

**AB Litigation Services**

<p align="right"><b>Page 77</b></p> <p>1 A No, not yet, but I'm expecting it any day.</p> <p>2 Q <b>Have you already gone through the retainer?</b></p> <p>3 A I don't get billings from my one team that's</p> <p>4 handling the majority of this, but yeah, they're</p> <p>5 definitely working against it for sure right now.</p> <p>6 Q <b>Who is part of this team?</b></p> <p>7 A Steven Kidwell. He's an individual out of</p> <p>8 Florida, and he has some offshore guys that I</p> <p>9 don't even know who they are, but I pay him, and</p> <p>10 then I have another freelance person that's been</p> <p>11 with me for a long time.</p> <p>12 Her name is Jessica, and then her son is</p> <p>13 also helping. My son is now helping which is</p> <p>14 great so he's able to make some money for college,</p> <p>15 so that's my team and me and Tara. Sorry. Five</p> <p>16 of us.</p> <p>17 Q <b>For work that you do is it typical that you</b></p> <p>18 <b>assemble a team for a project?</b></p> <p>19 A Uh-huh.</p> <p>20 Q <b>Is that a "yes" for the --</b></p> <p>21 A Yes. I'm sorry. Yes. Yes. It is a team of one</p> <p>22 sometimes or a team of five.</p> <p>23 Q <b>Do you have any additional work with TelyRx?</b></p> <p>24 A No.</p> <p>25 Q <b>Is the work done with TelyRx?</b></p>	<p align="right"><b>Page 78</b></p> <p>1 A No, no, no. We're still in progress. We're</p> <p>2 supposed to launch August 1st, but we're not going</p> <p>3 to make that, so it will go over probably I'm</p> <p>4 thinking the end of August is what I think the</p> <p>5 contract will end.</p> <p>6 Q <b>How much do you expect to earn from this client</b></p> <p>7 <b>TelyRx?</b></p> <p>8 A 20 percent. 20 percent of the billings, so let's</p> <p>9 just say 150,000. If we bill 150,000, we will</p> <p>10 make whatever that number is, 30,000.</p> <p>11 Q <b>Is \$50,000 a normal retainer amount?</b></p> <p>12 A No. No. 4,000 is typical when I've done it in</p> <p>13 the past, but I don't do retainers, very rarely.</p> <p>14 Q <b>Would you consider TelyRx to be a bigger client?</b></p> <p>15 A Oh, I would say they are probably the top ten</p> <p>16 clients of my career.</p> <p>17 Q <b>Do you expect to get more clients like TelyRx?</b></p> <p>18 A You know, like I said, if I look at my career,</p> <p>19 21 years, I've gotten maybe six or seven clients</p> <p>20 like that, so I would say I can't predict that</p> <p>21 one.</p> <p>22 Q <b>Do you have a rebuttal valuation?</b></p> <p>23 A What's a rebuttal valuation?</p> <p>24 Q <b>Are you going to use or have you used a person to</b></p> <p>25 <b>look at Jeremy Harkness's reports and give you an</b></p>
<p align="right"><b>Page 79</b></p> <p>1 <b>opinion about a different value of Tool Studios</b></p> <p>2 <b>and your income?</b></p> <p>3 A No.</p> <p>4 Q <b>Are you planning to retain an expert to rebut --</b></p> <p>5 A No.</p> <p>6 Q <b>And just so I can finish the question.</b></p> <p>7 A Yeah. I'm sorry.</p> <p>8 Q <b>Do you plan on retaining an expert to rebut</b></p> <p>9 <b>Mr. Harkness's reports?</b></p> <p>10 A I don't know.</p> <p>11 Q <b>Why don't you know?</b></p> <p>12 A I haven't even thought of it. I didn't even know</p> <p>13 you could.</p> <p>14 Q <b>When you started the company did anyone contribute</b></p> <p>15 <b>any funds?</b></p> <p>16 A Yeah, my mother.</p> <p>17 Q <b>What is your mother's name?</b></p> <p>18 A Joyce Bell.</p> <p>19 Q <b>Did anyone else contribute funds when the company</b></p> <p>20 <b>started?</b></p> <p>21 A Not when it started.</p> <p>22 Q <b>Did anyone else contribute funds at any other time</b></p> <p>23 <b>to Tool Studios?</b></p> <p>24 A Yeah. We had met with bankruptcy attorneys twice</p> <p>25 and we had a line of credit that the bank called</p>	<p align="right"><b>Page 80</b></p> <p>1 and we were ready to go under, and my best friend</p> <p>2 called Allie and offered her a line of credit</p> <p>3 because he knew I wouldn't take it. Anyway, he</p> <p>4 bailed us out at \$109,000.</p> <p>5 Q <b>Who is your best friend?</b></p> <p>6 A Mark Grylicki.</p> <p>7 Q <b>When did Mark Grylicki give you 109,000?</b></p> <p>8 A 2009. A five-year term loan, and we paid him back</p> <p>9 every penny and 2 percent interest.</p> <p>10 Q <b>Besides your mother --</b></p> <p>11 A And my father gave us 100,000. At one point we</p> <p>12 were doing really bad, and then we paid him back</p> <p>13 as well. In 2020 we finally paid him back, and he</p> <p>14 gave us that 100,000 in 2005 probably, and we paid</p> <p>15 it off finally in 2020.</p> <p>16 Q <b>Anyone else?</b></p> <p>17 A I'm trying to think. No.</p> <p>18 Q <b>How much money did your mother contribute?</b></p> <p>19 A 50,000.</p> <p>20 Q <b>How did it come about that she gave your company</b></p> <p>21 <b>50,000?</b></p> <p>22 A Her father had just passed away -- her mother had</p> <p>23 just passed away and left her some money, and I</p> <p>24 had been working for another agency and then there</p> <p>25 was problems with their financials and some</p>