

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

CASE NO: 17-012030-CA-01

INNOVATIVE SERVICE TECHNOLOGY
MANAGEMENT SERVICES, INC.,

Plaintiff,

v.

LEONARDO CORPORATION, et. al.

Defendants,

PLAINTIFF'S AMENDED RE-NOTICE OF TAKING DEPOSITIONS

PLEASE TAKE NOTICE that the undersigned will take the oral deposition of:

NAME	DATE AND TIME	LOCATION
Leonardo Corporation's Corporate Representative with the most knowledge concerning the subject matters identified in Schedule "A" attached hereto.	June 24, 2021 9:00 a.m. EST	Virtual/Zoom/Webex
Andrea Rossi	June 25, 2021 9:00 a.m. EST	Virtual/Zoom/Webex

upon oral examination via remote virtual as described below.

PLEASE TAKE FURTHER NOTICE that, due to disruptions to travel and accompanying shelter-in-place order caused by COVID-19 virus, Plaintiffs intend to take the depositions remotely, via videoconferencing equipment. As this deposition will be taken virtually, the reporter and witnesses will be in remote locations.

PLEASE TAKE FURTHER NOTICE that the deposition will be taken before a person authorized by law to take depositions virtually, a Notary Public, or any other public or officer

authorized by law to take depositions in the State of Florida. The oral examination will continue from day to day until completed. These depositions are being taken for the purpose of discovery, for the use at trial, or for such other purposes as are permitted under the rules of the Court. All counsel of record are invited to attend.

PLEASE TAKE FURTHER NOTICE that as this deposition will be conducted virtually, Plaintiffs reserve the right to conduct these depositions utilizing the secure web-based deposition option afforded by a company providing these services or in the alternative video conferencing (VTC) services or telephonically to provide remote/virtual access for those parties wishing to participate in the deposition via the internet and/or telephone. Also take notice that Plaintiffs reserve the right to record the depositions either by stenographic means or a digital reporter utilizing state-of-the-art digital recording equipment. Both the court reporter and digital reporter are authorized to administer the oath and serve as the deposition officer in the State of Florida pursuant to Order Nos. AOSC 2016 and AOSC20-23 (and the amendment thereto) issued by the Florida Supreme Court.

Please contact the noticing attorney at least five (5) calendar days prior to the deposition to advise that it is your desire to appear via this remote participating means, so that the necessary credentials, call-in numbers, firm name, email addresses, services, testing and information, if necessary, can be arranged and provided to you prior to the proceeding(s).

Respectfully submitted,

/s/ Richard Danese
Gary M. Carman, Esq.
Florida Bar No. 179409
Gary.Carman@gray-robinson.com
Richard F. Danese, Esq.
Florida Bar No. 58458
Richard.Danese@gray-robinson.com
Gray Robinson, P.A.
333 SE Second Avenue, Suite 3200
Miami, Florida 33131
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed and served electronically this **Thursday, June 17, 2021** upon:

Rodolfo Nuñez, Esq.
Rodolfo Nuñez, P.A.
Counsel for Leonardo Corp.,
2100 Salzedo Street, Suite 303
Coral Gables, Florida 33134
Tel: (305) 443-2440
Fax: (305) 443-2334
rnunez@acg-law.com

Respectfully submitted,

/s/ Richard Danese

SCHEDULE "A"

1. Knowledge regarding the allegations made by IST in the Complaint;
2. Knowledge regarding any and all defenses raised by Leonardo Corp. in the lawsuit;
3. Knowledge regarding the underlying lawsuit titled Andrea Rossi and Leonardo Corporation v. Thomas Darden and Industrial Heat, LLC, et. al., Case No. 16-cv-21199-CMA, including but not limited to the discovery propounded and produced in the action;
4. Knowledge regarding the hiring and/or retention of the law firm of PBYA and for attorneys John Annesser and Brian Chaiken;
5. Knowledge regarding any communications between PBYA and attorneys John Annesser and Brian Chaiken on the one part and Leonardo Corp. on the other part regarding IST and the electronically stored information services to be provided; and
6. Knowledge regarding the exhibits attached to the Complaint.