6 A. I don't remember the exact number.  
7 Q. It's usually more than you?  
8 A. It's more than me.  
9 Q. Okay. Do you know how many worked on  
10 Mr. Norrington's case?  
11 A. No, I don't know.  
12 Q. Has there been anybody beyond you that's  
13 worked on that?  
14 A. I don't know.  
15 Q. Is Fortress Data Solutions at all  
16 involved with the negotiation of bills?  
17 A. I don't know.  
18 Q. Have you ever seen them be involved in  
19 that process yourself?  
20 A. I haven't.  
21 Q. Once a case is settled and a number is  
22 agreed upon, you then enter that number into the  
23 system at Fortress?  
24 A. Correct.  
25 Q. And you mentioned accounts receivable as

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1 well. In this example, a number is agreed upon  
2 to settle a case and a number is agreed upon to  
3 satisfy the billed amount for Ortho Sport &  
4 Spine, okay? You follow me on that fact pattern?  
5 A. Yes.  
6 Q. If there's some delay in receiving the  
7 money, is part of your job trying to collect that  
8 money?  
9 A. Correct.  
10 Q. All right. How do you know that payment  
11 has not been received in that context?  
12 A. It will come on my list.  
13 Q. Okay. And that's where the money wasn't  
14 sent to the address in Florida, after a period of  
15 time it'll show up on your list?  
16 A. Correct.  
17 Q. Is money ever sent to Maranex instead of  
18 the address in Florida for these settlements?  
19 A. As far as I know we not -- we don't  
20 receive the checks.  
21 Q. Do you know what happens to the money  
22 once it hits the account in Florida?  
23 A. No, I don't know.  
24 Q. Who at Maranex handles that?  
25 A. I don't know.

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1 Q. And do you know whether any portion of  
2 that check goes to Maranex?  
3 A. I don't know.  
4 Q. When the check is issued are the  
5 attorney's fees normally already kept from that?  
6 A. I don't know.  
7 Q. We talked about eClinicalWorks before,  
8 remember?  
9 A. Yes.  
10 Q. That's Ortho Sport & Spine's medical  
11 software, right?  
12 A. Yes.  
13 Q. You're familiar with that system?  
14 A. I have seen it.  
15 Q. Okay. You agree you're familiar with  
16 it, right?  
17 A. I have --  
18 MR. ODETUNDE: Form.  
19 BY MR. O'DANIEL:  
20 Q. Would you agree or disagree that you're  
21 familiar with it?  
22 A. I have seen it.  
23 Q. Okay. I understand you've seen it.  
24 Would you consider yourself familiar with it, yes  
25 or no?

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1 A. Yes.  
2 Q. And that system tracks patient's  
3 records, right?  
4 A. I'm sorry. What do you mean?  
5 Q. Tell me in your words what  
6 eClinicalWorks does.  
7 A. Well, I can see there the balance.  
8 Q. Okay. Balance of what's owed?  
9 A. Correct.  
10 Q. And are you able to see the patient's  
11 attorney's information in eClinicalWorks?  
12 A. I haven't seen it done.  
13 Q. Okay. Does it also track -- the amount  
14 once it's ultimately paid, is that put in  
15 eClinicalWorks?  
16 A. I don't know.  
17 Q. Do you ever do that as part of your job?  
18 A. No.  
19 Q. For Ortho Sport & Spine, do you have  
20 access to their eClinicalWorks platform?  
21 A. Yes.  
22 Q. What context do you utilize that  
23 platform as part of your job?  
24 A. To see the balance.  
25 Q. And why do you need to do that if the

Page 53

1 balance is already on your list that you get from  
2 the Fortress system?  
3 A. To double-check.  
4 Q. I didn't understand you. I'm sorry.  
5 A. Double-check.  
6 Q. Okay. So you'd make sure the balance is  
7 right comparing eClinicalWorks and the Fortress  
8 System, right?  
9 A. Yes.  
10 Q. And tell me what this -- what's that  
11 called? Fortress what?  
12 A. Sorry?  
13 Q. You described the name of the Fortress  
14 system. What's it called again? Fortress --  
15 A. IQ.  
16 Q. IQ. Okay.  
17 A. Yes. The letter I and the letter Q.  
18 Q. Understood. Are there any other things  
19 you double-check on eClinicalWorks beyond the  
20 balance total?  
21 A. I don't remember.  
22 Q. Do you have the ability to input data  
23 into eClinicalWorks on behalf of Ortho Sport &  
24 Spine?  
25 A. No.

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1 Q. Have you ever done that before?

2 A. No.

3 Q. To your knowledge, does Fortress Data

4 Solutions have the ability to do that?

5 A. I don't know.

6 Q. To your knowledge, does anybody else at

7 Maranex enter data into Ortho Sport & Spine's

8 eClinicalWorks?

9 A. I don't know.

10 Q. Are you able to run reports in

11 eClinicalWorks?

12 A. No, I don't.

13 Q. How do you go about seeing what the

14 balance total is? How does that physically work?

15 A. I'm sorry?

16 Q. If you wanted to go double-check the

17 balance total for Mr. Norrington, for example,

18 how would you go about doing that in -- excuse me

19 -- eClinicalWorks?

20 A. I will have to log in into the system.

21 Q. Okay. And then what do you go to after

22 that?

23 A. Pull up the patient's name.

24 Q. Okay. And what other information does

25 it show under the patient's name?

Page 55

1 A. Probably demographics.

2 Q. Okay. What about information about the

3 case itself?

4 A. No, I haven't seen that there.

5 Q. Okay. But it is in Fortress IQ, though?

6 A. Yes, I have seen that.

7 Q. Is there any reports in eClinicalWorks

8 for Ortho Sport & Spine that you've run that show

9 profitability to any degree?

10 A. I'm so sorry. Would you please repeat?

11 Q. Is there any reports that you have

12 observed through Ortho Sport & Spine's

13 eClinicalWorks platform that indicate the amount

14 of money made on a case?

15 A. If I have seen?

16 Q. Right.

17 A. An amount of what? I'm so sorry.

18 Q. Yeah. When you're looking at

19 eClinicalWorks, have you ever run a report or

20 looked at anything on that system where there's

21 been any analysis done of how much money is made

22 on particular claims?

23 A. I don't run reports on any clinical.

24 Q. What about on Fortress IQ? Is there

25 anything showing -- that shows like percentage of

Page 56

1 bills that's recovered, those types of reports?

2 A. I don't know.

3 Q. Okay. I'm going to bring up some emails

4 real quick that have been produced in this case.

5 All right. Can you see the Exhibit 2, which

6 I've got marked as emails? You see that on the

7 screen?

8 (Defendants' Exhibit 2 was

9 marked and identified).

10 A. Yes, I'm seeing. I was trying to read

11 because it's a little bit small, but I was trying

12 to read.

13 Q. All right. And I can try to make it a

14 little bigger. Let me see if this helps. Is

15 that better?

16 A. Yes, that's better.

17 Q. Okay. All right. So I'm going to go --

18 this is 52 pages of emails that I put together.

19 We're not going to go through every one, but I'm

20 going to go to page 4 of this email chain.

21 You see this is a February 13th, 2023, email

22 on the bottom half of this page?

23 A. I'm seeing it.

24 Q. All right. And it's from Josling

25 Martinez. Do you know who she is?

Page 57

1 A. Yes.

2 Q. She works with you, right?

3 A. She works at the same office, yes.

4 Q. All right. She works for Maranex?

5 A. Yes.

6 Q. All right. But we see here she has a

7 Fortress Data Solutions email address, right?

8 A. I'm seeing it.

9 Q. And a signature line of Fortress Data

10 Solutions, right?

11 A. I'm seeing it.

12 Q. Why does she have those indications when

13 she works for Maranex?

14 A. I don't know.

15 Q. Okay. And your email address also has

16 Fortress Data Solutions, correct?

17 A. Correct.

18 Q. But your testimony is you don't work for

19 them, you work for Maranex, right?

20 A. Correct. We are the contractor.

21 Q. Okay. But why do you use a Fortress

22 Data Solutions email instead of a Maranex email?

23 A. I don't know.

24 Q. No one has ever told you why?

25 A. No. I'm just --

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1 Q. Have you -- I'm sorry. Go ahead.  
2 A. No, no. Sorry. Go ahead.  
3 Q. Since you started working at Maranex  
4 approximately five years ago, have you always had  
5 a Fortress Data Solutions email address?  
6 A. No.  
7 Q. What was your other one you had, if any?  
8 A. I don't remember exactly. It's always  
9 A. Delgado.  
10 Q. But was one of them @Maranex at the end?  
11 A. I don't remember.  
12 Q. Do you recall whether your signature  
13 block ever said Maranex instead of Fortress Data  
14 Solutions?  
15 A. I don't remember.  
16 Q. Did your -- did your signature block  
17 ever say anything except for Fortress Data  
18 Solutions?  
19 A. I don't remember.  
20 Q. Okay. You believe it has but you can't  
21 remember the name of the other company, correct?  
22 A. I cannot remember the name.  
23 Q. But you agree that it was another name  
24 at some point, right?  
25 A. I agree.

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1 Q. Okay. Where does Ms. Martinez live --  
2 well, does she work at the Roswell office?  
3 A. Yes.  
4 Q. And she still works there now?  
5 A. Yes.  
6 Q. Is she somebody you routinely work with?  
7 A. Yes.  
8 Q. Did you discuss with her at all this  
9 deposition?  
10 A. I'm sorry?  
11 Q. Did you talk to Ms. Martinez at all  
12 before this deposition began about the Norrington  
13 case?  
14 A. No.  
15 Q. What does Ms. Martinez do for her work?  
16 A. She helps with the cases.  
17 Q. Does she do the same work you do?  
18 A. She helps with that list.  
19 Q. All right. And I see her title is  
20 assistant case manager?  
21 A. That's what I'm seeing there.  
22 Q. Are you her supervisor?  
23 A. No.  
24 Q. Who is Josling's supervisor?  
25 A. As far as I know it will be Chinua.

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1 Q. Is that -- say that again? I'm sorry.  
2 A. Chinua.  
3 Q. Okay. The same person you gave me  
4 earlier?  
5 A. Yes, as far as I know.  
6 Q. Understood. Now, this email is to  
7 yolandanorful@medwrecks.com. Do you recognize  
8 her name?  
9 A. I'm just seeing it there.  
10 Q. Okay. Do you recognize her name?  
11 A. Probably I have emailed her before. I  
12 don't remember.  
13 Q. Okay. And we see that the -- this email  
14 says reaching out for an update on Mr. Norrington  
15 and it says it's estimated OSSP, which is Ortho  
16 Sport & Spine, right?  
17 A. Yes.  
18 Q. Estimated balance is 181,103.08 and  
19 that's highlighted. You see that?  
20 A. I'm seeing it.  
21 Q. Why is that highlighted in yellow?  
22 A. I don't know.  
23 Q. Is that something that's highlighted  
24 because it's important?  
25 A. I don't know.

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1 Q. Is it -- are those numbers always  
2 highlighted like that in these emails?  
3 A. I don't know.  
4 Q. All right. Going to page 5, this one  
5 lists an Ashley Jackson, who I think we'll see  
6 later is also at MedWrecks. Do you recognize her  
7 name?  
8 A. I have seen it.  
9 Q. Okay. And it says here if we go down,  
10 Ashley Jackson emails and says the client needs  
11 to be scheduled for a follow-up. You see that?  
12 A. Yes, I'm seeing it.  
13 Q. And then Josling indicates, I'll let you  
14 know once scheduled. So according to this,  
15 Maranex is also scheduling appointments, right?  
16 A. As far as I know we don't schedule  
17 appointments.  
18 Q. Okay. Well, what do you understand I  
19 will let you know once scheduled means?  
20 A. To put it with them on the calendar --  
21 Q. Okay.  
22 A. -- for the provider.  
23 Q. Well, that's what scheduling is, isn't  
24 it?  
25 A. I don't know.



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1 Q. So Maranex would then reach out to Ortho  
2 Sport & Spine to get a procedure scheduled,  
3 right?  
4 A. I will assume that's what we would do.  
5 Q. Okay. Going down to page 7 of Exhibit  
6 2, there's an email from Josling saying they've  
7 not been able to get in touch with Mr. Norrington  
8 and asking if he's still interested in treatment.  
9 Is that a common exchange that's held  
10 between a law firm?  
11 MR. ODETUNDE: Form.  
12 BY MR. O'DANIEL:  
13 Q. You can answer.  
14 A. Can you repeat?  
15 Q. Yeah. Is this a common type of -- is  
16 this an issue you've ever experienced yourself  
17 before where you relaying to a law firm that the  
18 provider, in this case Ortho Sport, has not been  
19 able to get in touch with the patient?  
20 A. We can do that sometimes.  
21 Q. Okay. And then once -- in this example,  
22 what's the next step once that happens?  
23 A. The next step after what? I'm sorry.  
24 Q. After you reach out to the law firm  
25 saying we've not been able to get in touch with

Page 63

1 them, does a law firm then normally try to get in  
2 touch with them?  
3 A. I don't know what they do.  
4 Q. Going down to page 10. All right. We  
5 see from page 10 to 11 this is an email dated  
6 April 10th, 2023, from you, correct?  
7 A. Yes.  
8 Q. And this is to Yolanda Norful, right?  
9 A. That's what I'm seeing there.  
10 Q. Okay. And this is where Mr. Norrington  
11 is recommended to have a surgery and it's  
12 described and it lists the cost of that surgery,  
13 a microdiscectomy, at 55,768, right?  
14 A. That's what I'm seeing there.  
15 Q. And this was a recommendation that you  
16 made after looking at the information in the  
17 Fortress IQ system for Mr. Norrington, right?  
18 A. I don't remember where I got that  
19 information from exactly.  
20 Q. But that's -- you explained earlier  
21 that's how that's normally done, right? Through  
22 the information on the Fortress IQ?  
23 A. That is to call my -- my list to do.  
24 Q. Right. And then you said earlier part  
25 of your job is recommending procedures, right?

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1 A. I don't recommend procedures.  
2 Q. Okay. You're not doing that here in  
3 this email?  
4 A. No. I'm saying what the doctor  
5 recommended.  
6 Q. Okay. And who -- how did you get this  
7 information?  
8 A. On the office note.  
9 Q. All right. That's something that you  
10 review on your own and then relay it to the law  
11 firm, right?  
12 A. In this case, yes.  
13 Q. And where do you get the cost of the  
14 estimated surgery?  
15 A. From a list.  
16 Q. That's on your Fortress IQ list?  
17 A. I don't remember where it is.  
18 Q. Is it something you have to ask the  
19 Ortho Sport office directly from or they just  
20 give it to you?  
21 A. I don't remember.  
22 Q. Why is the cost and the balance being  
23 provided to the law firm in this email?  
24 A. I'm so sorry.  
25 Q. Yeah. Why are you giving the law firm

Page 65

1 the cost of the estimated surgery?  
2 A. It's part of the process.  
3 Q. Process for what?  
4 A. To inform.  
5 Q. Okay. And then what happens after you  
6 send this email? What normally happens next?  
7 A. We make a recommendation on the  
8 findings.  
9 Q. Okay. Did you make a recommendation on  
10 the findings for Mr. Norrington in this instance?  
11 A. I don't remember.  
12 Q. Okay. If you make a recommendation, how  
13 is that relayed to the law firm?  
14 A. Can you please repeat?  
15 Q. Right. If you -- if you make a  
16 recommendation, how is that relayed to the law  
17 firm?  
18 A. A recommendation on what?  
19 MR. ODETUNDE: Form.  
20 BY MR. O'DANIEL:  
21 Q. For a surgical procedure.  
22 MR. ODETUNDE: Form.  
23 BY MR. O'DANIEL:  
24 Q. You can answer.  
25 A. Okay. How I?

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1 Q. Right. You said you make a --  
2 ultimately a recommendation is made is what you  
3 said, right?  
4 A. Yes.  
5 Q. How is that told to the law firm once  
6 that recommendation is made?  
7 MR. ODETUNDE: Form.  
8 BY MR. O'DANIEL:  
9 Q. Can you answer that?  
10 A. I call.  
11 Q. Who do you call?  
12 A. Whomever is the contact person.  
13 Q. At the law firm?  
14 A. Yes.  
15 Q. Why is that done via telephone instead  
16 of via in writing?  
17 A. I don't know. I just call.  
18 Q. Okay. So there's not normally a record  
19 of that ultimate recommendation then? It's all  
20 done over the telephone?  
21 A. Basically.  
22 Q. Okay. Scrolling down to page 16, on the  
23 bottom of this there appears to be a message sent  
24 to you from Yolanda Norful sent to Josling  
25 Martinez and copied to you, right? You see that?

Page 67

1 A. Yes, I'm seeing that.  
2 Q. And it's an encrypted message and I  
3 wasn't able to open it. What is normally sent  
4 via encryption?  
5 A. I don't know.  
6 Q. Are all emails sent via encrypted or  
7 only some?  
8 A. I don't know.  
9 Q. Okay. When you get an encrypted message  
10 how do you open it? Are you able to click on it  
11 or do you have to put in some password?  
12 A. I don't know. I don't remember.  
13 Q. Is it odd to see an encrypted message in  
14 your work?  
15 A. I might get that from time to time.  
16 Q. But most of them are not encrypted?  
17 A. I don't remember.  
18 Q. Scrolling down to page 18, this  
19 references an attachment. It's an email from  
20 Yolanda Norful again to you and Josling Martinez.  
21 Do you recognize Judy Herrera?  
22 A. I am seeing her name there.  
23 Q. Do you know who she works for?  
24 A. I cannot see on her -- on her -- on that  
25 email what --

Page 68

1 Q. Okay. I'm just asking if you know her  
2 name at all personally.  
3 A. I'm seeing it there in the email.  
4 Q. I know, but do you know -- do you know  
5 Judy Herrera? Do you know who she is?  
6 A. I have heard of her before.  
7 Q. Who does she work for?  
8 A. I don't know.  
9 Q. She does -- does she work for Maranex?  
10 A. No, she doesn't work for Maranex.  
11 Q. Do you believe she's associated with the  
12 -- associated with the law firm?  
13 A. Yes.  
14 Q. Okay. It talks about a message here,  
15 RPMSG. Do you know what that suffix is for that  
16 message?  
17 A. No, I don't know what that is.  
18 Q. Okay. On page 21 of Exhibit 2, it says  
19 here in an email to Ashley Jackson from Josling  
20 Martinez. I guess below this Ashley Jackson  
21 writes on January 25th, 2024, they're confirming  
22 with Josling and a copy to you that  
23 Mr. Norrington is done with treatment. You see  
24 that?  
25 A. I see that she's asking.

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1 Q. Yep. And then Josling replies, yes,  
2 correct?  
3 A. That's what I'm seeing there.  
4 Q. Right. How does Josling confirm or how  
5 would you confirm whether treatment is complete  
6 or not?  
7 A. I don't know how she does, but I will --  
8 if I need to do that I will check the office  
9 note.  
10 Q. Okay. And then she sends the final  
11 bills over to Maria Alreno at MedWrecks, right?  
12 A. What I'm seeing there is that final  
13 bills and records were sent.  
14 Q. Right. And is that normal procedure to  
15 send the final bills to the law firm?  
16 A. We don't do that. We don't send them.  
17 Q. Okay. Who is sending them?  
18 A. Ortho Sport & Spine.  
19 Q. So there's a way, in this example,  
20 Josling could have looked in the system and saw  
21 they were sent on January 18th by Ortho Sport?  
22 A. We might see that.  
23 Q. Okay. Is that your assumption what  
24 would be going on here based on what you're  
25 looking at in this email?

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1 A. Yes.

2 Q. I'm going down to page 32. Some of

3 these are duplicative. It talks here on this

4 email dated July 18th, 2023 -- and, again, you

5 see Lexus Tucker. Do you recognize that name?

6 A. I am seeing that -- I'm seeing that name

7 there.

8 Q. Do you recognize it?

9 A. I think I heard -- I heard that name

10 before.

11 Q. Do you associate that with the law --

12 somebody working for the law firm or somebody at

13 Maranex?

14 A. She's not with Maranex.

15 Q. Okay. You believe her to be working on

16 behalf of the law firm?

17 A. I believe so.

18 Q. And it says, Mr. Norrington in this

19 email is referred to pain management and Ortho

20 Sport does not have a specialist in network at

21 this time. What do you understand that to mean?

22 A. What I understand is that they don't

23 have anyone there to do that.

24 Q. Okay. That's in their own practice they

25 don't have a pain management doctor?

Page 71

1 A. At least what the -- the specialty he is

2 needing apparently.

3 Q. Okay. And when -- and if that's what's

4 going on here and Ortho Sport doesn't have a

5 specialist, what's the next step in finding a

6 doctor that can be a pain management? Is that

7 something that Maranex recommends? Another pain

8 management doctor?

9 A. I have not done that.

10 Q. Okay. Do you know how that is decided

11 after an email like this is sent?

12 A. No.

13 Q. Have you ever seen anybody at Maranex

14 recommend a doctor to a law firm?

15 A. I have not seen.

16 Q. Okay. I'm going to take this down.

17 Have you received any recent emails on

18 Mr. Norrington's case beyond any emails that I

19 sent you?

20 A. I'm so sorry?

21 Q. Have you received any recent emails

22 regarding Mr. Norrington's case?

23 A. The one with the link?

24 Q. Yeah. Beyond that, has there been any

25 other recent ones?

Page 72

1 A. No, I don't recall.

2 Q. To your knowledge, is Mr. Norrington --

3 is Maranex doing any work on behalf of his case?

4 A. I don't know.

5 Q. That's something you could see on the

6 list, though, if you needed to?

7 A. If it pop up on my list I will follow up

8 on it.

9 Q. Okay. All right. Going back before you

10 started working at Maranex, who did you work for

11 before them?

12 A. Premier Neurosurgical.

13 Q. And what did you do there?

14 A. Lien coordinator.

15 Q. And what type of work did that involve?

16 A. Basically filing liens.

17 Q. Filing liens?

18 A. Correct.

19 Q. How long did you work at Premier

20 Neurosurgical?

21 A. I would say -- I don't remember exactly.

22 It was two or three years.

23 Q. That's fine. And then where -- where is

24 their office?

25 A. It's closed.

Page 73

1 Q. It's closed now?

2 A. Yes.

3 Q. Okay. When it was inexistence, where

4 was it? Was it in the Atlanta area?

5 A. It was in Marietta.

6 Q. Okay. And did they do treatment for

7 injured patients that have attorneys?

8 A. They do that too. They used to do that

9 too.

10 Q. All right. And was part of your work

11 similar as it is at Maranex dealing with those

12 types of claims?

13 A. Not as -- it was more like filing the

14 liens.

15 Q. Filing the liens that, for example, a

16 hospital filed?

17 A. Like filing with the court.

18 Q. That you're filing on behalf of the

19 practice?

20 A. Exactly.

21 Q. I gotcha. All right. And did you do

22 anything negotiating what is owed on bills with

23 attorneys while you were at Premier

24 Neurosurgical?

25 A. Very little. Just some.

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1 Q. You did some of that?

2 A. Yes.

3 Q. Okay. And you would work to decide how

4 much is able to be accepted below what is being

5 billed to satisfy the office?

6 A. No. I didn't have the final decision.

7 Q. You would make a recommendation there?

8 A. Correct.

9 Q. Who had the final decision?

10 A. At that point, the manager.

11 Q. The manager at Premier?

12 A. Yes.

13 Q. But at Maranex you have the final

14 decision? It's not a manager over you, right?

15 A. I have a manager over me. I make the

16 recommendations.

17 Q. And then that manager makes the ultimate

18 decision?

19 A. I put them on the system.

20 Q. Right. And who -- what manager is that?

21 A. What manager is what? I'm sorry.

22 Q. At Maranex who is the manager that makes

23 the decision on what's ultimately accepted for

24 the bill?

25 A. No, I don't know.

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1 Q. Okay. I think I misunderstood you.

2 I understand that you're involved with -- at

3 Maranex now. At your job now you're involved

4 with negotiating the bills, right?

5 A. Yes.

6 Q. And you said you make a recommendation

7 as to what could be accepted for the bill, right?

8 A. Correct.

9 Q. And then you said somebody else, a

10 manager, if I understood you correctly,

11 ultimately decides what that number should be?

12 A. No. It was in Premier.

13 Q. That was at Premier. Okay. I'm talking

14 about Maranex now. When you make a

15 recommendation, who is deciding what that final

16 number can be?

17 A. I don't know.

18 Q. Well, it's somebody at Maranex, right?

19 A. I don't know.

20 Q. Okay. I mean, it seems like you got to

21 know. If a number is reached, somebody has got

22 to tell them what the final number can be.

23 A. I don't know.

24 Q. You don't know anybody at Maranex that

25 does that?

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1 A. No, I don't know.

2 Q. And once you make a recommendation, what

3 happens after that? Does it go to somebody else

4 at Maranex?

5 A. I don't know.

6 Q. Okay. All right. Any other work you

7 did at Premier beyond what you described?

8 A. Yeah, the main was filing the liens.

9 Q. Filing the liens. Was any of your work

10 focused on or looking into how much insurance an

11 adverse party may have?

12 A. I could call and try to gather

13 information on the case.

14 Q. All right. And you would call the law

15 firm for that?

16 A. Yes.

17 Q. Okay. All right. What about -- going

18 back before Premier Neurosurgical, what did you

19 do before then?

20 A. Before Premier, I believe, I was working

21 for a law firm.

22 Q. What law firm was that?

23 A. Cruz & Associates.

24 Q. And how long did you work for them?

25 A. I would say about two years.

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1 Q. And where -- they're in Atlanta,

2 correct?

3 A. Pardon me?

4 Q. They are located in Atlanta, correct?

5 A. I'm not sure where they're located now.

6 Q. When you worked there they were located

7 in Atlanta, correct?

8 A. Yes.

9 Q. And what -- what kind of work did you do

10 with Cruz & Associates?

11 A. Legal assistant.

12 Q. And what type of work did that do?

13 A. Doing intakes, meeting with clients.

14 Q. Were you also involved on the

15 negotiation of medical bills at your job there?

16 A. No.

17 Q. Would you work at all determining --

18 determining case value, what a case is worth?

19 A. No.

20 Q. All right. What about going back before

21 Cruz & Associates?

22 A. Before that I worked in Puerto Rico.

23 Q. Okay. What field were you in?

24 A. It was lab equipment. Laboratory

25 equipment.

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1 Q. All right. Did it have any involvement  
2 with medical bills?  
3 A. No.  
4 Q. So any other jobs you worked in the  
5 United States beyond the ones we talked about?  
6 A. Oh, my goodness. I have worked so many  
7 places. When I was in Puerto Rico it was --  
8 Q. Well, let me stop you real quick because  
9 I know -- I think you may have misunderstood me.  
10 I'm talking about once you -- what year  
11 approximately did you move to the United States?  
12 A. To the United States it was  
13 approximately 2012, I would say.  
14 Q. Okay. And my question was, since you  
15 moved to the United States in 2012 have you  
16 worked any other -- for any other companies or  
17 any other jobs beyond what we talked about today?  
18 A. Probably temporary jobs.  
19 Q. Okay. Did they involve medical billing  
20 at all?  
21 A. No.  
22 Q. All right. What fields were they in?  
23 A. That I was -- I worked temporarily for a  
24 criminal law firm a couple of months, and then I  
25 worked, like, for a month for a law -- another

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1 law firm.  
2 Q. Do you remember what that law firm was?  
3 A. Which one?  
4 Q. The one that you worked for a month for?  
5 A. It was personal injury law.  
6 Q. Do you recall the name of the law firm?  
7 A. It was something like Wad Law Firm or  
8 something like that. I don't remember the full  
9 name.  
10 Q. Watt, W-a-t-t?  
11 A. I would say it's, W-a-d.  
12 Q. Wad. Okay. All right. I'm going to  
13 share one more thing with you real quick. All  
14 right.  
15 THE COURT REPORTER: Are you marking  
16 these as exhibits?  
17 MR. O'DANIEL: Yeah, this is Exhibit 3  
18 and the deposition subpoena I brought up was one.  
19 I've got these numbered and I'll put them in the  
20 chat or however you want me to get them to you at  
21 the end.  
22 THE COURT REPORTER: Thank you.  
23 MR. O'DANIEL: This one is Exhibit 3.  
24 (Defendants' Exhibit 3 was  
25 marked and identified).

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1 BY MR. O'DANIEL:  
2 Q. Ms. Delgado, this is your LinkedIn page  
3 that I brought up. Do you recognize that?  
4 A. I'm seeing it.  
5 Q. Okay. And it talks about your  
6 experience under the about, correct?  
7 A. On the what?  
8 Q. On the about page right here. It says  
9 about you're experienced professional, it talks  
10 about some of the things you're experienced with?  
11 A. I'm seeing that.  
12 Q. And that includes eClinicalWorks, right?  
13 A. Correct.  
14 Q. What is NueMD?  
15 A. It was a system that was used Premier  
16 Neurosurgical.  
17 Q. Okay. What about MD Logics?  
18 A. I believe it was also a system over  
19 there at Premier.  
20 Q. Okay. Time matters, what's that?  
21 A. What I remember it was like a -- like a  
22 case management system at a law office.  
23 Q. Okay. What about SAP?  
24 A. SAP I use it when I was working in  
25 Puerto Rico.

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1 Q. Finally, there's one on here Sales  
2 Force. What is that?  
3 A. Sales Force is also a case manager --  
4 case management system.  
5 Q. And is that one of the case management  
6 systems that Ortho Sport & Spine uses?  
7 A. I don't know if Ortho Sport & Spine uses  
8 it.  
9 Q. Have you ever interacted with Sales  
10 Force on behalf of Ortho Sport & Spine?  
11 A. I have -- I use it in this company,  
12 Maranex.  
13 Q. In Maranex. And what type of -- is that  
14 part of what's used to get the list you were  
15 talking about earlier?  
16 A. No. Right now we are not using that  
17 system.  
18 Q. Okay. When you -- is it something that  
19 you used to use and no longer use?  
20 A. We no longer use it.  
21 Q. Okay. When you did use it, did it serve  
22 the same function as the current IQ system --  
23 Fortress IQ?  
24 A. Probably.  
25 Q. Okay. So it would have information

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1 about patients and the bills owed and the amounts  
2 paid?  
3 A. Probably.  
4 Q. How long ago did Maranex switch from  
5 Sales Force to Fortress IQ?  
6 A. I don't know.  
7 Q. It shows here under your experience on  
8 this next part, and it says you're a case manager  
9 with Revenue Cycle Management; you see that?  
10 A. Yes.  
11 Q. Why didn't you put Maranex there?  
12 A. I don't know.  
13 Q. That is your employer though, right?  
14 A. Correct.  
15 Q. Were you told not to put Maranex on your  
16 LinkedIn page by anybody?  
17 A. No.  
18 Q. Were you told not to put Fortress Data  
19 Solutions on your page by anybody?  
20 A. No.  
21 Q. Going down, it talks about your job at  
22 Premier Neurosurgical. That's what you told me  
23 about before, right?  
24 A. Yes.  
25 Q. It looks like evaluating patient's

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1 medical treatment to be held on a lien, that was  
2 part of your job, right?  
3 A. That's what it says there.  
4 Q. And that's accurate, correct?  
5 A. I don't remember.  
6 Q. This is what you put on your personal  
7 LinkedIn page.  
8 A. That's what is there.  
9 Q. You entered it yourself, right?  
10 A. I don't remember.  
11 Q. So you think this is incorrect that you  
12 didn't evaluate patient's medical treatment to be  
13 held on a lien at Premier Neurosurgical  
14 Institute?  
15 A. I'm just saying that I don't remember  
16 exactly. It has been so long ago.  
17 Q. Okay. Any reason to think you put that  
18 down wrong at the time?  
19 A. I don't remember.  
20 Q. You also negotiated when you were there  
21 bills and settlement with the assigned authority,  
22 correct?  
23 A. That's what it says there.  
24 Q. And that's accurate, right?  
25 A. I don't remember.

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1 Q. You can't say whether that's accurate or  
2 not on your Facebook page -- rather your LinkedIn  
3 page?  
4 A. I don't remember exactly.  
5 Q. All right. You think you would've put  
6 that down incorrectly and left it up without  
7 changing it?  
8 A. I don't remember.  
9 Q. And then we see paralegal at Cruz &  
10 Associates, which you also mentioned. Okay. And  
11 that was more typical paralegal work you told me,  
12 right?  
13 A. Looks like it.  
14 Q. Okay. And that's consistent with your  
15 memory?  
16 A. That's consistent with what?  
17 Q. Your memory as to what you did at Cruz &  
18 Associates?  
19 A. I don't remember exactly, but probably  
20 is that what I did.  
21 Q. You wouldn't intentionally put something  
22 false on your LinkedIn page, would you?  
23 A. No, I don't think so.  
24 Q. All right. I'm going to stop sharing  
25 that.

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1 The prior depositions you've taken, I think  
2 you said one of them was for an injury case like  
3 this. Was that while you were working at  
4 Maranex?  
5 A. I don't know it was like this but, yes,  
6 it was during Maranex.  
7 Q. Okay. So within the last five years  
8 then it would've been?  
9 A. Using that time frame, yes.  
10 Q. Okay. The other deposition you told me  
11 about, which was older, who were you working for  
12 when that one happened?  
13 A. I would say Premier.  
14 Q. And what was the issue at that  
15 deposition with Premier? Did it involve similar  
16 issues we're discussing today?  
17 A. I don't remember exactly.  
18 Q. In regard to this deposition, did you do  
19 anything to prepare for the deposition today?  
20 A. Like what?  
21 Q. Like meet with anybody at Maranex.  
22 A. With my manager.  
23 Q. Who is that?  
24 A. With Matt.  
25 Q. Okay. The name you gave earlier?

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1 A. Yes.  
2 Q. The one that's hard to spell?  
3 A. Yes.  
4 Q. Okay. Anybody else you met with to  
5 prepare for the deposition?  
6 A. With the attorney.  
7 Q. All right. Who is -- and I don't want  
8 to ask you about any discussions you had with an  
9 attorney, but whose attorney was it?  
10 A. The only I recall is the name Tom.  
11 Q. Okay. Was it Maranex's attorney, to  
12 your understanding?  
13 A. I don't know who he is.  
14 Q. Okay. Anybody else you met with besides  
15 those two people in regard to the deposition?  
16 A. No, I don't remember. I don't remember  
17 meeting with anyone else.  
18 Q. Did you review -- and, again, I'm not  
19 asking about any discussions you had with an  
20 attorney.  
21 A. Uh-huh. (Affirmative).  
22 Q. Did you review any documents to prepare  
23 for the deposition today?  
24 A. I don't remember reviewing documents.  
25 Q. How long ago did you have this meeting?

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1 A. I don't remember the exact time frame.  
2 Q. All right. Well, the service of the  
3 subpoena happened on, what, Friday, I think? So  
4 it's been since then, right?  
5 A. Pardon me?  
6 Q. The subpoena you were served with  
7 happened recently. It was the last -- it was --  
8 I think it was either last Thursday or Friday,  
9 right?  
10 A. Something like that.  
11 Q. The meeting happened sometime after  
12 that, right?  
13 A. Sometime after that.  
14 Q. And you don't recall what documents you  
15 looked at in that short time frame?  
16 A. No, I don't remember reviewing  
17 documents.  
18 Q. Or databases on a computer screen?  
19 A. I don't remember seeing anything on the  
20 computer.  
21 Q. Okay. As part of your work at Maranex,  
22 are you ever involved with assisting medical  
23 narratives that doctors provide?  
24 A. What do you mean? I'm so sorry.  
25 Q. Are you familiar with the term medical

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1 narrative?  
2 A. I have heard it before.  
3 Q. Are you ever involved with the  
4 preparation of those documents since you've been  
5 working at Maranex?  
6 A. No, I'm not involved in that.  
7 Q. You're never given drafts of them or  
8 make edits to them?  
9 A. Sorry?  
10 Q. You don't ever edit those or provide  
11 draft copies before they're finalized?  
12 A. No.  
13 Q. Who are -- are you aware of any  
14 competitors to Maranex that do the same type of  
15 work? Who competes with you all?  
16 A. I don't know.  
17 Q. Have you ever heard of Group-1 or  
18 Billvolt?  
19 A. I'm not familiar with that.  
20 Q. Okay. What about the company Madernex?  
21 Have you ever heard of that?  
22 A. Yes.  
23 Q. What is Madernex?  
24 A. It was the name of the company before.  
25 Q. So it used to be -- Maranex used to be

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1 called Madernex and now it's called Maranex?  
2 A. That's what I understand.  
3 Q. When did that change occur?  
4 A. I don't remember.  
5 Q. Is it more than a year ago?  
6 A. I don't remember exactly.  
7 Q. Okay. So technically when we talked  
8 about other companies you worked for, you've also  
9 worked for Madernex when it was called that,  
10 right?  
11 A. Yes.  
12 Q. When you worked for Madernex, was your  
13 email signature -- did it say Madernex or did it  
14 say another company?  
15 A. I don't remember the signature.  
16 Q. What about your email address or your  
17 business card?  
18 A. I don't have business cards and I don't  
19 remember the exact email. What I remember is  
20 being always A. Delgado.  
21 Q. Okay. The same -- the beginning part of  
22 the email was always the same?  
23 A. Yes, that's what I remember.  
24 Q. But it would change from time to time  
25 with different ending names, right?

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1 A. Probably.

2 Q. Okay. Do you have any relatives that

3 live in the Atlanta Georgia area?

4 A. Not that I'm aware of.

5 Q. Beyond your husband?

6 A. Not beyond my husband. I'm not aware of

7 any other relative here.

8 Q. Do you have any knowledge about

9 Mr. Norrington accident that's at the focus of

10 this case that occurred back in June of 2020?

11 A. I'm sorry?

12 Q. Do you have any knowledge about the

13 details surrounding the incident involving

14 Mr. Norrington and my client that occurred in

15 June of 2020?

16 A. No, I don't remember anything.

17 Q. Have you ever seen a video from that

18 accident?

19 A. No, I don't remember seeing a video.

20 Q. Have you ever -- are you ever provided

21 videos of accidents as part of your job at

22 Maranex?

23 A. I normally don't receive those.

24 Q. Have you ever seen them though?

25 A. When?

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1 Q. During your time at Maranex.

2 A. I don't remember.

3 MR. O'DANIEL: I think that's all I

4 have. I'm going to flip through here. I don't

5 know if Mr. Odetunde has any questions or not.

6 MR. ODETUNDE: I don't.

7 MR. O'DANIEL: Okay. All right. I

8 think that's it, Ms. Delgado. Thank you for your

9 time.

10 (Deposition concluded at 7:12 p.m.)

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D I S C L O S U R E

1 STATE OF GEORGIA

2 COUNTY OF PICKENS

3 SCHEDULED DEPOSITION OF: ARACELIS DELGADO

4

5

6 Pursuant to Article 10.B of the Rules and

7 Regulations of the Board of Court Reporting of

8 the Judicial Council of Georgia, I make the

9 following disclosure:

10 I am a Georgia Certified Court Reporter. I

11 am here as a representative of Huseby Global

12 Litigation. I am not disqualified for a

13 relationship of interest under provisions of

14 O.C.G.A. 9-11-28(c).

15 Huseby Global Litigation was contacted by

16 the office of O'Daniel McDonald, LLC to provide

17 court reporting services for this deposition.

18 Huseby Global Litigation will not be taking

19 this deposition under any contract that is

20 prohibited by O.C.G.A. 15-47-37 (a) and (b).

21 Huseby Global Litigation has no Exclusive

22 contract to provide reporting services with any

23 party to the case, any counsel in the case, or

24 any reporter or reporting agency from whom a

25 referral might have been made to cover this

deposition.

Huseby Global Litigation will charge its

usual and customary rates to all parties in the

case, and a financial discount will not be given

to any party to this litigation.

This, the 19th day of March, 2025.

*Morgan Spriggs*

Morgan Spriggs, CCR/CVR

CCR Number GA: 5920-2001-3003-5712

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C E R T I F I C A T E

1 STATE OF GEORGIA )

2 PICKENS COUNTY )

3

4

5 I hereby certify that the foregoing

6 transcript was taken down as stated in the

7 caption, and the proceedings were reduced to

8 print under my direction and control.

9 I further certify that the transcript is a

10 true and correct record of the evidence given at

11 the said proceedings.

12 I further certify that I am neither a

13 relative or employee or attorney or counsel to

14 any of the parties, nor financially or otherwise

15 interested in this matter.

16

17 This, the 26th day of March, 2025.

18

19 *Morgan Spriggs*

Morgan Spriggs, CCR/CVR

CCR No. GA: 5920-2001-3003-5712

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