

IN THE CIRCUIT COURT OF THE 15th
JUDICIAL CIRCUIT, IN AND FOR
PALM BEACH COUNTY, FLORIDA

CASE NO.: 502005CA001771XXXXMBAE

ELWOOD GARY BAKER,
Plaintiff,

vs.

NITV, LLC,

Defendant,

vs.

NITV FEDERAL SERVICES, LLC,
LOURDES IRIMIA, JAMES KANE and
CHARLES HUMBLE,

Third Party Defendants.

PRETRIAL STIPULATION

Plaintiff, ELWOOD GARY BAKER, and Defendant NITV, LLC and Third Party Defendants, NITV FEDERAL SERVICES, LLC, LOURDES IRIMIA, and CHARLES HUMBLE, by and through their undersigned attorneys and pursuant to the Order Setting Jury Trial and Directing Pretrial and Mediation Procedures file this Pretrial Stipulation and state:

A. Pending motions:

1. Hearing on Defendants' Objections to Request for Production (Set for hearing August 3, 2021 at 8:30 am)

B. Stipulated facts which require no proof at trial:

1. E. Gary Baker holds an Amended Final Judgment in the amount of \$250,000 against NITV, LLC dated May 23, 2013.
2. Baker's May 23, 2013 Amended Final Judgment remains unsatisfied.
3. NITV Federal Services, LLC is a Florida Limited Liability Company with a principal address is West Palm Beach, Palm Beach County, Florida.
4. Lourdes Irimia is a managing member of NITV Federal Services, LLC with an address in West Palm Beach, Palm Beach County, Florida.
5. Charles Humble is a managing member of NITV Federal Services, LLC with an address in West Palm Beach, Palm Beach County, Florida.

C. Statement of issues of fact for determination at trial:

Plaintiff believes the issues for Determination are:

**On Plaintiffs' Amended Third Party Complaint in Execution:
AS TO COUNT I
FRAUDULENT TRANSFER UNDER THE ACT
(NITV FED, IRIMIA, and HUMBLE)**

1. Whether an Amended Final Judgment against Defendant NITV, LLC (hereinafter Judgment Debtor) on a debt which has been due to Plaintiff under the Florida Uniform Fraudulent Transfer Act (hereinafter "the Act") since on or before May 23, 2013 is due Plaintiff.
2. Whether Plaintiff has been a present creditor under the act since May 23, 2013.

3. Whether Lourdes Irimia is a co-conspirator under the Act.
4. Whether Charles Humble is a co-conspirator under the Act.
5. Whether Plaintiff is entitled to a Cross-Over Judgment for attorney's fees against the Third Party Defendants up to the difference between the value of the alleged fraudulently transferred assets and the May 23, 2013 Judgment to the extent the value of any fraudulently transferred assets to any Third Party Defendants exceeds that debt.
6. Whether Plaintiff has performed all conditions precedent to the maintenance of this action or if they have been waived.
7. Whether Third Party Defendants NITV Fed, Irimia, or Humble are liable under the Act for the outstanding judgment by virtue of any or all of the following:
 - a. The fraudulent transfer of money, or other assets from the Judgment Debtor to NITV Fed, Irimia, or Humble after the date of judgment at a time when the Judgment Debtor was insolvent under the Act, without the Judgment Debtor's receipt of reasonably equivalent value for the transfer;
 - b. The fraudulent transfer of money, or other assets from the Judgment Debtor to NITV Fed, Irimia, or Humble after the date of judgment, without the Judgment Debtor's receipt of reasonably equivalent value for the transfer, which transfer caused the Judgment Debtor to become insolvent under the ACT, and NITV Fed, Irimia, or Humble knew the transfer would make the Judgment Debtor insolvent;

- c. NITV Fed, Irimia or Humble conspired amongst themselves to fraudulently transfer Judgment Debtor assets either to themselves or to NITV FED (Successor/Alter Ego) to carry on the Judgment Debtor's business.
8. Whether the conduct in 7.a – 7.c violates Florida Statute 726.105 and/or 726.106, subjecting NITV Fed, Irimia, or Humble to insider liability.

**AS TO COUNT II
PIERCING THE CORPORATE VEIL
(Humble)**

9. Whether NITV Fed, Irimia, or Humble either set up or used the Judgment Debtor for an improper purpose to perpetuate a fraud upon Plaintiff.
10. Whether the Judgment Debtor operated as the alter ego of Humble.
11. Whether Humble is liable by virtue of the following conduct which is grounds to pierce the corporate veil:
 - a. Shortly after the date of judgment, Humble caused the Judgment Debtor to cease operations or otherwise become a defunct corporation; and
 - b. Both before and after the date of judgment, Humble fraudulently transferred Judgment Debtor's assets either to himself or to NITV Fed without the Judgment Debtor 's receipt of reasonably equivalent value.
 - c. Humble used the Judgment Debtor to incur the debt at the time when the Judgment Debtor was insolvent under the ACT and incapable of repaying the debt.

- d. HUMBLE as Managing Member of an insolvent Judgment Debtor, had a duty to Plaintiff, an existing creditor under the ACT, to preserve the Judgment Debtor's assets which constitute a trust fund for its creditors and not allow same to be fraudulently transferred to or wasted by other insiders. Whether HUMBLE, breached his duty to Plaintiff by allowing the alleged misappropriation of the assets.
- e. HUMBLE had an affirmative duty to acquire knowledge and experience to perform his director duties, and a continuing obligation to keep informed about the Judgment Debtor's business activities and not ignore the illegal conduct of other insiders.
- f. HUMBLE failed to properly capitalize the Judgment Debtor.

**AS TO COUNT III
BUSINESS CONTINUATION
(NITV FED)**

- 12. Whether NITV Fed was set up by the insiders, IRIMIA or HUMBLE for the purpose of engaging in substantially the same business activities as the Judgment Debtor.
- 13. Whether NITV Fed was capitalized with the assets fraudulently transferred from the Judgment Debtor.
- 14. Whether NITV Fed reflects a continuity of Judgment Debtor ownership, business operations, personnel, officers and directors, utilization of the same independent

contractors to provide the same or nearly identical services to NITV Fed as those independent contractors provided for the Judgment Debtor and/or NITV Fed continued providing the same services and/or products as the Judgment Debtor.

15. Whether NITV Fed is either a business continuation, a successor corporation, or the surviving corporation of a de facto merger between NITV Fed and the Judgment Debtor and is liable for the judgment debt.

As Fees/ Costs of Collection

16. Whether each Third-Party Defendant should be held liable for payment of Baker's attorney's fees and costs incurred for these proceedings supplementary, and if so, in what amount(s).

Note: it is anticipated that entitlement and amount would be determined "post trial."

Third-Party Defendants believe the issues for Determination are:

1. Whether Third Party Defendants fraudulently transferred money or other assets from NITV, LLC, to insiders and/or a successor/alter-ego after May 23, 2013.
2. Whether Third Party Defendants conspired amongst themselves to fraudulently transfer NITV, LLC's assets to themselves or to successor/alter-ego.
3. Whether shortly after May 13, 2013, NITV, LLC, ceased operations or otherwise became a defunct corporation.

4. Whether before and after May 13, 2013, Third Party Defendants fraudulently transferred NITV, LLC's assets to themselves or to NITV Federal Services, LLC, without receipt of reasonably equivalent value.
5. Whether Third Party Defendant, Humble, intentionally and fraudulently failed to preserve NITV, LLC's asset and allowed same to be fraudulently transferred.
6. Whether NITV Federal Services, LLC, was set up by the Third Party Defendants for the purpose of engaging in substantially the same business activities as NITV, LLC.
7. Whether NITV Federal Services, LLC, was capitalized with assets fraudulently transferred from NITV, LLC.
8. Whether NITV Federal Services, LLC, reflects a continuity of NITV, LLC's ownership, business operations, personnel, officers and directors, utilization of the same independent contractors to provide the same or nearly identical services.
9. Whether NITV Federal Services, LLC, is either a business continuation, a successor corporation or the surviving corporation of a de facto merger between NITV Federal Services, LLC, and NITV, LLC.
10. Whether Baker should be held liable for any of the Third-Party Defendants' attorney's fees and costs incurred for these proceedings supplementary, and if so, in what amounts.

D. Trial exhibits with specific objections:

1. Plaintiff's Exhibit List is attached hereto as "EXHIBIT A."
2. Defendants' Exhibit List is attached hereto as "EXHIBIT B."

E. Trial witness lists:

1. Plaintiff's Trial Witness List is attached hereto as "EXHIBIT C."
2. Defendants' Trial Witness List is attached hereto as "EXHIBIT D."

F. Time Required: It is estimated that this bench trial will take 3 days to try.

G. Attorneys/Parties to try Case:

Scott W. Zappolo, Esquire
Zappolo & Farwell, P.A.
7108 Fairway Drive, Suite 322
Palm Beach Gardens, FL 33418
(561) 627-5000
szappolo@zappolofarwell.com
jfarwell@zappolofarwell.com
filings@zappolofarwell.com

is to try the case on behalf of Plaintiffs.

William Fleck, Esq.
Jupiter Legal Advocates
8895 North Military Trail, Suite E102
Palm Beach Gardens, FL 33410
(561) 748-8000
Wfleck@jla.legal
ptaylor@jla.legal

is to try the case on behalf of the Defendant/Third Party Defendants.

H. Peremptory Challenges:

None. This is a bench trial.

I. Each Party's Proposed Jury Instructions and Verdict Form: None. This is a bench trial.

Stipulated and Agreed:

For Plaintiff:

ZAPPOLO & FARWELL, P.A.
7108 Fairway Drive, Suite 322
Palm Beach Gardens, FL 33418
(561) 627-5000 (telephone)
(561) 627-5600 (facsimile)
szappolo@zappolofarwell.com
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jfarwell@zappolofarwell.com

By: /s/ Scott W. Zappolo
SCOTT W. ZAPPOLO
Florida Bar Number 132438

Date: July 27, 2021

For Defendants/Third Party Defendants:

Jupiter Legal Advocates
8895 North Military Trail, Suite E102
Palm Beach Gardens, FL 33410
(561) 748-8000
Wfleck@jla.legal
ptaylor@jla.legal

By: /s/ William Fleck
WILLIAM FLECK
Florida Bar Number 340707

Date: July 27, 2021

NOT A CERTIFIED COPY

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on this 27th day of July, 2021 pursuant to Fla. R. Jud. Admin. 2.516, a true copy of the foregoing document is being electronically filed and thereby e-served via Florida e-Portal on all counsel/parties affiliated with this case in the manner specified within the e-portal changes effective June 20, 2014. (Note: Alternate

e-mail addresses on the e-portal will be "checked" for service, and anyone affiliated with this case but not registered on the e-portal will be served in the manner specified by the aforementioned Rule.)

Persons served: William Fleck, Esq. wfleck@jla.legal; ptaylor@jla.legal;
wfleck@jupiterlegaladvocates.com

ZAPPOLO & FARWELL, P.A.
Attorney for BAKER
7108 Fairway Drive, Suite 322
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By: /s/ Scott W. Zappolo
SCOTT W. ZAPPOLO
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Third Party Defendants.

_____ /

EXHIBIT LIST

Plaintiff, ELWOOD GARY BAKER, by and through his undersigned attorneys, files his Exhibit List:

#	Ex.	Description	Date	From	To	Regarding	Obj?	Admit?
1.	1	Amended Final Judgment against NITV, LLC dated May 23, 2013 and recorded 5/28/2013	5/23/2013			\$250,000		
2.	2	Information from GSA Catalog related to NITV LLC						
3.	3	Printout of Federal Services Website showing Contractor NITV LLC and contract #						
4.		PPP Loan Data – Federal Services						
5.		2021 CVSA recertification schedule						



6.	Order - Judgment	5/20/14	NITV, LLC	Arnstein & Lehr, LLC	\$26,000.00		
7.	Print out related to NITV Group, Inc. in NV						
8.	Composite Exhibit – Historical Printouts of CVSA1.com						
9.	Printouts from CVSA1 Website	2004					
10.	Printouts from CVSA1.com website	2/9/2005					
11.	Printouts from CVSA1.com website	5/4/2005					
12.	Printouts from CVSA1.com website	1/25/2006					
13.	Printouts from CVSA1.com website	3/6/2006					
14.	Composite Exhibit – Print out of Federal Services Website/Articles on Federal Services Website						
15.	Composite Exhibit – Print out of Federal Services Website/Articles on Federal Services Website (www.cvsal.com - May of 2021)						
16.	Florida BIDS printout – NITV LLC						
17.	Florida Bids printout – Federal Services						
18.	NITV, LLC GSA Terms and Conditions effective 11/29/2011						
19.	Letter	June, 2008	NITV/Kane		NITV is sole source for CVSA		
20.	CVSAII Website printout						

21.	NITV LLC GSA Terms and Conditions effective 2/12/2007							
22.	Composite Exhibit – Corporate filings - NITV, LLC							
23.	Composite Exhibit – Corporate filings - NITV Federal Services, LLC							
24.	Affidavit of Charles Humble related to James Kane	4/13/21						
25.	NITV LLC Profit and Loss	1/1/2010-4/27/2010						
26.	NITV LLC Balance Sheet 4/27/10	4/27/10						
27.	NITV, LLC Statement of Cash Flow	1/1/2010-4/27/10						
28.	NITV Profit and Loss	1/09-12/09						
29.	NITV, LLC Balance Sheet	As of 12/31/09						
30.	NITV, LLC Statement of Cash Flows	1/2009-12/2009						
31.	Composite exhibit – PNC Commercial Loan Statements related to NITV, LLC							
32.	Composite Exhibit- National City Commercial Loan Automatic Charge Statements (with attached Billing Advice and statements 11/09 – 4/10 (St. George Bank, Australia)) related to NITV LLC							

33.	Composite Exhibit - Fidelity Federal Bank and Trust Business Checking Statements related to NITV LLC							
34.	Composite Exhibit – PNC Bank Business Checking Statements related to NITV, LLC							
35.	NITV, LLC U.S. Return of Partnership Income with attached schedules	2007						
36.	NITV, LLC U.S. Return of Partnership Income with attached schedules	2008						
37.	Chart – Accuracy: Polygraph vs. Voice Stress (CVSA)							
38.	Been Verified Information related to Charles Wayne Humble							
39.	Copy of Federal Services Advertisement (Police Magazine, October, 2018)							
40.	Copy of CVSA Advertisement (Police Magazine, October, 2018)							
41.	CVSAII Advertisement							
42.	BIS Proposed Charging Letter with attachments							
43.	Indiana Christian University Diploma of Psychology – Charles Humble							
44.	Federal Services Printout with information related to CVSA/GSA							

45.	End User License Agreement for CVSA Software						
46.	NITV, LLC GSA Terms and Conditions Effective 1/1/2017						
47.	Complaint filed in U.S.D.C Southern District of Florida Case 09:18-cv-80994-DLB						
48.	Plaintiff's Motion for Default Final Judgment Against Defendants filed in U.S.D.C Southern District of Florida Case 09:18-cv-80994-DLB						
49.	Declaration of Charles Humble filed in Federal Services v. Dektor 9:18-cv-80994-Brannon						
50.	Declaration of Matthew C. Smith filed in Federal Services v. Dektor 9:18-cv-80994-Brannon						
51.	Matthew C. Smith Curriculum Vitae						
52.	Composite Exhibits – Financial Analysis of NITV, LLC and Federal Services filed in Federal Court 9:18-cv-80994-Brannon						
53.	U.S. Patent number 7321855						
54.	U.S. Patent number 7571101						
55.	Composite Exhibit – Printouts of U.S Patent and Trademark Office search results						

56.	Composite Exhibit – Documents from West Palm Beach Police Department responsive to Public Records Request regarding NITV, LLC and Federal Services						
57.	Composite Exhibit – Documents from Bay County Sheriff’s Office responsive to Public Records Request regarding NITV, LLC and Federal Services						
58.	Composite Exhibit – Documents from Orange County Sheriff’s Office responsive to Public Records Request regarding NITV, LLC and Federal Services						
59.	Plaintiff’s Affidavit in Support of Plaintiff’s Motion to Institute Proceedings Supplementary	Filed 5/5/2014					
60.	Composite of Corporate Filings for “SOBE, LLC”						
61.	Composite of Corporate Filings for “Landview Enterprises, LLC”						
62.	Composite of Corporate Filings for “NITV Government Services, LLC”						
63.	Composite of Corporate Filings for “NITV, Inc.”						
64.	Final Judgment Dated December 10, 2009 – Recorded 12/17/2009	12/10/2009			\$575,000.00		

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65.	Verdict Dated 11/19/2009 – Recorded 11/23/2009				\$575,000.00		
66.	Fully Signed Settlement Agreement between “NITV” and US Dept. of Commerce, Bureau of Industry and Security (Signed by Humble 4/17/2006)						
67.	Order Relating to “NITV” by Bureau of Industry and Security dated 4/28/2006	4/28/2006					
68.	Terms and Conditions effective 2/12/2007 (GS-07F-0114M document)						
69.	Agreement dated 5/20/2014 between NITV, LLC and Arnstein & Lehr (filed in PB Cty Case No. 502013Ca018663)						
70.	11/5/2020 Printout from cvsa1.com/ourcompany.h tm page						
71.	Printouts from “charles-humble.com” website (and connected “blog” links)						
72.	Printouts from “charleshumble.com” website	10/8/2008					
73.	Video of CVSA1 website						
74.	Certificate of Registration – Copyright	5/16/2005					
75.	Certificate of Registration – Copyright	3/3/2006					

76.	Amendment/Supplement to Copyright Registration	11/30/2005					
77.	Certificate of Registration - Copyright	3/3/2006					
78.	List of law enforcement agencies that utilize CVSA (state by state, federal, and international (produced by NITV in 2004 Federal lawsuit against Gary Baker))						
79.	NITV Journal of Continuing Education (Plaintiff's former trial exhibit 56)	2003					
80.	NITV Journal of Continuing Education (Plaintiff's former trial exhibit 57)	2002					
81.	NITV Journal of Continuing Education (Plaintiff's former trial exhibit 58)	2000/2001					
82.	Composite Exhibit of Complaint(s) filed by NITV Federal Services, LLC in Palm Beach County Case Number 502015CA005885XXXX MB						
83.	Printout of cvs1.com website	7/16/2021					
84.	Video of cvs1.com website	7/16/2021					
85.	Any and all discovery/discovery responses served by any Defendant in this case						
86.	Any document exchanged through discovery in this matter						

87.		Any document used an exhibit to a deposition in this matter						
88.		Evidence Code 90.956 Summary(ies) related to interest that has accrued on the Amended Final Judgment (will be exchanged/disclosed prior to trial pursuant to rule)						
89.		Additional documents as discovery is ongoing/hearings are scheduled related to objections to requests for production						
90.		Impeachment/Rebuttal Exhibits as are necessary and proper						
91.		Any exhibit listed by any other party						

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Persons served: William Fleck, Esq. wfleck@jla.legal; ptaylor@jla.legal;
wfleck@jupiterlegaladvocates.com

ZAPPOLO & FARWELL, P.A.
Attorney for BAKER
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By: /s/ Scott W. Zappolo
SCOTT W. ZAPPOLO
Florida Bar Number 132438

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Plaintiff,

vs.

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Defendant,

vs.

NITV FEDERAL SERVICES, LLC,
LOURDES IRIMIA, JAMES KANE,
and CHARLES HUMBLE,

Third Party Defendants.

Please Note: The parties
have yet to exchange
exhibits. Therefore Plaintiff
reserves all objections at
this time.

DEFENDANT'S TRIAL EXHIBIT LIST

Defendant, NITV, LLC, by and through its undersigned counsel and pursuant to this Court's Order Setting Jury Trial, provides the following list of exhibits:

1. United State Patent No: 8595007B2.
2. Articles of Incorporation, related correspondence and filing document for NITV Federal Services, LLC, dated May 5, 2003.
3. Wagner and Associates, LLC/CPA Insolvency Letter dated September 20, 2006.
4. Thomas E. Johnson, CPA, Insolvency Letter dated September 20, 2010.
5. Independent Contractor/Instructor Agreement regarding Howard E. Shook (redacted) relating to Non-Disclosure Agreement.
6. Independent Contractor/Instructor Agreement regarding Kenneth R. Merchant (redacted) relating to Non-Disclosure Agreement.
7. Independent Contractor/Instructor Agreement regarding William Endler (redacted) relating to Non-Disclosure Agreement.



8. Summary Analysis Chart, NITV, LLC, net worth from December 31, 2008, to December 31, 2013.

9. NITV, LLC, Fact Information Sheet dated April 28, 2010.

10. Composite Exhibit NITV, LLC, timeline and documents related to other pending litigation reflected thereon.

11. NITV, LLC, timeline and documents related to NITV, LLC, Federal Tax Liens 2006 through 2010 reflected thereon.

12. Composite Exhibit consisting of Charles Humble timeline reflecting documents listed thereon 2006 through 2013.

13. Composite Exhibit Central Contractor Registration and related documentation and correspondence for NITV Federal Services, LLC.

14. Composite Exhibit consisting of Federal Security Clearances for NITV Federal Services, LLC.

15. Composite Exhibit consisting of NITV Federal Services invoices 2005 through 2015.

16. All exhibits listed by Plaintiff.

17. All exhibits necessary for rebuttal.

18. Deposition transcripts taken herein.

19. All discovery responses filed herein by either party.

20. Defendant reserves the right to amend this Exhibit List with proper notice to all parties and the Court.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by the Florida Courts E-Filing Portal to Scott W. Zappolo, Esquire, Zappolo & Farwell, P.A., 7108 Fairway Drive, Suite 322, Palm Beach Gardens, Florida 33418 (szappolo@zappolofarwell.com)

(jfarwell@zappolofarwell.com) (filings@zappolofarwell.com) this 16th day of July, 2021.

JUPITER LEGAL ADVOCATES
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Palm Beach Gardens, Florida 33410
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Facsimile: (561) 748-9000
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E-Mail: ptaylor@jla.legal

By: /s/ William A. Fleck
WILLIAM A. FLECK, ESQUIRE
Florida Bar No: 340707

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LOURDES IRIMIA, JAMES KANE and
CHARLES HUMBLE,

Third Party Defendants.

WITNESS LIST

Plaintiff, ELWOOD GARY BAKER, by and through his undersigned attorneys, files his
Witness List:

1. Elwood Gary Baker
c/o Zappolo & Farwell, P.A.
7108 Fairway Drive, Suite 150
Palm Beach Gardens, FL 33418
2. Charles Humble
c/o Jupiter Legal Advocates
8895 N. Military Trail, Suite 102E
Palm Beach Gardens, FL 33410
3. Lourdes Irimia
c/o Jupiter Legal Advocates
8895 N. Military Trail, Suite 102E
Palm Beach Gardens, FL 33410



4. James Kane
c/o Jupiter Legal Advocates
8895 N. Military Trail, Suite 102E
Palm Beach Gardens, FL 33410

5. NITV, LLC
Corporate Representative
c/o Jupiter Legal Advocates
8895 N. Military Trail, Suite 102E
Palm Beach Gardens, FL 33410

6. NITV Federal Services, LLC
Corporate Representative
c/o Jupiter Legal Advocates
8895 N. Military Trail, Suite 102E
Palm Beach Gardens, FL 33410

7. Olga Kane
c/o Jupiter Legal Advocates
8895 N. Military Trail, Suite 102E
Palm Beach Gardens, FL 33410

8. Carol Graham
c/o Jupiter Legal Advocates
8895 N. Military Trail, Suite 102E
Palm Beach Gardens, FL 33410

9. Representative of Vipre Technology Group
P.O Box 196547
Winter Springs, FL 32719

10. Frederick Endler
11400 Fortune Circle
West Palm Beach, FL 33414

11. Michael McQuillan
11400 Fortune Circle
West Palm Beach, FL 33414

12. Howard Shook
11400 Fortune Circle
West Palm Beach, FL 33414

13. Diana Montoyoa
11400 Fortune Circle
West Palm Beach, FL 33414

14. David Hughes
Believed to reside at:
358 Abbington Way
Clarkesville, GA 30523

(Mr. Hughes is anticipated only to be a rebuttal witness if Mr. Humble's testimony in this case is inconsistent with his earlier testimony in this and/or other matters)

15. Any and all additional witnesses and/or rebuttal witnesses, as discovery is ongoing.

16. Any and all witnesses listed on Defendants'/Third Party Defendants' witness list.

17. Rebuttal/Impeachment witnesses as necessary and proper.

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Persons served: William Fleck, Esq. wfleck@jla.legal; ptaylor@jla.legal;
wfleck@jupiterlegaladvocates.com

ZAPPOLO & FARWELL, P.A.
Attorney for BAKER
7108 Fairway Drive, Suite 322
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DEFENDANT'S TRIAL WITNESS LIST

Defendant, NITV, LLC, by and through its undersigned counsel and pursuant to this Court's Order Setting Jury Trial, provides the following list of witnesses:

1. Plaintiff, Elwood Gary Baker
c/o Zappolo & Farwell, P.A.
2. Charles Humble
c/o Jupiter Legal Advocates
3. James Kane
c/o Jupiter Legal Advocates
4. Olga Kane
c/o Jupiter Legal Advocates
5. Lourdes Irimia
c/o Jupiter Legal Advocates
6. All witnesses listed by Plaintiff who have not been subject to an objection.
7. All witnesses necessary for rebuttal.



8. Defendant reserves the right to amend this Witness List with proper notice to all parties and the Court.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by the Florida Courts E-Filing Portal to Scott W. Zappolo, Esquire, Zappolo & Farwell, P.A., 7108 Fairway Drive, Suite 322, Palm Beach Gardens, Florida 33418 (szappolo@zappolofarwell.com) (jfarwell@zappolofarwell.com) (filings@zappolofarwell.com) this 16th day of July, 2021.

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