

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

STATE OF FLORIDA,

Plaintiff,

vs.

CASE NO. 23-02935CF

TOMASZ KOSOWSKI,

Defendant.

_____/

VIRTUAL DEPOSITION OF REBECCA WATTERS

DATE: January 8, 2025

TIME: 1:59 p.m.

PLACE: Various Remote Locations
Via Zoom Video Communications

REPORTER: KIMBERLY L. RENFROE, RPR
Stenographic Reporter

VIRTUAL
APPEARANCES:

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Assistant State Attorney
Post Office Box 17500
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For the State

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1 DEPOSITION IN DISCOVERY

2 REBECCA WATTERS

3 Pursuant to notice duly given, the virtual
4 deposition of REBECCA WATTERS, called by the Defendant
5 in the above-styled cause, was taken by me, a Notary
6 Public in and for the State of Florida at Large, at the
7 time and place and in the virtual presence of counsel
8 enumerated on Page 2 hereof.

9 Thereupon, it was stipulated and agreed by and
10 between the attorneys for the respective parties, by and
11 with the consent of the said REBECCA WATTERS, that
12 signature to the said deposition be waived.

13 THE COURT REPORTER: Raise your right hand,
14 please.

15 Do you swear or affirm that the testimony
16 you're about to give in this cause will be the
17 truth, so help you God?

18 THE WITNESS: Yes.

19 THE COURT REPORTER: Thank you.

20 REBECCA WATTERS, having been first duly sworn via
21 Zoom Video Communications, upon interrogation in
22 discovery, testified as follows:

23 DIRECT EXAMINATION

24 BY MR. BRUNVAND:

25 Q. Good afternoon. My name is Bjorn Brunvand.

1 We're here on State of Florida versus Tomasz Kosowski
2 and we're here to take your deposition.

3 If you could please state your full name?

4 A. Full name is Rebecca Leigh Watters.

5 Q. And you've been listed as a witness in this
6 case and I believe you know why you're listed as a
7 witness in this case, but why don't -- why don't you --
8 well, why don't we start out by -- by -- by you telling
9 us what do you do now; do you still work with
10 Mr. Blanchard?

11 A. I -- yes.

12 Q. Okay. All right.

13 And going back to March of 2023, were you working
14 for Mr. Blanchard at that time?

15 A. Yes.

16 Q. And what were you doing for him, what kind of
17 work?

18 A. I -- a paralegal.

19 Q. Okay. Any particular field of -- of law that
20 you were working on?

21 A. More bankruptcy law.

22 Q. Okay. And how long had you worked with him at
23 that time?

24 A. March 2023 will be around -- I'm trying to do
25 the math -- eight years, eight, nine years.

1 Eight years.

2 Q. Okay.

3 And during the time -- and were you a paralegal the
4 whole time?

5 A. Yes.

6 Q. And during the time that you worked with him,
7 did you get to know Steven Cozzi?

8 A. Yes.

9 Q. And how long did you know Steven Cozzi?

10 A. From when he was hired with the firm to when
11 he was -- disappeared, left. I -- I don't know the
12 right word. From March 20 -- whatever the date was.

13 Q. Okay. So -- so do you recall when he was
14 hired?

15 A. No.

16 Q. Okay.

17 A. It's --

18 Q. Had -- had it been --

19 A. No.

20 Q. -- a period of years?

21 A. Yes. Prior, yes.

22 Q. Okay. All right.

23 And -- and by the way, if you ever need to take a
24 break or if you're not sure, you know, what I'm asking
25 you and what have you --

1 A. Uh-huh.

2 Q. -- just let us know and ask me to repeat
3 myself. And it's also important if a question asks for
4 a yes or no answer that you say yes or no instead of
5 uh-huh or unh-unh because that's hard to transcribe
6 sometimes.

7 A. Yes. Thank you. I'm just a little nervous.
8 Never done this before.

9 Q. Understood. Understood.

10 How would you describe your relationship with
11 Steven Cozzi?

12 A. Close.

13 Q. Okay. Were -- were you friends outside the
14 workplace or was it primarily a workplace relationship?

15 A. Workplace relationship.

16 Q. Okay. And -- and you had worked closely
17 together for several years?

18 A. Yes.

19 Q. Okay. Who -- who was in the office during
20 that time period in the years leading up to March of
21 2023?

22 A. I -- I don't understand the question.

23 Q. Who was working in the office besides
24 yourself? I assume Mr. Blanchard was working there and
25 Steven Cozzi.

1 Did anyone else work on a regular basis in the
2 office during the years leading up to March of 2023?

3 A. Yes.

4 Q. Okay. Who were -- who -- who else was working
5 there during that time period?

6 A. We had a person answering the phones named
7 Chris Carroll and Andrea Bauman, a -- an accountant.

8 Q. Okay. Anyone else?

9 A. No.

10 Q. Okay. All right.

11 You indicated that you had a good relationship with
12 Steven Cozzi in the workplace on -- and that it was
13 primarily a workplace relationship, correct?

14 A. Yes.

15 Q. Could you -- could you -- could you sort of
16 elaborate on that as far as -- you know, describe your
17 relationship a little bit beyond just that it was good
18 in the workplace. Give us a little bit more insight.

19 A. We would do like coffee breaks together,
20 Wendy's runs; we'd take little mental breaks and laugh
21 at like memes on the internet and share jokes with each
22 other. His office was like less than five feet from
23 mine and we had the door open the majority of the time
24 so we'd just laugh with each other and have good
25 camaraderie and we could come to each other with

1 stuff -- with like problems or venting or good news or
2 bad news. Just very close-knit within the office
3 especially working that -- that close together for the
4 length of time he was at the firm.

5 Q. Okay.

6 One second here.

7 Do you recall the day that -- that Steven Cozzi
8 disappeared?

9 A. Yes.

10 Q. All right. Let's talk about that day.
11 When did you arrive in the office that day?

12 A. I don't recall the exact time but usually I
13 would come to the office around 8:30.

14 Q. Okay. Do you recall whether or not
15 Steve Cozzi was -- had arrived in the office when you
16 arrived?

17 A. Yes. He was already there.

18 Q. Okay.

19 Do you recall greeting him when you arrived in the
20 office?

21 A. Yes.

22 Q. Okay.

23 Did you have a conversation with him or did you
24 just sort of say good morning and -- and go to your
25 desk?

1 A. I had a conversation with him and it was our
2 usual morning hellos. I would drop my lunch off in the
3 fridge and he would say hi to me and I brought my dog
4 Molly to work and he would say hi to her; and it was
5 just a really light morning. We even mentioned like
6 going to Wendy's in the afternoon after his morning
7 stuff.

8 Q. Okay.

9 A. I do remember that.

10 Q. Right.

11 The -- how long would you say you interacted with
12 him and spoke with him that morning?

13 A. I -- I don't recall how long.

14 Q. Okay. I mean, normally what would it be, just
15 a few minutes or --

16 A. Probably -- probably around ten --

17 Q. Okay.

18 A. -- just --

19 Q. All right.

20 A. -- yeah.

21 Q. And you said you had your dog with you that
22 day?

23 A. Yes. Yeah. She comes to work with me every
24 day.

25 Q. And the -- what kind of dog is it?

1 A. Corgi-Jack Russell mix.

2 Q. Okay. All right.

3 So -- and she stays what, under your desk or --

4 A. Uh-huh.

5 Q. -- in close proximity to you?

6 A. Yes.

7 Q. All right. It's a girl or boy?

8 A. Girl.

9 Q. Girl. Okay.

10 The -- do you recall what Steven Cozzi was wearing
11 that day?

12 A. A red sweater.

13 Q. Okay. Do you recall if he had a shirt on
14 underneath the red sweater, and if so, what color that
15 may have been?

16 A. I recall the shirt, I don't recall the color.

17 Q. Okay. Was it a -- was it a patterned shirt or
18 was it a plain shirt; do you recall?

19 A. I don't recall.

20 Q. Okay.

21 A. I don't remember.

22 Q. So you re -- so you recall that there was a
23 shirt underneath the -- the -- the red sweater but
24 beyond that, you don't recall anything about it.

25 A. Yes.

1 Q. Okay.

2 Do you recall if it was a long-sleeve shirt or a
3 short-sleeve shirt?

4 A. I don't recall that detail.

5 Q. Okay. But presumably you recall maybe seeing
6 a shirt collar coming out through the sweater or
7 something like that?

8 A. Yes.

9 Q. Okay. All right.

10 And how did -- how did Steve Cozzi appear to you
11 that particular day? Did he seem happy? Did he seem
12 sad? Did he seem stressed? Do -- what do you recall?

13 A. I recall our interaction joyful, happy. He
14 was a little stressed about a hearing coming up, which
15 is why he wanted to go to Wendy's, which is what we
16 usually did and I do remember him being stressed about
17 that but he always had a great attitude and he was like
18 it'll be fine. So he always had a great attitude.

19 Q. Did you go to Wendy's or were you planning on
20 going to Wendy's after the hearing?

21 A. After the hearing.

22 Q. Okay. All right.

23 And so when -- when -- when you're done with this
24 conversation, other than being anxious about the hearing
25 itself, did he indicate anything else as far as --

1 anything else that he was anxious about or worried about
2 or --

3 A. No.

4 Q. Okay. All right.

5 And so when you're done with your conversation
6 where does -- where does Steven Cozzi go; is he in a
7 room by himself? What -- tell me about that.

8 A. He went to his office, which was across from
9 mine and his office is -- was adjacent to the conference
10 room; and then I retreated to my office and -- I
11 retreated to my office.

12 Q. Did you -- did you close -- did you have a
13 door that was -- was your door fully enclosed and --
14 and -- and -- and was the door closed or was it open?

15 A. The door ended up closing. I had a project to
16 work on that I needed my earbuds in for.

17 Q. Okay. So you have your earbuds in and -- and
18 your puppy's there with you and you're working on a
19 project.

20 A. Yes.

21 Q. Okay.

22 And Steven is in his office the last time you see
23 him; and is his door closed or open when -- when you go
24 to your office?

25 A. Open. All --

1 Q. Okay.

2 A. -- the doors were open.

3 Q. Okay. So the only door that was closed was
4 your door?

5 A. Yes.

6 Q. Okay.

7 Was there any type of alert systems in your office
8 at the Belcher location that would, like, make sounds if
9 someone entered the front door or either the main door
10 to the building or -- or the door into your office?

11 A. There is -- it was an alarm system. It did
12 not have chimes on it.

13 Q. Okay. All right. And that's the word I was
14 looking for. So you -- you're ahead of me. I was -- I
15 couldn't remember the name of it. The chimes --
16 right? -- there were no chimes?

17 A. Uh-huh. Not when one would enter in.

18 Q. Okay. All right.

19 And was that strictly for the office going into the
20 Blanchard Law Office or was that for the building itself
21 as well?

22 A. The Blanchard Law Office only.

23 Q. Okay. Were you familiar with the vacant
24 offices that were in that building?

25 A. Yes.

1 Q. Okay. Did -- did -- would you ever go into
2 those vacant offices?

3 A. No.

4 Q. Okay. Would it be fair to say that -- that it
5 was -- it was easily accessible to go into that part of
6 the building?

7 A. Yes.

8 Q. Okay.
9 Do you know whether or not someone was keeping an
10 eye on those offices to make sure that they were locked
11 as far as access from the outside or do you have any
12 idea about that?

13 A. No.

14 Q. Okay.
15 The -- other than your contact with Steven Cozzi
16 that you talked about, do you have any more contact with
17 him that day?

18 A. No, not that day.

19 Q. Okay.
20 The -- at some point in time do you become worried
21 or concerned about the fact that you have not heard from
22 him or seen him in -- in some time?

23 A. Yes.

24 Q. All right. Tell us about that. What -- how
25 does that come about?

1 A. There was a weird feeling and my gut told me
2 to open the door and check. I was working on my
3 project. I was listening to a show and it was -- it was
4 the Jurassic Park movie and there was a moment in the
5 movie something just felt wrong. And I knew Steve's
6 routine pretty well and I got up and I saw he wasn't in
7 his office. He had his phone still playing jazz music,
8 he had an email open on his computer, and it just
9 felt -- it felt weird at that moment.

10 Q. Okay. So -- so while you're listening to the
11 show, for some reason you became concerned about what,
12 the fact that you had not heard from him or what -- what
13 is it, or was it anything in particular?

14 A. The -- more not heard, but when you work so
15 closely knit in this small of a firm, you get to know
16 your colleague's bathroom routines.

17 Q. Right.

18 A. And every day around the same time he'd have a
19 procedural routine, and he hadn't come back. And I
20 have -- I learned over time and by observation he didn't
21 come back and just more on the feeling from that. It
22 was like something -- something feels weird.

23 Q. Now, tell me about the routine that he
24 normally had. So -- I mean, you come in in the morning,
25 you greet each other or you may have a brief

1 conversation.

2 A. Uh-huh.

3 Q. What's the routine that you were accustomed to
4 that -- that, you know, was -- was -- was different on
5 this particular day?

6 A. He -- the -- procedurally, before a hearing,
7 he'd take about ten minutes, go to the restroom, and
8 I -- just -- it just felt off that maybe he -- something
9 happened. And every -- every day at the same time he
10 also would use the restroom and do that.

11 Q. How would you know, generally, that he was
12 using the restroom if you're in your office with the
13 door closed and working?

14 A. I don't always have the door closed when I
15 work so there were --

16 Q. Okay.

17 A. -- times when I would have the door open, I
18 didn't have that serious of a project going on and you
19 hear the doors open and close.

20 Q. Okay. So -- but -- but as far as the -- on --
21 on that particular day, you did have the door closed;
22 right?

23 A. Yes.

24 Q. But you were not aware of whether or not he
25 had gone to the bathroom or not gone to the bathroom.

1 A. I was not aware, just --

2 Q. Okay.

3 A. -- that gut feeling.

4 Q. So it was -- it was -- it was a gut feeling
5 that -- that was -- that you hadn't heard from him or --
6 or, I mean, would he normally stick his head in and --
7 and check on you or -- or -- or --

8 A. It was the gut feeling. He didn't normally
9 check in on me.

10 Q. Okay. So it -- it was just a -- like
11 sometimes you just get a feeling and you just got a
12 feeling that maybe something is wrong.

13 A. Yes.

14 Q. What time was that, do you know?

15 A. Around -- I don't recall the exact time, just
16 around maybe 10:15, 10:30, may -- that window; but I
17 don't recall the exact time.

18 Q. So the hearing -- I believe the hearing was at
19 10:30.

20 Do you recall what time the hearing was? I think
21 you had indicated earlier that you thought it was 10:30.

22 A. I don't recall the time of the hearing.

23 Q. Okay.

24 What do you do -- so you get up -- you get up,
25 you -- you -- you look in his office, he's not there,

1 then what do you do?

2 A. I went to Jake and I said something's wrong.
3 We both had said something was wrong.

4 Q. Okay. So you go to Jake and say something is
5 wrong and this is before you check to see if he's in the
6 bathroom?

7 A. Yes.

8 Q. Okay. This is before -- before you decide --
9 before you realize that he had missed the hearing?

10 A. Yes.

11 Q. All right. And -- and so you had this gut
12 feeling, Jake Blanchard had this gut feeling,
13 presumably, and -- and what do you do next?

14 A. I don't recall exactly what happened next.

15 Q. Okay.

16 Is there a moment -- well, do you recall whether or
17 not someone went to check and see if he was in the
18 bathroom?

19 A. Yes.

20 Q. Who did that?

21 A. Jake Blanchard.

22 Q. Okay. And do you recall him re -- returning
23 to the office from the bathroom?

24 A. Yes.

25 Q. And do you recall what, if anything, he may

1 have said to you at that time?

2 A. No.

3 Q. Okay. Was anyone else in the office at that
4 time other than Jake, yourself, your puppy and -- and --

5 A. No.

6 Q. -- Steve --

7 What happens after Mr. Blanchard or Jake checks on
8 the bathroom? You say you don't -- you don't recall
9 exactly what was said when he came back but what happens
10 next?

11 A. He went to check the rest of the building. I
12 was behind him when we went to check; I did not open any
13 of the doors. We went to check the rest of the
14 building.

15 Q. You -- you and -- and Mr. Blanchard?

16 A. Yes.

17 Q. And I know you refer to him as Jake and -- and
18 I refer to him as Mr. Blanchard because, obviously,
19 I'm -- I'm not at the same level as you are, so either
20 way is fine.

21 So when you're checking the building are you going
22 into the vacant part of the building?

23 A. Yes.

24 Q. All right. Do you -- do you go through the
25 entire -- there's several offices in the vacant part of

1 the building; right?

2 A. Yes.

3 Q. Do you guys check any of the doors to see if
4 they're locked or unlocked?

5 A. Yes.

6 Q. And what do you find?

7 A. They're all unlocked.

8 Q. All unlocked?

9 A. Yes.

10 Q. Or lock -- unlocked? Okay.

11 A. Unlocked.

12 Q. Okay.

13 And do you -- do you go into that utility closet?
14 You look in --

15 A. Yes.

16 Q. Okay.

17 And you don't see -- do you see anyone during the
18 time that you're walking around looking for Mr. Cozzi?

19 A. No.

20 Q. When you don't see him there what do you --
21 what do you do?

22 A. From there, Jake called the police.

23 Q. Okay. And what happens next?

24 A. I reached out to Michael asking him about
25 Steve. And then Michael came to the office as well.

1 Q. Okay. And Michael, would that be
2 Michael Montgomery?

3 A. Yes.

4 Q. Okay. And did Michael arrive at the office
5 before the police arrived or after?

6 A. I don't remember.

7 Q. Okay.
8 Do you recall having interaction with the --
9 with -- with law enforcement?

10 A. Yes.

11 Q. Who is the first person with law enforcement
12 that you speak with?

13 A. I do not remember the names, and I don't
14 remember the sex. It was either, obviously, male or a
15 female. I don't -- I don't remember.

16 Q. Okay. All right.
17 Are you okay?

18 A. Yeah, just hard remembering.

19 Q. I understand. I understand.
20 The -- but you -- so you spoke -- did you speak
21 with several members of law enforcement?

22 A. Yes.

23 Q. Okay. And when you spoke with them, did you
24 tell them truthful information to the -- to the best of
25 your ability?

1 A. Yes.

2 Q. Okay.

3 Do you -- let me -- give me one second here.

4 I believe one of the law enforcement officers that
5 you spoke with was a woman by the name of Jennifer Bure,
6 B-U-R-E; does that ring a bell?

7 A. Not the name, no. But -- not the name.

8 Q. Okay. That's fine.

9 In -- in the report -- in her report of -- of your
10 interview, it indicates that you had sent -- told her
11 that Cozzi seemed like his typical self and was in his
12 office preparing for a hearing, which is consistent with
13 what you've told me this morning -- this afternoon?

14 A. (Nods head.)

15 Q. Then it says that you advised that his door
16 would have been closed, however, the three of them know
17 each other's patterns for breaks and can tell when each
18 is on the phone, typing, et cetera.

19 I think you had indicated that you thought his door
20 to -- earlier today that you thought his door was open.

21 A. Yes.

22 Q. Okay. So when -- when there's a statement
23 here to law enforcement indicating that you believed
24 that the door was closed, you think that -- that's a
25 misperception by law enforcement?

1 A. I don't know.

2 Q. That's fine. That's fine. I believe that
3 there's a body cam that was worn so, you know, it --
4 it's likely that whatever conversation you had is -- is
5 recorded.

6 Were you nervous at the time?

7 A. Yes.

8 Q. All right. I understand.

9 It also indicates that you -- that you indicated
10 that you had not heard sounds from his office and that
11 you and -- and Blanchard agreed to check on him. And
12 then that -- that Blanchard indicated that Cozzi had an
13 important hearing at 10:30 but upon realizing that Cozzi
14 was not at his desk you became more concerned that he
15 now clearly missed court.

16 And I think you had indicated that you believed
17 that when you -- when you first checked on him it's
18 prior to that -- to that court hearing, and that you
19 actually learned later on -- you and -- and Blanchard
20 figure out later on that he had missed the court
21 hearing; is that accurate?

22 A. Can you rephrase the question for me?

23 Q. Okay. I -- I -- I thought you had said when
24 you -- when you first became concerned that -- about
25 Cozzi that -- and -- and you went to see Blanchard and

1 the two of you were equally concerned, that at that
2 point in time that that was before the hearing that was
3 scheduled that you later learned he had missed. I just
4 want to make sure I'm not misunderstanding that.

5 A. I -- I don't remember.

6 Q. Okay.

7 A. And -- yeah.

8 Q. That's fine. That's fine. And that's
9 perfectly fine. If you don't remember something it's
10 perfectly fine to say you don't remember.

11 What do you recall about -- you know, you -- you
12 indicated law enforcement was there and then
13 Michael Montgomery -- you -- you said you called
14 Michael Montgomery?

15 A. I Facebook messaged him.

16 Q. Okay. And -- and did you have his phone
17 number?

18 A. No.

19 Q. Okay. But -- but -- but you had -- you were
20 Facebook friends?

21 A. Yes.

22 Q. Okay. And do you still have those messages?

23 A. I'd have to check.

24 Q. Okay.

25 A. Probably.

1 Q. Yeah, if you can check on that and -- and --
2 and then you can share that with Mr. Vonderheide, if you
3 don't mind, that would be helpful.

4 Do you recall if -- if Mike Montgomery showed up
5 then shortly thereafter?

6 A. I don't recall what time.

7 Q. Okay. All right.

8 At some point in time do you view surveillance
9 footage to -- to look at people that were ent --
10 entering the building and leaving the building at
11 various times?

12 A. Yes.

13 Q. Did you look at all of the surveillance
14 footage or just sections of it?

15 A. Sections.

16 Q. Okay. And which sections do you recall
17 looking at? And I assume along with law enforcement?

18 A. Yes. Law enforcement had the surveillance and
19 it was the section of the person leaving wearing the
20 clothes with the cart.

21 Q. Okay. Is that the only section that you --
22 that you viewed?

23 A. Yes.

24 Q. All right.

25 I believe you had indicated that based on that

1 video that it was your opinion that that was not Steven
2 Cozzi.

3 A. Yes.

4 Q. Okay.

5 And -- and -- and could you elaborate on how it is
6 that you knew that that was not Steven Cozzi?

7 A. Steven walked with a certain type of flair to
8 his walk and this person did not carry themselves in the
9 same manner as Steve did.

10 Q. Okay. Could you -- could you elaborate on --
11 on when you say with a certain flair; what does that
12 mean.

13 A. Steve always had an -- just a -- like a happy
14 way of walking, whether it was stressed, upset, or -- he
15 never carried himself in this like -- in any type of
16 negative type manner. He always just very airy walk,
17 and he -- he just carried himself in this jovial way no
18 matter his mood, and the person on that surveillance, as
19 I recall, was not walking in the same manner as him.

20 Q. Okay.

21 Anything else about the person you see in the video
22 that led you to the conclusion that you did not believe
23 that that was Steven Cozzi?

24 A. Body shape -- the body shape. The way that
25 person was built.

1 Q. What about the body shape?

2 A. I -- to the best of my ability recalling, the
3 person was more -- maybe broader and Steve wasn't built
4 in this broad of a manner. He was a smaller statuesque.

5 Q. When you say broader, are you talking shoulder
6 to shoulder or -- or the entire body or --

7 A. More -- I -- more shoulder to shoulder.

8 Q. Okay. All right.

9 What about the height?

10 A. I don't recall the height.

11 Q. Okay. All right.

12 What about the clothing?

13 A. I don't recall the exact clothing.

14 Q. Okay. All right.

15 Did you ever look into the bathroom, the men's
16 bathroom?

17 A. No.

18 Q. The -- in Detective Hunt's report it's -- it's
19 indicated when they spoke with you that you said that
20 you recalled making small talk with Cozzi this morning;
21 that's accurate, right?

22 A. Yes.

23 Q. All right. And then that you believed that
24 you had last seen him in the office around 9:40 a.m.;
25 Does that seem accurate?

1 A. It seems accurate.

2 Q. Okay. That you described the day as being
3 normal and that -- and did not express any reason why
4 Cozzi would have left like this.

5 That sounds right?

6 A. Yes.

7 Q. Okay.

8 And then you talked to them about the -- the -- the
9 doorbell camera system that was immediately outside the
10 entrance to the Blanchard Law and explained that that
11 did not record unless you pushed the -- the button.

12 A. Yes.

13 Q. Okay. And that's accurate as well?

14 A. Yes.

15 Q. Okay.

16 Do you recall viewing a still image of someone
17 entering the building that was shown you -- to you by
18 law enforcement?

19 A. I don't recall that.

20 Q. And for purposes of the person that's leaving
21 the building that you indicated did not appear to be
22 Steven Cozzi, was that person -- was that -- was that a
23 still image or was that a video that you watched?

24 A. Video.

25 Q. Okay. And -- and -- which makes sense because

1 you describe his happy walk, would that be a fair
2 assessment, happy gait? He -- he generally walked --

3 A. Yes -- well -- yes. Steve's gait, yes.

4 Q. Yes. Would -- would that be a good
5 description, happy -- a happy gait?

6 A. Yes.

7 Q. Okay.

8 In -- in -- in Bolton's -- Detective Bolton's
9 interview, it indi -- it indicates that you had said
10 that after being informed by Blanchard that Cozzi could
11 not be located, that you checked his office and found
12 his personal effects still on his desk; phone being
13 plugged into computer, playing music, and that you
14 unplugged the phone and began to look for Cozzi.

15 Is that an accurate rendition or did you go into
16 the office before Blanchard expressed concerns about his
17 whereabouts? Or do you remember?

18 A. I did -- I did not go into the office before.

19 Q. Okay. So -- so you go into the office after
20 you and Blanchard talked about his whereabouts and after
21 Blanchard had gone to the bathroom and checked if he was
22 in the bathroom.

23 A. Yes.

24 Q. Okay.

25 Were you aware of an unknown person being

1 encountered or found in the electrical closet like a
2 week earlier?

3 A. Yes.

4 Q. Okay. How -- how were you aware of that?

5 A. We had the cleaning woman -- I don't recall
6 her name -- come to our door, ring our doorbell, which
7 is within the office, asking us if we had a scheduled
8 maintenance worker in that back electrical room and I
9 said no. And she said they implied it was for us and
10 from there it was there was some unknown person back
11 there.

12 Q. Okay.

13 A. That's how I found out about that person.

14 Q. Okay. And the person who you refer to as the
15 cleaning woman, do you -- did she tell you that she
16 recognized that person that -- that was in the
17 electrical closet?

18 A. Can you repeat the question?

19 Q. The -- the woman who gave you that
20 information, and you don't -- I think you said you don't
21 recall her name?

22 A. Yes.

23 Q. Did that woman tell you that -- that -- that
24 she -- the woman had recognized the person who was --
25 that was located in the electrical closet?

1 A. No.

2 Q. Just give me one second.

3 If I gave you the name of that person who you
4 referred to as the cleaning woman, would -- do you think
5 you would recognize it?

6 A. I think so.

7 Q. Heinrich?

8 A. I don't remember that last name.

9 Q. What about Debra?

10 A. Yes.

11 Q. Okay. Debra?

12 A. Yeah.

13 Q. Can you describe Debra? Just in general.

14 A. She -- she's shorter stature, has -- I recall
15 her having blonde hair, a little bit older, longer face,
16 more of a pronounced nose.

17 Q. Okay. And when you say a little bit older,
18 that can -- that can mean an awful lot of things, so
19 like --

20 A. Yeah. Everybody ages differently. So --

21 Q. Right.

22 A. -- maybe 50 to 60, I -- I don't recall her
23 age. We --

24 Q. Sure.

25 A. -- didn't talk --

1 Q. Sure.

2 A. -- about that.

3 Q. But -- but -- so this woman, Debra, came to --
4 to your office and asked if you had called someone to --
5 to do some sort of service work in the electrical
6 closet.

7 A. Yes.

8 Q. Okay.

9 And -- and you indicated no, and -- and that was
10 the extent of it?

11 A. Yes.

12 Q. Debra didn't say anything about I think it's
13 someone that has been to your office before or I
14 recognize the person or anything like that?

15 A. I don't recall her saying something like that
16 to me.

17 Q. Okay. All right. Do you think if -- if you
18 had recalled her saying something like that that you
19 probably would have told law enforcement back in March
20 of 2023 if someone had told you that a week earlier?

21 A. Can you rephrase it for me?

22 Q. All right.

23 If -- when you spoke with law enforcement on, what
24 was it, March 21st -- right? -- 2023; do you recall
25 that? The -- the day that he disappeared.

1 I'm sorry. Yeah, March 21st -- right? Double
2 check.

3 The day that he disappeared there was reports of an
4 unknown male that was in the utility closet a week
5 earlier. Did you know -- were -- did you know about
6 that at that time?

7 A. That there were law enforcement reports?

8 Q. Right. That there were law enforcement
9 reports or -- or just the fact that Debra had come to
10 you and asked if you had asked for someone to go and
11 service the -- the utility closet.

12 A. I'm so sorry, I'm very confused of what --
13 what -- what the question is for me to answer.

14 Q. Okay. You indicated that Debra had come to
15 you -- the cleaning lady had come to you about a --
16 about an incident that was about a week prior to Steven
17 Cozzi disappearing.

18 A. Yes.

19 Q. And had asked if your office had called for
20 someone to come and do some work in the utility closet.

21 A. Yes.

22 Q. And -- and you told her no, we had not; right?

23 A. Yes.

24 Q. Okay. The day that Steven Cozzi disappears,
25 that information is brought to the attention of law

1 enforcement, that there had been this strange person in
2 the utility closet the week before.

3 A. Okay.

4 Q. Were you aware of that?

5 A. I don't recall being aware of that information
6 of that person the week before, I don't recall being
7 aware of that.

8 Q. At -- at that time.

9 A. At that time, I --

10 Q. Well, I mean you knew that -- you knew -- you
11 knew that Debra had -- had asked you about it; right?

12 A. Yes.

13 Q. And that was prior to Steven Cozzi
14 disappearing.

15 A. Yes.

16 Q. Okay. It -- what is it -- do you just not
17 know the -- the timing as far as whether or not it was a
18 few days or a week or two weeks; is that the part that
19 you don't know?

20 A. I'm -- I don't know what the -- the question
21 is. I've -- I'm just -- that's where I'm -- are we
22 talking about a police report for the week prior or --

23 Q. Well, the -- there is --

24 A. I'm -- I'm just confused on the question
25 that --

1 Q. Okay.

2 A. -- I'm trying to answer for you.

3 Q. Sure.

4 There is a police report for the week prior and I
5 don't know if you were aware of that or not.

6 A. I was not aware of that.

7 Q. Okay.

8 A. I am not aware of that.

9 Q. Okay. Yeah, there was.

10 But my question is -- and you already answered part
11 of it; you already answered the fact that Debra did not
12 tell you that she recognized the person that she was
13 making inquiries about, right?

14 A. Right, I don't recall her telling me she
15 recognized that person.

16 Q. Okay. So it was an unknown person, right?

17 A. Yes.

18 Q. Okay.

19 Do you recall whether or not there was any
20 questions to you the day of Steven Cozzi's disappearance
21 about this unknown person that had been there possibly a
22 week earlier?

23 A. I -- I don't recall. There could have been
24 mention of it but I -- I don't recall.

25 Q. Okay. But -- and then the follow-up question

1 was, you know, whether or not Deb -- Debra, the cleaning
2 lady, Debra Heinrich, told you that she believed that
3 the person that she had seen, roughly a week earlier,
4 was someone who had been to your office previously?

5 A. I don't remember her saying that to me.

6 Q. To you. Okay. All right. Okay.

7 That's -- that's all I was trying to find out.

8 A. Okay.

9 Q. Sorry.

10 A. Thank you. Sor --

11 Q. I was --

12 A. It's okay. I'm just --

13 Q. -- not trying to be difficult.

14 Yeah. Let's see here.

15 The person that you saw leaving on the surveillance
16 video, could you see that person's face on the
17 surveillance video?

18 A. No.

19 Q. Would it be fair to say that based on that
20 surveillance video, you cannot identify who that person
21 is, other than the fact that you -- you say it's not
22 Steven Cozzi because of his gait?

23 A. Yes, sir.

24 Q. Okay. And -- and his build, right?

25 A. Yes.

1 Q. Almost done.

2 Have you been deposed for the civil case?

3 A. No.

4 Q. Do you know if your deposition has been
5 scheduled for the civil case?

6 A. It has not been scheduled.

7 Q. Okay.

8 Okay. Is there anything that you think is
9 important for us to know that we have not discussed as
10 it relates to the information that you have, as it
11 relates to this -- this case? Anything you're sitting
12 there saying I can't believe he didn't ask me this?

13 A. It's kind of hard on the spot to think of
14 anything, --

15 Q. That's fine. I mean, --

16 A. -- so...

17 Q. -- there may not be any. There may not be
18 any. I mean, but if you were sitting there and you're
19 thinking to yourself, my, gosh, why didn't he ask me
20 this, I would like to know what that is. But if that's
21 not in your head then -- then that's perfectly fine.

22 That's -- there -- you -- you're not pondering
23 that.

24 A. Right now, no.

25 Q. Okay.

1 A. But maybe later. I'm so nervous. I'm just --

2 Q. Okay. That's fine.

3 A. Yeah.

4 Q. And -- and I guess what I would ask is -- is
5 if later you -- there's something that you -- you think
6 of and you're like, you know, I really think this is
7 something that they should know, if you can reach out to
8 Mr. Vonderheide and let him know.

9 A. Yeah. I mean, like --

10 Q. And he'll relay that to me, but --

11 A. Yeah. Okay. That's fine.

12 Q. Okay. Was it -- were -- were you about to say
13 something or --

14 A. Like -- I mean, I saw blood on the door. I
15 didn't go into the bathroom but there's blood on the
16 door.

17 Q. You -- okay.

18 A. Like, on the bottom of the door. Like,
19 stuff -- more that type of detail, like --

20 Q. The -- the bathroom door?

21 A. -- going into the hall -- yeah, the bathroom
22 door.

23 And like going into the hallway, the overwhelming
24 smell of bleach like somebody tried to bleach
25 everything, which wasn't procedural at all for

1 Ms. Debra, she never used bleach.

2 So it's more like stuff like that where it's like,
3 well, there was an overwhelming smell of bleach when we
4 left through the back door. We didn't leave through the
5 front door to check on Steve, we went through Steve's
6 office.

7 Q. Right.

8 A. And the overwhelming smell of bleach was
9 you -- hit us as we left the back door, and Jake went
10 into the bathroom, I didn't, but you could -- I could
11 see blood on the door that was on the door. I didn't go
12 into the bathroom.

13 Q. Sure. How --

14 A. So...

15 Q. How much -- how much of what you believed to
16 be possibly blood did you see on the door?

17 A. Like a -- it kind of looked like a finger, I
18 remember seeing a finger type thing, like a smudge.

19 Q. Smear or a smudge?

20 Okay. All right. Okay.

21 Anything else? So you got the odor, you got -- you
22 got a smudge on the door; anything else?

23 A. Just a -- more overall weird atmosphere that
24 day. I know it's not anything to go on. It was -- you
25 know, the dog comes with me to work. She was off --

1 after seeing Steve, she was off all day with attitude
2 wise and on edge. And I know it's just a dog, but it
3 just -- it just felt weird all --

4 Q. When you say --

5 A. -- all day.

6 Q. When you say after seeing Steve, what do you
7 mean?

8 A. She was -- the dog was happy to see him. We
9 go --

10 Q. Right.

11 A. -- into my office but then there was a time
12 where I could tell she was agitated and I thought it was
13 based off of the animal hospital next-door because they
14 would bring dogs out of the animal hospital after
15 surgery, but I don't recall any dogs being brought out,
16 and she carries herself in a manner when she's agitated.
17 So it was just kind of -- just more, I wished, about
18 like did you see the door to the bathroom and then the
19 smell of the bleach, so...

20 That's like all I could think of was we left and
21 this overwhelming smell of bleach and the blood and the
22 dog's in tow the whole time, so she was like hyperaware
23 of what was going on, at least with -- with my energy
24 because she's my dog.

25 Q. Okay.

1 What, if any, contact had you had with
2 Tom Kosowski?

3 A. It was more secretarial-type purposes with
4 Kosowski, answering his calls. He would call into the
5 office. If he came and used the office as a conference
6 room. If he didn't -- 'cause he didn't have one of his
7 own, I would greet him, let him in, show him the fridge.
8 But nothing ever, like, more than me being a secretary
9 in that type of manner.

10 Q. How many times was Tom Kosowski at the office?

11 A. I don't recall how many exactly; just when he
12 was there using the conference room for the case.

13 Q. Roughly, how many?

14 A. Ten at the most, that I can recall.

15 Q. And when he would be there, how -- how long
16 would he normally be there? Would it be for a couple of
17 hours at a time, a few minutes at a time?

18 A. A couple hours say --

19 Q. Okay.

20 A. -- on the hours end.

21 Q. And would Mr. Cozzi normally be there when he
22 was there?

23 A. Yes.

24 Q. Okay.

25 Would they be in the conference room together?

1 A. Yes.

2 Q. Okay.

3 Were they, like, conducting depositions?

4 A. Yes.

5 Q. Any --

6 A. Everything was on the calendar.

7 Q. Okay. Did they have --

8 A. Whatever it was.

9 Q. -- meetings, depositions, those type of
10 things?

11 A. Yes.

12 Q. Okay. So I'm assuming he wasn't using the
13 conference room unless Steven Cozzi was present as well.

14 A. Yes.

15 Q. Okay. All right.

16 Was -- was Tom Kosowski, would you say he was
17 polite when he would call you and have interactions with
18 you?

19 A. I don't recall politeness.

20 Q. Okay. What do you recall about his -- about
21 his -- you know, when he would reach out, you know, his
22 demeanor, his speech?

23 A. Speech, curse, demanding, more -- not treating
24 me as if like the best -- it's hard to say it politely.

25 I -- he -- he held his nose very high above me when

1 speaking with me and leaving messages when he would call
2 for Steve on the case. Not to use the term secretarial
3 but very just, I get water, like just secretary-type
4 things. So it wasn't human interaction; I was a means
5 to get to talk with Steve.

6 Q. Okay.

7 So you -- you said he -- roughly, he -- he may have
8 used the conference room or been there about ten times;
9 could be a little bit more, could be a little less?

10 A. Yes.

11 Q. Okay.

12 What about having phone conversations with
13 Steve Cozzi? How often would he have phone
14 conversations with Steve Cozzi?

15 A. Often. There would be times he would call
16 three or four times a day asking for Steve.

17 Q. Okay.

18 A. And I would relay the messages over.

19 Q. Okay. All right.

20 And sometimes you would put the call through and
21 sometimes you would pass on messages?

22 A. Yes. Yeah, depending on Steve's availability
23 between his other clients and calls.

24 Q. And for what period of time are we talking
25 about that these visits would take place and these phone

1 calls would take place? Are we talking about three
2 months leading up to -- to March of 2023, six months
3 leading up to it, nine months, a year; do you recall?

4 A. It feels like it was since Steve got on that
5 case the amount of calls to him and correspondence.

6 Q. And -- and do you know when --

7 A. I don't recall exactly when.

8 Q. Sure. Do you know when Steve came -- got on
9 the case?

10 A. I don't recall when he started it.

11 Q. Would you have prepared some sort of a Notice
12 of Appearance when he started it or would he have done
13 that himself?

14 A. He usually would do that himself for the civil
15 cases.

16 Q. Okay. So would it be fair to say that --
17 whatever the date is that he files the Notice of
18 Appearance, up until March 21st, 2023 is the time period
19 that we're talking about?

20 A. That is fair.

21 Q. Okay.

22 A. Yes.

23 Q. All right. We spoke a little bit more as --
24 is there anything else that's come to mind from your
25 perspective as far as anything that you think I'm

1 missing or that you think I should be asking you?

2 A. No.

3 Q. Okay.

4 MR. BRUNVAND: Nathan, do you have any
5 questions?

6 MR. VONDERHEIDE: Yeah, I do.

7 CROSS-EXAMINATION

8 BY MR. VONDERHEIDE:

9 Q. Rebecca, was there a time when there was a
10 confrontation between Mr. Kosowski and Mr. Cozzi; do you
11 recall that day?

12 A. I don't recall the date of the day, but I know
13 there was --

14 Q. Okay.

15 A. -- a confrontation.

16 Q. Well, tell me --

17 A. Yes.

18 Q. -- what you know and what you observed that
19 day.

20 A. That day was a -- he was using the office. I
21 was meeting with Jake Blanchard, Jake, in his office and
22 we were discussing a case, I don't recall which case,
23 and Steve relayed a confrontation happened. And I
24 observed just both of them talking about -- like the
25 confrontation happened and Jake went into the conference

1 room to possibly stop whatever was going on; but from
2 there, I was just in Jake's office. I don't know the
3 conversations.

4 Q. Did -- did they talk in front of you about
5 what the confrontation was?

6 A. No.

7 Q. Okay. And what -- what -- how do you know
8 that that's what they were talking about?

9 A. Jake relayed that something happened between
10 Steve and Kosowski; he didn't tell me exactly what.

11 Q. Okay. Did -- did you stay in Jake's office
12 the whole time?

13 A. Yes.

14 Q. All right.

15 And then Jake's office is kind of -- how far away
16 is that from the conference room you think?

17 A. Jake's office?

18 Q. Yeah.

19 A. About four feet.

20 Q. Okay.

21 When they were in the conference room doing depos
22 would they have the door open or closed; do you
23 remember?

24 A. Closed.

25 Q. Did you see Steven when he came to talk to

1 Jake or -- like, how did that work or did Jake get up
2 and leave the room?

3 A. Jake got up and left.

4 Q. Okay. So did you ever see Steven come into
5 Jake's office?

6 A. No.

7 Q. Okay. Afterwards did Jake come back to his
8 office while you were still in there?

9 A. Yes.

10 Q. And did he -- what did he tell you happened?

11 A. That a confrontation happened between Kosowski
12 and Steve.

13 Q. Did he -- did he get -- flesh out further
14 details?

15 A. I don't recall him doing more details.

16 Q. Okay. Did -- well, what did Jake look like
17 when he came back after that?

18 A. Pretty flustered.

19 Q. Okay.

20 Did you see Steven later that day, the -- the day
21 of the confrontation, did you see him later?

22 A. Yes.

23 Q. All right. Tell me what happened with that.
24 Did you guys talk about it?

25 A. We did not talk about it.

1 Q. Okay. Did -- did Steven mention anything, did
2 he -- at all about the confrontation?

3 A. Not the confrontation. Just --

4 Q. Okay.

5 A. Yeah.

6 Q. Well, would you guys talk about Dr. Kosowski
7 and -- and the way that he would behave at these
8 hearings?

9 A. Yeah. He relayed the agitation and just
10 unfriendliness towards him on any manner throughout the
11 case. He would talk to me a lot about those types of
12 situations.

13 Q. Okay. So -- and when you say throughout the
14 case, you mean not just that day but any other time he
15 had contact with him?

16 A. Yes.

17 Q. And so can you explain that more to me? Like,
18 what would -- what would Steven say about Dr. Kosowski?

19 A. Like, he -- he just would say he's just not
20 being friendly with him, he's rude on emails, he's rude
21 on calls, and I know it was stressing him even to the
22 point where I'd try to shrug it off, I'm like, oh,
23 he's -- this is -- seems like it's a lot but, now -- you
24 know, now it's more than that. But Steve would
25 constantly tell me he's not nice to me, he's saying

1 awful things to me, and it was just -- it was a constant
2 almost every day mentioning Kosowski and how he was
3 treating him. All -- it was almost every day.

4 Q. When you say every day it's not just every day
5 during depos, it's every day that they're --

6 A. Yes.

7 Q. -- talking.

8 A. Yes. Yeah, it's every day.

9 Q. And would it be every day Monday through
10 Friday, Mr. -- Dr. Kosowski's calling and -- and
11 reaching to Steve?

12 A. Yeah, it would feel like every day at least,
13 it just -- yeah.

14 Q. Well, I know that you probably don't have like
15 it written down, for example, like, all the times maybe
16 he reached out and contacted, but, would he call --
17 like, in a week, on average, would he call more than
18 once during a week?

19 A. Yes. Yeah.

20 Q. Okay. And -- and every time he would call
21 would Steven come tell you what he was like on the
22 phone, his demeanor was like?

23 A. No, he wouldn't every time tell me the
24 demeanor but there would be times where I'd like put
25 Dr. Kosowski on hold, tell Steve he was on hold, and I

1 could -- he just was like, oh, I can't -- I can't deal
2 with this right now, take a message for me; and I would.
3 And then I'd let him know through email he called and
4 sometimes he'd pick up the phone just to not have to
5 have the guy call more times during the day.

6 Q. Do you know what kind of things Dr. Kosowski
7 would be requesting?

8 A. I do not.

9 Q. The door in Steven's office that goes into the
10 hallway, you know the door I'm talking about?

11 A. The one that -- which hallway?

12 Q. Okay. I guess we'll call it the public
13 hallway, for lack of a better term, the one that goes to
14 the bathroom.

15 A. Okay. Yes.

16 Q. Like, for example, when you would go to the
17 bathroom would you go through Steven's office or would
18 you go a different way?

19 A. I would go through Steven's office.

20 Q. All right. Would Jake do the same thing?

21 A. Yes.

22 Q. All right. And then if you had visitors for a
23 deposition, like, for example, Dr. Kosowski, would he
24 also use that door?

25 A. Yes.

1 Q. All right. And when -- in fact, if you had
2 people using the conference room would you encourage
3 them to go through that door --

4 A. Yeah.

5 Q. -- Steven's door?

6 A. Yes.

7 Q. All right. So, essentially, anybody visiting
8 the office, if they had to go to the bathroom, you'd say
9 go right there?

10 A. Yeah.

11 Q. I mean, it's the closest, straightest shot
12 from the conference room -- right? -- right through his
13 office?

14 A. Yeah. And then to get back in, if they were
15 to use the front door they'd have to buzz in and then
16 I'd have to let them in.

17 Q. So as a result, would you -- did that door --
18 did it -- do you know how it locked?

19 A. Which one?

20 Q. The -- the one from Steven's office into the
21 public hallway, how -- how did it unlock?

22 A. It was a deadbolt.

23 Q. Okay. So if it was -- if somebody went to go
24 use the bathroom it would be, obviously, unlocked;
25 right?

1 A. Correct.

2 Q. Okay.

3 A. Yes.

4 Q. And when Steve -- do you -- do you know --
5 maybe you can't answer this, I don't know. Did -- did
6 Steven have a key to that door for the deadbolt?

7 A. Oh -- I don't -- I don't think so. I don't
8 recall. I don't know.

9 Q. Do you recall if you would -- if he went to
10 the bathroom would he lock the door or would he leave it
11 unlocked?

12 A. He'd leave it unlocked.

13 Q. And you haven't seen Steven since March of
14 2023 have you?

15 A. No.

16 Q. All right. And has anybody called in
17 purporting to be him since then?

18 A. No.

19 MR. VONDERHEIDE: I don't have anything else.

20 REDIRECT EXAMINATION

21 BY MR. BRUNVAND:

22 Q. Received any emails or any other type of
23 communication from someone indicating that they're
24 Steve?

25 A. No.

1 Q. Okay. And that includes like social media?
2 Including social media?

3 A. Yes, including social media, no reach out.

4 Q. Okay.

5 MR. BRUNVAND: Any other questions, Nathan?

6 MR. VONDERHEIDE: I -- no, I have nothing
7 else.

8 Thanks, Rebecca.

9 MR. BRUNVAND: Okay.

10 THE WITNESS: Thank you.

11 MR. BRUNVAND: Rebecca, you can -- we can put
12 you down either for -- as a read or a waive for
13 the -- for -- for the transcript.

14 Do you -- do you know the difference between
15 the two?

16 THE WITNESS: I do not.

17 MR. BRUNVAND: Okay. So reading, it basically
18 means that the court reporter will send you a
19 transcript before it's finalized for you to review
20 and then there's a sheet in the back where you can
21 write in if there's something you disagree with.
22 You're not -- it's not going to change the
23 transcript but it would note that, you know, you
24 don't believe you said, you know, whatever it is.

25 Waiving it, you -- that would not happen, you

1 would still get the transcript before you would
2 ever testify but you just wouldn't read it prior to
3 it being finalized. So some people read, some
4 people waive, it's whichever you prefer.

5 THE WITNESS: Waive is fine.

6 MR. BRUNVAND: Okay.

7 THE WITNESS: Waive.

8 MR. BRUNVAND: All right. Sounds good.

9
10 THEREUPON, the virtual deposition concluded at
11 3:09 p.m.
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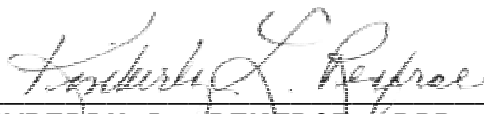
CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF PINELLAS

I, the undersigned authority, certify that
REBECCA WATTERS, personally appeared before me via Zoom
Video Communications and was duly sworn on January 8,
2025.

Witness my hand and official seal this
31st day of January, 2025.


KIMBERLY L. RENFROE, RPR



Notary Public, State of Florida
Commission No.: HH 80650
Expiration Date: 1/31/25

1 REPORTER'S DEPOSITION CERTIFICATE

2 STATE OF FLORIDA

3 COUNTY OF PINELLAS

4 I, Kimberly L. Renfroe, Registered Professional
5 Reporter, certify that I was authorized to and did
6 stenographically report the virtual deposition of
7 REBECCA WATTERS; that a review of the transcript was not
8 requested; and that the transcript is a true and
9 complete record of my stenographic notes.

10 I further certify that I am not a relative,
11 employee, attorney, or counsel of any of the parties,
12 nor am I a relative or employee of any of the parties'
13 attorney or counsel connected with this action, nor am I
14 financially interested in the action.

15 Dated this 31st day of January, 2025.

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18 KIMBERLY L. RENFROE, RPR
19 Stenographic Reporter
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23 (Transcript ordered by Bjorn E. Brunvand, Esquire,
24 on January 8, 2025.)
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