

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

STATE OF FLORIDA,)
 Plaintiff)
)
vs.) Case No. 23-02935-CF
)
TOMASZ KOSOWSKI,)
 Defendant.)

)

DEPOSITION OF JAKE CECIL BLANCHARD

DATE: Monday, July 29, 2024
TIME: 9:43 a.m.
PLACE: VIA ZOOM VIDEOCONFERENCE
REPORTER: Kathy H. Hoy
 Notary Public

A-P-P-E-A-R-A-N-C-E-S

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ALSO PRESENT:

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For the Deponent, Jake Cecil Blanchard

I-N-D-E-X

July 29, 2024

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EXHIBITS

(No exhibits marked.)

1 DEPOSITION IN DISCOVERY

2 JAKE CECIL BLANCHARD

3 PURSUANT to notice duly given, the deposition
4 of JAKE CECIL BLANCHARD, called by the Defendant
5 in the above-entitled cause, was taken by me, a
6 Notary Public in and for the State of Florida at
7 Large, at the time and place and in the presence
8 of counsel enumerated on page 1 hereof.

9 THEREUPON, it was stipulated and agreed, by
10 and between the attorneys for the respective
11 parties, by and with the consent of the said
12 deponent, that signature to the said deposition be
13 reserved.

14 THEREUPON, the following proceedings were had
15 and taken:

16 MR. BRUNVAND: My name is Bjorn Brunvand.
17 We're here on State of Florida v. Tom Kosowski.
18 Present for this deposition is Nathan Vonderheide
19 for the State, Simon Gaugush on your behalf and
20 Julian Velez I'm assuming is here on your behalf
21 as well, and Mr. Blanchard, and Kathy Hoy, the
22 court reporter who will swear you in.

23 COURT REPORTER: Would you raise your right
24 hand for me please.

25 Do you swear or affirm that the testimony

1 you're about to give today shall be the truth, the
2 whole truth, and nothing but the truth?

3 MR. BLANCHARD: I swear.

4 COURT REPORTER: Thank you.

5 JAKE CECIL BLANCHARD, having been duly sworn
6 or affirmed, was examined and testified as
7 follows:

8 DIRECT EXAMINATION

9 BY MR. BRUNVAND:

10 Q. Could you please state your full name.

11 A. Jake Cecil Blanchard.

12 Q. Okay. And, Mr. Blanchard, my name is Bjorn
13 Brunvand. Apart from this case I don't believe we've
14 ever met, is that accurate?

15 A. Correct.

16 Q. Okay. How long have you practiced law in the
17 Pinellas County area?

18 A. 16 years.

19 Q. Okay. And as it relates to this case, you're
20 listed as a witness by the State of Florida.

21 Did you have any direct involvement in the civil
22 case that Steven Cozzi was primarily handling prior to
23 March 28th of 2023?

24 A. Yes.

25 Q. Okay. What was your involvement in that case

1 prior to March 28, 2023?

2 A. I was supervising. My name was on the
3 pleadings, and Mr. Cozzi was my associate, and I was
4 supervising the case, but Mr. Cozzi primarily was doing
5 most of the labor on it.

6 But I reviewed all the pleadings and helped him
7 with the pleadings and things like that.

8 Q. Okay. All right. Prior to that particular
9 date had you had any face-to-face interactions with Tom
10 Kosowski?

11 A. I think I -- maybe one time I passed him in
12 the hall at my office on the way to the bathroom.

13 Q. Okay. And do you recall when that would have
14 been?

15 A. I don't recall. It was one of the times he
16 came to the office for a deposition.

17 Q. Okay. How many times did he come to the
18 office for depositions, if you recall?

19 A. I think he was there -- I know he was there at
20 least four times for extended periods of time. Three of
21 them -- three for depositions that I'm sure of, and then
22 one was for a special magistrate hearing for a discovery
23 dispute.

24 Q. Okay. And over what time period?

25 A. I think it -- I would say all of that took

1 place over a year or more.

2 Q. So would that be like January of 2022 through
3 January 2023?

4 A. Yes.

5 Q. Okay. All right.

6 A. Maybe a little bit before that. Maybe there
7 was one or two things before that, but, yes.

8 Q. All right. And the only interaction, direct
9 interaction, you had with him was maybe passing in the
10 hallway.

11 A. Right. And I think -- and I spoke to him one
12 time on the phone.

13 Q. Okay. Do you recall when that was, and then
14 the circumstances surrounding that?

15 A. It was -- I want to say it was probably
16 sometime in January 2022. I was trying to see if there
17 was a way to resolve the case, and so I spoke to him on
18 the phone for maybe 15 minutes or so.

19 Q. Okay. And basically it was an effort to see
20 if the case could be resolved short of litigation.

21 A. Correct.

22 Q. And what can you tell me about that
23 conversation?

24 A. It wasn't anything out of the ordinary that I
25 can remember. It was similar to the ones that I've had

1 before where, get me a proposal and, you know, I ask
2 what you want, what is it -- you know, what do they want
3 kind of thing.

4 I don't really remember much about it other than we
5 had the conversation and I wanted to see if there was a
6 way to settle the case.

7 Q. Okay. And it was not successful as far as
8 getting the case settled.

9 A. No.

10 Q. Okay. But as far as the specifics and details
11 of it you don't specifically recall.

12 A. No.

13 Q. But nothing out of the ordinary.

14 A. Correct.

15 Q. Both as to the issues discussed and the
16 behavior of Tom Kosowski at that time.

17 A. Correct.

18 Q. Okay. There are three e-mail and text
19 productions that have been provided to us through
20 Attorney Simon Gaugush; are you familiar with those
21 productions?

22 A. Yes.

23 Q. And do those productions include every e-mail
24 and every text between you and Mr. Cozzi as it relates
25 specifically to Tom Kosowski, meaning where you guys are

1 discussing Tom Kosowski?

2 A. I believe so, yes.

3 Q. Okay. All right. So as far as you know there
4 are no missing e-mails or texts discussing Tom Kosowski.

5 A. As far as I know.

6 Q. Okay. All right. And I guess specifically as
7 it relates to e-mails and text messages that would
8 either show animosity between Kosowski and Mr. Cozzi
9 and/or escalating tensions between the two, as far as
10 you are concerned those have all been produced.

11 A. As far as I know.

12 Q. Okay.

13 MR. GAUGUSH: Bjorn, let me just interject
14 here.

15 MR. BRUNVAND: Yes.

16 MR. GAUGUSH: So there could be
17 communications between Mr. Blanchard and his
18 clients with Mr. Cozzi. I'm not saying that there
19 are because it's been a long time since I've
20 looked at the records, but it's possible that
21 there are communications with the clients that
22 reference Mr. Kosowski and those would be covered
23 by the attorney-client privilege.

24 So I think what Mr. Blanchard is really
25 responding to is are there any non-privileged

1 communications that relate to Mr. Kosowski that
2 have been produced, and in which case the answer
3 is yes, but there could be privileged
4 communications, which have not been produced.

5 MR. BRUNVAND: Okay. Are you in a position
6 to tell us if there are conversations that discuss
7 those specific topics that are contained within
8 what you view as privileged communications?

9 MR. GAUGUSH: No. Just because your question
10 is very specific regarding discussions about
11 Mr. Kosowski, and I would have to look back
12 through those communications to verify whether or
13 not any of the privileged communications cover
14 that topic.

15 So I can't tell you whether or not there
16 actually is a conversation about Mr. Kosowski.
17 For instance, like his behavior or, you know, how
18 he's addressed the parties with the clients.

19 MR. BRUNVAND: Okay.

20 MR. GAUGUSH: But it's possible. That's what
21 I'm trying to get at.

22 MR. BRUNVAND: Right. And so the concern is
23 that there has been reference to e-mails and/or
24 text messages that relate to that issue, and so I
25 mean I think it would make sense maybe if you were

1 able to, you know, with the permission of your
2 client, to isolate any communications about Steven
3 Cozzi, even if there would -- the clients, and
4 considered privilege. So maybe an in-camera
5 examination could be done by the court to see
6 whether or not any of that might be appropriate
7 for us to have even if it's redacted.

8 MR. GAUGUSH: And I wouldn't be opposed to an
9 in-camera review of any potentially privileged
10 records that relate to the issues that you're
11 asking about.

12 I do know in particular with respect to, and
13 I don't want to jump ahead, but we have produced
14 communications related to January 26th of 2023,
15 and I believe everything related to that has been
16 produced.

17 MR. BRUNVAND: Right. Okay.

18 MR. GAUGUSH: So outside that context I --
19 like I said, I would have to go back through the
20 communications to see are there privileged
21 communications between Jake Blanchard, Steven
22 Cozzi with the clients related to the issues that
23 you've been asking, you know, concerning your
24 client.

25 MR. BRUNVAND: And I think really I should

1 probably broaden that to any communications about
2 Mr. Kosowski as it relates to his behavior one way
3 or the other.

4 MR. GAUGUSH: Uh-huh.

5 DEPONENT: Respectfully there are none.

6 MR. BRUNVAND: Certainly I mean I would think
7 for the entire time period, but most likely it
8 would be between the January and March time
9 period, but okay. We can --

10 MR. GAUGUSH: Why don't we table that.

11 I know -- and perhaps what we can do at the
12 end of the deposition or even during the course of
13 it, I'm taking notes obviously of these particular
14 issues.

15 We can go back through those communications
16 and try to find communications related to the
17 issues that you're specifically addressing.
18 There may be none, but if there are, then we -- I
19 would have no problem submitting those to the
20 court for in-camera review to make a privilege
21 determination.

22 MR. BRUNVAND: Sure. And it's my belief that
23 I need to know with certainty what's there and
24 what's not there.

25 MR. GAUGUSH: I understand.

1 MR. BRUNVAND: Even if it's privileged. Then
2 it's privileged and then we can deal with that
3 issue, but that's fine. We can do that.

4 MR. GAUGUSH: Okay. So hold on one second.
5 Let me just -- I need to address something on a
6 privileged matter with my client, okay?

7 MR. BRUNVAND: Sure.

8 MR. GAUGUSH: Okay. Go ahead.

9 MR. BRUNVAND: Okay.

10 MR. GAUGUSH: I just directed him not to
11 discuss anything that was potentially privileged
12 just for the record.

13 MR. BRUNVAND: That's fine.

14 Q. (By Mr. Brunvand) Mr. Blanchard, are there
15 e-mails authored by yourself or Mr. Cozzi that you have
16 instructed -- or that you for whatever reasons have
17 determined you do not want to share with the prosecution
18 and myself aside from privilege?

19 A. No.

20 Q. Okay.

21 A. No. The only thing that would keep me from
22 sharing anything would be privilege.

23 Q. Okay. And then meaning that -- and something
24 that might potentially disclose things that you're not
25 allowed to disclose because of the confidentiality with

1 your client.

2 A. Correct. That would be the only reason.

3 Q. All right. During the July 11th, 2023
4 hearing, and I believe it's on Page 27 of the
5 transcript, I don't have it in front of me, but you
6 talked about Steven Cozzi having excessive anxiety even
7 for an attorney; could you elaborate on that?

8 A. Yes. I think it was probably a year or so
9 before that, you know, he -- I could just tell as, you
10 know, someone who knew him very well who is strict -- we
11 were very close friends. You could just tell that he
12 was just -- you know, you could tell that someone is
13 anxious and is stressing.

14 And so as, you know, a mentor we spoke about it,
15 and I told him not to be -- you know, if he was having
16 stress or anxiety, you know, not to be ashamed or afraid
17 to talk about it. You know, every -- I told him that,
18 you know, I have that myself and so -- and it was, you
19 know, just I guess a mentoring moment conversation.

20 And so I told him, you know, you should go talk to
21 somebody about it and, you know, get some assistance
22 with it. And he did. And I told him, you know, like I
23 said, it's nothing to be ashamed of, I had stressed with
24 it myself, I have anxiety myself with trying to keep up
25 with everything and trying to keep clients happy and

1 trying to do the best you can.

2 And so then he did go see somebody about it, and
3 then we talked maybe once or twice more about it, and
4 then that was it. So that was -- you know, I think he
5 addressed it and was fine after that.

6 Q. Okay. And this was excessive anxiety in
7 general and not specifically related to Tom Kosowski, is
8 that fair?

9 A. Fair. But I don't know if it was -- I don't
10 know, I mean I don't know if I would characterize it as
11 excessive.

12 It was noticeable, but I'm not a psychiatrist or a
13 psychologist. I don't know what excessive is, but it
14 was to the point where I thought, you know, we should
15 talk about it.

16 Q. Okay. Do you recall whether or not you used
17 the phrase excessive when you described it previously?

18 A. I mean I think it was excessive for him, if I
19 did use it.

20 Q. Okay. Regardless of, you know, a psychologist
21 may have a different opinion, but from your perspective
22 you may have used that phrase.

23 A. Say again.

24 Q. From your perspective do you recall maybe
25 having used the description excessive anxiety?

1 A. I may have.

2 Q. Okay. And I think what you were just saying
3 was that a psychologist may describe it differently, but
4 that was your, as a layperson, perspective?

5 A. Correct.

6 Q. Okay. All right. Other than him telling you
7 about his anxiety how did that manifest itself as far as
8 what did you witness as it relates to that?

9 A. How did it manifest itself?

10 I could just tell. You can just tell when someone
11 that you know that you're close to is a bit off.

12 Q. Okay. Did it affect his work?

13 A. It didn't really affect his work, but when --
14 because everybody makes mistakes, but when he would make
15 a small mistake, he would get a bit more upset than
16 usual.

17 Q. Okay. All right. So maybe when others might
18 say, hey, this is something that can easily be fixed,
19 it's not a big deal --

20 A. Right.

21 Q. -- and he may focus on it excessively to some
22 degree.

23 A. I don't know if I would say excessively, but
24 it was -- he would make a bigger deal about it than I
25 thought it was, and I never -- I was -- I'm not -- I

1 wasn't the type to, you know, grind somebody to the
2 ground, but it -- I'm a supervise -- I supervise him.

3 So if I had to point something out, I would, but he
4 was harder on himself than I was on him.

5 Q. Okay.

6 A. And then -- so, yeah.

7 Q. And how long had he been a lawyer at that
8 time?

9 A. I want to say four years.

10 Q. Okay. And how long had he been with your
11 office?

12 A. Two.

13 Q. Okay. And it's not --

14 A. A little over two.

15 Q. Right. And would you agree it's not uncommon
16 for younger lawyers sometimes to worry about things
17 that, as we get older and more experience, we may not
18 worry about as much?

19 A. 100%, yes.

20 Q. Yes.

21 A. I agree with that.

22 Q. Did it rise to the level where he considered
23 quitting his work as a lawyer?

24 A. No.

25 Q. As it relates to March 21st, 2023 what do you

1 recall as far as that morning and your initial
2 interaction with Mr. Cozzi, if any?

3 A. I came in that morning like I normally do and
4 like I typically did, and I stopped in his office and
5 said, good morning, and chatted with him for a few
6 seconds and then I went into my office or I think I went
7 to the bathroom first. I always go to the bathroom
8 first.

9 And then I came back through the door and chatted
10 with him for a few moments and said, good morning, and
11 talked about maybe a case but joked around with him
12 about something.

13 And then I just remember like laughing about
14 something. And then I don't remember about what, but --
15 exactly, but we were always joking around.

16 But -- and then I went into my office and I got to
17 work on a project that I was working on.

18 Q. Okay. You said you went to the bathroom
19 first. Is that the bathroom that's in the common
20 hallway?

21 A. Correct.

22 Q. And do you recall anything about the
23 conditions of the bathroom, the cleanliness of the
24 bathroom?

25 A. The first time I went into it?

1 Q. That's correct.

2 A. No. It seemed normal.

3 Q. Okay. Was there a particular person as far as
4 you knew who was responsible for maintaining the
5 bathroom and cleaning the bathroom?

6 A. I think that the landlord had some folks that
7 he paid to clean the common area and the bathroom.

8 Q. And do you know how often they would come and
9 clean?

10 A. I do not.

11 Q. Okay. You indicated that the condition of the
12 bathroom was common or nothing out of the ordinary I
13 believe you said.

14 Did that change later that day?

15 A. Yes.

16 Q. Okay. Tell us about that.

17 A. Well, the next time I went into the bathroom
18 it's kind of -- before I got to the bathroom, like
19 before I got to the door, I smelled like a strong
20 chemical smell which smelled like bleach and I saw some
21 little splotches or like spots of blood on the outside
22 of the door.

23 And then when I opened the door, I saw blood near
24 the urinal. I saw a big splotch of like paint that
25 had -- it looked like it had been rubbed off the wall,

1 and then I saw blood on the toilet, and then the floor
2 was darker than usual. It looked like there had -- it
3 looked like somebody tried to clean up a mess in there.

4 Q. And is this prior to the arrival of law
5 enforcement?

6 A. Yes.

7 Q. Okay. And when you say you see blood, would
8 it be fair to say what you saw is something that
9 appeared to you to possibly be blood?

10 A. I know what blood looks like.

11 Q. I understand. But blood and other substances
12 can look alike.

13 A. Okay.

14 Q. So it would appear the same.

15 A. It looked like blood to me.

16 Q. I'm sorry?

17 A. It looked like blood to me. I don't know what
18 else it could have been. I'm not trying to be
19 argumentative.

20 Q. All right. I mean you didn't do any type of
21 testing. You know forensic people did testing to
22 determine whether or not it's blood or not, right?

23 A. Yeah. I'm sure they did.

24 Q. Okay. And would you defer to their findings
25 as to what was blood and what was not blood?

1 A. Sure. Yes.

2 Q. All right. There appeared to be cleaning
3 supplies in the bathroom underneath the sink; do you
4 recall seeing that in the cabinet of the sink?

5 A. I don't recall seeing anything specific.

6 Q. Okay. Do you recall ever looking in that
7 cabinet under the sink?

8 A. I have looked under that cabinet, yes, when I
9 was out of toilet paper.

10 Q. Okay. In the past when you looked in there
11 did you see cleaning products or no?

12 A. I have something similar, but I never saw
13 bleach in there or anything like that. Maybe some like
14 Windex or some other kind of like spray of some sort.

15 Q. Okay. All right. And you yourself did not
16 maintain any -- you didn't have any bleach in your
17 office I believe based on your previous testimony.

18 A. No. There wouldn't be any reason for me to
19 have that.

20 Q. Okay. Do you know if any of the other
21 businesses maintained bleach in the building?

22 A. I wouldn't know.

23 Q. Okay. Do you know the -- when the bathroom
24 had been cleaned prior to March 21st, 2023?

25 A. No.

1 Q. And would, I think based on your earlier
2 testimony, maybe the landlord would be the one that
3 could give us that information?

4 A. Perhaps.

5 Q. Okay. So you go into the bathroom, you see
6 the things that you just described. What do you do
7 after that?

8 A. I go back through the door into Steve's office
9 because Steve had a door that went directly to the
10 hallway. I went back through that door and looked
11 around the office for Steve and looked at his desk and
12 noticed his wallet, his phone, and his keys, and I
13 bumped his computer, and an e-mail came up, it woke the
14 computer up, and then the e-mail came up that looked
15 like he was in the middle of responding to an e-mail
16 from me.

17 And then I was wondering if maybe -- you know, then
18 I was just like wondering where he was and I started to
19 worry, and I thought, you know, all the possibilities
20 ran through my mind. I thought maybe he -- because I
21 know there were -- I knew there was a hearing at 10:30,
22 but I didn't know if he went to it, which would have
23 been unusual for him to go to because those hearings
24 were typically telephonic or on Zoom.

25 But so I texted and I didn't hear back from him.

1 Actually that was before -- that was a little bit before
2 that, but his wallet, phone, and his keys were on the
3 desk so I obviously didn't think he, you know, went to
4 the hearing.

5 But it was -- everything ran -- a lot of things ran
6 through my mind where he -- I was just wondering where
7 he was, you know. So I was trying to think of
8 everything.

9 Q. What time would you say that you -- that this
10 is taking place where you went to the bathroom and
11 checked it out and when you're checking out Mr. Cozzi's
12 office?

13 A. Around 11:30 or so, but I may have texted him
14 before that.

15 Q. Okay.

16 A. Just to -- because he hadn't been -- he had
17 been gone a little while, longer than typical. So I may
18 have texted him before that to see if -- you know, if he
19 went to that hearing.

20 And then, you know, he didn't respond to me right
21 away like he really does, and then that's when I went to
22 look for him actually, now I remember, yeah.

23 And I have the text and I'm sure you have it as
24 well.

25 Q. Okay. And so then what happens?

1 A. So then I'm -- I just go all through the
2 building and look for him and try to find him. I went
3 through all -- there's five or six other offices. One
4 of them can be combined or so, but there was other
5 offices. Most they're -- about half the building was
6 empty.

7 So I went through all of the rooms that were not
8 occupied that were unlocked. So I went through all them
9 looking for him, you know, and then I went out in, you
10 know, the parking lot and then was looking for him.

11 And then just couldn't and then started panicking
12 and then called the police when I couldn't find him.

13 Q. And you say you went through the rooms and
14 they were unlocked.

15 A. Uh-huh.

16 Q. This is in the vacant part of the building.

17 A. Correct. Yeah.

18 Q. Okay. Did you exit any of the -- there are
19 doors that lead to the outside from the vacant part of
20 the building, right?

21 A. Uh-huh.

22 Q. And that's a yes?

23 A. Well, I did not leave. There are other doors
24 that lead to the outside of the building, but I did not
25 go through them.

1 Q. Okay. Did you check them to see if they were
2 locked or unlocked?

3 A. I don't remember. I just was looking for
4 Steve and so I don't know if I checked to see if the
5 doors were locked or unlocked.

6 Q. Do you know whether or not they could be
7 unlocked from the inside without a key?

8 A. I don't know.

9 Q. Okay. Are there doors within your office at
10 the time?

11 You're no longer there, right?

12 A. Correct.

13 Q. Were there doors within your office at the
14 time that lead to the outside other than the one that
15 leads into the lobby area?

16 A. No.

17 Q. Okay. So the only entry and exit from the
18 outside to your office would come through the main
19 lobby.

20 A. Correct.

21 Q. All right. Before you call law enforcement do
22 you go outside and look for Mr. Cozzi's car?

23 A. I don't -- yes.

24 Q. Okay.

25 A. Yeah. I don't remember if I did it on -- I

1 remember looking for his car, but I don't remember if it
2 was before I called law enforcement, but I remember when
3 I was on the phone with law enforcement I mention that
4 his car was still there.

5 Q. Okay. So you called. What, did you call
6 9-1-1 or what do you -- who do you call?

7 A. 9-1-1 I believe.

8 Q. Okay. And do you recall how long you were on
9 the phone with the 9-1-1 operator?

10 A. Maybe 10 minutes or so or longer. Maybe a
11 little -- yeah, about 10 minutes or so I think. 10 to
12 15 minutes.

13 Q. Okay. Were you put through to anyone else
14 other than the 9-1-1 operator?

15 A. I don't remember.

16 Q. Okay. At some point do you have initial
17 contact with a law enforcement officer who comes to your
18 office?

19 A. Yes.

20 Q. Do you recall who that was?

21 A. I don't remember the law enforcement officer's
22 name, no.

23 Q. Was it a man or a woman?

24 A. I think there was one of each.

25 Q. Okay. And tell us about what happened and the

1 conversation that you had with them when they first
2 arrive.

3 A. I told them that I was looking for my friend,
4 that he got up and left his desk, and I thought he went
5 to the bathroom and -- but -- and his wallet and his
6 phone and his keys were there. His car is in the
7 parking lot. And I was worried and I told them that,
8 you know, there's something wrong with the bathroom,
9 that, you know, initially I thought he had some sort of
10 bathroom emergency and maybe he went and changed in one
11 of the other rooms or whatever.

12 And then -- but I -- but then -- and that I looked
13 for him but I couldn't find him, and then I was really
14 worried about him.

15 Q. Okay. All right. Do you recall being asked
16 by law enforcement while they were there at your office
17 about whether or not you had any concerns about anyone
18 in particular who may have harmed Steven Cozzi?

19 A. Initially I couldn't think of anybody because
20 he was just the sweetest man and I didn't, and we
21 knew -- and I knew him at that point for, you know, four
22 years and, you know, I just couldn't think of anybody.

23 But then when the law enforcement officer, you
24 know, pressed me on it and I was like, the only person I
25 can think of is this Tomasz Kosowski because he's the

1 one -- he's the only person I know that is just, you
2 know, rude and hateful to Steve.

3 Q. And when do you -- so initially you tell law
4 enforcement, I can't think of anyone, right?

5 A. Right.

6 Q. Okay. When during -- I'm assuming some time
7 later that day is that when you tell them that maybe Tom
8 Kosowski?

9 A. Yeah. And I was just -- because I just kept
10 thinking it over and over and over again, and that's the
11 only person that came into my mind was him.

12 Q. Okay. And specifically what was it that made
13 you think that maybe Tom Kosowski would have any
14 involvement?

15 A. Because he was the -- he was -- he was the
16 only person I know that was like rude to Steven on a
17 regular basis, and just, you know, hateful and trying
18 constantly to, you know, get him in trouble with the
19 court. You know, he'd file motions for sanctions and he
20 was always looking for a way to get us sanctioned for
21 something one way or another in the case. I mean, it's
22 all over the docket.

23 And so that was the only person I could think of.

24 Q. Okay. Other than filing motions for
25 sanctions, what else was it that he would do that gave

1 you concerns as far as Steven Cozzi is concerned?

2 A. Well, there was -- he was nasty to him in
3 e-mails, and then I remembered that at the last
4 deposition that we had at the office there was an
5 incident where Kosowski in the bathroom on a break at
6 the deposition calls Steve a scumbag. He said he called
7 him a scumbag like his clients.

8 And so that's when I -- I mean and that's really
9 kind of when, you know, it sort of sunked -- it sort of
10 started sinking into me that this was the person that --
11 that was the only person I could think of.

12 Q. Okay. So when you say that he told him that
13 he was a scumbag in the bathroom, you were not present
14 for that, right?

15 A. No.

16 Q. How was that reported to you?

17 A. He sent an e-mail to Rebecca and --

18 Q. Okay.

19 A. -- I sent a text back to Steve and I -- yeah.

20 Q. And the text you sent back to Steve said what?

21 A. Said that I'm stopping the depo and I'm
22 kicking him the fuck out of my office.

23 Q. Okay.

24 A. And then I went --

25 Q. Go ahead.

1 A. No, you go ahead.

2 Q. And what was Mr. Cozzi's response to your
3 direction in the text message?

4 A. Well, I think, you know, he calmed me down. I
5 think he said, it's not a big deal. I -- in between I
6 went and I flung open the door to the conference room
7 where they were having the deposition, and I looked at
8 Kosowski and I looked at Steve, and Steve waved me off,
9 and I respected Steve. So I didn't want to disrespect
10 him.

11 He indicated to me he didn't want me to do that and
12 that, you know, he didn't want me to stop the
13 deposition. So I controlled myself and I shut the door
14 and I let the deposition continue, but I made it clear
15 that he wasn't -- that's Kosowski was never coming back
16 to that office because he had been there, you know, at
17 least four or five times before for extended periods of
18 time. So I didn't want him back after that, though.

19 Q. Okay. And during the previous occasions when
20 he had been there had there been any similar issues?

21 A. I don't think that there was anything that
22 rose to the occasion that -- other than Steve mentioning
23 to me that it was -- you know, he was contentious during
24 the deposition itself. I don't think there was anything
25 outside of that like that time, no.

1 Q. And what was your --

2 A. There was always -- go ahead.

3 Q. What was your understanding of being
4 contentious in the deposition? What does that mean as
5 far as you know?

6 A. Kosowski would ask -- he was just aggressive
7 with the witnesses.

8 Q. Okay.

9 A. And he would be -- and then so if Steve
10 objected to a question, he would just become -- he would
11 just get -- he'd get mad.

12 Q. Okay. And mad, and then how would he -- how
13 would he verbalize his anger or frustration?

14 A. I don't know. You'd have to read -- I mean
15 it's in the transcript if you -- I mean, you know, so.

16 Q. So beyond what's in the transcripts, is there
17 anything beyond that that would help us understand what
18 was taking place during those earlier --

19 A. Not that I recall.

20 Q. Okay. Being contentious, I mean, lawyers --
21 Mr. Kosowski was not a lawyer, right? He's a doctor.

22 A. Correct.

23 Q. Okay. But even when lawyers -- some
24 lawyers -- lawyers have different styles as it relates
25 to depositions.

1 A. Correct.

2 Q. Some can be very confrontational and others
3 not; would you agree?

4 A. Yes.

5 Q. Okay. All right. And then --

6 A. Steve wasn't the confrontational type, though.

7 Q. Sure. Sure. But just because one is not the
8 confrontational type doesn't mean that others cannot be,
9 whether they're --

10 A. Correct.

11 Q. -- lawyers or pro se.

12 A. Right.

13 Q. Okay. I believe during the July 11th, 2023
14 hearing in the criminal case you had indicated that Tom
15 Kosowski was upset about a complaint and a negative
16 review that had been posted and that it was going to
17 affect his career so he blamed everybody that had
18 anything to do with that.

19 Is that what the civil case was about as far as you
20 know?

21 A. I think that was the genesis of the civil
22 case.

23 Q. The negative review.

24 A. I think so, yeah.

25 Q. And how it would impact Dr. Kosowski's career.

1 A. Not that how it impacted it.

2 I think it was that he was just -- I think that's
3 what drove him in the civil case.

4 Q. What?

5 A. I don't know that he sought to correct it so
6 much as revenge, make people miserable because of it.

7 Q. So Tom Kosowski initially sued your client, is
8 that correct, among others?

9 A. Yes.

10 Q. Okay.

11 A. Yes.

12 Q. And what were the claims that he was alleging
13 in his complaint against your client and others?

14 A. I'd have to look at the complaint again. It's
15 been a long time since I saw it. If you want, we can --

16 Q. Do you have it handy or no?

17 A. No, I don't.

18 Q. Okay. Do you --

19 A. But I mean it's on the record and there's --
20 it was a long complaint with 14 or 15 counts in it.

21 Q. Okay. Do you recall whether or not there was
22 a primary count or a primary allegation other than the
23 negative review?

24 A. I'd have to look at the complaint. It's been
25 a long time since I looked at that complaint, but I

1 just -- I'd have to look at it. I remember -- you know,
2 I remember that there was -- Jennifer Friend was a
3 medical biller. She was named in the complaint, but I
4 didn't represent her.

5 I'd have to look at the complaint, Bjorn, which I
6 don't mind doing, if you have --

7 Q. The --

8 A. I'm not trying to be difficult. I just don't
9 remember that much about it anymore.

10 Q. Okay. Would it be fair to say, though, that
11 there were multiple allegations beyond the negative
12 review?

13 A. Yes. Yeah.

14 Q. Okay. And specifically was there a
15 counterclaim filed by your client?

16 A. No.

17 Q. Okay. So you just -- your client basically
18 just answered the complaint and --

19 A. I think we had filed -- I think we filed --
20 initially we filed a motion to dismiss.

21 Q. Okay.

22 A. And then --

23 Q. But -- I'm sorry. Go ahead.

24 A. But I don't believe -- I don't -- no, I don't
25 think we did a counterclaim.

1 Q. Okay. Who did your office represent? You had
2 multiple clients, right?

3 A. Yeah. So I represented basically everybody
4 that wasn't Jennifer Friend. So that would have been
5 Total Vitality, Dunedin Surgical Center, Erel Laufer,
6 Erel Laufer, M.D., PA or something like that, Brian
7 Wolstein, and Adam Rosoff.

8 Q. Okay. You indicated in the July 11th hearing
9 that Dr. Kosowski made it personal with Steven. I think
10 the question was, did Dr. Kosowski make it personal with
11 Steven, and your answer was, yes. I believe that may be
12 on Page 55 of the transcript of the hearing. Do you
13 recall that?

14 A. Can I look at the transcript?

15 Q. Sure. Absolutely.

16 A. What paragraph?

17 Q. I'm not sure what paragraph, but I believe
18 it's on Page 55.

19 A. Yes. It's 56. Apparently I was talking --
20 that's when I started talking about the bathroom break
21 on January 26.

22 Q. I'm losing your audio a little bit.

23 A. I'm sorry. That's when I was talk -- can you
24 hear me?

25 Q. Yes. I can hear you now.

1 A. Okay. So I believe it was, yeah, at 55, 56.
2 That's when I started talking about the bathroom
3 incident on January 26 between Kosowski and Steve.

4 Q. Right.

5 A. That's when I thought it had gone personal,
6 yes.

7 Q. Right. Apart from the bathroom incident, the
8 allegation of the statement that's allegedly made in the
9 bathroom during that deposition, what else can you refer
10 to that would support the idea that Dr. Kosowski made it
11 personal with Steven beyond the bathroom incident?

12 A. Just you can feel it. You know, you can feel
13 the -- I could feel that Kosowski obviously -- you could
14 tell in the tone of the e-mails that he didn't like
15 Steven.

16 There was also another e-mail where he indicated
17 that Steve and Jake Pillsbury, who's the attorney that
18 represented Jennifer Friend, were, quote-unquote,
19 pulling -- I shouldn't -- I can't quote it, but he was
20 saying that they were -- you know, they, you know,
21 just -- something about some shit that they do. This is
22 shit -- you know, referred to something as, this is the
23 shit that Steve and Jake Pillsbury or Jacob Pillsbury
24 do.

25 You know, he just started, you know, just -- he

1 started to get -- you know, in the e-mails you could
2 tell there was building up animosity.

3 Q. So part of the frustration in some of the
4 e-mails that I've seen appear to be over scheduling
5 issues.

6 Do you recall seeing e-mails between Steve Cozzi
7 and Jake Pillsbury and Tom Kosowski about --

8 A. I think that part of it, and I think it was
9 also disputes over discovery issues.

10 Q. Okay. So discovery issues. Scheduling
11 issues.

12 A. Yeah.

13 Q. And would you agree that these are issues that
14 frequently in litigation sometimes the attorneys get
15 frustrated with each other about scheduling issues and
16 discovery issues?

17 A. Not to that extent.

18 Q. Okay. What about --

19 A. I think that they probably -- I think this was
20 more than that. This started to become more than that
21 in my mind, but again, you know --

22 Q. Not what we see in the actual e-mails, right?
23 Is there anything else that you can tell us beyond
24 what's spelled out in the e-mails, and then -- I mean
25 because we can read the e-mails, right?

1 A. Right.

2 Q. And, you know, you talk about the tone of the
3 e-mail. You're perceiving that from reading the
4 e-mails.

5 A. Well, and talking to Steve as well.

6 Q. Sure. Sure.

7 A. So let me just put it this way. It was
8 more -- he was more of an asshole in the e-mails and
9 more of -- created more animosity in the e-mails and
10 with the scheduling but -- than a typical -- than an
11 attorney would. We'll just -- we'll leave it at that.

12 But we chalked it up to him not being an attorney.

13 Q. Right. Should we say more than the majority
14 of attorneys would. There might be exceptions.

15 A. Well, I mean more than any attorney that I
16 encountered, you know.

17 Q. Okay. All right. Understood. Understood.
18 So beyond what's in the e-mails and text messages, what
19 else can you tell us about specific conversations that
20 you had with Kosowski where he expressed concerns to you
21 about Dr. Kosowski?

22 A. I don't -- I think you might want to ask the
23 question again.

24 Q. Okay. Are you able to hear me?

25 A. I am. I think that you maybe said the wrong

1 name at the first part of the question.

2 Q. Oh, I did. Okay. So apart from the e-mails
3 that you have referenced and then your interpretation of
4 what those e-mails mean, from the conversations that you
5 had with Steven Cozzi what else can you tell us about
6 those conversations and how those caused you to have
7 concerns about Dr. Kosowski?

8 A. I mean there were days that -- when we were
9 dealing -- when Steve was dealing with Kosowski that we
10 would talk about it, and it was so -- it was just
11 more -- it was so frustrating because he was so -- you
12 know, Kosowski was so hard to -- so difficult to deal
13 with. I mean it was just frustrating.

14 And so we would -- you know, we would talk about
15 that, and it would -- you know, when he parted from his
16 attorney it was -- you know, as difficult as we thought
17 that she was, which, you know, she was professional but
18 still, you know, a very good advocate for her client,
19 but we wished that he had an attorney so we wouldn't
20 have to deal with him directly, and we talked about that
21 quite often.

22 Like, I just wished he'd hire an attorney because
23 he is so hard to the deal with. You know, everything
24 about it. You know, everything about the case and
25 everything about the interactions between, you know,

1 Kosowski and not just Steve but the other attorney, Jake
2 Pillsbury, it was just -- it was a weird vibe. I don't
3 know how to say it, but it was uncomfortable, it was
4 excessive, and, you know, it was different. It was
5 something -- it was different than what we were used to
6 so we talked about it more than we did other cases
7 perhaps, but we also talked about it in a sense where it
8 seemed like, you know, he was just pushing the case to
9 cause animosity and pain because it was -- I mean I
10 don't want to be pejorative, but I -- the case wasn't a
11 very good case.

12 I mean it didn't make any sense, and so we often
13 wondered what his real motivation was.

14 Q. How did it not make sense?

15 A. Well, you can read it for yourself.

16 Q. But I'm asking for your perspective. How did
17 it not make any sense?

18 A. Because he was -- he blamed some -- he was --
19 because I mean he was blaming a biller for a problem
20 that he caused.

21 He blamed -- and then ended up roping everybody
22 else that was anywhere in the vicinity into it, and it
23 just didn't make sense, you know.

24 Q. Was he seeking financial reparations?

25 A. He was, but there was no -- I mean it was --

1 the number that he -- I don't remember what the number
2 was, but it was a ridiculous number and again there was
3 no way of calculating. He didn't have any way of
4 calculating what his damages were, and that was also
5 kind of the issue, too, was like, what does he really
6 want here.

7 I mean what -- you know, how is this going to, you
8 know, make him whole? What does he want? And then we
9 could never get like a number out of him. And then when
10 we did, it was just sort of just pulled out of the air.

11 So it just -- it was just bizarre.

12 Q. When you say it was just pulled out of the
13 air, what do you mean by that?

14 A. He didn't really have any real way of
15 quantifying what his damages were. I mean so it seemed
16 like he just made stuff up. Making up a number.

17 Q. Did he come up with a number?

18 A. I think he did when we were trying to -- when
19 I was trying to like work out a resolution, but it was a
20 ridiculous number and so it didn't go any further than
21 that.

22 Q. The complaint that was filed, the initial
23 pleadings that were filed in this case, were those
24 drafted and filed by an attorney?

25 A. I believe so.

1 Q. Okay. The handling cases where people
2 represent themselves, is that something that you
3 frequently encounter?

4 A. No.

5 Q. Okay. Have you had other cases beyond this
6 case where the other party was pro se?

7 A. Yes.

8 Q. Okay. Do you find that sometimes pro se
9 parties can be difficult to deal with because they
10 don't -- they're not trained in being lawyers?

11 A. I don't know if that's why they're difficult
12 to deal with, but the other one that I had -- the
13 other -- I've only had a few. The other ones weren't as
14 bad, but they were more difficult than typical, sure.

15 Q. Okay. I mean is that potentially part of the
16 equation, that pro se parties may believe that they
17 understand, you know, how to litigate a case and what
18 the law is, but they may not really have a full grasp of
19 the law and how to proceed?

20 A. I think that may be part of it, and I think
21 that there's no one there to have them understand that,
22 you know, according to the law they may not necessarily
23 be right. So then you've got the pro se who just sees
24 that one side of the world, and that's it. And then so
25 they think no matter what, you know, that they're right.

1 I think that is sort of the issue.

2 Q. Okay. I mean did it appear that Dr. Kosowski
3 felt like he had been wronged?

4 A. I feel like that absolutely he felt like he
5 had been wronged.

6 Q. Okay. And obviously -- well, I shouldn't say
7 obviously.

8 Presumably he did not know Steve Cozzi, and I
9 apologize, maybe that's what I said earlier. Maybe I
10 said Steve Kosowski.

11 A. That's right.

12 Q. Okay. Yeah. I apologize.

13 A. That's okay. No worries.

14 Q. Presumably he did not know Steve Cozzi when
15 the lawsuit was filed.

16 A. I would be shocked if I actually did, but I
17 don't think so, no.

18 Q. Yes.

19 A. I don't see those two running in the same
20 circles.

21 Q. Was Steve Cozzi working for you when you were
22 first hired to represent the defendants in this case?

23 A. Yes. Uh-huh.

24 Q. And what year was that, if you recall?

25 A. I want to say it was around March 2019

1 actually.

2 Q. Okay. All right. So about at the very
3 beginning of Steve Cozzi's employment with your office.

4 A. He came to work with me September 2018.

5 Q. Okay. So early on in his employment with your
6 office.

7 A. Yes.

8 Q. Okay. Was there an accusation against Steve
9 Cozzi of him having done anything inappropriate in the
10 civil case?

11 A. Kosowski made a number of accusations like
12 that.

13 Q. Okay.

14 A. He would say things like that. He would call
15 Steve a liar at hearings. And so -- and I think he
16 maybe filed a motion at some point but he constantly was
17 indicating that Steve and Jacob Pillsbury, who was
18 Jennifer Friend's attorney, were doing things -- doing
19 wrongful things I guess.

20 Q. Was there an allegation that you recall about
21 Steve Cozzi having falsified anything?

22 A. Yeah. I think he said something to that
23 effect, but it was obviously not true.

24 Q. Okay. And so tell me what --

25 A. I don't really remember now that I think. I

1 honestly don't remember. I mean you're jogging my
2 memory by talking about it, but I don't specifically
3 remember the incident.

4 I only remember bits and pieces of it, but I think
5 at some point he basically said that Steve like
6 falsified some sort of -- some evidence or something.
7 It was something like really ridiculous and so I mean --
8 and I think he said it to the Judge. But I don't think
9 the Judge thought anything of it. And I think --

10 Q. This was --

11 A. Go ahead.

12 Q. Yes. Specifically do you recall what it is
13 that --

14 A. No, I don't. I really don't.

15 Q. Is there anything you have that would refresh
16 your memory about what it is?

17 A. I'd have to go back through the docket, the
18 pleadings, and the e-mails to see. I don't remember
19 specifically.

20 Q. Okay. Can you at some point do that after
21 we're done with this deposition and maybe relay the
22 information to your attorney and he can relay it to
23 Mr. Vonderheide?

24 A. Sure.

25 Q. Okay.

1 A. Yeah. I'd have to do some digging, but I
2 think we can figure that -- about the time frame out
3 what the situation was, but I don't remember as I sit
4 here.

5 I only remember vaguely. It's been a long time.

6 Q. Okay.

7 A. I mean I'd have to have something to jog my
8 memory on it. I just -- I can't think of it as I sit
9 here.

10 Q. Okay. But falsifying something would be
11 the --

12 A. He did accuse Steve of falsifying something.
13 I do remember that now that you mention it, but I don't
14 remember specifically the incident or anything that I
15 could speak to specifically, not without jogging my
16 memory, but I think if we went back through the record
17 we could -- we might be able to pinpoint it.

18 Q. Okay. All right. If you could do that,
19 please, and then send that to your attorney and then I
20 may have some follow-up questions on that later on,
21 but --

22 A. Fair enough.

23 Q. You talked briefly about opening the door to
24 the deposition room of Ms. Mason in January of 2023, and
25 that Steve Cozzi waved you off I think is what you said?

1 A. Correct.

2 Q. Okay. Did you guys have any dialogue, verbal
3 dialogue, or was it just him waving you off?

4 And this is when you open the door because you were
5 upset about the e-mail that you receive.

6 A. He may have mouthed the words to me, don't.
7 But I remember seeing his hand, you know, telling me.
8 You know, I picked it up. But he didn't --

9 Q. Or text.

10 A. There was context there, but he didn't -- I'm
11 sorry, what was that?

12 Q. Well, did he verbalize anything or --

13 A. Not --

14 Q. I guess the --

15 A. Not like audibly I guess.

16 Q. Okay. All right. But he waved you off.

17 A. Right.

18 Q. And he may have mouthed something that you --

19 A. Correct.

20 Q. -- took it to mean what?

21 A. Don't. Don't do that. Don't.

22 Q. Okay. When you open the door to the
23 deposition room can you describe how you opened the
24 door?

25 A. I flung it open --

1 Q. What does that mean?

2 A. -- angrily. I didn't open it -- I opened it.
3 I snatched it open. I don't know. I opened it quickly.

4 Q. All right.

5 A. I opened it as if I was pissed.

6 Q. Okay. Okay. Is this before or after you
7 received the text from Mr. Cozzi saying, don't, we're
8 not canceling the deposition or something to that
9 effect?

10 A. I don't remember.

11 Q. I believe you had indicated that in the July
12 11th hearing that you were furious, that your veins were
13 popping out of your neck, and that you were getting
14 ready to stop the deposition and ring his neck,
15 referring to Kosowski.

16 A. Yeah. I was getting ready to grab him by the
17 nape of his neck and throw him the fuck out of my
18 office.

19 Q. Okay.

20 A. I was going to be physical with him. I was
21 very upset.

22 Q. Okay.

23 A. Steve was a close, dear friend of mine. He
24 didn't deserve it.

25 Q. I understand. How long did this take, you

1 opening the door, and then having the nonverbal
2 communication?

3 A. Less than a minute.

4 Q. Do you know whether or not the deposition was
5 being recorded?

6 A. I'm sure it was.

7 Q. Do you know it was -- there would be a court
8 reporter, but do you know whether or not there was a
9 video recording, an audio recording?

10 A. I think it was partly on Zoom. So there would
11 have been an audio recording --

12 Q. Okay.

13 A. -- at the very least or a Zoom recording.

14 Q. What was your practice as it relates to these
15 depositions that were conducted by via Zoom?

16 Would you normally have them recorded?

17 A. It would be up to the court reporter.

18 Q. Okay. So your office would not have a
19 preference one way or the other.

20 A. No.

21 Q. Okay. Do you know who the court reporter was
22 for this particular deposition?

23 A. I have the transcript. So we can look at that
24 and tell you. Do you want me to look at the transcript
25 and tell you?

1 Q. Sure. Sure. If you have it, sure.

2 A. Well, wait, wait, wait. I'm sorry, this is
3 the transcript from that hearing.

4 No, I don't. I'd have to look at the transcript.
5 I don't know who it was, and I don't have that
6 transcript here.

7 Q. Who was conducting the deposition primarily?

8 A. Well, I think Kosowski was the one that wanted
9 to have the deposition. So I think it was him
10 conducting the deposition.

11 Q. Okay. And if he's conducting the deposition,
12 would he most likely be the one that arranged for the
13 court reporter?

14 A. I don't know.

15 Q. Okay. Do you have a way of checking your
16 office files and records to see whether or not your
17 office arranged for the court reporter?

18 A. I think we could probably call the court
19 reporter and see who called them first. I think we can
20 figure it out.

21 Q. Okay.

22 A. But I don't remember who it was, who called
23 the court reporter.

24 Q. If you can figure that out and get back -- and
25 get that information to your lawyer so that he can

1 convey it to us, that would be great.

2 A. Okay.

3 MR. GAUGUSH: Bjorn, I didn't want to
4 interrupt your examination. Is there any way we
5 could take a five-minute comfort break?

6 MR. BRUNVAND: Absolutely.

7 MR. GAUGUSH: Okay. Great. Thanks.

8 MR. BRUNVAND: Absolutely.

9 (A recess was taken.)

10 Q. (By Mr. Brunvand) On the deposition that we
11 have been talking about do you recall that being on
12 January 26, 2023?

13 A. Yes.

14 Q. And prior to the incident that you described
15 where you open up the door in anger, were you in the
16 office or had you been somewhere else?

17 A. I had been somewhere else prior to that. I
18 was -- I hadn't -- I don't know that I was at the office
19 the entire time the deposition was going on, if that's
20 what you're asking me.

21 Q. Right. Where were you when you received the
22 message from Steven Cozzi?

23 A. Gosh, I don't -- I honestly don't know.

24 Q. Okay. So would you say --

25 A. It could have been -- I mean I could go back

1 and look at my calendar, but, you know, I don't -- I'm
2 trying to think. I just don't know.

3 Q. I believe you indicated before that you had
4 been out of the office and just returned to the office
5 that afternoon.

6 A. Correct.

7 Q. Do you know, do you recall, whether or not you
8 immediately went to the deposition room when you return
9 to the office or had you gone to sit at your desk?

10 What do you recall doing?

11 A. I was at my desk.

12 Q. Okay.

13 A. I was at my desk and then I went from my desk
14 to the room. I do remember that because the conference
15 room was -- is next to my office, and I remember going
16 out of my office and, yes, to the -- and opening the
17 door.

18 Q. All right. But you also remembered that
19 shortly before that you had returned to your office from
20 somewhere outside of the office.

21 A. Correct.

22 Q. Okay. And if you looked at your calendar,
23 might you be able to tell where you had been prior to
24 that?

25 A. Maybe. I could have been running errands so.

1 Q. Okay. Right. If you could take a look and if
2 you are able to gather that information and share it
3 with us.

4 A. Yes. If I can figure it out.

5 Q. But it would be fair to say that but for this
6 text message you had no plans of participating in that
7 deposition that day.

8 A. Okay. So what was it -- how I found out was
9 the e-mail.

10 Q. Okay. That's fine.

11 A. Is that what you're talking about?

12 Q. But for the e-mail did you have --

13 A. Right.

14 Q. -- any intentions of participating in the
15 deposition that day?

16 A. No.

17 Q. Okay. And then after the e-mail occurs,
18 that's when you text Steve Cozzi at some point and tell
19 him that you're going to shutdown and end the
20 deposition.

21 A. That's correct.

22 Q. And he tells you, no, don't do it.

23 A. Correct.

24 Q. Something to that effect.

25 A. Correct.

1 Q. All right. And the text message speaks for
2 itself, right?

3 A. Correct.

4 Q. And you don't recall whether or not that text
5 message was prior to you bursting into the deposition or
6 after.

7 A. My text message to him was prior to.

8 I don't remember if his text message to me saying
9 that it was no big deal was after I burst into the room
10 or before or -- I don't remember, but I think it was
11 after.

12 Q. Okay. So your message to him was before.

13 A. Mine was before, correct.

14 Q. And you recall seeing his response, and you
15 think it was after you had entered the room.

16 A. I think so, yes.

17 Q. Okay.

18 A. Because the whole interaction with the room
19 was less than a minute.

20 Q. Okay. Might it be that his gestures when you
21 walked in the room along with seeing the response after
22 the room might have been the totality of the
23 communication then caused you to back off and let them
24 complete the deposition?

25 A. Yes.

1 Q. Okay. Do you know how long the deposition
2 continued after Tom Kosowski reportedly told Steve Cozzi
3 that he was a scumbag?

4 A. Not specifically.

5 Q. Okay. But it was ongoing after this reported
6 statement was made, right?

7 A. Correct.

8 Q. Because that's what caused you to enter the
9 deposition room temporarily.

10 A. Correct. I don't think I went passed the
11 doorway, though. I don't actually think I went into
12 the -- I didn't actually go into the room. I just
13 opened the door, but, yes.

14 Q. Did Steve Cozzi indicate to you what, if
15 anything, he said to Tom Kosowski after being told that
16 he is a scumbag?

17 A. No.

18 Q. Do you recall whether or not he ever told you
19 that he responded to Tom Kosowski something to the
20 effect of, go to hell?

21 A. No.

22 Q. Okay.

23 A. But that doesn't -- I don't think Steve would
24 have said that.

25 Q. Okay. Okay. Do you think he would have

1 responded?

2 A. No.

3 Q. But you weren't there. So you don't know
4 whether or not there was any response.

5 A. Correct.

6 Q. The e-mail about being called a scumbag, do
7 you have that with you?

8 A. No.

9 Q. Do you know if it has a timestamp on it?

10 A. I'm sure it does. I mean all e-mails do.

11 Q. Right. The --

12 A. I mean we produced it, but I don't have it. I
13 don't have it in front of me.

14 Q. Sure. Sure. But as far as you're concerned
15 the e-mail was the first communication to you about the
16 allegations that Tom Kosowski called Steve Cozzi a
17 scumbag.

18 A. Correct.

19 Q. And that resulted in you briefly entering the
20 deposition room and then the deposition continued.

21 A. Correct.

22 Q. Okay. And do you know if anyone else was
23 being deposed that day or was it strictly Ms. Mason?

24 A. I don't think anyone else was.

25 Q. Okay. I'm going to share an e-mail here and

1 see if -- make sure I get the right one.

2 Are you able to see that, Mr. Blanchard?

3 A. Yes. And you can call me Jake if you don't
4 mind.

5 Q. I will. Thank you for that.

6 And if I inadvertently say Mr. Blanchard throughout
7 the deposition, it's not anything personal.

8 A. No. No worries.

9 Q. So the time of this e-mail appears to be 3:22
10 p.m. on Thursday, January 26th, is that accurate?

11 A. Correct.

12 Q. And the recipient is Jake Blanchard and
13 Rebecca Watters.

14 A. Correct.

15 Q. Now who is Rebecca Watters?

16 A. Rebecca Watters is a paralegal that's been
17 working with me since June 2015.

18 Q. Okay. All right. And in this e-mail it
19 basically says, he just called me a scumbag like the
20 clients I represent.

21 Is this the e-mail that you're referring to that
22 caused you to go into the deposition room?

23 A. Correct.

24 Q. And the e-mail that caused you to text, send a
25 text message to Steve Cozzi.

1 A. Yes.

2 Q. Okay. Are you able to see the text message
3 that I just shared?

4 A. Yes.

5 Q. And it appears -- it has Steve and then it has
6 January 26, 3:28 p.m., and it says, stop the depo and
7 come into my office.

8 Is that your text to Steve Cozzi?

9 A. Yes, it is.

10 Q. Do you know why it's doubled like that?
11 Is that --

12 A. Yes. So I switch from an Android to an
13 iPhone.

14 Q. Okay.

15 A. And for some reason every text -- I did a
16 backup and then restored it. I don't -- but anyway, I
17 switch from an Android to iPhone and that's what it did.

18 Q. Okay. So you didn't send the message twice.
19 You sent it once.

20 A. Correct. Right.

21 Q. And then Steve Cozzi responded, we just had a
22 break, it's okay.

23 A. Correct. Yes.

24 Q. And then you responded, no, I'm kicking him
25 the fuck out.

1 A. Correct. Yep. Yes.

2 Q. Are you able to -- do you still have this
3 message in your phone?

4 A. Yes.

5 Q. Are you able to see the time that you sent --
6 I mean that he sent, we just had a break?

7 A. Let me check.

8 Q. Okay.

9 A. No, I'm not. I'm trying to see if it could
10 tell me the time when I click on it, but it doesn't have
11 that option unfortunately.

12 Q. Okay. Your recollection as to what he says,
13 don't, he's sanctions happy.

14 A. Yes.

15 Q. Do you recall whether or not that was before
16 or after you entered the deposition?

17 A. I don't recall.

18 Q. The next one that Steve Cozzi presumably sends
19 says, I was just upset, it's no big deal.

20 A. That was after.

21 Q. That was after, okay.

22 A. Yes.

23 Q. And then on the screen that I'm looking at
24 there's a message that's cutoff. Is that the same --

25 A. Yes.

1 Q. The double entry of the I was just upset, it's
2 no big deal?

3 A. Correct. Uh-huh.

4 Q. Yes?

5 A. Just a copy of it.

6 Q. And the next text message, without disclosing
7 anything privileged or what have you, the next text
8 message following that does it have anything to do with
9 Tom Kosowski?

10 A. No.

11 Q. Okay. Does it in anyway assist you in the
12 timing of anything?

13 A. No.

14 Q. Okay. And so just to make sure when he says,
15 I was just upset, it's no big deal, that's after you had
16 gone into the deposition room.

17 A. Yes.

18 Q. The don't, he's sanctions happy, you're not
19 sure if that was before or after.

20 A. I'm not sure.

21 Q. Okay. And would it make sense that your text
22 message saying, no, I'm kicking him the fuck out, would
23 have been before you entered the deposition room?

24 A. Yes.

25 Q. Do you know whether or not law enforcement or

1 anyone else has had access to your phone to try to
2 determine the exact times of these text messages?

3 A. I don't know. Not to my phone, no.

4 Q. Okay. Do you have itemized billing for your
5 phone that might assist us in narrowing down the times
6 of these text messages beyond the January 26th, 2023 at
7 3:28 p.m.?

8 A. I don't know.

9 Q. Can you check on that and let your lawyer know
10 if that's something --

11 A. Yes. I was thinking the same thing, but I
12 don't know if it does or I don't know if I could check
13 by looking at it, but I'll look to see.

14 Q. Take a look at it. Sometimes the itemized
15 billing will give the time --

16 A. Right.

17 Q. -- of the text messages and what have you
18 without the content but maybe we can sort of piece it
19 together.

20 A. Sure.

21 Q. Do you know what time the deposition ended
22 that day?

23 A. No. It's on the transcript, though.

24 Q. Okay. Do you remember if you had any
25 conversation with Steve Cozzi at the conclusion of the

1 deposition that day about what had happened or what had
2 not happened?

3 A. Yes, we did talk.

4 Q. In the text message -- I apologize. In the
5 e-mail it indicated that the statement was made, but it
6 doesn't make any reference to the bathroom.

7 Do you need to see that e-mail again or do you
8 recall that?

9 A. I recall that.

10 Q. Okay. If you recall, when do you recall Steve
11 Cozzi saying anything about it happening in the
12 bathroom?

13 A. I don't remember, but I -- I don't remember
14 when but I think it was after we talked about it or I
15 mean I think it was after the incident. I don't
16 remember, though, exactly.

17 Q. Okay. In the text message he says, we just
18 had a break, would suggest to me that you would not have
19 known that they had a break without him sending you that
20 text message.

21 A. I didn't think about it.

22 Q. Okay.

23 A. But I didn't -- I didn't think about it.

24 Q. Right. But the e-mail doesn't say that it
25 happened -- where it happened, right?

1 A. Right.

2 Q. And the text message doesn't say where it
3 happened.

4 A. Right.

5 Q. Okay.

6 A. I -- I found that I do believe it -- I must
7 have found out after we had a chance to talk about it.

8 Q. At the conclusion.

9 A. Right. But for some reason I may have assumed
10 it as well because --

11 Q. Okay. Assumed that the two of them were in
12 the bathroom at the same time or --

13 A. I don't know. I don't know. I don't know
14 when I found out, Bjorn.

15 Q. Okay.

16 A. I don't know when I found out.

17 Q. That's fine. Do you recall, going back to
18 March 21st, 2023, you initially tell law enforcement
19 that you can't think of anyone who would want to harm
20 Mr. Cozzi?

21 Do you recall at what point you bring up Tom
22 Kosowski?

23 A. Well, they just kept asking me I think, you
24 know, can you think -- is there anybody you can think
25 of, anybody at all, can you think of anybody at all,

1 right?

2 So I guess at some point I said, that's the only
3 person I can think of.

4 Q. At some point that day.

5 A. Yeah.

6 Q. Okay. Do you know if it was hours after your
7 initial contact with law enforcement?

8 A. I don't remember.

9 Q. Okay. Do you remember it being that day?

10 A. Yes.

11 Q. Okay. Do you remember who you brought the
12 information to?

13 A. One of the law enforcement officers. I don't
14 remember specifically.

15 Q. Well, do you recall if it was one of the
16 initial responding officers or if it was a detective
17 later on?

18 A. I think it may have been a detective.

19 Q. Okay. All right. Do you recall whether or
20 not it happened before or after you were allowed to view
21 the video surveillance?

22 A. It was before I viewed the video surveillance
23 I believe.

24 Q. Okay. When did you view the video
25 surveillance?

1 A. I didn't get to view it until later in the day
2 after, you know, begging and trying to convince someone
3 to let us see it.

4 Q. Okay. And do you recall whether or not law
5 enforcement was of the belief that Steve Cozzi had
6 walked out of the building based on their review of the
7 video surveillance?

8 A. I don't know what they thought.

9 Q. Okay. They didn't express it to you.

10 A. Not really.

11 Q. Okay. Did they ask you if you could identify
12 the person that was walking out of the building?

13 A. There wasn't any -- there was somebody pulling
14 a cart or something coming out of the building.

15 Q. Sure.

16 A. But I couldn't identify them.

17 Q. Did they ask you if you could identify that
18 person?

19 A. Yeah, they asked me who that -- who I thought
20 that was, and I said, I didn't know.

21 Q. Okay. Did they ask you if that could be Steve
22 Cozzi?

23 A. They asked me if that could be, and I said,
24 absolutely not Steve Cozzi. It's not him.

25 Q. Okay. And what was it about the appearance of

1 the person in the video that made you say, absolutely
2 not, it could not be Steve Cozzi?

3 A. Well, he was taller.

4 And also, you know, you get to -- you see someone
5 every day. You understand how they move. And you
6 just -- he didn't move like Steve. He didn't walk --
7 you know, he didn't act -- you know, he just didn't have
8 the mannerisms or -- and he was also, like I said,
9 taller. So it was clearly it wasn't Steve.

10 Q. Okay. Did you indicate at one point that you
11 believed that Tom Kosowski wanted to harm you?

12 A. I don't think so.

13 Q. Okay. Did you believe at some point that he
14 wanted to harm you?

15 A. Not prior to this incident.

16 Q. Okay. Since this incident did you?

17 A. Yeah. I would -- yeah, I'm a little -- I've
18 been -- I'm still scared truthfully.

19 Q. Okay. Okay.

20 A. I do worry about that.

21 Q. And --

22 A. Because I don't know who he knows, you know,
23 or who he could call.

24 Q. And that's based on your beliefs as to what
25 happened with Steve Cozzi?

1 A. Yes. I worry about it.

2 Q. Just give me one second.

3 Was there -- did you notice any elevation of Steve
4 Cozzi's anxiety levels in the weeks leading up to March
5 21st?

6 A. Not really, no.

7 Q. Any indications that he had started drinking
8 alcohol again?

9 A. No.

10 Q. Okay. Were you aware that he had had a -- in
11 the past had had an alcohol problem?

12 A. Yes.

13 Q. Okay. Is that something that you think you
14 would notice if he had started consuming alcohol again?

15 A. Yes.

16 Q. Okay. And how is that?

17 A. Again, you get to know somebody you see every
18 day.

19 Q. Okay.

20 A. Mannerisms. Actions. Speech.

21 You know, he was -- I knew him so well that if I
22 thought he was drinking again, I would have known. I
23 think I would have known. But there wasn't any
24 indication to me that he was.

25 Q. Do you have any theories as to what happened

1 or didn't happen on March 21st as it relates to Steve
2 Cozzi?

3 A. Now? As I think about it?

4 Q. Sure.

5 A. Knowing what I know now?

6 Q. Sure. I know you know that he was murdered or
7 you believe that he was murdered, right?

8 A. Yes.

9 Q. Beyond that as far as what happened. It would
10 be pure speculation I assume on your part.

11 A. Yes.

12 Q. Okay. The hearing that took place on March
13 28th, 2023, do you recall that hearing?

14 A. Yes.

15 Q. Do you recall whether or not there was a court
16 reporter present for that hearing?

17 A. I don't recall.

18 Q. Did your office arrange to have a court
19 reporter present for that hearing?

20 A. I don't remember.

21 Q. Can you check with your office and let your
22 lawyer know so that he can convey the information to
23 Mr. Vonderheide as to whether or not your office did
24 arrange for a court reporter, and if so, who the court
25 reporter was?

1 A. Yes.

2 Q. Have you ever seen a transcript of that
3 hearing?

4 A. No.

5 Q. The motions that were heard on that particular
6 day, were those motions that have been filed by Tom
7 Kosowski?

8 A. I don't remember.

9 Q. If I suggested there were five motions pending
10 and they were all plaintiff motions, Tom Kosowski was
11 the plaintiff, correct?

12 A. Correct.

13 Q. Okay. Do you recall you appeared for that
14 motion, right?

15 A. I did.

16 Q. Telephonically.

17 A. Yes.

18 Q. And did you make any arguments at that
19 hearing?

20 A. I don't remember speaking much. I think that
21 Jacob Pillsbury spoke mostly.

22 Q. Okay. Who do you recall being present for
23 that hearing?

24 A. It was Jacob Pillsbury, myself, and Judge
25 Muscarella I believe.

1 Q. Okay. And a court reporter if a court
2 reporter was present.

3 A. I don't know.

4 Q. No, I'm saying, if a court reporter was
5 present, then it would include a court reporter.

6 A. Correct.

7 Q. Okay. And Tom Kosowski was not present, is
8 that accurate?

9 A. Correct.

10 Q. At that point he had been arrested for murder,
11 correct?

12 A. Correct.

13 Q. Were there any discussions between the
14 attorneys and Judge Muscarella about the fact that Tom
15 Kosowski had been arrested for the murder of Steve
16 Cozzi?

17 A. Not that I recall.

18 Q. So any discussions about whether or not Tom
19 Kosowski had been arrested?

20 A. I think that was the reason cited for him not
21 appearing by Mr. Pillsbury, but I don't think there was
22 a discussion about it.

23 Q. Okay. Do you know if any attempts were made
24 to reach out to the jail to make sure that Tom Kosowski
25 could appear for the phone hearing?

1 A. Not that I recall.

2 Q. Do you recall how long that hearing was?

3 A. 30 minutes or so. Maybe less.

4 Q. Do you recall an affidavit of a Prova Softe
5 that was attached to one of the motions as an exhibit?

6 A. No.

7 Q. Okay. Do you recall seeing an affidavit
8 authored by Prova Softe?

9 A. No.

10 Q. Do you know who Prova Softe is?

11 A. No.

12 Q. And I believe you indicated that Jake
13 Pillsbury did most of the arguments during this hearing.

14 A. Correct.

15 Q. Did you make any of the arguments during this
16 hearing?

17 A. I don't recall speaking much.

18 Q. Okay. So you may have made some of the
19 arguments or you don't believe you made any arguments?

20 A. I don't remember if I made any arguments or
21 not.

22 Q. Do you recall if anyone suggested to the court
23 that it might be appropriate to make sure, since Tom
24 Kosowski was incarcerated and since they were his
25 motions, that maybe he should -- someone should make

1 sure that he had the ability to attend the hearing?

2 A. I don't recall.

3 Q. Do you know whether or not your firm has
4 previously represented Trisha Mason as a client?

5 A. I don't think so.

6 Q. One of the motions that were heard on that
7 date, on March 28th, was a plaintiff's motion for
8 subpoena duces tecum of records from third parties.

9 Do you recall whether or not any of those third
10 parties filed any objections or appeared for the
11 hearing?

12 A. I don't remember.

13 I don't think they appeared.

14 Q. Okay. And if they filed objections, it would
15 be part of the court docket.

16 A. Yes.

17 Q. Okay. And if it's not part of the court
18 docket, it would be fair to assume they did not file
19 objections; can we agree with that?

20 A. Yes.

21 Q. Okay. Do you recall who was tasked with
22 drafting the order reflecting the rulings on March 28th?

23 A. I don't remember.

24 Q. And do you recall whether or not there were
25 any instructions from the court regarding copying

1 Dr. Kosowski with the proposed order?

2 A. I don't remember.

3 Q. Just to make sure. I think I already asked
4 you this, but you knew that Tom Kosowski was in jail on
5 March 28, 2023, correct?

6 A. Yes.

7 Q. And how did you learn that he was arrested?

8 A. I don't remember how I found out.

9 Q. But you knew it well in advance of that
10 hearing, correct?

11 A. Yes. I don't know if it was well in advance
12 of the hearing. I just knew. I knew it --

13 Q. Did you tell --

14 A. -- because I don't remember what day. I don't
15 remember what day.

16 Q. Do you recall if law enforcement contacted you
17 to let you know that he had been arrested?

18 A. I don't remember. I don't remember how I
19 found out. I really don't.

20 Q. Do you recall if you knew prior to it being
21 all over the news?

22 A. Yes.

23 Q. Okay. All right. Do you recall if any
24 consideration was given to continuing the hearing on
25 March 28 in light of Tom Kosowski's absence?

1 A. I don't remember. I don't remember. I think
2 it would have been up to the Judge, but I don't remember
3 if anybody talked about it.

4 Q. Okay.

5 A. The Judge certainly could have continued it.

6 Q. Right.

7 A. The Judge knew he was in jail.

8 Q. How do you know that?

9 A. Because by that time it was on the news.

10 Q. How do you know that the Judge watched the
11 news?

12 A. I just know that she knew he was in jail.

13 Q. Okay. And is that because the Judge made some
14 statement about it?

15 A. I think that Mr. Pillsbury said that he had
16 been arrested, and the Judge said that she knew that he
17 had been arrested.

18 Q. At the beginning of the hearing.

19 A. At some point, yes.

20 Q. Okay. But as far as whether or not there was
21 any discussions about continuing it, you don't recall
22 that taking place.

23 A. No.

24 Q. Okay. No, you don't recall, right?

25 A. I do not recall.

1 Q. Okay. The next hearing that took place I
2 believe was on May 2nd, 2023; do you recall that?

3 A. Yes.

4 Q. And this was a hearing on the defendants'
5 motion for summary judgment?

6 A. Yes.

7 Q. And you handled that.

8 A. Yes.

9 Q. Was there a court reporter present for that
10 hearing?

11 A. I don't remember.

12 Q. Okay. Can you find out and let Simon know so
13 that he can then forward that information to
14 Mr. Vonderheide?

15 A. Yes.

16 Q. Okay. The original hearing on May 2nd was
17 supposed to be an in-person hearing.

18 Do you know when it was changed from an in-person
19 to telephonic?

20 A. No.

21 Q. Do you know why it was changed from in-person
22 to telephonic?

23 A. Yes.

24 Q. Why was that?

25 A. So that Mr. Kosowski could participate.

1 Q. Okay. Did someone indicate that the option of
2 him being transported in person for the hearing was not
3 an option?

4 A. No.

5 Q. Okay. Who decided for purposes of that
6 hearing to make sure that he was -- had access to a
7 phone hearing and then that he would be able to
8 participate?

9 Who made that decision?

10 A. I don't know.

11 Q. Okay.

12 A. I guess the Judge.

13 Q. Was it you?

14 A. I wanted to make sure he was there, but I
15 don't know how the procedure went, but I know that the
16 Judge made sure he was on the phone.

17 Q. Do you recall whether or not that issue was
18 discussed at the earlier hearing March 28th?

19 A. I don't think so. I don't remember.

20 Q. Okay.

21 A. But I don't think so.

22 Q. All right. Do you recall whether or not you
23 or your office had communications with the court about
24 changing it over from an in-person to a phone hearing?

25 A. I think the court changed it and then informed

1 us.

2 Q. Okay. There's a notice -- I believe there was
3 a notice of hearing that changes it from in-person to
4 via phone, and I believe it was prepared by your office,
5 but --

6 A. We may have been directed to do so by the
7 Judge's clerk or assistant.

8 Q. Okay. All right.

9 A. We wouldn't have done it on our own.

10 Q. All right. So you may have received an e-mail
11 from the JA or a phone call saying --

12 A. Her phone call saying, you need to change this
13 to a telephonic hearing, correct, because we wouldn't
14 have done it on our own. We wouldn't have had the
15 information to -- for the call-in, right, so -- but
16 someone directed -- the Judge's chambers directed us to
17 change it to a telephonic hearing one way or the other.

18 Q. Do you recall Tom Kosowski asking for a
19 continuance after you had made your argument in the May
20 2nd hearing?

21 A. I don't remember. I don't remember.

22 Q. Okay. And I'm assuming then that you don't
23 remember the reasons he may have put forth in the
24 request for a continuance.

25 A. I don't remember.

1 Q. Okay. Do you recall that he was appearing at
2 least for portions of that hearing via telephone?

3 A. Yes.

4 Q. Do you recall him indicating to the court that
5 he did not have access to his legal notes due to his
6 incarceration and that that was part of the reason he
7 wanted to continue the hearing?

8 A. I don't remember.

9 Q. Okay. Do you recall him indicating to the
10 court that he was concerned about outstanding motions
11 that needed to be argued prior to the summary judgment
12 motion being heard?

13 A. I don't remember.

14 Q. Do you recall Tom Kosowski complaining about
15 not being treated fairly during the May 2nd hearing?

16 A. I do remember him saying something about that.

17 Q. And do you recall Mr. Pillsbury making a
18 comment maybe in jest about his request to be treated
19 fairly?

20 A. No. I know that there's been ample
21 opportunity for him to appeal that judgment and it
22 hasn't been done and the time has passed. So he could
23 have appealed it if he didn't think he was being treated
24 fairly.

25 Q. Do you recall either you or Mr. Pillsbury

1 responding in any way to his concern about not being
2 treated fairly?

3 A. I don't remember. Like I said, I know that he
4 hired -- I looked on the docket and I saw he hired
5 somebody to represent him in the case, and he had an
6 opportunity to appeal and he didn't so.

7 Q. The orders that were entered on March 28, 2023
8 I believe Mr. Pillsbury was tasked with preparing those
9 for the court's consideration; do you recall that?

10 A. I don't remember.

11 Q. Okay. As an attorney does Mr. Pillsbury have
12 any ethical obligations as it relates to communicating
13 or delivering said orders to the parties in a case?

14 A. I think if the Judge directs him to do that he
15 does, but other than that I don't know that there's
16 anything in, you know, the professional responsibility
17 code that indicates that you must do that.

18 Q. Okay. Do you know whether or not the court
19 directed him to do that?

20 A. I don't remember.

21 Q. Normally when orders are shared with the
22 parties, it's not necessarily an ethical obligation.

23 A. I don't know if it is or not. I just don't --
24 I never -- I do it any way, but I don't know if it's
25 written somewhere that you have to do it.

1 Q. Okay.

2 A. That was my point of that.

3 Q. But your practice is always to share orders in
4 a timely fashion.

5 A. Yes.

6 Q. Okay. And that's, these days, generally done
7 electronically.

8 A. Yes.

9 Q. All right. And would that be done almost
10 simultaneously with you receiving the orders signed by
11 the court?

12 A. Would it be simultaneously --

13 Q. Or would the court submit them to all the
14 different parties?

15 A. When the order is signed?

16 Q. Right.

17 A. I think that when you submit it to the court,
18 depending on the Judge's practices, you have to
19 submit -- some Judges make you submit envelopes and
20 actually like physically take them down to the office
21 and drop them off so that when they sign them, they can
22 put them in the envelopes to go to the parties.

23 So I don't know. I don't know what this Judge's
24 practices were, but I don't remember.

25 Q. Is there anything else that I have -- is there

1 anything else that you believe is important for us to
2 know that you haven't -- that we haven't talked about
3 here today or that you have not communicated to law
4 enforcement about this?

5 A. No.

6 MR. BRUNVAND: So other than the matters that
7 I asked you to follow-up with with your counsel, I
8 don't have any other questions. I don't know
9 if --

10 MR. VONDERHEIDE: No question from the State.

11 MR. BRUNVAND: -- anybody else has any
12 questions.

13 MR. VONDERHEIDE: No questions from the
14 State.

15 MR. BRUNVAND: Okay. Jake, do you want to
16 read or waive if we transcribe these depositions?

17 DEPONENT: I'll read. And I actually will.
18 I know a lot of times people say that they do that
19 and they don't, but I actually will read it and
20 make sure.

21 MR. BRUNVAND: I'm going to turn off the
22 recording.

23 (The deposition was concluded at 12:01 p.m.)
24
25

ERRATA SHEET

IN RE: State vs. Kosowski

DATE TAKEN: July 29, 2024

WITNESS: Jake Cecil Blanchard

Page	Line	Correction	Reason
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Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

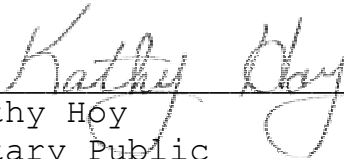
DATE	(JAKE CECIL BLANCHARD)
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CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF PINELLAS)

I, the undersigned authority, certify that
JAKE CECIL BLANCHARD, personally appeared before me and was
duly sworn on July 29, 2024 via Zoom Videoconference.

WITNESS my hand and official seal this 23rd day
of December, 2024.



Kathy Hoy
Notary Public
State of Florida at Large
My Commission No.: HH 578942
Expires: September 23, 2028



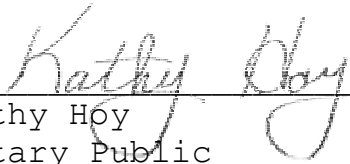
CERTIFICATE OF REPORTER

STATE OF FLORIDA)
COUNTY OF PINELLAS)

I, Kathy Hoy, Court Reporter, certify
that I was authorized to and did stenographically
report the deposition of JAKE CECIL BLANCHARD; that a
review of the transcript was requested; and
that the foregoing pages are a true record and complete
record of my stenographic notes taken during said
deposition.

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

Dated this 23rd day of December, 2024.



Kathy Hoy
Notary Public
State of Florida at Large
My Commission No.: HH 578942
Expires: September 23, 2028