

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RAYMOND E BUTLER, II,

Case No. 1:25-cv-04443

Hon. April Perry

Plaintiff,

v.

ELI JACKFINN EDDI a/k/a ELY EDDI, ILANA FINN EDDI, DORINE
MAGENCE, MANUEL MAGENCE, JEFFREY K. GUTMAN,
NACHSHON DRAIMAN, WILLIAM KANTER, JOEL S. ROTHMAN,
MOSHE SOLOVEICHNIK, ALAN GREEN, JERRY CHERNEY, SHMUEL
FUERST, HAROLD KATZ, SAMUEL MASLATON, DANIEL BERGMAN,
IRVING BIRNBAUM, ARON STANTON, CHAIM RAJCHENBACH, RIVKA
RAJCHENBACH, AVRUM RAJCHENBACH, MENACHEM SHABAT, AHUVA
SHABAT, RONALD SHABAT, ERIC ROTHNER, COLMAN GINSBURG,
JAMES MAINZER, MARSHALL K. BROWN, JEFFREY FINN, MEIR
“AARON” COHEN, GARRY CHANKIN, NANCY ROSEN, MARK ANTEBI,
BARRY ANTEBI, DAVID R. RAANAN, and ELLIOT E. ANTEBI.

Defendants.

**PLAINTIFF’S OPPOSITION TO DEFENDANTS CHAIM
RAJCHENBACH AND MENACHEM SHABAT’S MOTION FOR
SANCTIONS (ECF 272)**

Defendants Chaim Rajchenbach and Menachem Shabat (“Movants”) seek extraordinary sanctions (monetary awards and a filing bar, and (in ECF 271) dismissal of this action with prejudice) under Fed. R. Civ. P. 11, the Court’s inherent authority, and 28 U.S.C. § 1927 based on Plaintiff’s Verified *Ex Parte* Emergency Motion to Vacate Stay, Vacate Protective Order, Freeze Trust Assets, and Appoint Neutral Fiduciary (the “Emergency Motion”).

The request **must** be denied in its entirety. Movants failed to comply with **Rule 11's** mandatory safe-harbor protocol. Their memorandum rests on material **misrepresentations** of the record, including the **false** claim that Plaintiff ever expressed “violent threats” or any threats of any kind, and fails to establish that the Emergency Motion (ECF 167) was objectively frivolous or brought in bad faith. No such statements appear in any filing, transcript, or communication by Plaintiff. The Emergency Motion raised colorable concerns grounded in publicly available CMS ownership data, Plaintiff's documented status as a beneficiary of the Jack Finn Irrevocable Trust (evidenced by contemporaneous disbursement forms, EXHIBIT A), and the ongoing parallel state-court proceedings. Successive denials of related requests do not convert a good-faith application for emergency relief into sanctionable conduct. Movants' selective quotation, omission, and alteration of hearing testimony further demonstrate that the sanctions motion itself is an improper attempt to continue fraud on the Court and to chill legitimate advocacy concerning trust assets and protective-order scope. Even former counsel Racine M. Miller has formally notified Movants of these same fatal defects and requested that they withdraw, correct, or narrow the filings EXHIBIT B; Movants' continued prosecution of the expanded motion confirms its improper purpose.

I. Movants Failed to Comply with Rule 11’s Explicit Safe-Harbor Protocol

Rule 11(c)(2) is unambiguous: a motion for sanctions “**must** be served under Rule 5, but it must not be filed or be presented to the court if the challenged paper, claim, defense, contention, or denial is withdrawn or appropriately corrected within 21 days after service.” The safe-harbor period is **mandatory**; Substantial compliance requires service of a document that identifies the precise paper, the respondents, and the relief sought, and that affords a meaningful, uninterrupted 21-day opportunity to withdraw or correct. See *Nisenbaum v. Milwaukee County*, 333 F.3d 804, 808 (7th Cir. 2003); *Matrix IV, Inc. v. Am. Nat’l Bank & Tr. Co. of Chi.*, 649 F.3d 539, 552–53 (7th Cir. 2011).

Movants served a proposed memorandum on August 22, 2025, ***only five days before*** the August 27, 2025 hearing at which the Emergency Motion was adjudicated and denied. The challenged filing was therefore decided before the ordinary 21-day safe-harbor period could expire. No authority permits a party-initiated Rule 11 motion to proceed under those circumstances. Moreover, the filed papers (ECF 271–272) materially expand the relief and factual grounds beyond the August 2025 filing. ECF 272 n.1 claims the differences are limited to a footnote, an updated procedural-history section, page-limit deletions, and a font change. That statement addresses only the memorandum; it does not address ECF 271’s newly express request for dismissal with prejudice or the

reliance on an alleged “unbroken pattern” of later conduct (appeals, judicial-disqualification motions, separate litigation against judges, disciplinary proceedings involving Plaintiff’s previous counsel Ms. London, and Plaintiff’s subsequent *pro se* filings). None of that later conduct existed when the proposed motion was served therefore none of it could have been withdrawn or corrected during the 2025 safe-harbor period, and none of it may properly form the basis of a Rule 11 motion against Plaintiff or former counsel.

Moreover, the Rule 11 motion was served while the case remained stayed and while an appeal of the Emergency Motion denial was pending. The Court thereafter entered an order divesting itself of jurisdiction over the merits and staying motion practice (Dkt. 227). Movants did not re-serve a new compliant Rule 11 motion after the stay of motion practice lifted and after the Seventh Circuit affirmed the denial and expressly noted that its own sanctions order against prior counsel “does not prevent the defendants from seeking additional sanctions in the district court.” Instead, Movants filed ECF 272 on July 17, 2026, nearly eleven months after the first draft service and **long after** any realistic opportunity to withdraw the Emergency Motion existed. A letter or draft that fails to afford a meaningful, uninterrupted 21-day window after the procedural landscape permits response does not satisfy the Rule. The motion is therefore procedurally barred.

II. No Violent Threats, or Any Threats of Any Kind, Were Ever Expressed by Plaintiff

Movants' memorandum repeatedly asserts that the protective order was necessitated by "appalling conduct by Plaintiff, including violent threats towards the Movants and a bank associated with them, CIBC Bank USA." (ECF 272 at 3.) That assertion is **false**. Plaintiff has never expressed, written, or uttered any violent threat, threat of physical harm, or threat of any kind against Movants, CIBC, or any witness. The record contains no such statement.

Movants rely on selective and incomplete quotations from the March 27, 2025 hearing transcript (Dkt. 112). Movants claim Plaintiff "admitted to his threatening communications" and that his language "echo[ed] the words 'deny, defend, depose' written on the bullets that killed UnitedHealthcare CEO Brian Thompson." The full context of Plaintiff's testimony demonstrates the opposite: Plaintiff described perceived litigation delay tactics employed by opposing parties and counsel; he did not threaten anyone. The Court's subsequent characterization of the testimony as supporting a protective order does not rewrite the words Plaintiff **actually** spoke. Movants' omission of surrounding testimony and their insertion of an inflammatory analogy to a homicide constitute material alteration of the record. Such conduct itself risks sanctions and further undermines any claim that Plaintiff acted in bad faith.

The beneficiary disbursement forms contemporaneously signed in 2009 (submitted with this opposition) further confirm Plaintiff's status as a recognized beneficiary who received trust funds via wire transfer with the written consent of Jack Finn and other family members. Those documents, together with the Moskowitz affidavit (ECF 272-2, EXHIBIT D) acknowledging that certain trusts were involved in a 2011 nursing-home transaction partially owned by the Jack Finn Irrevocable Trust, supply a factual predicate for Plaintiff's concerns about asset movements, concerns that were **neither fabricated nor sanctionable**.

III. The Emergency Motion Was Neither Frivolous nor Brought in Bad Faith; Movants' Legal and Factual Logic Is Flawed

A filing is frivolous under Rule 11 **only** if it is objectively baseless (i.e., if no reasonable attorney or party would have believed the contentions had a chance of success after reasonable inquiry.) *Cuna Mut. Ins. Soc. v. Off. & Pro. Emps. Int'l Union*, Loc. 39, 443 F.3d 556, 560 (7th Cir. 2006). Successive unsuccessful motions do not automatically become frivolous. *Alexander v. United States*, 121 F.3d 312 (7th Cir. 1997), and *Universitas Educ., LLC v. Nova Grp., Inc.*, 2021 WL 4443962 (S.D.N.Y. Sept. 28, 2021), involved pure rehashing of arguments already conclusively rejected with no new facts or law. Here, the Emergency Motion presented (1) updated CMS ownership filings that Plaintiff reasonably

interpreted as reflecting changes in operational control of skilled-nursing facilities; (2) the continued pendency of the parallel state action whose resolution the original stay order identified as potentially dispositive; and (3) Plaintiff's verified assertion, supported by the 2009 disbursement instruments, that he is a beneficiary entitled to information and protection of trust corpus.

Movants' claim that the exhibits "on their face" negate any transfer is a contested interpretation of regulatory data, not an objective truth that rendered Plaintiff's position groundless. Likewise, the assertion that Plaintiff "misrepresented" the status of the state-court case ignores the contemporaneous orders and Plaintiff's good-faith characterization of ongoing delay. The Court denied the Emergency Motion after an evidentiary hearing; that denial does not retroactively render the motion sanctionable. Rule 11 is **not** a fee-shifting statute for the prevailing party on every contested emergency application.

The cases Movants cite further illustrate the deficiency in their logic. *Xped LLC v. Entities Listed on Exhibit 1*, 690 F. Supp. 3d 831 (N.D. Ill. 2023), involved patent falsehoods used to obtain an *ex parte* TRO. No comparable fabrication exists here. *Eberhardt v. Walsh*, 122 F.4th 681 (7th Cir. 2024), concerned a hyperactive pattern of sixteen motions, nearly all denied, that the district court expressly found screamed bad faith. The Emergency Motion was a single application for extraordinary interim relief grounded in trust-asset

concerns, precisely the type of motion a beneficiary may bring without inviting sanctions. *Fries v. Helsper*, 146 F.3d 452 (7th Cir. 1998), involved filings that impugned a judge’s integrity with total disregard for the truth; Plaintiff’s criticism of prior rulings, while vigorous, does **not** rise to that level.

Further confirming that the Emergency Motion rested on a good-faith factual predicate rather than any improper purpose, Defendant Ilana Eddi’s June 18, 2026 deposition testimony (EXHIBIT C) in the parallel state-court action (Case No. 22 CH 675) establishes that assets from the “Rajchenbach deal” (a nursing-home transaction) were in fact held in the Jack Finn Irrevocable Trust even though her father had told her the deal “was not supposed to go into an irrevocable trust.” (Ex. C, Eddi Dep. Tr. at 72–75.) She further acknowledged that an irrevocable trust cannot be changed or amended and confirmed that the Trust made disbursements, including the 2009 distribution to Plaintiff. (*Id.* at 40–41, 83.) This testimony independently corroborates Plaintiff’s concerns about Trust assets and control that underlay the Emergency Motion and defeats any claim that the Motion was objectively baseless or filed in bad faith.

IV. Movants’ Pattern of Selective Quotation, Omission, and Mischaracterization Constitutes an Improper Attempt to Perpetuate Fraud on the Court

Beyond the false “violent threats” narrative, Movants systematically omit material portions of hearing transcripts and prior filings. They ignore Plaintiff’s

repeated explanations that communications with CIBC concerned legitimate investigative inquiries into trust-related banking activity, not harassment. They ignore the 2009 disbursement forms establishing beneficiary status. They ignore that Plaintiff's prior counsel's later disciplinary history (London, addressed by the Seventh Circuit) cannot be imputed wholesale to Plaintiff, particularly after Plaintiff terminated that counsel and proceeded *pro se*. These omissions and alterations transform a legitimate sanctions inquiry into an improper vehicle for continuing to mislead the Court about the factual record.

V. Movants Improperly Attribute Conduct and Fail to Provide Individualized Notice

ECF 271–272 combine Rule 11, § 1927, and inherent authority without adequately identifying which conduct is asserted against which respondent under which source of authority. Collective references to “Plaintiff and his counsel” do not provide meaningful notice. Former counsel Racine M. Miller has formally notified Movants (letter of July 27, 2026) that she withdrew on September 2, 2025 (motion granted May 21, 2026), that she had no involvement in later appellate filings, or Plaintiff's subsequent *pro se* filings, and that none of that later conduct can establish her knowledge, inquiry, intent, or purpose when the Emergency Motion was filed. (Ex. B) The same logic applies with equal force to Plaintiff: pre-withdrawal events cannot retroactively convert a good-faith emergency application into sanctionable conduct.

There was no individualized finding at the August 27, 2025 hearing that Plaintiff, or either former counsel, fabricated evidence, manipulated CMS records, knowingly made a false statement, failed to conduct a reasonable inquiry, acted in bad faith, or filed the Emergency Motion to harass. The Court simply denied extraordinary interim relief after considering competing evidence. Movants' continued reliance on later events and collective labeling confirms the motion's improper purpose.

VI. Neither Inherent Authority nor 28 U.S.C. § 1927 Supports Sanctions

Inherent-authority sanctions require a finding of willful abuse of process or bad faith. *Fuery v. City of Chicago*, 900 F.3d 450, 463 (7th Cir. 2018). Section 1927 **requires** objectively unreasonable multiplication of proceedings. The Emergency Motion did not multiply proceedings unreasonably; it sought a discrete form of interim relief that the Court entertained and denied on the merits. Subsequent appellate proceedings were authorized by statute. Plaintiff's vigorous advocacy does not meet the high threshold for either sanction. The requested filing bar is particularly inappropriate against a *pro se* litigant seeking to protect claimed beneficiary interests in a multi-billion-dollar trust corpus.

VII. CONCLUSION

For the foregoing reasons, Movants' motion for sanctions (ECF 271-272) should be **DENIED** in its entirety. Plaintiff requests that the Court further order Movants to show cause why they should not be **sanctioned** for filing a motion that itself violates **Rule 11** by *misrepresenting* the record, omitting material testimony, expanding far beyond the safe-harbor draft and advancing the demonstrably false claim that Plaintiff ever made threats of any kind.

Dutifully submitted,

/s/ Raymond Earl Butler II
Raymond E. Butler II
Plaintiff, Pro Se

14320 Shirley Rd.
Baraga, MI. 49908
773-997-0328
RaymondEButler@protonmail.com

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5 and Local Rule 5.5, I hereby certify that on August 10th, 2026, I electronically filed the foregoing **PLAINTIFF'S OPPOSITION TO DEFENDANTS CHAIM RAJCHENBACH AND MENACHEM SHABAT'S MOTION FOR SANCTIONS (ECF 272)** with the Clerk of the Court using the CM/ECF system, which will automatically send electronic notification of such filing to all attorneys of record who are registered CM/ECF users.

/s/ Raymond Earl Butler II

Raymond E. Butler II
Pro Se Plaintiff
14320 Shirley Rd.
Baraga, MI. 49908
773-997-0328
RaymondEButler@protonmail.com

EXHIBIT A

JACK FINN IRREVOCABLE TRUST

FORM OF DIRECTION TO DISBURSE

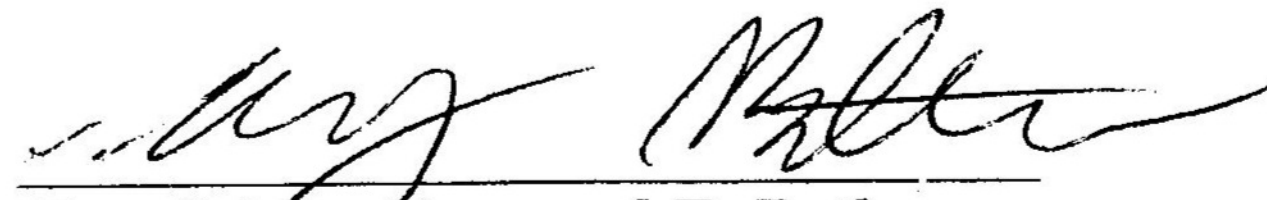
To: Trustee of Jack Finn Irrevocable Trust
Illana Eddy, Trustee
Ely Eddy, Trustee
Fax No: (732)-346-1825

You are hereby requested and directed to disburse to the undersigned Beneficiary the sum of Thirty Thousand Dollars (\$30,000). The undersigned fully understands and agrees that this distribution from the Trust will reduce any other amounts that may be due under the terms of the Trust agreement.

By Wire Transfer to: Chase Bank- Account Name: Shoshana Finn and Jack Finn- funds being deposited in this account and then delivered to the undersigned beneficiary.

Account No: 822012498

Routing No: 07100013


Beneficiary- Raymond E. Butler

Address: 10475 Carol Ct. Rosemont, IL 60475
Telephone No: 773/587-1613

Date: September 21, 2009

AGREED 
Jack Finn

EXHIBIT B



Nicholas H. Callahan, Esq.
Barack Ferrazzano Kirschbaum & Nagelberg LLP
200 W. Madison St., Ste. 3900
Chicago, IL 60606

SENT BY EMAIL ONLY
nick.callahan@bfkn.com
samantha.zuba@bfkn.com

July 27, 2026

Re: Raymond E. Butler, II v Eli Jackfinn Eddi a/k/a Ely Eddi , et al.
1:25-cv-04443/N.D. IL

Dear Mr. Callahan:

I write in my individual capacity as former counsel for Raymond E. Butler, II, and as one of the persons against whom your clients seek sanctions in ECF Nos. 271 and 272.

I no longer represent Mr. Butler. My attorney-client relationship with him ended on September 2, 2025, and I moved to withdraw that same day. The Court granted my motion to withdraw on May 21, 2026. I therefore cannot file a response on behalf of "Plaintiff," coordinate or control Plaintiff's response, make litigation decisions for Plaintiff, or adopt positions taken by Mr. Butler or Ms. London after my representation ended.

Before requiring me to incur the considerable uncompensated time and expense necessary to defend against ECF Nos. 271 and 272, I ask that your clients reconsider whether those filings can properly be maintained against me in their present form.

Opportunity to Withdraw, Correct, or Narrow ECF Nos. 271-272

The proposed motion served in August 2025 principally concerned ECF No. 167 and related advocacy then before the Court. The motion filed in July 2026, however, seeks materially broader relief and relies upon substantial later conduct in which I had no involvement.

Most notably, ECF No. 271 now expressly requests dismissal of Plaintiff's entire action with prejudice as a sanction. The filed motion supports that request through an alleged "unbroken pattern" of misconduct extending well beyond August 2025, including subsequent appeals, judicial-disqualification filings, separate litigation against members of the judiciary, disciplinary proceedings involving Ms. London, and later filings by Mr. Butler.

As indicated by my appearances and signed filings and correspondence, I did not pursue those subsequent matters. I did not advocate in the later appellate filings, judicial-disqualification motions, separate litigation, disciplinary submissions, or pro se filings now invoked by Movants. None of that conduct existed when the proposed Rule 11 motion was served in August 2025, none of it could have been withdrawn or corrected during the 2025 safe-harbor period, and none of it may properly establish my knowledge, inquiry, intent, or purpose when ECF No. 167 was filed.

ECF No. 272 states in footnote 1 that the differences between the filed memorandum and the memorandum transmitted in August 2025 consist of an additional footnote, an updated procedural-history section, deletions made to comply with page limitations, and a font change. That statement addresses only the memorandum. It does not address the separate relief requested in ECF No. 271, including the newly made express request for dismissal with prejudice, or explain how later events that did not exist when the proposed motion was served may support a party-initiated Rule 11 motion against former counsel. Although the served memorandum mentioned dismissal as a possible sanction in a footnote, its conclusion did not request dismissal, and it did not base such relief upon later events that had not yet occurred.

The filed papers also combine Rule 11, 28 U.S.C. § 1927, and the Court's inherent authority without adequately identifying which conduct is asserted against which respondent under which source of authority. Those standards are materially different. Collective references to "Plaintiff and his counsel" do not provide meaningful notice of the particular conduct allegedly attributable to me, the applicable culpability standard, or the expenses supposedly caused by my individual actions.

Accordingly, please confirm whether Movants will withdraw, correct, or narrow ECF Nos. 271 and 272 as follows:

1. Please confirm whether Movants will withdraw their request for sanctions against me personally. If so, please agree to file an appropriate notice or stipulation promptly.
2. If Movants intend to proceed against me, please withdraw the request for dismissal with prejudice and the request for a prospective filing restriction to the extent either is based upon conduct occurring after service of the August 2025 proposed motion or upon conduct not attributable to me. I am no longer Plaintiff's counsel, possess no authority to file papers on his behalf, and did not participate in the later filing activity upon which Movants rely. Please identify what conduct by me could support prospective restrictions against an attorney who has already withdrawn.
3. Please withdraw any reliance upon Ms. London's later appellate filings, disciplinary proceedings, judicial-disqualification motions, separate actions, or other post-September 2, 2025 conduct as a basis for sanctions against me. The same applies to Mr. Butler's later pro se filings, communications, appeals, and motions. Conduct by

others after my representation ended cannot establish the reasonableness of my inquiry, my knowledge, my intent, or my purpose in July or August 2025.

4. Please correct any suggestion that the Seventh Circuit found ECF No. 167, the appeal from the denial of the asset-related relief, or my conduct frivolous. The Seventh Circuit affirmed the denial of the requests to lift the stay, freeze assets, and appoint a neutral fiduciary; dismissed the protective-order portion of the appeal for lack of appellate jurisdiction; and characterized the separate request for mandamus and motion to supplement that request as frivolous. Those later filings and that limited frivolousness determination should not be attributed to me.
5. Please also correct the assertion that ECF No. 227 imposed a blanket prohibition against all motion practice, including every ancillary motion. ECF No. 227 recognized that the Court retained authority over ancillary matters, identified two pending ancillary motions, and exercised its discretion to continue those motions while appellate proceedings remained pending. It did not expressly prohibit the filing of every additional ancillary motion.
6. Please identify each category of fees, costs, or other monetary relief that Movants contend was caused by my individual conduct. Any such amounts should be distinguished from expenses resulting from conduct by Mr. Butler or Ms. London, subsequent appeals, later motions, the separate litigation involving members of the judiciary, disciplinary proceedings, or events occurring after my representation ended.
7. The proposed Rule 11 motion was served on August 22, 2025, only five days before the August 27 hearing and adjudication of ECF No. 167. Please identify the authority upon which Movants rely in contending that a party-initiated Rule 11 motion may proceed where the challenged filing was adjudicated before expiration of the ordinary 21-day period in which it could be withdrawn or appropriately corrected.
8. Please identify the exact document Movants contend was served pursuant to Rule 11(c)(2), and confirm whether Movants contend that every allegation, factual ground, respondent, and form of relief now presented in ECF No. 271 appeared in the document served in August 2025. In particular, please address ECF No. 271's first express request that the action be dismissed with prejudice and the reliance upon events that had not yet occurred when the proposed motion was served.
9. Please withdraw any contention that the August 27, 2025 hearing produced an express finding that I fabricated evidence, manipulated CMS records, knowingly made a false statement, failed to conduct a reasonable inquiry, acted in bad faith, filed ECF No. 167 to harass, or violated Rule 11. The Court denied extraordinary interim relief after considering the parties' competing evidence. I am unaware of any individualized finding that my conduct was frivolous, dishonest, reckless, or undertaken for an improper purpose.
10. Finally, to the extent Movants seek sanctions against me based upon particular language in ECF No. 203, please identify the factual basis upon which they attribute each challenged statement to me individually, including whether they contend that I

drafted, authorized, personally advocated, or knowingly adopted the specific language at issue.

For each position Movants intend to maintain against me, please identify the particular filing, statement, or act at issue; the date of the conduct; the source of sanctioning authority invoked; the applicable legal standard; the relief sought; the fees or costs allegedly caused by that conduct; and the evidentiary basis for attributing it to me individually.

This request provides Movants a fair opportunity to withdraw, correct, or narrow their filing before unnecessary expense and additional motion practice occur. It is not intended to substitute for any separate notice or procedure that may be required under Rule 11(c)(2), and I reserve all rights concerning the propriety of ECF Nos. 271 and 272.

Clarification of ECF No. 275 & Briefing Procedure

Your motion nevertheless seeks relief against me personally, including monetary sanctions, a prospective filing restriction, and other relief. ECF No. 275, however, directs only “Plaintiff” to file a response by August 10, 2026.

The order does not expressly direct me to respond, state that I may file a separate response in my individual capacity, establish a page limit for my separate response, or address the limited sur-reply I previously requested.

I cannot respond as counsel for Plaintiff, and my interests are materially different from those of Mr. Butler and Ms. London. A separate response is therefore necessary to the extent your motion seeks relief against me personally.

Please confirm whether Movants agree to submit a joint request asking the Court to clarify that:

1. I may file a separate response solely on my own behalf and in my individual capacity as a former-counsel sanctions respondent;
2. I am not required to join, coordinate with, adopt, or respond on behalf of Mr. Butler or Ms. London;
3. I may file my separate response on or before August 14, 2026, which is 28 days after ECF Nos. 271 and 272 were filed;
4. I may file a separate response not exceeding 25 pages, excluding the caption, tables, signature block, certificates, and exhibits;
5. Movants may file a reply within 14 days after my separate response, subject to the Court’s applicable reply-page limitation; and
6. I may file, without further leave, a limited sur-reply not exceeding seven pages within seven days after Movants’ reply, confined exclusively to arguments, authorities, evidence, factual assertions, or requests for relief first presented in reply.

No further briefing would be permitted absent leave of Court.

ECF No. 275 presently establishes August 10, 2026 as Plaintiff's response deadline but does not expressly state whether that deadline applies to me individually. Unless and until the Court clarifies the order, I will proceed on the assumption that August 10 may be treated as applicable to me, without waiving my objection to that interpretation. My request for clarification and an adjusted schedule should not be construed as an intention to disregard the existing order.

Pending clarification by the Court, please also confirm that Movants will not contend that I defaulted, waived any objection, or failed to respond merely because I did not file a response on behalf of "Plaintiff" by August 10, 2026.

A separate response and adequate page allowance are warranted because the filed motion:

- invokes three distinct sanctions authorities;
- seeks relief against three differently situated respondents;
- incorporates a lengthy record extending across several courts and proceedings;
- requests monetary, prospective, and case-terminating sanctions;
- relies substantially upon conduct occurring after my representation ended;
- raises threshold issues concerning safe harbor, notice, timeliness, causation, individualized responsibility, and the differences between the served and filed motions; and
- requires me to distinguish my conduct from subsequent conduct by Mr. Butler and Ms. London.

A limited sur-reply is likewise appropriate because Movants' reply may attempt to identify new conduct, new expenses, new authorities, or new theories of attribution that are not adequately presented in ECF Nos. 271 and 272. Requiring a separate motion for leave after the reply would create avoidable expense and additional motion practice. A narrowly confined sur-reply authorized in advance would instead permit a complete record without unfairly extending briefing.

Preservation of Objections & Notice of Potential Relief

Nothing in this letter waives any procedural or substantive objection to ECF Nos. 271 and 272. I expressly preserve all objections concerning, among other matters:

- compliance with Rule 11's safe-harbor requirements;
- adjudication of the challenged filing before expiration of the safe-harbor period;
- the material differences between the motion served in August 2025 and the allegations and relief presented in July 2026;
- reliance upon conduct occurring after service of the proposed motion;
- reliance upon conduct occurring after my representation ended;

- timeliness and delay;
- notice and due process;
- individualized responsibility;
- causation;
- proportionality;
- the availability of dismissal or prospective filing restrictions;
- the attribution of another person's conduct to me;
- the evidentiary basis for the factual assertions made against me;
- the availability of relief under Rule 11, § 1927, or the Court's inherent authority; and
- my right to seek appropriate expenses, fees, sanctions, or other relief arising from the filing and continued prosecution of ECF Nos. 271 and 272.

At this time, I ask that your clients reassess whether there is a good-faith factual and legal basis to continue seeking sanctions against me personally. I am unaware of any finding at the August 27, 2025 hearing that I fabricated evidence, knowingly made a false statement, failed to investigate, acted in bad faith, or filed ECF No. 167 for an improper purpose. I sought withdrawal immediately after my representation ended and did not participate in the subsequent litigation conduct upon which Movants now rely.

Should Movants continue pursuing relief against me without an adequately individualized factual and legal basis after receiving this notice, I reserve the right to seek all appropriate relief, including reasonable expenses and fees to the extent recoverable, sanctions under 28 U.S.C. § 1927, relief under the Court's inherent authority, relief available under Rule 11(c)(2), and any other appropriate remedy.

This reservation is not intended to escalate the dispute. Its purpose is to provide Movants with notice of the significant procedural and factual defects in their filing and a fair opportunity to withdraw, correct, or narrow their positions before I am forced to incur further expense defending against them.

Please provide Movants' position by the close of business on July 28, 2026, so that any agreed submission or, if necessary, motion for clarification may be presented promptly without jeopardizing the existing response deadline.

Sincerely,

/s/ Racine M. Miller

Racine M. Miller
Attorney & Counselor

RM/rm

CC: Ms. Katherine London, Esq. (Email Only)
Mr. Raymond Butler (Email Only)

EXHIBIT C

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

RAYMOND E. BUTLER II,
Plaintiff,

v.

Case No. 22 CH 675

ILLANA EDDI AND ELY EDDI,
INDIVIDUALLY AND AS TRUSTEES
OF THE JACK FINN IRREVOCABLE
TRUST,

Defendants.

DEPOSITION OF ILANA FINN EDDI called as a
witness for examination, taken pursuant to the
provisions of the Code of Civil Procedure and the
Rules of the Supreme Court of the State of Illinois
pertaining to the taking of depositions for the
purpose of discovery, before ASHLEIGH CHANDLER,
Digital Reporter, on JUNE 18, 2026 at 9:00 A.M.

APPEARANCES OF COUNSEL

On behalf of the Plaintiff:

KATHERINE LONDON, ESQUIRE
KMFL LAW
100 Illinois Street
Suite 200
St. Charles, Illinois 60174
630-507-9998
Klondon@kmflaw.com

On behalf of the Defendant:

ROBIN MAHER, ESQUIRE
LEVENFELD PEARLSTEIN, LLC
120 South Riverside Plaza
Suite 1800
Chicago, Illinois 60606
312-346-8380
rmaher@lplegal.com

Also Present:

Raymond E. Butler II, Plaintiff

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INDEX TO EXAMINATION

WITNESS:	DIRECT	CROSS	REDIRECT	RECROSS
ILANA FINN EDDI				
By Ms. London	4			

INDEX OF EXHIBITS

(No exhibits marked.)

(On the record at 9:00 a.m.)

MS. LONDON: This is the deposition of Ms. Ilana Finn Eddi, case 22 CH 675, pending in the Cook County Chancery Court in Cook County, Illinois.

The deposition is being taken via Zoom on June 18th, 2026 at 9:00 a.m.

Present, are the Deponent, Ms. Ilana Finn Eddi; counsel for Ms. Eddi, Robin Maher, M-A-H-E-R; myself, Katherine London, counsel for Plaintiff, Raymond E. Butler; and Plaintiff, Raymond E. Butler.

Would you swear in the Deponent, please?

THE REPORTER: Yes. Okay. Will the Witness please raise your right hand to be sworn?

ILANA FINN EDDI

having been first duly sworn, testified as follows:

THE REPORTER: Okay. You can lower your hand. Thank you.

Counsel, you may proceed.

MS. LONDON: Thank you.

DIRECT EXAMINATION

BY MS. LONDON:

Q. Ms. Eddi, will you please state your name and spell it for the record?

A. Ilana Eddi. Or if you want, my maiden name

1 is Finn. I-L-A-N-A F-I-N-N E-D-D-I.

2 Q. Thank you. Have you ever been deposed
3 before?

4 A. No.

5 Q. Okay. So I'm sure your attorney already
6 explained to you, but just so that we're on the same
7 page, the deposition is where I get to ask you a
8 number of questions and you respond truthfully.

9 A. Okay.

10 Q. When I ask you a question and you answer,
11 then I will assume that you heard the question and you
12 understand it, okay?

13 A. Uh-huh.

14 Q. If you don't understand the question at any
15 time or you don't hear me, then please let me know,
16 and then I'll rephrase it or I'll state it again,
17 okay?

18 A. Okay.

19 Q. Also, just to be clear, answer any questions
20 as fully and accurately as possible.

21 A. Uh-huh.

22 Q. Your attorney might object to questions, if
23 she believes that she has the grounds to do so. Just
24 please let me finish my question before you answer,

1 okay?

2 A. Uh-huh.

3 Q. If you want to consult with your lawyer, you
4 can certainly do that at any time. We just ask that
5 you finish answering a question before you start
6 consulting with your attorney, all right?

7 A. Okay, okay.

8 Q. And we can take a break whenever you want.
9 Just let us know.

10 A. Okay.

11 Q. Okay?

12 A. Okay.

13 Q. Do you understand that we're here today to
14 ask questions about Raymond Butler and the court case
15 brought by him? He filed this claim against you as a
16 trustee and individually, correct?

17 A. Yes.

18 Q. Okay, okay. What's your date of birth?

19 A. My date of birth?

20 Q. Yes.

21 A. 9/7/66.

22 Q. Okay. And where do you currently live?

23 A. Florida.

24 Q. All right. And have you ever used any other

1 names, aliases, nicknames, anything like that?

2 A. I -- not really. Sometimes accidentally.

3 Q. Okay.

4 A. Mail will come with something, but that's not
5 something that I -- I only use my -- what I just gave
6 you.

7 Q. Okay. Do you ever spell your name with two
8 Ls?

9 A. No. But I've seen people do that.

10 Q. Okay. And what's your middle name?

11 A. Susan.

12 Q. Okay. Is your middle name now Finn?

13 A. Is my what? Sorry.

14 Q. Is your middle name now Finn? Did you drop
15 Susan?

16 A. No -- I don't -- I don't use it. I go by
17 Ilana Eddi.

18 Q. So you don't use your middle name as Susan?

19 A. Oh no, no. But that -- you asked me what it
20 is. That's my middle name.

21 Q. Okay. All right. Are you currently taking
22 any medication, or do you have any medical conditions
23 that would affect your ability to understand and
24 answer questions today?

1 A. Not medication.

2 Q. Okay. And you understand that you're
3 testifying under oath, and that your answers have the
4 force and full effect of you being in open court?

5 A. Uh-huh.

6 Q. Okay. All right. What is your current
7 occupation?

8 A. My current occupation?

9 Q. Uh-huh.

10 A. Is very intensely taking -- running the show
11 of my -- my special needs children.

12 Q. Okay. And how many do you have?

13 A. Three.

14 Q. What are their ages?

15 A. Twenty -- sorry -- Thirty-two, thirty-one,
16 and twenty-nine.

17 Q. Okay. And do they live with you?

18 A. Two live with me.

19 Q. And where does the other one live?

20 A. She lives in West -- West Palm Beach.

21 Q. Okay. What kind of needs do they have?

22 A. Everything. I -- I don't know. That's hard
23 to -- it's everything. I mean, they can't -- they
24 cannot live on their own.

1 Q. But one of them does?

2 A. One of them does, no. One of them does not.
3 She just lives there with 24-hour caregiving.

4 Q. Twenty-four-hour care, like, an in-home care?

5 A. Yes.

6 Q. Okay. Are there nurses that come in and out,
7 or does somebody live there?

8 A. No. It's not nurses. It's a lady that lives
9 overnight, and then there are two -- like, two
10 teachers that come in.

11 Q. Okay.

12 A. I mean, they're like teachers. Yeah.

13 Q. Okay.

14 A. Sorry?

15 Q. Are you married?

16 A. I am married.

17 Q. Okay. And who are you married to?

18 A. Ely.

19 Q. Ely?

20 A. Ely Eddi.

21 Q. Okay. And does he live with you as well?

22 A. No.

23 Q. Are you separated?

24 A. Yes.

1 Q. Legally?

2 A. No.

3 Q. Okay. Did you get a get?

4 A. Yes.

5 Q. Okay. All right. And who is the biological
6 father of your children?

7 A. Ely. Ely Eddi.

8 Q. Okay. All right. And you live by yourself,
9 correct?

10 MS. MAHER: Objection. Asked and answered.
11 She lives with her two children.

12 BY MS. LONDON:

13 Q. You take care of them on your own?

14 A. No. I mean, mostly, but no. I have some
15 help.

16 Q. What kind of help?

17 A. I have --

18 MS. MAHER: Objection. Relevance. This is
19 going pretty far beyond what could be relevant in a
20 trust case.

21 MS. LONDON: Well, I'm trying to figure out
22 how she pays for all of this.

23 MS. MAHER: Her personal finances are not at
24 issue in this case. Objection. Relevance.

1 MS. LONDON: They are.

2 BY MS. LONDON:

3 Q. Okay. How do you know the Plaintiff?

4 A. How do I know Ray?

5 Q. Yes.

6 A. Ray -- I don't really know Ray. He was a
7 foster child of Pessie and my father's.

8 Q. When did you first meet him?

9 A. There's no way I could tell you the year. I
10 don't know. It was decades ago, but I did not see him
11 too much.

12 Q. Did you live with your parents at the time
13 that he was a foster child?

14 A. My parents? You mean, my father and his
15 wife?

16 Q. Yes.

17 A. No.

18 Q. How old were you when he came to stay?

19 A. I do -- I was not living in the house.

20 Q. Do you remember his sisters coming to stay?

21 A. I was not living in the house. I was in New
22 York.

23 Q. You were in New York. Were you married at
24 that time?

1 A. When they -- when they came?

2 Q. Uh-huh.

3 A. No.

4 Q. Okay. So have you spoken with Raymond in the
5 past?

6 A. When he tried to contact me, I think one time
7 he showed up at my house, once or twice.

8 Q. Okay. And what happened then?

9 A. Nothing. I -- I spoke to him. He was a very
10 nice young man. I -- I don't -- I didn't have a lot
11 of interaction. I wasn't really around. And he --

12 Q. Well, why did he come to your house? I mean,
13 what was that interaction?

14 MS. MAHER: Objection. Form. Speculation.
15 Time period.

16 BY MS. LONDON:

17 Q. Where were you living when Raymond came to
18 your house?

19 A. Skokie.

20 Q. Did you own a home there?

21 A. Yes.

22 Q. And he knew where you lived?

23 A. Yes.

24 Q. Did he contact you before he showed up?

1 A. Honestly -- I -- I don't think so, but I
2 don't remember.

3 Q. Okay.

4 A. Yeah.

5 Q. Can you describe the interaction when he came
6 to your home?

7 A. It -- it was -- it was nothing. I was fine.
8 I don't -- I don't -- it was just a typical, I think
9 he was, like, down on himself. He was -- he was very
10 down and -- but that's all I really remember about it.

11 Q. What else do you remember about that
12 interaction?

13 A. It was decades ago.

14 Q. Okay. And then you said he showed up again?

15 A. When I say decades, I mean, maybe it was
16 more. It was definitely more than a -- one decade,
17 but I don't know. No, showed up again. I -- I don't
18 know. I don't know. I know for sure it was one time
19 for sure. After that I -- I don't -- I have a fuzzy
20 memory about it. Maybe he came along with his sister
21 one time. It was more -- it -- it seemed like a
22 visit, but I'm not even sure he was there. Somebody
23 was with his sister when she came.

24 Q. Okay. Did you have any interaction with him

1 at your father's house?

2 MS. MAHER: Objection. Form. Time frame.
3 Relevance.

4 BY MS. LONDON:

5 Q. Have you ever had any interaction with
6 Raymond at your father's house at any time?

7 A. Oh, gosh. I -- I must have, but if I did, it
8 was very little.

9 Q. Have you ever had any business or financial
10 dealings with him?

11 A. With who? With Ray?

12 Q. Yes.

13 A. No, no.

14 Q. Okay. Okay. When did you first become a
15 trustee of the Jack Finn Irrevocable Trust?

16 A. I think it was -- I'm going to say I think it
17 was 2007.

18 Q. Okay. And did you take over as trustee from
19 someone else?

20 A. Yes.

21 Q. Who was that?

22 A. I believe it was Jerry Cherney.

23 Q. Okay. And at that time, had he been the only
24 trustee you took over from?

1 A. My dad's paperwork was very confusing. There
2 was an action on Raymond, but I don't know if I took
3 it over. I think it was Jerry Cherney that was the
4 main, but I know my father had other trustees
5 involved, so I -- but I don't know. I -- I thought
6 that I took it over from Jerry Cherney.

7 Q. Okay. Other trustees that were involved in
8 the trust that you took over?

9 A. I'm sorry?

10 Q. You said there were other trustees involved.
11 Do you mean in the trust that you took over?

12 MS. MAHER: Objection. Form and time period.
13 Are you asking whether they were involved at the time
14 she took over, or are you asking whether they were
15 involved at any time in the past?

16 MS. LONDON: I'm asking what she means by
17 other trustees involved.

18 THE WITNESS: I just --

19 MS. MAHER: Do you understand the question,
20 Ilana?

21 THE WITNESS: I do not understand that
22 question.

23 BY MS. LONDON:

24 Q. Okay.

1 MS. MAHER: Can you rephrase the question,
2 please, Ms. London?

3 BY MS. LONDON:

4 Q. I asked if you only took over for Mr.
5 Cherney. You said your father's paperwork was
6 confusing, and he had other trusts, and there may be
7 other trustees involved. I'm trying to clarify if you
8 mean there were other trustees involved in the trust
9 that you took over as a trustee.

10 A. Were there other, you know, I -- I still
11 don't -- I'm -- I'm really sorry. Please repeat it
12 one more time. I know this is looking stupid. Please
13 repeat the question.

14 Q. Well, actually, I'll move on, because I can
15 come back to it. It's okay.

16 A. Okay. Okay. Come back to it.

17 Q. What is the date on the trust that you are a
18 trustee of? The original date.

19 MS. MAHER: Objection. Form. Do you mean
20 the date it was --

21 MS. LONDON: The date that it was --

22 MS. MAHER: -- it was executed or created?

23 MS. LONDON: Correct. The date it was
24 created.

1 THE WITNESS: The date it was --

2 BY MS. LONDON:

3 Q. Thank you.

4 A. The what -- the date --

5 MS. MAHER: Objection. Objection.

6 Foundation. But go ahead and answer, if you know the
7 date that trust was created.

8 THE WITNESS: If -- if I know the date of
9 when it was created?

10 MS. MAHER: Yes.

11 THE WITNESS: I mean, I'm told it was '93,
12 1993.

13 BY MS. LONDON:

14 Q. You don't have a copy of it?

15 A. I -- I wasn't a trustee in 19 --

16 MS. MAHER: Objection. Form.

17 BY MS. LONDON:

18 Q. Do you have a copy of the trust in which you
19 are a trustee?

20 A. I have a copy, because you guys provided it.

21 Q. How do you know what the trust says your
22 obligations are?

23 MS. MAHER: Objection. Form.

24 BY MS. LONDON:

1 Q. Do you know what a trustee is? Do you know
2 what their responsibilities are?

3 A. I fully did not understand that, and I -- but
4 I did take it on, saying I would only do it -- I was
5 made fun of for this by my father's wife, but I said I
6 would only do it if I couldn't be held responsible.

7 Q. Okay. Did you review any documents in
8 preparation for today's deposition?

9 A. A little bit.

10 Q. What did you review?

11 A. The -- when I took over from Jerry Cherney,
12 the trustee.

13 Q. Okay.

14 A. There was -- oh, sorry. My -- I'm very
15 fuzzy, but there was one other -- there was something
16 else I reviewed from -- wait that -- that my attorney
17 sent me --

18 Q. Okay.

19 A. -- to review. It's not coming to mind at the
20 moment, but I might remember.

21 Q. Okay. When you became a trustee, were you
22 promised any sort of compensation?

23 A. No. I mean, to be paid for that position
24 specifically, no. Just -- just a beneficiary

1 sometimes, but not -- no, no compensation.

2 Q. Are you a trustee and a beneficiary of the
3 trust that you say was created in 1993?

4 MS. MAHER: Objection. Time period. Are you
5 asking whether she's a beneficiary now, or whether she
6 was a beneficiary at the time she acted as trustee?

7 MS. LONDON: Well, she claims she's acting as
8 trustee now.

9 MS. MAHER: Objection. There's been no
10 testimony on that.

11 MS. LONDON: She just testified that she
12 became a trustee in 2007 for her father's 1993 trust.

13 MS. MAHER: Yes. And she said nothing about
14 today or whether that trust even exists.

15 BY MS. LONDON:

16 Q. Are you still a trustee today of that same
17 trust?

18 A. I believe so. I -- I believe --

19 Q. Are you a beneficiary currently?

20 A. I believe so.

21 Q. Were you a beneficiary all along?

22 A. Yes, I believe so.

23 Q. Okay. So have you received separate
24 compensation just for being a trustee?

1 A. No.

2 Q. Okay. So as a trustee, you should know what
3 trust instruments and any amendments, or restatements,
4 or anything like that, are part of the trust in which
5 you are a trustee. Do you know that?

6 MS. MAHER: Objection. Is that a statement?
7 Are you asking her whether --

8 MS. LONDON: I'm asking if she understands
9 that all trust amendments, restatements, and
10 instruments that she is a trustee of, she is
11 responsible for knowing. Does she even know that?

12 MS. MAHER: Objection. Form.

13 BY MS. LONDON:

14 Q. Do you know what trust instruments are
15 included in the trust in which you are a trustee?

16 A. So we -- this is totally above my pay grade,
17 and I am not -- like, I'm very fuzzy on a lot of it.
18 It -- I was not the one who even held documents or
19 whatever that I -- I'm not -- and no one, not my
20 father's attorney, nobody, explained anything to me.

21 Q. Who holds the documents, then?

22 A. Ely.

23 MS. MAHER: Objection. Foundation. Go ahead
24 and answer. Ely was her answer.

1 THE WITNESS: Ely.

2 MS. MAHER: Just pause for one second, so
3 that I can make an objection.

4 THE WITNESS: Yes, yes.

5 BY MS. LONDON:

6 Q. Do you know of any amendments that were made
7 to the trust in which you're a trustee?

8 A. I believe so.

9 Q. What were those?

10 A. Well, there was -- there was definitely a
11 2012 amendment. I -- off the top of my head, I
12 don't -- I couldn't tell you anything. Oh, wait.
13 Wait. So was it also 2007? I don't know if I'm
14 confusing, I think, maybe 2007, 2012. This is all
15 about the '93 trust amendments, right?

16 Q. Yes.

17 A. Sorry.

18 Q. Okay.

19 A. That's -- that's where I am. Yeah.

20 Q. Are you aware of any restatements regarding
21 the trust that you are a trustee of?

22 MS. MAHER: Objection. Form. It's an
23 irrevocable trust. Are you suggesting it was
24 restated?

1 MS. LONDON: Yes.

2 MS. MAHER: An irrevocable trust cannot be
3 restated. Objection. Form.

4 MS. LONDON: And yet we have multiple trusts
5 that have been done that way.

6 MS. MAHER: I don't believe so. Objection.

7 BY MS. LONDON:

8 Q. Okay. All right. Regarding the trust in
9 which you're a trustee, what are the provisions
10 regarding distributions and investments?

11 MS. MAHER: Objection. If you want to show
12 her a document, I don't think this is a memory test.
13 You can ask her what is her understanding of something
14 without looking at the document, but it may be that
15 her understanding is not something she can testify to
16 without a document.

17 MS. LONDON: I understand. I do have a
18 document. Just a minute please.

19 BY MS. LONDON:

20 Q. Okay. Sorry. Does this document look
21 familiar to you? It's the Seventh Trustee Amendment
22 to the Jack Finn Irrevocable Trust dated December 3rd,
23 1993.

24 A. Yes.

1 MS. MAHER: You're going to have to show her
2 the entire document, if you want her to -- we're going
3 to keep a clear record here.

4 MS. LONDON: I understand.

5 MS. MAHER: So if you're showing exhibits,
6 we're going to need to see the entirety of the exhibit
7 that you're trying to show, and identify it for the
8 record, preferably by Bates number or uploaded through
9 the portal, but we can't have exhibits that are not
10 clear for the record. I was not sent any exhibits
11 ahead of time, and I haven't seen any uploaded into
12 the portal.

13 MS. LONDON: This is discovery that you've
14 already been given.

15 MS. MAHER: And for this record, I'm going to
16 need to know what it is. That's the point.

17 MS. LONDON: I just said it was the Seventh
18 Trust Amendment to the Jack Finn Irrevocable Trust
19 dated December 3rd, 1993.

20 MS. MAHER: And we're going to -- I need to
21 see that entire document to make sure there's no extra
22 pages to make sure it is what was produced. I can't
23 verify it, based on this little snippet you're showing
24 on the screen.

1 MS. LONDON: All right, Ms. Maher. Yeah.
2 Stop sharing. Let me back up. When we take a break I
3 will get all the documents over to you. In the
4 meantime, let me continue.

5 MS. MAHER: Can we take one quick break? I
6 just need one minute please.

7 MS. LONDON: Yeah.

8 THE REPORTER: Ms. London, would you like for
9 me to go off the record until she comes back?

10 MS. LONDON: Yes, please.

11 THE REPORTER: Okay.

12 MS. LONDON: Thank you. Sorry.

13 THE REPORTER: We're off the record. The
14 time is 9:23 a.m.

15 (Off the record.)

16 THE REPORTER: We're back on the record. The
17 time is 9:24 a.m.

18 BY MS. LONDON:

19 Q. Okay, okay. When did you first become
20 familiar with the terms of the trust in which you are
21 a trustee?

22 A. I -- I honestly don't recall.

23 Q. When you were made a trustee, did you read
24 the original trust agreement?

1 A. It was very difficult. I -- I must have, but
2 it was very, very difficult getting documents from
3 Colman Ginsparg.

4 Q. Okay. Let me ask you this, can you describe
5 for me, just describe for me how you became a trustee
6 of this trust? What were the circumstances?

7 A. That's --

8 MS. MAHER: Objection. Form.

9 BY MS. LONDON:

10 Q. What were the circumstances under which you
11 became a trustee for this trust?

12 A. Robin?

13 MS. MAHER: Do you not understand the
14 question? I'm actually having a difficult time
15 understanding the question as well.

16 You've shown her the Seventh Amendment, she's
17 testified that she became trustee in 2007. Are you
18 asking her who asked her to? I don't understand the
19 question.

20 MS. LONDON: Yes. I'm asking her how she
21 even got into this position, because she doesn't seem
22 to know anything about the trust, what a trustee does,
23 what her responsibilities are. She doesn't appear to
24 have looked at anything. So I'm wondering how she

1 even became a trustee.

2 MS. MAHER: Why don't you pose a new
3 question, and I will object if she doesn't understand
4 it, but I don't think she understands what are the
5 circumstances.

6 THE WITNESS: No. I do.

7 MS. MAHER: Okay.

8 BY MS. LONDON:

9 Q. Okay. Go ahead.

10 MS. MAHER: Do you want to answer the
11 question, then?

12 THE WITNESS: I really want to answer this.

13 MS. MAHER: Ms. Court Reporter, so we have a
14 clear record, maybe you could just read back the
15 question, so that we're all on the same page?

16 MS. LONDON: Yeah.

17 THE REPORTER: Okay.

18 (The record was read back as requested.)

19 THE WITNESS: May I?

20 MS. MAHER: Yes.

21 BY MS. LONDON:

22 Q. Yes.

23 MS. MAHER: Yes, please.

24 THE WITNESS: Okay. So I was in the -- this

1 is not an excuse. I was in the thick of a very
2 serious situation with my children, all three of them,
3 and my father came to me and said, you need to be
4 trustee. And I said, I don't know. I'm not -- that's
5 not for me, and I know what you're dealing with, and
6 there's -- I can't. And somehow -- well, he said to
7 me for sure that you have to. You have to do it. I
8 don't know who else, because Jerry was no longer and,
9 I guess, all -- whoever else was before that. He
10 says, you -- he says, you really have to do it. And
11 that's when I said, as long as I cannot be personally
12 held responsible, sued, anything, I said, but I don't
13 want to do it, and I know nothing about it.

14 And my father didn't take trusts seriously
15 anyway. He made them, but he didn't respect them.

16 BY MS. LONDON:

17 Q. He didn't respect the trust documents?

18 A. No. He just -- no.

19 Q. I just want to be clear that you are talking
20 about a document not trusting another person.

21 A. Correct.

22 Q. Okay.

23 A. No. Oh, no. He -- what I mean is, my
24 father, himself, did not understand trusts, did not

1 understand the responsibility. He never would've put
2 this on me. He had -- it clearly states that I can't
3 be sued. Ely can't be held personally responsible,
4 but here we are today.

5 Q. Where does it state that?

6 A. I can't -- it -- it says it in -- it says it
7 somewhere. I -- I -- there's so many documents and,
8 you know, you're speaking like, you know,
9 I -- there's -- there's a couple attorneys and
10 whatever. You're speaking like I should know
11 everything that's going on. It was -- first of all,
12 you know, I'm not an attorney, but I -- I certainly
13 tried to ask many people to explain many different
14 things through the years. But I also was very
15 involved with what I was doing. It was very, very
16 hard to know anything, and when I'm fighting with an
17 attorney, where my father also stated to him, please
18 send my daughter all the documents, and he's not doing
19 it, it's very difficult to -- sorry.

20 MS. MAHER: All right. Let's ask a question
21 and answer a question. We're going to have a unclear
22 record at this point. I'm not even sure what the last
23 question was.

24 BY MS. LONDON:

1 Q. But she was answering my question. Which
2 attorney did you speak to that you said you were
3 arguing with?

4 A. That I -- that I was arguing with?

5 Q. Yes.

6 A. Did -- can you repeat what I -- can the Court
7 Reporter just repeat what I said?

8 Q. Sure.

9 MS. MAHER: Let's take a quick break here,
10 okay?

11 MS. LONDON: Okay. How long would you like?

12 MS. MAHER: Thanks.

13 MS. LONDON: Five?

14 MS. MAHER: Five minutes would be good.

15 MS. LONDON: Okay. Okay. All right. Can we
16 just go off the record for --

17 MS. MAHER: Yeah.

18 MS. LONDON: -- five, until Ms. Maher is
19 ready?

20 MS. MAHER: Okay.

21 THE REPORTER: We are off the record. The
22 time is 9:29 a.m.

23 (Off the record.)

24 THE REPORTER: We are back on the record.

1 The time is 9:33 a.m.

2 MS. LONDON: Okay. So I think before we
3 left, Ms. Eddi asked -- if you wouldn't mind repeating
4 what she had previously said, in answering my last
5 question. I was specifically asking about which
6 attorney she said she was arguing with. So I know it
7 went on for quite a while, but if you could just maybe
8 back up a little bit.

9 THE REPORTER: Okay. I'm looking.

10 MS. MAHER: Just so we have the question in
11 mind before she reads the testimony, can you pose the
12 question so that she can hear and so she can answer
13 the question?

14 BY MS. LONDON:

15 Q. Which attorney did you speak to regarding
16 this trust that you said you were arguing with?

17 A. Trying to speak to Colman Ginsparg -- trying
18 to speak to -- trying to get all the documents when my
19 father did as well. Colman Ginsparg.

20 Q. Okay. How many times did you speak to him?

21 A. Colman? I don't even know. Maybe -- I don't
22 know. Not a lot. I couldn't get him on the phone. I
23 don't know. I did see him in person when I was with
24 my father together. That was also -- I don't know if

1 that was more than once or twice. And I'm not -- I'm
2 not sure about the second time, but -- and then
3 speaking to him, I know Ely tried to call him to get
4 documents also. My cousin did. I don't know.

5 MS. MAHER: Ilana, how many times, was the
6 question.

7 THE WITNESS: I don't -- I don't know,
8 because I just know that we were -- I was trying to
9 get documents from him, but I don't -- I can't tell
10 you how many times exactly. It was a very long time
11 ago.

12 BY MS. LONDON:

13 Q. Okay. Which documents were you trying to
14 obtain?

15 A. Everything my father did with him.
16 Everything. So it wasn't specific to '93 whatever,
17 because I don't recall at that time that I knew there
18 was a '93 trust, but it was anything that Colman
19 Ginsparg did with my father. That was what I was
20 trying to --

21 Q. Did he send you any documents?

22 A. Eventually.

23 Q. What did he send you?

24 A. He sent a box that was, I think -- he sent a

1 box of disorganized nothing, paragraphs left out,
2 papers missing. It was disorganized, and
3 I -- I -- Ely dealt -- I gave it to Ely, and Ely -- I
4 don't know from there.

5 Q. Do you remember when this happened, what the
6 time period was?

7 A. If I tell you a time period in -- in that
8 chaotic time in my life, I'd be lying to you.

9 Q. Okay.

10 A. I -- I don't know a time period.

11 Q. When did your father pass away?

12 A. He -- just a couple of years ago, 2022. May,
13 I think.

14 Q. When you were sent this box of documents, was
15 it before or after your father passed away?

16 A. No. It was before.

17 Q. Okay. Was your father living in Illinois at
18 that time?

19 A. When I -- when I got the documents?

20 Q. Yes.

21 A. Yeah. I mean, yeah, my father was a little
22 bit back and forth, but yeah, he was -- he was in
23 Chicago.

24 Q. Does that help narrow down what the time

1 frame might be?

2 A. With?

3 Q. When you received the documents, does knowing
4 that he lived in Chicago and it was before he passed,
5 does that help narrow down the time the --

6 A. Not so much.

7 Q. -- period of time?

8 A. I'll -- I could tell you that it wasn't
9 recently. That's what I got. But not so much
10 because, like I said, my father was back and forth
11 from Chicago to Florida. It doesn't narrow it down so
12 well for me.

13 Q. Okay. When was the last time you talked to
14 Colman Ginsparg?

15 A. So it definitely has not been in the last
16 five, seven maybe eight. It hasn't been in the last
17 five years for sure. The last time might have
18 been -- it was a very long time ago, and it might have
19 been on a call with my father, three-way call or
20 something.

21 Q. Okay. So is your testimony that you received
22 a box of documents before your father passed away in
23 2022 from Colman Ginsparg?

24 A. After much -- finally.

1 Q. Okay. And did you look through that box of
2 documents?

3 A. No. That's why I handed it over to someone
4 that could.

5 Q. Okay. When I first asked you the question,
6 you said that there were documents that were missing
7 and things that had paragraphs missing; is that
8 correct?

9 A. Because that's what I was told.

10 Q. So you didn't look at the documents yourself
11 to know that?

12 A. Well, I was -- I think I was shown the
13 documents. I think -- I don't -- I don't remember
14 this, but I definitely was told, and I don't recall
15 that either.

16 Q. Okay.

17 A. I might have skimmed through it, but I
18 remember getting rid of it pretty quickly, like, out
19 of my hands.

20 Q. Okay. And who told you about what was and
21 wasn't in the documents? No you have to answer.

22 THE WITNESS: May I? Oh, okay.

23 MS. MAHER: Just the who. It's a person who
24 you're being asked.

1 THE WITNESS: Okay. Yeah, yeah.

2 MS. MAHER: And I'm just qualifying that, in
3 case that person is a lawyer, so that if it's a lawyer
4 that represented you, you know that I could object
5 based on the attorney-client privilege.

6 MS. LONDON: Okay. But please don't coach
7 her, please don't coach her.

8 MS. MAHER: With the attorney-client
9 privilege, I am going to instruct my client according
10 to her privilege rights.

11 MS. LONDON: It's who?

12 MS. MAHER: And I don't have a problem --

13 MS. LONDON: If it's a lawyer's name, it's a
14 lawyer's name.

15 MS. MAHER: -- with the question, who?

16 BY MS. LONDON:

17 Q. Who? Who told you about the documents?

18 A. That they're -- that they're whatever. His
19 name was -- it might be Craig Solar. My cousin Jeff
20 said that they were disorganized and a -- and a mess,
21 and he had a very hard time reaching Colman for
22 documents.

23 Q. I missed the name of this person you said.
24 I'm sorry.

1 A. Ely -- so Ely told me, but then it -- it
2 was -- I think it was he must -- maybe he skimmed
3 through them, but then he had them look them over.
4 Well, not -- not my cousin. My cousin just -- that
5 was a side thing he just mentioned. And, I mean,
6 actually it's written in the documents, I think you
7 guys provided.

8 Q. I just missed the name of the person that you
9 initially said before your cousin.

10 A. Oh, the -- you mean, the attorney?

11 Q. Yes.

12 A. Possibly Craig Solar. If it wasn't him, it
13 was someone connected with him, I think.

14 Q. Okay. And is that the same -- well, who
15 showed you the documents?

16 A. Who showed me? Well, I don't -- I
17 really -- I know there's an email about it, how it was
18 the most horrible thing you ever saw. No, no, I'm
19 exaggerating. I don't -- I really -- I don't -- I
20 don't know. I don't know if it was probably -- maybe
21 it was -- I -- I don't know. I don't know if Ely told
22 me on the phone verbally. I don't -- I don't know.

23 Q. Okay. Did Manny Magence get the documents
24 from Colman -- or Magence?

1 MS. MAHER: Objection. Foundation.

2 BY MS. LONDON:

3 Q. I'm just asking if you know.

4 MS. LONDON: Sorry, Robin?

5 MS. MAHER: I said objection, foundation.

6 You can answer it, if you know.

7 THE WITNESS: Yes. So did he get the
8 documents? Did Colman send him the documents?

9 BY MS. LONDON:

10 Q. Did Manny Magence get the documents from
11 Colman Ginsparg?

12 A. No. Not that I know of.

13 Q. Did Colman Ginsparg -- do you know if Colman
14 Ginsparg sent them to him?

15 A. I do not know.

16 Q. Okay.

17 A. I do not know.

18 Q. Okay. All right.

19 A. But it wouldn't have been because he
20 requested it.

21 Q. Okay. Do you know what assets are included
22 in the 1993 trust --

23 MS. MAHER: Objection. Time frame.

24 BY MS. LONDON:

1 Q. -- of which you are a trustee?

2 MS. MAHER: No. My objection is related to
3 when the assets were held in the trust, not when she
4 was trustee.

5 BY MS. LONDON:

6 Q. Do you know what assets are held in the trust
7 currently?

8 A. I don't think there are assets currently, but
9 I --

10 Q. Okay.

11 A. Yeah.

12 Q. Where is your money coming from?

13 MS. MAHER: Objection. Relevance. We're not
14 answering questions about her personal finances. You
15 can ask her whether she currently gets money from the
16 Jack Finn Irrevocable Trust, but not her personal
17 finances.

18 BY MS. LONDON:

19 Q. Do you get money from the Jack Finn
20 Irrevocable Trust?

21 MS. MAHER: And is that a current question?

22 MS. LONDON: Yes.

23 THE WITNESS: So may I?

24 MS. MAHER: Yes.

1 THE WITNESS: No. As far as -- I hope I'm
2 not being real ignorant on this, but as far as I know,
3 I do not receive anything from the trust.

4 BY MS. LONDON:

5 Q. Do you have your own trust?

6 MS. MAHER: Objection. Relevance.

7 MS. LONDON: We're trying to establish where
8 the money comes from that she lives on. We believe
9 that it comes from the Jack Finn Irrevocable Trust,
10 and could be sent through other trusts, sub-trusts
11 that she gets money for. She doesn't have a job. She
12 has special needs children. She's separated from her
13 husband. Where's the money coming from?

14 THE WITNESS: Well, Ely fully --

15 MS. MAHER: We are not getting into her
16 personal finances today. You can ask about the trust
17 that is at issue. The Court has quashed subpoenas
18 relative to personal finances. That is beyond the
19 bounds of this litigation. You've asked her whether
20 she gets money from the Jack Finn Irrevocable Trust,
21 and she testified that, to her knowledge, she does
22 not. But we're not going to get into her sources of
23 income or trusts that she may have created herself or
24 other trusts.

1 BY MS. LONDON:

2 Q. Okay. Do you recall a meeting with your
3 father and Raymond Butler and his sisters at Jeffrey
4 Gutman's office in 2021?

5 A. I would -- no.

6 Q. Don't remember being on the phone?

7 A. Oh, on the phone in 2021?

8 Q. I'm sorry. Strike that.

9 It was 2009, September 21st, 2009.

10 A. Oh, gosh. I -- are you able to elaborate a
11 little bit? I don't know. What was it about? I
12 don't know.

13 Q. Yeah. It was the time when Mr. Butler signed
14 a form of disbursement from the Jack Finn Irrevocable
15 Trust, giving him \$30,000.

16 A. That was -- that was not in Jeffrey's office.

17 Q. Where was it?

18 A. Jeffrey had nothing to do with that.

19 Q. Okay.

20 A. As far as I've heard him say that countless
21 times, I don't -- I don't know who all --

22 Q. But the document is on his letterhead, so I'm
23 just asking you what you remember?

24 A. I -- I remember him -- I thought he was in

1 Colman's office. I was on -- I thought he was in
2 Colman's office.

3 Q. You remember it happening? You remember a
4 disbursement to Raymond Butler?

5 A. Yes, yes.

6 Q. Okay. And you remember it was from the Jack
7 Finn Irrevocable Trust?

8 A. Yes.

9 Q. Do you remember that it was for \$30,000?

10 A. Yes.

11 Q. Do you remember it was as a beneficiary of
12 that trust?

13 A. No. It -- I mean, I saw the wording, but no,
14 that was one of Colman's errors, the way it was
15 written. That's what I'm told.

16 Q. Who told you that?

17 MS. MAHER: The who question, if it came from
18 an attorney, I have no problem with the who question,
19 but we're not going to get into attorney-client
20 communications.

21 THE WITNESS: Okay. It was, yeah, Jeffrey,
22 and I think there might have been another attorney and
23 I -- this one -- this, I don't remember. I just
24 remember that when Jeffrey told me, someone else had

1 told me that already. And it was an -- I believe it
2 was an attorney.

3 BY MS. LONDON:

4 Q. And what is it that they told you?

5 A. That --

6 MS. MAHER: Objection. I'm going to direct
7 her not to answer any question related to anything her
8 attorney might have told her.

9 BY MS. LONDON:

10 Q. You just testified that something was
11 Colman's error. I'm trying to clarify what that
12 means.

13 MS. MAHER: I'm going to direct her not to
14 testify to her communication with her attorney. If
15 you have any understanding of what Colman's error was,
16 outside of a communication from your attorney, you may
17 testify.

18 THE WITNESS: So -- so let me think
19 about -- so, Robin, I think I need you to be more
20 clear, because -- for me, or just explain it a little
21 better. So --

22 MS. MAHER: Can we go off the record? And
23 I'm going to have a conversation with my client --

24 MS. LONDON: Sure.

1 MS. MAHER: -- about what the attorney-client
2 privilege is.

3 MS. LONDON: Sure.

4 MS. MAHER: Okay.

5 MS. LONDON: Well, okay.

6 THE REPORTER: Do we want to do maybe just 10
7 minutes, just in case the conversation's a little
8 long?

9 MS. LONDON: Sure.

10 THE REPORTER: Okay. We are off the record.
11 The time is 9:48 p.m. We'll come back at 9:58.

12 (Off the record.)

13 THE REPORTER: We are back on the record, and
14 the time is 10:01 a.m.

15 So let me see. I'm trying to find the last
16 question. Let me see. Okay.

17 (The record was read back as requested.)

18 THE REPORTER: And, Ms. London, the last
19 question, the actual question I have that you asked,
20 is: And what is it that they told you?

21 MS. MAHER: And I directed her not to answer
22 the question, what is it that they told you?

23 THE REPORTER: Yes, yes.

24 MS. MAHER: So I think we need a new

1 question.

2 THE REPORTER: Yes.

3 BY MS. LONDON:

4 Q. Is your Attorney Colman Ginsparg?

5 A. No.

6 Q. Was he ever your attorney?

7 A. No.

8 Q. Is Jeffrey Gutman your attorney?

9 A. Currently, no.

10 Q. Was he ever your attorney?

11 A. Yes.

12 Q. When?

13 A. When -- since -- since this began.

14 Q. Since this case began?

15 A. Uh-huh.

16 Q. In, like, this state case?

17 A. It -- yes, since this -- since the very
18 beginning of, anything Ray brought forward --

19 Q. Okay.

20 A. -- Jeffrey's been the one.

21 Q. Was he your attorney in 2009?

22 A. 2009? For what? For -- for --

23 Q. Was he your attorney in 2009?

24 A. You'd have to -- for what? I don't even know

1 that he was ever my -- representing me in any other
2 way, but for what?

3 Q. So my question before, you said Jeffrey told
4 you something. I asked you what? And then Ms. Maher
5 explained attorney-client privilege. If he was not
6 your attorney in 2009, then what did he tell you?

7 MS. MAHER: Objection. Do not state what
8 your attorney told you. If you are trying to
9 establish whether he told it to her prior to the time
10 he represented her, you need to ask that question.
11 But I'm not going to allow you to ask her a question
12 without regard to a time frame with respect to --

13 MS. LONDON: I did. I said in 2009.

14 MS. MAHER: You did not ask that as part of
15 the question. If your question is, did he talk to
16 you, did he tell you this in 2009? She can answer
17 when, but she's not going to tell you what her
18 attorney told her.

19 MS. LONDON: I understand that. She already
20 testified to what happened in 2009 in that office.

21 BY MS. LONDON:

22 Q. In 2009 was Jeffrey Gutman your attorney?

23 A. No.

24 Q. Okay. In 2009, what did he tell you about an

1 error by Colman Ginsparg?

2 MS. MAHER: There is no testimony that he
3 told her anything about an error in 2009, Ms. London.

4 MS. LONDON: It was just read back.

5 MS. MAHER: That is not what was said.

6 BY MS. LONDON:

7 Q. When did he tell you that? When did he tell
8 you there was an error?

9 THE WITNESS: Robin?

10 BY MS. LONDON:

11 Q. No. You have to answer.

12 MS. MAHER: You can answer a question.

13 THE WITNESS: That's what I'm asking.

14 MS. MAHER: She has a question about whether
15 there's an objection.

16 THE WITNESS: Well, yeah. No. I understand.
17 Should I answer the question?

18 MS. LONDON: Okay.

19 THE WITNESS: Should I answer?

20 MS. MAHER: You can answer when you spoke
21 with Mr. Gutman about this document, the when
22 question.

23 THE WITNESS: Not in 2009.

24 BY MS. LONDON:

1 Q. When?

2 A. When he was representing me in this -- right
3 now. You know, not today, but when he was
4 representing me.

5 Q. At what point in the case?

6 MS. MAHER: Objection. Form. At what point
7 in the case, what?

8 BY MS. LONDON:

9 Q. At what point in the case did he explain this
10 to you? At the very beginning, in the middle,
11 yesterday?

12 A. I mean, no, not recently.

13 Q. Okay.

14 A. Well, it's either the beginning when
15 the -- when it -- when, I guess, we were discussing
16 the note maybe.

17 Q. Okay. It's your testimony here today that
18 there are no assets in the Jack Finn Irrevocable
19 Trust?

20 MS. MAHER: Objection. Form. Time frame.
21 Do you mean now, or at any point?

22 MS. LONDON: All of the questions that I'm
23 asking are about this time frame, unless I indicate
24 otherwise. Currently.

1 MS. MAHER: So today?

2 MS. LONDON: Currently.

3 MS. MAHER: Okay.

4 BY MS. LONDON:

5 Q. Today, are there any assets in the Jack Finn
6 Irrevocable Trust?

7 A. Okay. It's -- these trusts are very
8 confusing, but again, if I'm not being ignorant, I
9 think there's an insurance policy.

10 Q. Okay. Is this the only trust that you are a
11 trustee of?

12 MS. MAHER: Objection. Form.

13 BY MS. LONDON:

14 Q. How many other trusts are you a trustee of?

15 MS. MAHER: Objection. Relevance, to the
16 extent you're asking if she's trustee of her own trust
17 or other family trusts.

18 MS. LONDON: She keeps saying there are many
19 trusts, and she can't keep this one separate from any
20 others. So I'm just wondering what she's confusing
21 this trust with. If we're only talking about this
22 trust today, and she is a trustee of this trust, I'm
23 asking if there are assets in this trust today, and
24 she says these trusts are confusing. If we're only

1 talking about one, I'm asking about this one.

2 MS. MAHER: Okay. You can answer that
3 question, Ilana.

4 Can you pose it to her directly, so it's in
5 mind?

6 MS. LONDON: Yes.

7 BY MS. LONDON:

8 Q. Regarding the Jack Finn Irrevocable Trust,
9 are there any assets in that trust today?

10 A. Okay. I think I answered that, and I hope
11 that it is -- but as far as I know, it's a -- there's
12 an insurance policy.

13 Q. What kind of insurance policy?

14 A. I believe it's a second-to-die MetLife
15 policy.

16 Q. Okay. Do you know what the value is?

17 A. It was supposed to be. I believe it's -- I
18 think it's 1,000,000.

19 Q. Okay. At the time that you took over as
20 trustee in 2007, do you know what assets the trust
21 held at that time?

22 A. In 2007?

23 Q. When you took over as trustee.

24 A. I'm going to say I probably did, but as I sit

1 here today -- I always knew about the insurance policy
2 for sure.

3 Q. So your testimony is when you took over as
4 trustee in 2007, you don't know what assets were held
5 in the Jack Finn Irrevocable Trust?

6 MS. MAHER: Objection. That's not what she
7 said.

8 MS. LONDON: That's what she --

9 THE WITNESS: She said she always knew about
10 the insurance policy.

11 BY MS. LONDON:

12 Q. In 2007, when you took over, do you know what
13 assets were in the Jack Finn Irrevocable Trust?

14 A. I'm not certain because I don't know.
15 I -- I'll just say I'm not certain.

16 Q. Okay. Did you take any steps to inventory
17 the assets in that trust when you took over in 2007?

18 A. To inventory them?

19 Q. Correct.

20 A. What does that -- what do -- you mean
21 to -- to --

22 Q. Did you take any steps to compile a list of
23 assets that were held by the Jack Finn Irrevocable
24 Trust?

1 A. No.

2 Q. Okay.

3 A. Myself, personally, no.

4 Q. Okay. Do you know if anybody else took an
5 inventory?

6 A. I don't know for certain. Possibly.

7 Q. And who would that be?

8 THE WITNESS: Robin?

9 MS. MAHER: If it's an attorney, you can say
10 the who, even if it's an attorney.

11 THE WITNESS: Okay. My cousin Jeff. I know
12 he did.

13 BY MS. LONDON:

14 Q. Okay. How would Jeff have had access to the
15 assets?

16 A. I -- I --

17 MS. MAHER: Objection. Foundation.

18 BY MS. LONDON:

19 Q. You're the Trustee, correct? In 2007 you
20 took over as trustee from Jerry Cherney, correct?

21 A. Correct.

22 THE WITNESS: Do you want me to answer her?

23 MS. MAHER: The question is, you took over
24 for Jerry Cherney.

1 THE WITNESS: Yeah.

2 MS. MAHER: Pose a new question.

3 THE WITNESS: Yeah. Pose a new question.

4 Yeah.

5 BY MS. LONDON:

6 Q. How would your cousin Jeff know what the
7 assets are in 2007 --

8 MS. MAHER: Objection.

9 BY MS. LONDON:

10 Q. -- when you took over?

11 MS. MAHER: Sorry. Objection. Foundation.

12 BY MS. LONDON:

13 Q. You can answer.

14 A. I can answer that? It's -- it's cuckoo to me
15 that you're asking me how my -- it -- I don't live
16 with my cousin, and I couldn't tell you. I know that
17 I did not send him anything.

18 Q. If you're the trustee of the trust, it's your
19 responsibility to know what assets are in the trust,
20 correct?

21 A. Correct.

22 MS. MAHER: Objection. Form.

23 BY MS. LONDON:

24 Q. I asked you if you took an inventory. You

1 said you didn't. You said someone else might have. I
2 asked you who. You said, my cousin Jeff. My question
3 was, if you're the trustee and you're the one who is
4 supposed to know what assets are in there, how would
5 your cousin, Jeff, know what the assets are?

6 MS. MAHER: Objection. Foundation.

7 BY MS. LONDON:

8 Q. You can answer.

9 MS. MAHER: She testified she doesn't know
10 how Jeff knew. She didn't give him the information.
11 I don't know that you can get anything more out of her
12 on that. She doesn't know.

13 BY MS. LONDON:

14 Q. Okay. Are you aware that in 2012 -- your
15 stepmother is Pessa Finn, correct?

16 A. If you want to call her that?

17 Q. How should I describe her?

18 A. My father's ex-wife.

19 Q. Okay. Just for clarity, Pessa Finn is your
20 father's ex-wife?

21 A. Uh-huh.

22 Q. Okay. Are you aware that in 2012 she stated
23 that the assets in the Jack Finn Irrevocable Trust
24 were close to \$50,000,000?

1 MS. MAHER: Objection. Form. Foundation.

2 MS. LONDON: It's in discovery. There's a
3 letter in discovery that states that.

4 MS. MAHER: So the question is, are you aware
5 that she stated it?

6 MS. LONDON: Yes.

7 THE WITNESS: Back then, or recently, or
8 what?

9 BY MS. LONDON:

10 Q. During the pendency of this case that we're
11 in right now, in the state case, she drafted a letter
12 to Judge Conlon and stated that she believed that
13 there was \$50,000,000 in the Jack Finn Irrevocable
14 Trust. I'm just asking if you're aware of it.

15 MS. MAHER: Of that statement not that
16 there's purportedly \$50,000,000.

17 THE WITNESS: Yeah. I'm aware of that
18 statement from that time period, not earlier, yeah.

19 BY MS. LONDON:

20 Q. Correct. From that time period.

21 A. Yes.

22 Q. Okay. And were you told that statement by
23 somebody?

24 A. It -- it-

1 MS. MAHER: Are you asking her how she became
2 aware of that statement?

3 MS. LONDON: Yes.

4 THE WITNESS: If -- if I was then, yeah, if I
5 was told, then it was by Jeffrey. It couldn't have
6 been anyone else. Yeah.

7 BY MS. LONDON:

8 Q. Okay. Do you believe that statement to be
9 true?

10 A. I wish it's true.

11 Q. Okay. All right.

12 MS. MAHER: But that's not the question. The
13 question is do you believe it to be true?

14 THE WITNESS: Right. I mean, absolutely not.

15 BY MS. LONDON:

16 Q. Okay.

17 A. But yeah, I don't.

18 Q. Okay. When you took over the trust in 2007
19 from Jerry Cherney, did he give you a list of assets
20 that had ever been a part of the Jack Finn Irrevocable
21 Trust since it was started in 1993?

22 MS. MAHER: Objection. Form. Foundation.
23 You can answer the question as to whether he gave you
24 such a list.

1 THE WITNESS: So I'm just going to repeat.
2 You're -- so you're asking if Jerry Cherney turned
3 over to me a list of -- absolutely not. Not Jerry
4 Cherney.

5 I hope I -- I hope my memory's serving me right,
6 but I don't recall that.

7 BY MS. LONDON:

8 Q. So when you took over in 2007, how did you
9 know what assets were held in that trust?

10 A. Only by -- I get -- I -- okay. It was a long
11 time ago. I'm assuming it was from trying to reach
12 Colman Ginsparg. I didn't really know.
13 You're -- you -- you're saying that I knew. I mean,
14 I --

15 Q. I'm asking --

16 A. -- and maybe clarify it a little more.
17 That's all. Yeah.

18 MS. MAHER: Just listen to the questions.
19 Answer the questions.

20 Ms. London, pose a question.

21 BY MS. LONDON:

22 Q. In 2007 when Jerry Cherney turned over
23 trusteeship to you, did he give you a list of assets
24 that had ever been --

1 A. No.

2 Q. -- part of the Jack Finn Irrevocable Trust?

3 A. Sorry. I should have let you finish. No.

4 Q. Okay.

5 A. I don't think so. I don't recall that.

6 Q. So when you took over as a trustee, were you
7 given any records of trust income, expenses, receipts,
8 anything like that?

9 A. Absolutely, no.

10 Q. Okay. So how do you know what assets were in
11 the trust in 2007 at that time?

12 THE WITNESS: Can I answer? Can I answer?

13 MS. MAHER: The question is, how did you know
14 in 2007?

15 THE WITNESS: Yeah.

16 MS. MAHER: You can answer that question. I
17 don't think she's asking you a question about what an
18 attorney might have told you after.

19 Is that right, Ms. London?

20 MS. LONDON: No. Correct. I'm not asking
21 that.

22 THE WITNESS: Okay. So -- so how did I know
23 what was in the 2007 trust if nobody sent me any
24 records?

1 MS. MAHER: No. The question is in 2007, how
2 did you know what was in the 1993 Jack Finn
3 Irrevocable Trust?

4 Do I have that right, Ms. London?

5 MS. LONDON: Yes.

6 MS. MAHER: She's just obviously confused on
7 the question.

8 MS. LONDON: Yes. That's correct.

9 THE WITNESS: Okay. Only because, I was told
10 about the insurance policy by my father.

11 BY MS. LONDON:

12 Q. Okay. So your father told you, I'm making
13 you a trustee of this trust, correct?

14 A. That's about it.

15 Q. Is that correct?

16 A. Yes.

17 Q. He directed you to be a trustee?

18 A. He forced me to.

19 Q. Okay. And your testimony now is your father
20 told you there's an insurance policy in this trust?

21 A. Yes.

22 Q. Okay.

23 A. That's all. That's it. That's what I heard.

24 Q. Were you told at any time then, now, anytime

1 in between, of any other asset held by that trust?

2 A. No. Not that -- not held by that trust.

3 Q. Okay.

4 A. Because it was irrevocable, right? Okay.

5 Q. Yes. Okay. Did Jerry Cherney tell you
6 anything that transpired in that trust between the
7 time that it was started in '93 to 2007, including
8 things like amendments, any sort of accounting,
9 anything like that?

10 A. If I --

11 THE WITNESS: I mean, Robin, can I answer
12 this?

13 MS. MAHER: Listen to the question.

14 THE WITNESS: Yes.

15 MS. MAHER: Answer that question.

16 THE WITNESS: Yes.

17 MS. MAHER: Yes. You may answer it.

18 THE WITNESS: I was not --

19 MS. MAHER: Did Jerry Cherney tell you? Can
20 we repeat the question so she has it in mind?

21 MS. LONDON: Yes. Of course.

22 MS. MAHER: Now that we've had a lot of
23 conversation.

24 BY MS. LONDON:

1 Q. Sure. Did Jerry Cherney tell you what
2 transpired with the trust from 1993 to 2007, when you
3 took over, regarding any amendments, any assets that
4 had been acquired or dispersed, anything of that
5 nature?

6 A. Jerry Cherney -- I inherited zero from Jerry
7 Cherney. Not a phone call, nothing. They -- nothing.

8 Q. Did you sign any documents with Jerry
9 Cherney?

10 A. Yeah. There was a document.

11 Q. Okay. Do you remember what it was?

12 THE WITNESS: Can I answer, Robin? Sometimes
13 there's, like, a --

14 MS. MAHER: You can answer if you remember
15 what document you signed.

16 THE WITNESS: Can I just say this? Sometimes
17 there's, like, a -- a lag or something until
18 you -- sometimes, like, I'm waiting, and then I -- I
19 can't hear if there's an objection so quickly, you
20 know? Okay. Just want to say that. Now, I probably
21 forgot the question. Okay. It was about Jerry
22 Cherney. I'm sorry. Just a reminder, quickly. I'm
23 sorry, Ms. London.

24 BY MS. LONDON:

1 Q. Which documents did you sign with Jerry
2 Cherney?

3 A. So it was where -- where I took over as
4 trustee.

5 Q. Okay, okay. Do you have conversations with
6 Ely regarding this trust?

7 A. A long time -- I mean -- I mean, definitely
8 in the early years. Recently, not real -- I mean, not
9 really.

10 Q. Okay. Have you prepared any documents,
11 ledgers, statements, or anything regarding the trust
12 finances?

13 A. No.

14 Q. Okay.

15 A. No.

16 Q. Do you know who has?

17 MS. MAHER: Objection. Form. Presumes
18 anyone has.

19 BY MS. LONDON:

20 Q. I mean, there's so many questions that are
21 confusing. I am really just trying to nail down, if
22 you didn't do it, has Ely created any documents,
23 ledgers, statements, anything that could be prepared
24 regarding the trust finances?

1 A. I'm going to guess no, but --

2 Q. Okay.

3 A. I'm not in -- I don't -- I don't know what
4 he's done.

5 Q. Okay, okay. In the documents that you signed
6 with Jerry Cherney, is there an indemnification clause
7 in there? Is there a clause that states that you
8 won't be held liable for anything?

9 MS. MAHER: Objection. Form. I object to
10 you asking her to recall the details of a document
11 from nearly 20 years ago. If you want to show her a
12 document --

13 MS. LONDON: Earlier, she testified that
14 there was a document. I'm asking her if it was this
15 one.

16 MS. MAHER: Well, this one. I don't see a
17 this one. So --

18 MS. LONDON: The document that she --

19 MS. MAHER: -- if you want to show her.

20 MS. LONDON: No. I don't, actually. I just
21 want to know if the document that she remembers
22 signing with Colman Ginsparg stated that she wouldn't
23 be held accountable for anything.

24 MS. MAHER: Do you mean Jerry Cherney?

1 MS. LONDON: I mean, Jerry Cherney. Excuse
2 me.

3 THE WITNESS: Which one? Okay.

4 MS. MAHER: If you recall --

5 THE WITNESS: Yeah. I do.

6 MS. MAHER: -- the details of that document.

7 THE WITNESS: I think I do. There's a whole
8 lot I don't remember --

9 MS. MAHER: Do you think you --

10 THE WITNESS: But I think I do. Yes. So
11 you're asking if it stated that in -- in when
12 I -- when we -- when I took over from Jerry Cherney?

13 BY MS. LONDON:

14 Q. Yes.

15 A. It did not.

16 Q. Okay.

17 A. It was a very quick -- yeah.

18 Q. Okay. Do you remember if in that document
19 there was an indemnity clause from Jerry Cherney to
20 you and Ely, stating that when he signed over the
21 trust, if something went wrong, he would be protected?

22 MS. MAHER: Objection. Form. Foundation.

23 BY MS. LONDON:

24 Q. You can answer.

1 MS. MAHER: Just whether you remember that
2 document containing such a provision, is that what
3 you're asking?

4 MS. LONDON: Yes.

5 THE WITNESS: Yes. I'm trying to think of
6 that document. I don't -- that he would be protected?

7 BY MS. LONDON:

8 Q. Yes.

9 A. Not -- -- it might have mentioned that, it
10 might have. I don't remember the wording. It might
11 have.

12 Q. Okay, okay. Have there been any transactions
13 with the Jack Finn Irrevocable Trust, any
14 transactions? Since you took over in 2007 to current,
15 have there been any transactions, financial
16 transactions, involving this trust?

17 A. I'm just going to say -- you mean, wait
18 to -- okay. I think I need -- am I allowed to talk to
19 Robin a second? No. I'm probably not.

20 Q. You can, but you'll have to take a break.

21 MS. MAHER: So if you don't understand the
22 question, you can ask for clarification on this
23 question, but you need to answer the question before
24 we take a break.

1 THE WITNESS: Okay. So can you make sure the
2 question's really clear because --

3 BY MS. LONDON:

4 Q. Of course.

5 A. Yeah. Sorry.

6 Q. Sure, no.

7 A. I'm sorry. I keep having -- having -- asking
8 you to repeat things. Yeah.

9 Q. It's okay. It's not a problem. I want to
10 make sure I'm clear.

11 Have there been any transactions that you're
12 aware of involving this trust between 2007, when you
13 took over, to today?

14 A. How do you -- okay. I'm just trying to
15 think. From 2007?

16 Q. Yes.

17 A. Ugh. See, nothing's coming to mind, but,
18 like, I want to be extra. I -- I -- all I can say is
19 nothing's coming to mind.

20 Q. Okay, okay. Just a second. Are you aware of
21 any documents, emails, letters, text messages, or any
22 other records relating to any of the issues involved
23 in this case?

24 MS. MAHER: Objection. Form. I really don't

1 know what you're asking there. Any other than what?
2 Than what we've discussed?

3 MS. LONDON: Than has been presented in
4 discovery.

5 MS. MAHER: You haven't shown her a document.

6 MS. LONDON: I'm not going to show a
7 document. I want to know if there are any documents,
8 outside of what has been provided in discovery,
9 emails, texts, letters, anything that pertain to the
10 issues, in this case that have not been submitted.

11 MS. MAHER: I'm going to object to that
12 question, because it is just way too vague. That
13 pertain to this case? Do you mean documents that
14 you've requested --

15 MS. LONDON: No.

16 MS. MAHER: -- and you want to explore those
17 answers to document requests?

18 MS. LONDON: No. That's not what I mean.

19 MS. MAHER: I think the words pertain to this
20 case --

21 MS. LONDON: Okay.

22 MS. MAHER: -- are too broad to possibly
23 answer.

24 MS. LONDON: Pertain to issues in this case,

1 but I can move on.

2 BY MS. LONDON:

3 Q. All right. Have you sent or received any
4 communications, email, text, phone calls, social media
5 with Mr. Butler?

6 A. Have I -- okay. I'm just going to repeat
7 this part. Have I received any, I don't think video,
8 but you said text or phone calls?

9 Q. Yes.

10 A. Yes.

11 Q. And were they received?

12 A. Yes.

13 Q. Did you send any?

14 A. Yes. Texts.

15 Q. Okay.

16 A. Uh-huh.

17 Q. During the pendency of this case?

18 A. That's a good -- I might -- I don't remember
19 if it was before. I think it -- I think it was
20 before.

21 Q. Okay. Did you have any communications with
22 him regarding the issues in this case?

23 A. I don't know that we ever got to that.
24 I -- I don't think -- he -- he was just making

1 statements, but I don't think we ever really got into
2 a conversation about it.

3 Q. Okay. Did you have communications with
4 anyone else regarding this case?

5 MS. MAHER: Objection. Form.
6 Attorney-client privilege, to the extent you are
7 asking her about communications with her lawyers.

8 MS. LONDON: I'm not.

9 MS. MAHER: Objection. Time period.

10 BY MS. LONDON:

11 Q. I'm asking about third parties from the time
12 that this case started until now, have you had
13 conversations with anyone? I asked you about Mr.
14 Butler. It could be his sisters. It could be your
15 father's ex-wife. It could be Ely. Have you been
16 having conversations about this case?

17 MS. MAHER: Objection. Form. That is a very
18 broad and compound question.

19 BY MS. LONDON:

20 Q. You can still answer.

21 MS. MAHER: It's just whether you've had a
22 conversation with a third-party, not your attorney,
23 about this case.

24 THE WITNESS: So I -- okay. I try really not

1 to speak about this with anybody, so I'm trying to
2 think. I'll -- I'm going to -- I'm just going to be
3 safe and say it's possible, just to be safe, but I try
4 not to.

5 BY MS. LONDON:

6 Q. Okay. Do you know who those people would be
7 that you might possibly have had conversations?

8 A. I don't recall any conversations, so I don't
9 know who those people would be, because I don't
10 recall.

11 Q. Okay. Who are the beneficiaries, or is the
12 beneficiary of this trust that you are a trustee for,
13 Jack Finn Irrevocable 1993?

14 A. As I understood it, Hannah and Shoshana.

15 Q. And have they received any accounting?

16 A. No.

17 Q. Okay. Have they received any disbursements?

18 A. No.

19 Q. Is there something in the trust document that
20 states when they're supposed to receive disbursements?

21 MS. MAHER: Objection. Calls for a legal
22 conclusion. You're asking her to recall off the top
23 of her head a trust document that you refuse to show
24 her.

1 MS. LONDON: Well, we keep asking for it, and
2 we haven't gotten it yet, the original.

3 MS. MAHER: I don't even know what to say to
4 that. Objection. Incorrect. There is a trust
5 document that's been produced in this case. If you
6 want to show it to her, and try to establish her
7 understanding of it, I'm happy to go down that road.

8 MS. LONDON: Yeah. We have two documents
9 that are Jack Finn Irrevocable Trusts, both dated
10 1993, and they have different terms. So I don't know
11 which document is the operative document. That's the
12 one we're asking about. So in the document --

13 MS. MAHER: Well, why don't you show her the
14 two, and maybe she can tell you if that's what you're
15 looking to learn.

16 BY MS. LONDON:

17 Q. I would like to know what the terms of the
18 trust say about disbursements to beneficiaries, from
19 your understanding.

20 MS. MAHER: I don't think asking her to
21 recall off the top of her head is a fair question.

22 If you can, with specificity, recall off the
23 top of your head, you can answer, but I think that is
24 an unfair question.

1 BY MS. LONDON:

2 Q. Are you not answering?

3 A. Oh, I don't know -- I -- I thought -- am I
4 supposed to answer? I don't know. Sorry.

5 MS. MAHER: You can answer whether you recall
6 the terms related to distributions.

7 THE WITNESS: The terms. So without having
8 the document in front of me, I mean, I remember that
9 there was something, but I don't -- I -- I could not
10 repeat it back to you what it said exactly. That's
11 the truth.

12 BY MS. LONDON:

13 Q. Okay. Have you engaged in any transactions
14 between the trust and yourself or your family?

15 A. In what way? In --

16 Q. Have you had any disbursements? Have you
17 purchased any assets? Anything involving the trust
18 and you or your family?

19 A. Purchased any assets or from -- no?

20 Q. Have you taken any disbursements?

21 A. They're not disbursements.

22 Q. What are they?

23 A. It's my own half of the money from
24 the -- from a deal.

1 Q. Okay. What deal are you talking about?

2 MS. MAHER: Can we get clear on what trust
3 you're asking about, Ms. London?

4 MS. LONDON: I'm only asking about the Jack
5 Finn Irrevocable Trust, for which she's a trustee and
6 took over in 2007.

7 MS. MAHER: Okay. So do you understand that,
8 Ilana? She's asking you about any deals between --

9 THE WITNESS: Yeah. But this is the thing --

10 MS. MAHER: -- the Jack Finn Irrevocable 1993
11 Trust and you.

12 THE WITNESS: Okay. I did not. Like I said,
13 I didn't ever had a copy of the '93 trust that I'm
14 aware of, and because of that, I don't know -- I don't
15 know what -- maybe Jeffrey -- maybe he went over
16 something with me, but I don't have -- I don't -- I'm
17 unclear if it was -- it was in the trust, if it was
18 money that was supposed to be dispersed, if the deal
19 was supposed to be in there or not, or if it was in
20 there or not.

21 BY MS. LONDON:

22 Q. What deal are you talking about?

23 A. The Rajchenbach deal. Ray is familiar with
24 the Rajchenbach deal.

1 Q. Okay. But I'm asking you, what is the
2 Rajchenbach deal?

3 A. I -- it's a -- it was a -- that's what we
4 call it. It was a deal that my father went into, a
5 nursing home deal. And what -- what more could I say?
6 That was a nursing home deal. My father sold it, and
7 that's the one I'm referring to.

8 Q. Okay. When you say "it," what are you
9 referring to?

10 A. I'm sorry?

11 MS. MAHER: Objection. Form.

12 MS. LONDON: She just said, my father sold
13 it. I'm just saying, what is it?

14 THE WITNESS: Can I answer?

15 MS. MAHER: Yeah.

16 THE WITNESS: Okay. That -- that nursing
17 home.

18 BY MS. LONDON:

19 Q. Which one was that?

20 A. I believe it was Zion.

21 Q. Okay. So even I got a little confused here.
22 So I asked you if you had engaged in any transactions
23 between the trust and yourself or your family. Is
24 your testimony the Rajchenbach deal?

1 MS. MAHER: I think her testimony was that
2 she didn't know whether that had anything to do with
3 the trust, and then she later said her father sold it.
4 So I'm now confused --

5 MS. LONDON: Right.

6 MS. MAHER: -- by your question, because she
7 didn't testify that it had anything to do with this
8 trust.

9 MS. LONDON: I'm just wondering why she
10 brought it up then, because there's money coming from
11 somewhere. She's trying to explain it, but I don't
12 have the full picture.

13 MS. MAHER: Objection. Do you want to pose a
14 question? I don't know that there's a question
15 pending.

16 BY MS. LONDON:

17 Q. Can you explain any more about the
18 Rajchenbach deal and why you might think it has to do
19 with this Jack Finn Irrevocable Trust?

20 A. No. I stated I don't know, or I wasn't told
21 it has -- that it would be in an irrevocable trust.

22 Q. That the nursing home would be?

23 MS. MAHER: She just said that she wasn't
24 told it would be in an irrevocable trust.

1 MS. LONDON: I'm just clarifying.

2 BY MS. LONDON:

3 Q. Are you talking about the nursing home not
4 being in the trust? Is that what you're saying?

5 MS. MAHER: She never said there was a
6 nursing home at all. She said a deal.

7 MS. LONDON: She did. She said a nursing
8 home in Zion. He sold it. That was the Rajchenbach
9 deal. And then she said, I never understood it to be
10 in an irrevocable trust. I'm just trying to clarify
11 what she's talking about.

12 MS. MAHER: Let's pose a question. I don't
13 think she understands what you're getting at.

14 BY MS. LONDON:

15 Q. Okay. Are you saying that you believe now,
16 today, sitting here, that the Zion Nursing Home, when
17 it was sold came out of the Jack Finn Irrevocable
18 Trust?

19 A. Came out of?

20 Q. It was an asset in, and he sold it.

21 A. What I said was, it was not -- that was not
22 supposed to go into an irrevocable trust. That's what
23 my father verbally told me. It was not supposed to go
24 into an irrevocable trust.

1 Q. That property was not supposed to go into it?

2 A. Correct. Was not.

3 Q. Thank you. That's all I wanted to clarify.

4 A. Oh, okay. Okay.

5 Q. Okay. And your testimony earlier was, I'm
6 paraphrasing, I don't have it exactly, my half of
7 money from a deal. You're talking about this nursing
8 home, correct? The Zion Nursing Home your father
9 sold?

10 THE WITNESS: Just looking to Robin,
11 can -- may I answer?

12 MS. MAHER: What is your question? I'm not
13 sure I understand that question.

14 BY MS. LONDON:

15 Q. When you stated, my half of money from a
16 deal, what did you mean by that?

17 A. I'm just waiting on Robin. I don't know.

18 MS. MAHER: You can go ahead and answer that
19 question.

20 THE WITNESS: Okay. So what did I mean by
21 that?

22 MS. MAHER: Yes.

23 THE WITNESS: At the sale, my -- the -- my
24 father gave me half at the sale of that deal, you

1 know, he gave me half of that.

2 BY MS. LONDON:

3 Q. Okay. And how do you believe that that's
4 connected to the Jack Finn Irrevocable Trust, of which
5 you are a trustee?

6 A. Because it was something that you asked
7 previously.

8 Q. I asked if you'd engaged in any transactions
9 between the trust and yourself or your family.

10 A. No. But it was -- it -- that -- I don't
11 think that was the question that triggered it. It was
12 something that you said. I don't -- I -- I've --

13 Q. Okay.

14 A. I don't know, myself, right at the moment,
15 but --

16 Q. I'll move on.

17 A. Okay.

18 Q. Okay.

19 A. Okay.

20 Q. Are you aware of any complaints or
21 allegations of mismanagement in the trust?

22 MS. MAHER: Objection. Form. Do you mean
23 this complaint, for an accounting?

24 MS. LONDON: No.

1 MS. MAHER: Are you talking about complaints
2 in legal matters, or are you just talking about people
3 saying words that are complaining?

4 BY MS. LONDON:

5 Q. Any formal complaints, legal to, you know,
6 agencies anything, alleging mismanagement of the
7 trust, are you aware of any?

8 MS. MAHER: Objection. Form.

9 BY MS. LONDON:

10 Q. Are you aware of any? You can answer.

11 A. No, no. I --

12 Q. Okay. That's all I'm asking. Okay.

13 All right. Let me just check something here real
14 quick. All right. Can I just have, like, two
15 minutes, like, a two-minute break?

16 A. Sure.

17 Q. I just want to run through my notes real
18 quick. I just need two minutes, just make sure
19 I'm -- is that okay?

20 MS. MAHER: Yeah. Yeah, sure.

21 MS. LONDON: Can we just go off the record
22 for, like, two minutes? Thank you very much.

23 MS. MAHER: Of course.

24 THE REPORTER: We're off the record at 10:39

1 a.m.

2 (Off the record.)

3 THE REPORTER: We are back on the record.

4 The time is 11:19 a.m.

5 BY MS. LONDON:

6 Q. Okay, okay. Ms. Eddi, I'm going to go back
7 to the form of direction to disperse that we discussed
8 earlier from 19 -- I'm sorry -- from 2009. Do you
9 remember talking about that?

10 A. Uh-huh.

11 Q. Okay. Were you aware that there were
12 multiple forms of direction to disperse signed that
13 day?

14 A. That there were multiple?

15 Q. Yes.

16 A. You mean, besides Ray?

17 Q. I mean, that Raymond signed multiple forms of
18 directions to disperse. There was more than one
19 document.

20 A. Well, I was not present. I was on the phone.

21 Q. Okay.

22 A. But yeah, I -- yeah, I did. I remember
23 somebody told -- told me, either my father or -- I
24 don't know somebody.

1 Q. Okay.

2 A. My father was there.

3 Q. Yes. And do you remember that he and Mr.

4 Butler signed a document together, themselves?

5 A. Ray and my father. Yeah.

6 MS. MAHER: Objection. Foundation.

7 BY MS. LONDON:

8 Q. They signed a direction of disperse. Do you
9 remember that on that date in 2009, that your father
10 and Raymond signed a form of direction to disperse
11 together?

12 A. Were -- I'm sorry. Were they -- am I aware,
13 were they separate?

14 Q. No.

15 A. Or were they together?

16 Q. Are you aware that they signed the same piece
17 of paper a form of direction to disperse?

18 A. Yeah. I think so.

19 Q. Okay. Are you aware that there were three
20 other documents that were forms of directions to
21 disperse?

22 A. Other than -- other than the one form to
23 disperse?

24 Q. Yes.

1 A. I -- okay. So the honest answer is maybe at
2 the time, but right now I don't recall that.

3 Q. Okay.

4 A. I'm sorry. Yeah.

5 Q. No. Don't be sorry. It's okay.

6 A. Okay.

7 Q. Do you remember that there was a form of
8 direction to disperse signed that same day by your
9 father; Raymond; Silver, Mr. Butler's sister; and
10 Hannah, Mr. Butler's sister?

11 A. So I have a vague memory of one of them that
12 they were, like, a witness or something.

13 Q. They signed a document.

14 A. Yeah. I don't know that I saw Hannah's.

15 Q. Okay.

16 A. It might have been Silver's.

17 Q. Okay.

18 A. Okay. I don't know. Did I answer that
19 completely? Or -- or was -- oh, okay.

20 MS. MAHER: She's just testing your memory.
21 What do you remember --

22 THE WITNESS: Yeah. Okay.

23 MS. MAHER: -- without seeing the document.

24 THE WITNESS: I -- I think and I -- I could

1 have this backwards. It could have been Hannah and
2 not Silver, but I think it was Silver.

3 BY MS. LONDON:

4 Q. Okay. Do you remember that that direction to
5 disperse was for the amount of \$30,000?

6 A. Yes.

7 Q. Okay.

8 A. Yeah.

9 Q. And do you know how that money was dispersed
10 to Mr. Butler?

11 A. I think that had something to do with Ely.

12 Q. Okay.

13 A. I was not involved with that, like, it was
14 a -- we had, like, a conference call whatever. I -- I
15 think I was in my kitchen and I -- I -- but I -- but I
16 believe the next part, whatever, was done with Ely.

17 Q. Okay. Do you believe that Ely dispersed the
18 money to Mr. Butler?

19 MS. MAHER: Objection. Foundation.

20 BY MS. LONDON:

21 Q. Go ahead. You can answer.

22 A. Oh, sorry. No, not directly to him. I don't
23 know if it was -- I -- I don't know how it was done.
24 I think it -- maybe it was deposited somewhere.

1 Q. Okay. And do you remember what bank that
2 would have been with?

3 MS. MAHER: Are you asking does she remember
4 what bank someone else might have deposited money into
5 15 years ago?

6 MS. LONDON: Yes. If she just happens to
7 remember.

8 MS. MAHER: And if you don't --

9 MS. LONDON: Then say, I don't know.

10 MS. MAHER: -- that's okay too.

11 THE WITNESS: I'm trying to think about this,
12 because I don't know. I could be so off on this. I
13 don't know why Chase Bank comes to mind. I don't -- I
14 also don't know, was it an account of Ray's or was it
15 deposited somewhere for Ray, like, in Silver's account
16 or -- I -- I'm not. I got to say, don't have details.

17 BY MS. LONDON:

18 Q. Okay.

19 A. I -- I -- again, yeah.

20 Q. So there was a form of direction to disperse
21 giving \$30,000 to Raymond from the Jack Finn
22 Irrevocable Trust. That was in 2009.

23 A. Yes.

24 Q. I'm making a statement. That was in 2009.

1 A. Yes, yes.

2 Q. You became trustee in 2007, correct?

3 A. I believe so.

4 Q. Okay.

5 A. Yes. I think so.

6 Q. Do you know where that \$30,000 to disperse
7 came from?

8 A. I believe it was from the sale of a insurance
9 policy my father had.

10 Q. So earlier, you testified that today there is
11 a life insurance policy in the Jack Finn Irrevocable
12 Trust, correct?

13 A. Yes, but -- I think I did say that -- but so
14 the paper -- I -- I -- it's very possible that it's
15 somewhere else and it's not there.

16 Q. Okay.

17 A. But I know that that insurance -- that the
18 policy that was sold, that one is certain.

19 Q. I missed the last part. The policy that was
20 sold, what?

21 A. The -- the insurance policy that was sold
22 that was on -- on my father's life, that one,
23 that -- that -- definitely there was disbursement from
24 there.

1 Q. To Raymond?

2 A. So again, I don't know if it was directly to
3 Raymond or if he had it go to his sister's account,
4 or -- I -- I don't know. I was -- I -- I don't know.
5 That part I don't know. And maybe they even told me
6 at the time. I -- I just don't know, but I'm sorry.
7 I had a lot going on.

8 Q. Sure.

9 A. So I don't know. But -- but I know that I
10 didn't -- I wasn't the one who gave it to him; that, I
11 know.

12 Q. Okay. So this policy that was sold, was that
13 the same one that was in the account in 2007 when you
14 took over?

15 A. Okay. Wait. The policy that was
16 sold -- the -- was that the same one that was in what
17 account? What --

18 Q. I'm only talking about the Jack Finn
19 Irrevocable Trust.

20 A. So -- and that's in the trust account?

21 Q. Yes. So earlier you testified that you
22 believe that there was a second-to-die MetLife policy
23 in that account, right?

24 A. Right. Currently.

1 Q. Currently.

2 A. Right.

3 MS. MAHER: Objection. Form. I think the
4 word account is confusing her, because insurance
5 policies are not owned in accounts.

6 MS. LONDON: Right. I know, I know.

7 MS. MAHER: And I can see her saying that
8 account. I do think that is where the source of the
9 confusion is.

10 MS. LONDON: My bad. I understand that.

11 THE WITNESS: Right? Okay. Yes, definitely.
12 Go ahead.

13 BY MS. LONDON:

14 Q. The insurance policy, the second-to-die
15 MetLife policy, is in the Jack Finn Irrevocable Trust
16 as an asset today, correct?

17 MS. MAHER: So she said just a moment ago
18 that she testified to that earlier, but now she
19 doesn't know that that is actually accurate. She
20 thinks she might have confused that.

21 MS. LONDON: Okay.

22 MS. MAHER: I see the look of confusion on
23 her face, but she just two seconds ago clarified that.

24 MS. LONDON: Okay. Well, that was my

1 confusion too. I wasn't sure which she was confused
2 about.

3 BY MS. LONDON:

4 Q. So I guess, then, my question is, again, do
5 you know what assets are in the Jack Finn Irrevocable
6 Trust today, as we sit here?

7 A. As far as I'm aware, there are zero assets in
8 that trust.

9 Q. Why is it open? Why does it exist?

10 A. I have no idea.

11 Q. But if you're --

12 A. I -- I didn't -- where -- where are the
13 transactions? I don't know. It --

14 Q. If you're the trustee, why haven't you closed
15 it?

16 MS. MAHER: Objection. Form. It presumes it
17 hasn't been terminated.

18 MS. LONDON: Has it? I mean, she earlier
19 testified that there was a policy in there. Now she's
20 not sure.

21 BY MS. LONDON:

22 Q. Is the Jack Finn Irrevocable Trust that
23 you're a trustee of active?

24 A. I don't know if it's active. No one -- no

1 one -- I didn't know you have to close it. I -- I
2 didn't -- I don't know. But I do know that it was the
3 other -- it was the policy that was sold that was in
4 there, and that's why I was --

5 Q. So I just want to clarify for me.

6 A. Yeah.

7 Q. So please correct me. Your testimony now is
8 that you believe in 2007 there was a second-to-die
9 MetLife policy in the Jack Finn Irrevocable Trust?

10 A. In 2007, yes.

11 Q. Okay.

12 A. Before, yes.

13 Q. Okay. And you believe that policy was sold
14 in 2009?

15 A. Yes.

16 Q. And those proceeds, 30,000 of which went
17 either to Mr. Butler or his sisters, they are attached
18 to this direction to disperse?

19 A. Well, Ray for sure. I know they got also,
20 but I don't know if it was at the -- I don't know if
21 it was the same documents, the same -- I --

22 Q. Okay.

23 A. I saw something with -- I saw something that
24 maybe she was a witness, Silver.

1 Q. Okay. So earlier you testified that you
2 believe that policy to be worth \$1,000,000.

3 A. Wait, what -- what the -- the --

4 Q. The second-to-die MetLife policy.

5 A. -- the policy? The second-to-die, no, no,
6 no. That's a -- it wasn't -- it's the -- it's the one
7 that was sold. That -- that policy that was sold
8 that's where the money came to -- to go to Ray.

9 Q. So I think I just need to clarify which
10 policy that is. I thought your testimony was that the
11 second-to-die MetLife policy was the only asset in the
12 Jack Finn --

13 A. I totally misspoke. I'm sorry.

14 Q. Okay.

15 A. It's definitely -- I'm sorry, my head. It's
16 definitely 100 percent. So this is one of the -- I'm
17 not clear on -- but I'm very clear on this. It was
18 definitely -- there was a policy my father no longer
19 needed. That one was sold. That's where the
20 proceeds, that's -- that's where it came from.

21 Q. That's where the proceeds to pay Raymond came
22 from?

23 A. Yes.

24 Q. Okay. Are you saying that is the same policy

1 that was the asset in the Jack Finn Irrevocable Trust
2 in 2007 when you took over?

3 A. Yeah. The -- the policy that was sold, that
4 MetLife policy?

5 Q. Yes.

6 A. Yes, yes.

7 Q. And earlier you testified that the value of
8 that policy was \$1,000,000.

9 A. Honestly, okay, so I was confusing it -- I'm
10 confusing it. I don't know or I don't remember. I
11 probably knew, but I do not remember now, today, what
12 the value of that policy was.

13 Q. Okay. Do you know how much it was sold for?

14 THE WITNESS: Robin, can I answer that?

15 MS. MAHER: You can answer it if you
16 remember. This is quite a memory test from 20 years
17 ago.

18 THE WITNESS: Okay.

19 MS. MAHER: But if you remember.

20 THE WITNESS: It's crazy, because there's
21 little things I remember that I -- whatever, and there
22 are things I -- but I believe it was 200,000.

23 BY MS. LONDON:

24 Q. Okay.

1 A. Or maybe 205 or 210 or -- it was -- it was
2 next to the number 200,000.

3 Q. Okay. If \$30,000 went to Raymond, where did
4 the rest of the money go?

5 THE WITNESS: Robin?

6 MS. MAHER: You can answer.

7 THE WITNESS: Can I answer?

8 MS. MAHER: If you remember or no, it's a
9 memory test.

10 THE WITNESS: Okay. I -- what I remember is
11 my -- when the money came through my -- I went and I
12 deposited -- deposited it at, the bank's name at the
13 time, I think, was First Commercial. Not positive
14 about that -- First Commercial. I know that it's
15 Byline Bank today, because I was --

16 BY MS. LONDON:

17 Q. Okay.

18 A. Yeah. So First Commercial, I -- I deposited
19 it there, and a very short time after my father hit
20 the roof, screaming at me. And he first said to me,
21 put it away. It should stay safe. And then he hit
22 the roof. I -- I need to take it out and give it to
23 him, and I could not listen to him.

24 Q. So did he take the money out?

1 A. No. I took the money out. And I gave it to
2 my father as he -- again, I mean, let him rest in
3 peace, he was an amazing man, but I gave it to him and
4 I had to. He -- he was ballistic.

5 Q. Okay. And did you give him the full amount?

6 A. Yes, 100 percent.

7 Q. So you know or you don't know what your
8 father did with the money?

9 A. The only thing I know is that he said that he
10 dispersed it to, not just Ray, but Pessie and that
11 he -- whatever they wanted -- whatever that it was,
12 for them.

13 Q. Okay. And as you sit here today, do you
14 understand that policy to have been the only asset in
15 the 1993 Jack Finn Irrevocable Trust, of which you
16 became a trustee in 2007?

17 A. I'm trying to -- I think so.

18 Q. Okay.

19 A. Yeah.

20 Q. Earlier, you talked about a nursing home in
21 Zion.

22 A. Uh-huh.

23 Q. That was one of your father's assets,
24 correct?

1 A. Yes. Half of it.

2 Q. Half of it was his asset.

3 A. Uh-huh.

4 Q. And was that asset kept in a trust?

5 A. Not that I'm aware of.

6 Q. Okay. When was that nursing home sold?

7 A. I'm so fuzzy. When was Zion sold? I don't
8 know. Can -- are you able to give me some years to
9 pick from? I mean --

10 Q. Oh, no. I'm just asking if you know.

11 A. I don't. I -- I'm sure I did know, but
12 again, COVID, my kids, I don't know.

13 Q. Okay.

14 A. Sorry. I'm not looking for excuses. That's
15 the truth.

16 Q. But you think it was before COVID?

17 A. Oh, yeah.

18 Q. Okay.

19 A. Yeah.

20 Q. And who was involved in --

21 MS. MAHER: Ms. London, I don't want to
22 interrupt your flow, but there's two Raymond Butlers
23 on right now, and I just want to make sure we don't
24 have someone who's not Raymond Butler. Can I see the

1 screen of both of those participants? And now one
2 disappeared.

3 MR. BUTLER: Yeah. Because one was an issue,
4 and I dropped signal. No. The other one is me.

5 MS. MAHER: Okay.

6 MR. BUTLER: Stop making a --

7 MS. MAHER: Very good.

8 MR. BUTLER: -- mountain out of nothing.

9 BY MS. LONDON:

10 Q. Okay. Who was involved in that transaction?
11 You mentioned somebody Rajchenbach before.

12 A. Yeah.

13 Q. Which Rajchenbach?

14 A. Which one? Yeah. It was it -- it was the
15 father. I -- again, yeah, I'm pretty sure it was
16 the -- I mean, maybe the father involved the sons. I
17 don't know.

18 Q. Do you know his name? Do you know a first
19 name?

20 A. Of the father?

21 Q. Yeah.

22 A. The father? Jack.

23 Q. Oh, okay. So Jack Rajchenbach, your father,
24 Jack Finn, and were you involved in that transaction

1 as well?

2 A. There in -- no, no.

3 Q. Okay.

4 A. No.

5 Q. Who else was involved?

6 A. I have no idea.

7 MS. MAHER: Objection. Foundation.

8 MS. LONDON: I'm just wondering if she knows
9 who else is involved.

10 MS. MAHER: She said she wasn't involved.

11 BY MS. LONDON:

12 Q. Do you know how long he held that asset
13 before he sold it?

14 A. I mean, it was years.

15 Q. Okay.

16 A. I -- I don't -- exactly how long, I mean,
17 maybe it was anywhere from 10 to 15 years. I
18 don't -- I -- I could be very off.

19 Q. Okay.

20 A. But it -- it was years.

21 Q. And what was the deal your father made with
22 you regarding that asset?

23 MS. MAHER: You know, I think I'm going to
24 object. I'll let her answer that one question, but

1 we're going pretty far down the road of a deal that
2 was not really at issue. I allowed some leeway
3 because it came up in a confusing manner and I wanted
4 to make sure we have a clear record. But if you want
5 to pose that question, I'll let her answer, but I
6 object to going too far beyond the assets of this
7 trust.

8 THE WITNESS: Oh, so you're waiting on me?

9 BY MS. LONDON:

10 Q. Yes.

11 A. Yeah. Okay. So sorry.

12 Q. That's okay.

13 A. So you asked what -- what is the -- what is
14 the deal that we made?

15 Q. Yes.

16 A. He was in -- was it Barbara Fox? I'm
17 not -- -- he was with an attorney, and at the time of
18 the sale he -- he, from the very beginning, gave me
19 half of it. Was it at the time of the sale? See, I
20 don't even -- or was it the, yeah, the time of
21 the -- the purchase or the time --

22 Q. Okay.

23 A. Not sure about that, but at the beginning or
24 the end of it, maybe when he was about to get the

1 money. I don't -- it's at some point.

2 Q. Okay.

3 A. Yeah.

4 Q. Are you aware that Rajchenbach said that he
5 purchased that nursing home from the Jack Finn
6 Irrevocable Trust?

7 MS. MAHER: Objection. Form. Foundation. I
8 don't know that is actually even true.

9 MS. LONDON: It's in the document --

10 MS. MAHER: You can ask her whether she is
11 aware.

12 BY MS. LONDON:

13 Q. Are you aware of that statement?

14 A. I'm going to write this question down. Can
15 you -- I -- can you just --

16 MS. MAHER: No. Ilana, just listen to the
17 question.

18 THE WITNESS: Okay.

19 MS. MAHER: Are you aware of whether that
20 statement was ever made?

21 THE WITNESS: Am I aware that what -- that
22 what statement was ever made?

23 BY MS. LONDON:

24 Q. Are you aware --

1 MS. MAHER: I don't know that it was made.
2 She's purporting to say a statement. She's asking
3 whether you're aware of that statement.

4 THE WITNESS: Could you repeat that too?

5 BY MS. LONDON:

6 Q. Are you aware that Rajchenbach bought that
7 nursing home from the Jack Finn Irrevocable Trust?

8 A. No.

9 Q. Are you aware that it is included is some of
10 the assets in the 1993 Jack Finn Irrevocable Trust?

11 A. Irrevocable Trust?

12 MS. MAHER: Objection. Form. You're stating
13 something as a fact that is not a fact.

14 MS. LONDON: It is a fact. There are
15 multiple '93 trusts. One of them lists these nursing
16 homes as assets. I'm still trying to figure out
17 what's the operative trust, and she can't even testify
18 to that.

19 MS. MAHER: Well, if you want to show her
20 what document you're purportedly talking about, we can
21 do that, but you have to number documents and show
22 them to her if you contend they exist.

23 MS. LONDON: They're in our discovery. It's
24 not like I'm showing her something new, but I

1 understand what you're saying.

2 THE WITNESS: Yeah. Thank you.

3 BY MS. LONDON:

4 Q. Okay. All right. Do you get income from any
5 other nursing homes?

6 MS. MAHER: Objection. We're well beyond
7 this trust and its assets.

8 MS. LONDON: Even though there are -- okay.

9 BY MS. LONDON:

10 Q. Do you know Chaim Rajchenbach?

11 A. Do I know him?

12 Q. Yeah.

13 A. I don't know him.

14 Q. Okay. Do you know Menacham Shabbat?

15 A. I don't think I -- who?

16 Q. Menacham Shabbat?

17 A. I don't know them. I don't think I ever met
18 them.

19 Q. Okay. They weren't family friends?

20 A. Maybe -- I lived many years in New York, I
21 was not -- maybe of my father's, I don't -- I
22 don't -- he mentioned them, talked about them
23 occasionally, but not -- I -- I never saw them come
24 over or -- I wasn't around.

1 Q. Just for clarification, when did you move out
2 of your father's home?

3 A. Well, my parents divorced, and I never really
4 officially lived with my father and Pessie. I mean, I
5 think that after they got married, which I don't
6 really recall what year that was either, if I think
7 and think and think about it I might, but I moved out.
8 I wasn't around.

9 Q. Okay. So when your parents got divorced, is
10 that when you moved to New York?

11 A. No. Because they got divorced when I was
12 twelve and a half.

13 Q. Oh. I'm just trying to figure out where you
14 lived when all of these people were around and all of
15 these things were happening. I'm just trying to --

16 A. I was probably in Brooklyn.

17 Q. Okay.

18 A. Yeah.

19 Q. And you think that was probably in the what?

20 A. Well -- okay. Sorry. It's a little -- let
21 me see. I'm at my mother's house. Excuse me one
22 second.

23 MS. MAHER: Ilana, is there anyone in the
24 room you are in?

1 THE WITNESS: No. They're on the other side
2 of the door, but I hear my mother's voice.

3 MS. MAHER: Okay.

4 THE WITNESS: Like, it's very --

5 MS. MAHER: Okay.

6 BY MS. LONDON:

7 Q. Do you need a minute?

8 A. Let me tell them.

9 Q. Do you need a minute?

10 A. They're fighting. Let me tell them to just
11 quiet. I can hear them. Hold on one second, please.

12 MS. LONDON: All right. Let's take a
13 two-minute break.

14 MS. MAHER: Sure.

15 MS. LONDON: Okay?

16 MS. MAHER: Sure.

17 MS. LONDON: All right.

18 THE REPORTER: We're off the record. The
19 time is 11:42 a.m.

20 (Off the record.)

21 THE REPORTER: We're back on the record. The
22 time is 11:43 a.m.

23 BY MS. LONDON:

24 Q. Do you remember what year you moved out of

1 your --

2 A. Oh, yeah.

3 Q. -- parents' home?

4 A. It -- okay. Let's see. So I was -- I was
5 mostly with my mom. I went to school in Brooklyn when
6 I was 15 years old.

7 Q. Okay.

8 A. So then, there were a summer here or there
9 where I came back, but I never really officially lived
10 with my father and Pessie.

11 Q. Okay, okay. So during the time, I guess, I
12 don't know how old you are now, and I'm not going to
13 ask you, but can you tell me approximately what year
14 you would've been in New York?

15 A. If you give me a second, I could -- I
16 definitely think I could.

17 MS. MAHER: Kate, why don't you just ask her
18 what year she was born.

19 MS. LONDON: Yep.

20 MS. MAHER: You know she moved when she was
21 15.

22 MS. LONDON: That's right. All right. I was
23 trying to avoid that.

24 MS. MAHER: She'll remember that one.

1 BY MS. LONDON:

2 Q. I was trying to be nice, but what year were
3 you born?

4 A. '66.

5 Q. Okay. Thank you.

6 A. Yeah.

7 Q. That's all I needed. Okay, okay. All right.
8 You purchased a house in Skokie at some point,
9 correct?

10 A. Uh-huh.

11 Q. Okay. Do you remember about when that was?
12 Ballpark?

13 A. 2000.

14 Q. Okay. Were you married at that point?

15 A. Uh-huh.

16 Q. Okay.

17 A. Yes.

18 Q. So you and Ely lived in that house together?

19 A. No.

20 Q. Okay. Have you and Ely ever lived together?

21 A. Oh, yeah.

22 Q. Okay.

23 A. Yeah.

24 Q. When were you separated?

1 A. Oh well, I took the kids to go to a private
2 school --

3 Q. Okay.

4 A. -- in Illinois. I was living in New Jersey
5 at the time, and that's when I came in 2007,
6 around -- I think it was summer of 2007.

7 Q. Okay. You came by yourself?

8 A. Yeah, with the kids.

9 Q. Okay.

10 A. And my cousin, yeah.

11 Q. But you purchased the house around 2000, you
12 think?

13 A. Yeah.

14 Q. So was it empty?

15 A. Yes.

16 Q. Okay. And then when you moved here, you
17 moved into that home. Did Ely ever live in that
18 house?

19 A. No.

20 Q. Okay. Have you and Ely lived together since?

21 A. Since when?

22 Q. Since you separated.

23 MS. MAHER: Objection. Form.

24 BY MS. LONDON:

1 Q. I might be confused. Did you say that you
2 and Ely separated in 2007, and that's when you came
3 back to Chicago?

4 A. No. We didn't separate our marriage. I just
5 left with the kids to take them to a special school
6 needs school, a special school.

7 Q. Okay. And Ely did not live there?

8 A. No, because he worked.

9 Q. Okay. Okay. Have you lived with him since
10 the time that you left and came to Chicago?

11 A. He -- the answer is no. I mean, I could --

12 Q. Okay. That's all I'm asking.

13 A. Yeah, yeah.

14 Q. Okay. I'm just trying to figure out -- yes.
15 Okay. Thank you. Okay.

16 Okay. When you came back you became involved
17 with your father's trusts, correct?

18 MS. MAHER: Objection. Form.

19 BY MS. LONDON:

20 Q. You just testified you came back to Chicago
21 in 2007, correct?

22 A. To Skokie, yeah.

23 Q. Okay. And in 2007, you also became a trustee
24 of your father's, the Jack Finn Irrevocable Trust,

1 correct?

2 MS. MAHER: The Jack Finn Irrevocable 1993
3 Trust?

4 MS. LONDON: Yes.

5 MS. MAHER: Just so we have a clear record.

6 MS. LONDON: Yes.

7 THE WITNESS: Yes. Without -- without even
8 really -- I don't know. I guess, yes, I did, but I
9 didn't -- I don't think I received it.

10 BY MS. LONDON:

11 Q. Okay.

12 A. But, yeah.

13 Q. At that time your father also made Ely a
14 trustee as well, correct?

15 A. Right. I don't know if Ely accepted it, but
16 I think he tried to.

17 Q. Okay. Well, if he didn't accept it, then how
18 was he involved in a disbursement to Raymond?

19 A. No. He's -- he -- right, correct. He -- he
20 has some limit -- yes, he does have some involvement.

21 Q. Okay. And is your testimony here today that
22 he has the documents, any documents, associated with
23 the Jack Finn Irrevocable Trust from 1993?

24 MS. MAHER: Objection. Form. I think it

1 misstates prior testimony and is a confusing question,
2 because I think you said, any documents.

3 BY MS. LONDON:

4 Q. Do you have any documents from the Jack Finn
5 Irrevocable 1993 Trust of which you are a trustee?

6 A. From '93, no. I don't have.

7 Q. Okay. Do you have any --

8 A. Only what had been shown. Some -- you guys
9 had it or something. I don't know. It was in
10 discovery. I don't know.

11 Q. Okay. Do you know if Ely has any documents
12 associated with this trust?

13 A. He had the same problem I did.

14 Q. And yet, earlier you testified that you got a
15 box from Colman Ginsparg that you gave to Ely,
16 correct?

17 A. Uh-huh. Passed it, yeah, long time.

18 Q. Okay. And your testimony remains that you
19 don't know what's in that box?

20 A. I passed it. I wanted it to be taken care
21 of. I don't have -- I don't know what's really in
22 that box.

23 Q. Okay. It's very confusing. I don't know if
24 I asked you this already, so I apologize if I did.

1 Are you a trustee for any of your other father's
2 trustees -- I mean, trusts?

3 MS. MAHER: Objection. Relevance.

4 MS. LONDON: I'm just trying to figure out
5 how you can be a trustee of a trust and not have any
6 documents, know any information, see a trust document,
7 know about disbursements, and not follow any of the
8 rules that would apply to any other trustee.

9 MS. MAHER: And you asked her whether she's a
10 trustee of any other of her father's trusts. This
11 case is just about the Jack Finn Irrevocable 1993
12 Trust.

13 MS. LONDON: This goes to general knowledge
14 about being a trustee.

15 MS. MAHER: You know, I'm not going to let it
16 go far beyond, but go ahead and answer --

17 MS. LONDON: That's what I'm asking.

18 MS. MAHER: -- the question of whether you
19 are, to your knowledge, a trustee of any other of your
20 father's trusts. It's really just a yes or no
21 question.

22 THE WITNESS: Yeah. I -- I can't say. I
23 don't know, I don't think. I think no. I -- I don't
24 know.

1 BY MS. LONDON:

2 Q. Okay. So you don't know if there are other
3 assets that your father has in other trusts?

4 MS. MAHER: Objection. Relevance. We're not
5 getting into the other trusts or assets.

6 BY MS. LONDON:

7 Q. You can answer.

8 A. If I'm aware if there's other -- no. I'm not
9 aware if there's anything else in other trusts.

10 Q. Okay. What do you understand your duties to
11 be as a trustee?

12 A. Probably what you stated earlier. I -- I --

13 Q. Okay.

14 A. -- I was not aware at all. No one informed
15 me, not my father's attorney. I don't know. I was
16 not aware.

17 Q. Okay. Are you aware of any other money that
18 Raymond might have received from your father?

19 A. Other than that?

20 Q. Yes.

21 A. The -- other than the disbursement?

22 Q. Correct.

23 A. You're asking me if I'm aware?

24 Q. Yeah, yeah. Do you know if your father gave

1 him any other money?

2 A. I didn't witness it.

3 Q. Okay.

4 A. But my father felt a little bad, he would say
5 from time to time, you know, he felt bad for him and
6 maybe he -- he went maybe to a lunch once in a while.
7 He would maybe probably give him \$100 or so. I don't
8 know. Well, not --

9 Q. Okay. But in terms of significant sums --

10 A. Go ahead. I'm sorry.

11 Q. Sorry. In terms of significant sums, did he
12 give him any, other than the \$30,000 you're aware of?

13 A. I'm trying to -- I don't -- I'm just not
14 aware. I don't know if he my father would have
15 verbally had to have told me something years ago, and
16 I -- I just -- I really don't know the answer to that.

17 Q. Okay. Why did he feel bad for Raymond, do
18 you remember?

19 A. Well, not that -- it wasn't -- not because
20 he's -- he's a -- he's a good young man now, so they
21 say, but just because of the situation with his
22 sisters. And they were in the foster children
23 and -- and they were around longer than he was. It
24 was basically that's what -- that's what he told me.

1 Q. You mean, his sisters were around longer than
2 him?

3 A. Yeah. Like, he -- he -- went to go live
4 somewhere else and -- and they -- you know,
5 they -- they were having a hard time -- one -- I don't
6 know how soon after he came into the home and he -- he
7 went to live somewhere else, but they didn't.

8 Q. Okay.

9 A. As far as I know, yeah.

10 Q. Did you and your father discuss why he may or
11 may not have been adopted?

12 THE WITNESS: Robin, I don't know. Should I
13 answer that? Should I?

14 MS. MAHER: Yeah. You can answer that.

15 THE WITNESS: Well, okay. So I'm not sure
16 that I know all the reasons. I know something he did
17 tell me about an incident, so I don't know if I'm
18 supposed to say that here.

19 BY MS. LONDON:

20 Q. You can go ahead and tell, yes.

21 A. He became aggressive, Ray -- Ray did.

22 Q. Like, violent?

23 A. Yeah, with a knife.

24 Q. To whom?

1 A. I mean, this is all -- I did not -- I didn't
2 see it with my own eyes, but with -- that's what I was
3 told from -- from with Pessa, I think.

4 Q. Okay. So when you say he went to live
5 somewhere else, was he placed somewhere else?

6 MS. MAHER: Objection. Foundation.

7 THE WITNESS: Yes. Oh, okay. There's a lag.
8 Am I supposed to -- am I -- do I answer? I couldn't
9 hear.

10 MS. MAHER: Yeah. Go ahead and answer, but I
11 think she answered, yes.

12 THE WITNESS: Yes.

13 MS. MAHER: Was that your answer?

14 THE WITNESS: Yes.

15 MS. LONDON: Yes. I got it.

16 BY MS. LONDON:

17 Q. Do you know anything about where Raymond was
18 placed after he left your father's house?

19 A. I know some things, you know, again what I
20 was told.

21 Q. Okay.

22 A. I wasn't even in the same city.

23 Q. Did you know Raymond's grandfather?

24 A. No. I did not.

1 Q. Jonas Neufeld?

2 A. Who?

3 Q. Jonas Neufeld?

4 A. No.

5 Q. You never met him?

6 A. I don't -- I mean, I don't know, was it 25
7 years ago that I -- I -- I don't believe I did. I
8 don't have any memory of it.

9 Q. Okay. And are you aware whether or not he
10 gave your father money?

11 A. Ray's grandfather?

12 Q. Yes.

13 A. No, no.

14 Q. Are you aware of where the money would've
15 come from to be able to take in all of those children,
16 Ray and his sisters?

17 MS. MAHER: Objection. Relevance.
18 Foundation, if you're asking her how her father --

19 MS. LONDON: I'm asking her if she knows how
20 he provided for children.

21 MS. MAHER: -- had money to provide for
22 children.

23 MS. LONDON: Yeah. I'm asking her if she
24 knows.

1 BY MS. LONDON:

2 Q. What occupation did your father have?

3 A. They were foster children, and the state was
4 giving them money.

5 Q. What was your father's occupation?

6 A. He was in the nursing home businesses, you
7 know, before -- years earlier, he -- he was in a
8 couple businesses, but in those years he was
9 in -- in -- he would put deals together and find
10 investors and he -- he bought some nursing homes.

11 Q. Okay. Did he ever work in waste management?

12 A. A very, very long time ago. I think he was
13 married to my mother when he worked in that.

14 Q. Okay.

15 A. Way before he met Pessa and the kids came.

16 Q. Okay.

17 A. But not as a garbage pickup person either.

18 Q. No. I understand that.

19 A. Okay, okay.

20 Q. If you know, did Pessa have her own children?

21 A. Yeah.

22 Q. Okay. Do you know how many she had?

23 A. One son.

24 Q. Okay. All right. I think that's about it.

1 Is there anything else that you believe is important
2 for me to know about any of the issues in this case?

3 MS. MAHER: Objection. Form. That's an
4 inappropriate question.

5 BY MS. LONDON:

6 Q. Anything you want to clarify?

7 A. I don't, other than I confuse -- I confuse
8 these things, because also the manner in which it was
9 eventually sent to me. Other than that, I confused a
10 couple things, but I think we -- I hope we cleared
11 them up.

12 Q. Okay.

13 A. Okay.

14 Q. Okay. I think that's all I have.

15 A. Okay.

16 MS. MAHER: All right. I don't have anything
17 for the Witness.

18 THE REPORTER: Okay. We are off the record.
19 The time is 11:59 a.m.

20 (Whereupon, the deposition concluded at 11:59 a.m.)
21
22
23
24

CERTIFICATE OF REPORTER

I, ASHLEIGH CHANDLER, a Digital Reporter do
hereby certify:

That the foregoing witness whose examination
is hereinbefore set forth was duly sworn and that said
testimony was accurately captured with annotations by
me during the proceeding.

I further certify that I am not related to
nor employed by any of the parties to this action and
that I am in no way interested in the outcome of this
matter.

In witness thereof, I have hereunto set my
hand this 25 June, 2026.

Ashleigh Chandler

ASHLEIGH CHANDLER

Notary Commission No. HH 791154

Commission Expires: 4/15/2030

DEPOSITION ERRATA SHEET

Our Assignment No. 23515

Case Caption: RAYMOND E. BUTLER II vs. ILLANA EDDI
AND ELY EDDI, INDIVIDUALLY AND AS TRUSTEES OF THE JACK
FINN IRREVOCABLE TRUST

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I
have read the entire transcript of my examination
taken in the above-captioned matter or the same has
been read to me, and the same is true and accurate,
save and except for changes and/or corrections, if
any, as indicated by me on the DEPOSITION ERRATA SHEET
hereof, with the understanding that I offer these
changes as if still under oath.

Signed on the _____ day of _____, 20____.

ILANA FINN EDDI

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EXHIBIT D

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

RAYMOND E. BUTLER II	)	
	)	
Plaintiff,	)	Case No. 2022 CH 675
	)	
v.	)	
	)	The Honorable Allen P. Walker
ILLANA EDDI AND ELY EDDI, individually	)	
and as Trustees of the Jack Finn Irrevocable Trust,	)	
	)	
Defendants.	)	

AFFIDAVIT OF SHOMSHON MOSKOWITZ

I, Shomshon Moskowitz, hereby certify, under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure:

1. The facts set forth in this affidavit are within my personal knowledge, and if called upon I would and could competently testify thereto.
2. I am counsel for Avrum Rajchenbach and Rivka Rajchenbach as trustees for the GPN Family Trust (“GPN Trust”) and Ahuva Shabat as trustee for the Doros Generation Trust (“Doros Trust”).
3. The GPN Trust and the Doros Trust are not related to the Jack Finn Irrevocable Trust.
4. The GPN Trust and the Doros Trust are not predecessors, successors, or beneficiaries of the Jack Finn Irrevocable Trust.
5. The GPN Trust and the Doros Trust, through associated entities, were involved in the purchase of a nursing home partially owned by the Jack Finn Irrevocable Trust in 2011.

Under penalties of perjury pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in the foregoing affidavit are true and correct,

except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he believes the same to be true.

Dated: March 10, 2025

DocuSigned by:

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