

IN THE CIRCUIT COURT OF THE 15<sup>th</sup>  
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.

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**NOTICE OF TAKING VIDEOTAPED DEPOSITION OF  
NITV FEDERAL SERVICES, LLC VIA ZOOM**

*Please See Zoom Information Below*

**TO:** William A. Fleck, Esq.  
8895 North Military Trail  
Suite E102  
Palm Beach Gardens, FL 33410

**PLEASE TAKE NOTICE** that the undersigned attorneys will take the videotaped deposition of:

**DEPONENT:** NITV Federal Services, LLC who shall designate a person to testify on its behalf and bind said company related to the following areas of inquiry:

1. NITV Federal Services, LLC's responses to Elwood Gary Baker's Interrogatories (the responses were served/filed 6/30/2015);
2. NITV Federal Services, LLC's specific nature of business from its inception through present day;
3. NITV Federal Services, LLC's contracts with state and federal agencies;
4. NITV Federal Services, LLC's use of advertising, including but not limited to, website services, participation in trade organizations, and political contributions;

5. NITV Federal Services, LLC's past and present assets, how they were acquired, and the specific relationship between NITV Federal Services, LLC and NITV, LLC (as it may have changed over the years); and
6. NITV Federal Services, LLC's employees throughout the years.

**DATE:** Thursday, February 18, 2021

**TIME:** 10:00 a.m.

**PLACE:** Zoom Video Conference

Join Zoom Meeting

<https://us02web.zoom.us/j/83651690310?pwd=ZnN4ZEI5SXZJTlpJTCTUeEhEMnduZz09>

Meeting ID: 836 5169 0310

Passcode: 771719

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upon oral examination, pursuant to the Florida Rules of Civil Procedure, and statutes of the State of Florida before Pleasanton & Marsaa Court Reporting or some other Notary Public, who does not represent either of the parties and is not interested in the outcome of the case. Pursuant to Fla.R.Civ.P. 1.310 (b)(4), this deposition will be videotaped by Scott W Zappolo, 7108 Fairway Drive, Suite 322, Palm Beach Gardens, FL 33418. The oral examination will continue from day to day until completed. This deposition is being taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted by law.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 13th day of January, 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.**

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