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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION

Case No.: 0:19-CV-62608

- - - - -X  
ANDREW S. ROBBINS,  
  
Plaintiff,  
  
vs.  
  
OFF LEASE ONLY, INC.,  
  
Defendants.  
- - - - -X

DEPOSITION OF: REBECCA A. RADOSEVICH

DATE: July 9, 2020

TIME: 11:31 a.m to 2:39 p.m.

PLACE: BY VIDEOCONFERENCE

PURSUANT TO: Notice by counsel for Plaintiff  
for purposes of discovery, use at  
trial or such other purposes as  
are permitted under the Federal  
Rules of Civil Procedure

BEFORE: CYNTHIA L. BRAUN, RPR  
Notary Public, State of  
Florida at Large

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1 APPEARANCES:

2 FRANK M. MALATESTA, ESQUIRE  
Malatesta Law Office  
3 871 Venetia Bay Boulevard  
Suite 235  
4 Venice, Florida 34285  
(941) 246-3812  
5 Attorney for Plaintiff

6 ABBYE E. ALEXANDER, ESQUIRE  
Kaufman Dolowich Voluck, LLP  
7 301 East Pine Street  
Suite 840  
8 Orlando, FL 32801-2740  
(407) 789-0230  
9 Attorney for Defendant

10 SAMUEL B. MENAGED, ESQUIRE  
Kaufman Dolowich Voluck, LLP  
11 100 SE 3rd Avenue  
Suite 1500  
12 Fort Lauderdale, Florida 33394-0002  
(954) 302-2461  
13 Attorney for Defendant

14 EJOLA C. COOK, ESQUIRE  
Off Lease Only, Inc.  
15 827 South State Road 7  
North Lauderdale, FL 33068-2823  
16 (954) 876-7429  
17 Attorney for Defendant

18 ALSO PRESENT:

19 Andrew S. Robbins

20  
21  
22  
23  
24  
25

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1 TRANSCRIPT OF PROCEEDINGS

2 THE REPORTER: The attorneys participating in

3 the deposition acknowledge that I, Cynthia Braun,

4 the court reporter, am not present with the witness

5 and that I will be reporting the proceedings and

6 administering the oath remotely. This arrangement

7 is pursuant to an order issued by the Florida

8 Supreme Court.

9 The parties and their counsel consent to this

10 arrangement and waive any objections to this manner

11 of reporting. Please indicate your agreement by

12 stating your name and your agreement on the record.

13 MR. MALATESTA: Frank Malatesta on behalf of

14 the plaintiff, so agreed.

15 MS. ALEXANDER: Abbye Alexander on behalf of

16 Off Lease Only, so agreed.

17 MS. COOK: Ejola Cook on behalf of Off Lease

18 Only, so agreed.

19 REBECCA A. RADOSEVICH,

20 the witness herein, being first duly sworn on oath, was

21 examined and deposed as follows:

22 THE WITNESS: Yes.

23 DIRECT EXAMINATION

24 BY MR. MALATESTA:

25 Q Ms. Radosevich, could you please pronounce

Page 5

1 your name for me so I can get it for the record, for my

2 edification, please?

3 A Rebecca Radosevich.

4 Q Radosevich, okay. Good.

5 Have you ever been deposed before?

6 A Yes.

7 Q Okay. Zoom is a little bit different, as

8 you've seen, because you have been sitting in our

9 depositions. Sometimes there's a little bit of a delay,

10 so please give me the opportunity to finish my question,

11 and I will do my best to give you the opportunity to

12 finish your answer; is that fair?

13 A Yes.

14 Q And as you know, verbal responses are

15 necessary because head shakes or nods or something to

16 that effect would not be able to be picked up by the

17 court reporter, okay?

18 A Yes.

19 Q And if you don't understand a question, please

20 let me know.

21 A Okay.

22 Q In September and August of 2019, what were

23 your positions or position with Off Lease Only?

24 A I was and currently am the chief human

25 resources officer, and I also serve as counsel for

<p style="text-align: right;">Page 6</p> <p>1 employment and labor matters. 2 Q Describe your responsibilities as the chief 3 human resources officer. 4 A I oversee the human resources department with 5 all of the HR functions, and I also -- and then, of 6 course, the legal capacity, I advise as to labor and 7 employment matters. 8 Q Is that what you do as chief human resources 9 officer, or is it different? 10 A Well, I only have one title, but both 11 functions fall underneath that title. 12 Q Do you take any steps to differentiate between 13 your basic core HR functions and your functions as 14 counsel on labor and employment issues? 15 MS. ALEXANDER: Object to the form. 16 THE WITNESS: I don't understand the question. 17 BY MR. MALATESTA: 18 Q How do you differentiate between your wearing 19 the hat of an attorney, in-house counsel on behalf of 20 Off Lease Only and when you're performing routine HR 21 functions that a chief human resources officer would 22 perform? 23 A I still think the question is rather vague, so 24 I can't answer. Both duties are part of my job. 25 Q And my question is: How do you differentiate</p>	<p style="text-align: right;">Page 7</p> <p>1 between being in-house counsel and performing your HR 2 duties? 3 MS. ALEXANDER: Do you mean, Frank, just for 4 clarification purposes, do you mean something along 5 the lines of when does she know she's acting as an 6 attorney versus when she's not acting as an 7 attorney? I'm not quite understanding either. 8 MR. MALATESTA: I'll withdraw the question, 9 and maybe I'll take that line. 10 BY MR. MALATESTA: 11 Q At all times you are performing as your role 12 as chief human resource officer, is it your position 13 that you're also simultaneously performing your role as 14 in-house general counsel? 15 A I am not the in-house general counsel. 16 Q I'm sorry. You're correct. I'm going to 17 withdraw that question. 18 At all times you're performing your role as 19 chief human resources officer, are you also 20 simultaneously performing a role as in-house general 21 counsel on labor? I'll strike that again. 22 At all times that you are performing your role 23 as chief human resources officer, are you also 24 performing a role as counsel on labor/employment issues? 25 A I would not say at all times, no.</p>
<p style="text-align: right;">Page 8</p> <p>1 Q Identify at what times you don't feel that you 2 would be performing a general counsel role. What types 3 of tasks would that entail? 4 A I am not a general counsel. 5 Q Okay. Identify some tasks that wouldn't be 6 under the labor and employment counsel hat or position. 7 A Are you asking me to identify any task? 8 Q Any task that would fit that role, yes. 9 A I currently serve as the COVID task force 10 leader, and I help manage that, so I would say that that 11 is not in a legal capacity. 12 Q Any other job duties or tasks that wouldn't be 13 as a part of your counsel role? 14 A Just any task? I guess I don't understand the 15 question. 16 Q Can you identify a single place, whether on 17 LinkedIn, an old resume, Facebook, anything whatsoever 18 where you presented yourself as inside counsel on labor 19 and employment issues? 20 A I have a LinkedIn page, and that's all I have 21 on social media. 22 Q Does it say you're counsel on labor and 23 employment issues? 24 A I would have to go check, but it probably 25 does.</p>	<p style="text-align: right;">Page 9</p> <p>1 Q Do you want to take a look? 2 A Sure. 3 Q So this has not been identified as an exhibit 4 because I wasn't anticipating going here, but we are 5 going to identify it as Exhibit No. 24, and we will call 6 it Rebecca Radosevich's LinkedIn page printed June 15th, 7 2020. 8 Can you read and view what's on the page, 9 Ms. Radosevich? 10 A Yes. 11 Q Is there anything on this -- we're going to 12 scroll down the rest of your LinkedIn on home page, but 13 is there anything you can see on here that indicates you 14 are counsel on labor and employment issues for Off Lease 15 Only? 16 A Well, the "Esquire" after my name indicates 17 that I'm an attorney. 18 Q Do you feel that indicates that you are 19 counsel for Off Lease Only on labor and employment 20 issues? 21 A I think that designates that I am an attorney. 22 I will always be an attorney. I never take off my 23 attorney hat. 24 Q Do you believe that all your communications in 25 your role as chief human resources officer are protected</p>

<p style="text-align: right;">Page 10</p> <p>1 by attorney-client privilege? 2 A All communications? No. 3 MR. MALATESTA: Madam Court Reporter, did you 4 catch that? I didn't understand it. Could you 5 read back the answer? 6 (The previous question and answer were read.) 7 BY MR. MALATESTA: 8 Q What communications would not be protected by 9 attorney-client privilege? 10 A Any communications where I'm not rendering 11 legal advice or making a decision that's a legal 12 decision. 13 Q Explain what a legal decision is. 14 A A decision which requires a legal opinion. 15 Q Are you saying that the actual decision would 16 be protected or just that the issuance of opinion on a 17 decision would be protected? 18 A I think the question is speculative, and I 19 can't answer that question. 20 Q What's speculative about the question? 21 A You're not being specific. It's vague. 22 Q Did human resources make a recommendation to 23 Mark Fischer to terminate Mr. Andrew Robbins' 24 employment? 25 MS. ALEXANDER: I'm going to instruct you not</p>	<p style="text-align: right;">Page 11</p> <p>1 to answer anything that's attorney-client 2 privileged, so be careful how you respond to his 3 answer without disclosing if there is any 4 attorney-client privileged information. 5 THE WITNESS: So the way you asked the 6 question, you didn't ask about me, you asked about 7 the department? 8 MS. ALEXANDER: Do you want to rephrase your 9 question, Frank? 10 MR. MALATESTA: No. 11 MS. ALEXANDER: Okay. Then I'm objecting to 12 the form. 13 MR. MALATESTA: What's your objection? 14 MS. ALEXANDER: You say "the department," so 15 the department could be made up of several people 16 or just one person. It's not defined as to what 17 you mean by "department." 18 BY MR. MALATESTA: 19 Q Do you know whether or not human resources or 20 an individual therein made a recommendation to Mark 21 Fischer to terminate Andrew Robbins' employment? 22 MS. ALEXANDER: I'm going to object too 23 because "recommendation" could be construed as 24 vague because it might have -- 25 MR. MALATESTA: That's exactly what Mark</p>
<p style="text-align: right;">Page 12</p> <p>1 Fischer said six days ago on Friday, June whatever. 2 Ms. Radosevich was in that deposition. I'm using 3 that same terminology. I don't believe it's vague 4 in any way, shape, or form, and I would ask that 5 the question be answered. 6 MS. ALEXANDER: If you know, Rebecca, you can 7 answer. 8 THE WITNESS: I don't know. 9 BY MR. MALATESTA: 10 Q Did you individually make a recommendation to 11 Mark Fischer to terminate Mr. Andrew Robbins' 12 employment? 13 MS. ALEXANDER: Actually, I'm going to object 14 to the form as to "recommendation." 15 THE WITNESS: Any conversations I had with 16 Mark Fischer in that regard are protected by 17 attorney-client privilege. 18 BY MR. MALATESTA: 19 Q So it's your position that any recommendation 20 you made, which Mark Fischer testified last week that he 21 accepted, is protected by attorney-client privilege. 22 MS. ALEXANDER: I'm going to object again as 23 it relates to the word "recommendation." 24 THE WITNESS: And I can't testify as to 25 Mr. Fischer's testimony, but I can testify that any</p>	<p style="text-align: right;">Page 13</p> <p>1 legal advice I rendered with regard to Mr. Robbins 2 to Mr. Fischer is protected by attorney-client 3 privilege. 4 BY MR. MALATESTA: 5 Q Did someone within Off Lease Only make a 6 decision to terminate Mr. Andrew Robbins? 7 A Yes. 8 Q Who? 9 A Mark Fischer. 10 Q What facts or issues -- withdraw the question. 11 Do you know why Mr. Fischer made that 12 decision? 13 A Yes. 14 Q Explain why. 15 A Mr. Robbins abandoned his position when he 16 failed to call in or show up for work. 17 Q When did he fail to call in or show up for 18 work? 19 A Specifically, Monday, Tuesday, and Wednesday 20 after the hurricane. I don't know the dates. 21 Q How did Mr. Fischer come to know that 22 Mr. Robbins had allegedly failed to show up to work 23 September 2nd, 2019; September 3rd, 2019; and 24 September 4th, 2019; Monday, Tuesday, Wednesday? 25 A I can't testify as to what Mr. Fischer, what</p>

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1 he knew or how he knew.  
 2 Q You can because those are facts. When  
 3 Mr. Fischer learned and how he learned of an alleged job  
 4 abandonment or not showing up to work, those are all  
 5 facts that you can certainly attest to.  
 6 I'm not asking what legal advice you provided.  
 7 I'm asking when Mr. Fischer became aware that  
 8 Mr. Robbins had allegedly abandoned his position.  
 9 MS. ALEXANDER: Object to the form. You're  
 10 asking her to testify as to somebody else's  
 11 knowledge.  
 12 BY MR. MALATESTA:  
 13 Q Do you know -- I'm going withdraw the  
 14 question.  
 15 Do you know when Mr. Fischer became aware or  
 16 how he became aware that Mr. Robbins had allegedly  
 17 abandoned his job?  
 18 A No, I cannot testify as to Mr. Fischer's  
 19 knowledge.  
 20 Q Why not?  
 21 A Because I'm not Mr. Fischer.  
 22 Q I didn't ask whether or not you are  
 23 Mr. Fischer or whether you knew exactly what he was  
 24 thinking. I asked whether or not you know when he  
 25 received that information.

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1 Is this a true and accurate copy of your  
 2 LinkedIn page?  
 3 A It looks like it might be. I haven't updated  
 4 it in a while.  
 5 Q But you did update it for the chief human  
 6 resources officer position, correct?  
 7 A At some point.  
 8 Q All right. Did Mr. Robbins approach you or  
 9 his supervisor, Ray Rodriguez, about requesting time off  
 10 to handle issues, personal issues in Brazil?  
 11 A Did he approach me? Is that your question?  
 12 Q Or Ray Rodriguez.  
 13 A Ray Rodriguez forwarded me an e-mail from  
 14 Mr. Robbins.  
 15 Q This is an e-mail from Andy Robbins to  
 16 yourself and Mark Fischer dated August 15, 2019, at  
 17 12:11 p.m. Take a moment and review it.  
 18 Can you actually see the page to be able to  
 19 read it, Ms. Radosevich?  
 20 A If you make it a little bit bigger, I would  
 21 appreciate it.  
 22 Q Let me see what I can do.  
 23 Is that better?  
 24 A Yes, thank you.  
 25 Q Let me know when I should scroll down.

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1 MS. ALEXANDER: And she already answered and  
 2 said she doesn't know because she's not Mr. Fischer  
 3 so she doesn't know when he -- I mean, he could  
 4 have, you know -- she doesn't know what information  
 5 is in his head. She doesn't know -- she's not him.  
 6 MR. MALATESTA: That's not my under -- that  
 7 doesn't fit the fact pattern in any way, shape, or  
 8 form.  
 9 MS. ALEXANDER: You can change the question  
 10 the way that it's framed, but the way that it's  
 11 framed right now she's not able to answer. If you  
 12 want to rephrase your question, I'm not going to do  
 13 your job for you and tell you how to do it, but the  
 14 question that you're asking she is not able to  
 15 answer.  
 16 BY MR. MALATESTA:  
 17 Q Let's go back to the exhibit up on the screen.  
 18 Is there anywhere on this section that  
 19 indicates you are serving in the capacity as counsel on  
 20 labor and employment issues for Off Lease Only?  
 21 A As I didn't list my job responsibilities on  
 22 this LinkedIn page, no.  
 23 Q Anything on this page?  
 24 A I wasn't an attorney for those positions.  
 25 Q That's just education, okay.

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1 A You can scroll.  
 2 You can scroll.  
 3 Okay.  
 4 Q Are you familiar with this e-mail?  
 5 A Yes.  
 6 Q Is this a true and accurate copy of the  
 7 e-mail?  
 8 A It appears to be.  
 9 Q Take a second and review this e-mail, and I'll  
 10 scroll down when you're ready.  
 11 This is a -- just let me know when you're  
 12 ready.  
 13 A Ready.  
 14 I'm ready.  
 15 Okay.  
 16 Q Are you familiar with this e-mail?  
 17 A Yes.  
 18 Q Is it a true and accurate copy of the Ray  
 19 Rodriguez e-mail to yourself and Bob Harris on  
 20 August 13th, 2019, at 5:10 p.m.?  
 21 A It appears to be.  
 22 Q Now, this was produced as a part of the  
 23 defendant's disclosures. Why didn't this get marked --  
 24 do you know why this didn't get marked as alleged  
 25 privileged attorney-client work product?

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1 A I don't.  
 2 Q Do you believe Mr. Rodriguez's request to  
 3 yourself and Bob Harris was a request for a legal  
 4 opinion?  
 5 A I don't know.  
 6 Q What do you mean you don't know?  
 7 A I mean I don't know.  
 8 Q How do you differentiate between requests from  
 9 employees about HR issues when they might trigger  
 10 attorney-client privilege?  
 11 A That's the same question as before. I don't  
 12 know how to answer that question.  
 13 MS. ALEXANDER: Frank, just for the record,  
 14 when we were producing, we were trying to produce  
 15 as many documents to you as we possibly could  
 16 because you were seeking them.  
 17 I personally don't see how this is legal  
 18 advice. It's just Ray Rodriguez asking Rebecca a  
 19 question. I don't think that this e-mail  
 20 particularly is discussing anything legal related,  
 21 but the e-mails that follow did, so in your motion  
 22 to compel and your request, we were trying to be as  
 23 forthcoming as possible.  
 24 BY MR. MALATESTA:  
 25 Q At some point in time on August 13th, did

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1 THE REPORTER: I didn't get your objection,  
 2 Ms. Alexander.  
 3 MS. ALEXANDER: I was just trying to say that  
 4 I think that this is kind of out of context. I  
 5 mean, she's reading a privilege log. She wasn't  
 6 prepared to go over these specific e-mails and  
 7 doesn't have them in front of her, at least not  
 8 that I can assume since she was not supposed to  
 9 have documents with her per Frank's instructions  
 10 earlier.  
 11 MR. MALATESTA: I never asked her to read the  
 12 privilege log. I asked her what the basis for this  
 13 first e-mail --  
 14 MS. ALEXANDER: But she doesn't know what the  
 15 first e-mail is. What I'm saying is you have a  
 16 privilege log in front of her which was produced by  
 17 her counsel. She doesn't have the specific e-mails  
 18 in front of her, so you're asking her to answer  
 19 questions in a vacuum.  
 20 BY MR. MALATESTA:  
 21 Q Do you know what the basis for the withholding  
 22 of the first e-mail identified for August 13th, 2019,  
 23 is?  
 24 MS. ALEXANDER: Same objection.  
 25 THE WITNESS: I can't answer questions for

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1 Mr. Rodriguez request that you issue a legal opinion or  
 2 provide a legal explanation on any issues?  
 3 A Mr. Rodriguez would not need to ask for a  
 4 legal opinion. That's not -- people don't -- generally  
 5 don't ask for a legal opinion in that manner as you  
 6 stated.  
 7 Q How do people, generally speaking, ask for a  
 8 legal opinion at Off Lease Only from you?  
 9 A Well, it depends. I mean, that's a vague  
 10 question.  
 11 Q Here is a copy of the second amended privilege  
 12 log from the defendant which was produced maybe 45  
 13 minutes ago, give or take. Have you had the opportunity  
 14 to review this document before it was produced to the  
 15 plaintiff?  
 16 A Yes.  
 17 Q And just to be clear, this version of the  
 18 document.  
 19 A Yes.  
 20 Q The first privilege which appears -- privilege  
 21 log appears to be for an e-mail. What was the basis for  
 22 that being withheld as privilege?  
 23 A Do you want me to take time to read the  
 24 document?  
 25 Q If you want to, yes.

Page 21

1 things I'm not looking at. I'm sorry.  
 2 BY MR. MALATESTA:  
 3 Q I didn't ask you whether you were looking at  
 4 it. I asked you whether you know what the basis for the  
 5 withholding of that communication is.  
 6 A Not without looking at it.  
 7 Q Do you have that e-mail on your computer in  
 8 front of you?  
 9 A No.  
 10 MS. ALEXANDER: Frank, if you give us a  
 11 minute, we can try to figure out which -- or not  
 12 figure out -- we could go off the record for a  
 13 minute and look at that e-mail so that either we  
 14 amend the privilege log or Rebecca can answer your  
 15 questions.  
 16 MR. MALATESTA: That's fine, if you think you  
 17 can do something to move this.  
 18 MS. ALEXANDER: Yeah. Can you give us like  
 19 five, ten minutes?  
 20 MR. MALATESTA: That's fine.  
 21 MS. ALEXANDER: I appreciate it.  
 22 MR. MALATESTA: Thank you.  
 23 (A three-minute break was taken.)  
 24 MS. ALEXANDER: Okay. Back on the record.  
 25 While we considered this particular e-mail

<p style="text-align: right;">Page 22</p> <p>1 itself not to contain privileged information, this 2 is the first of a chain of e-mails that leads into 3 information that is considered privileged. 4 Therefore, like I said to you earlier, we were 5 being as candid and as forthright with everything. 6 If we didn't think it was attorney-client 7 privilege, we didn't think we had a basis to keep 8 it out, because that e-mail itself is not seeking 9 attorney-client privileged information. I mean, it 10 doesn't provide attorney-client privileged 11 information, so that particular e-mail was 12 produced, and it was inadvertently put onto the 13 privilege log, so we will -- if you want us to 14 amend that right this moment, we can amend the 15 privilege log right this moment. Otherwise, we 16 will take that particular e-mail off. 17 MR. MALATESTA: Understood. Just a moment. I 18 just opened it up earlier. 19 So just for clarification, on the second 20 amended privilege log, the first document 21 referenced was actually produced, and it's been 22 Bates stamped DEF00067 and 68? 23 MS. ALEXANDER: Yes, that's the e-mail I'm 24 referring to. 25 I mean, looking back on it now, should I have</p>	<p style="text-align: right;">Page 23</p> <p>1 kept it out? Probably. But again, you know, we 2 were up against a motion to compel. We are 3 required to be as forthcoming as we possibly can. 4 There is no privileged information in that 5 e-mail, so you know, to avoid you coming back to us 6 and saying, you know, that we didn't produce 7 everything that we were supposed to produce, we 8 were trying to be as forthright and as candid as 9 possible with you, and therefore, we allowed this 10 one to come in, but the e-mails that follow it are 11 attorney-client privilege. 12 I don't know how else to get around it, I 13 mean, for us. We can't produce documents that are 14 protected. 15 MR. MALATESTA: Okay. 16 MS. ALEXANDER: I mean, I know you would love 17 to take the position that, you know, she's the 18 human resources officer and not an attorney, but 19 she is. She's -- you know, she even put that in 20 her affidavit to you that she handles all of their 21 labor and employment issues. And at the deposition 22 of Ejola, she even testified she doesn't handle any 23 HR issues. 24 So I mean, other than that, her being an 25 attorney and representing the company in a dual</p>
<p style="text-align: right;">Page 24</p> <p>1 capacity, I mean, it doesn't matter whether she has 2 it on Facebook or LinkedIn. It doesn't change her 3 position. 4 MR. MALATESTA: Well, we're going to agree to 5 disagree on that, I think. 6 MS. ALEXANDER: That's fine. You can ask her 7 whatever questions you want. It's your deposition. 8 I'm just saying that in terms of this particular 9 e-mail, I'm trying to clarify for the record so 10 that we can move on. 11 MR. MALATESTA: Okay. So do we have a copy of 12 this e-mail within Ms. Radosevich's possession? 13 MS. ALEXANDER: I'm sorry. Which one? 14 MR. MALATESTA: The second one. 15 MS. ALEXANDER: I mean, I only went to look at 16 the first one because that's the one you were 17 asking for. Do you want to give me a list of the 18 ones you want to ask for, and I can go off line and 19 look at them very quickly? 20 MR. MALATESTA: All of them except for the one 21 with Ejola. 22 MS. ALEXANDER: Okay. Give us a few minutes. 23 MR. MALATESTA: Yeah. Take your time. Thank 24 you. 25 (A seven-minute break was taken.)</p>	<p style="text-align: right;">Page 25</p> <p>1 MR. MALATESTA: Is Ms. Radosevich in a 2 position where she can see these e-mails? Not that 3 I want her to disclose their contents or anything 4 of attorney-client privilege. 5 MS. ALEXANDER: You can ask her. I mean, 6 we're taking the position that the privilege log 7 speaks for itself. We have designated that these 8 e-mails are privileged. We went back over them to 9 determine they are, in fact, privileged, and we are 10 going to instruct Ms. Radosevich not to talk about 11 the substance of the e-mails. That's what the 12 privilege log is for. 13 MR. MALATESTA: Okay. 14 MS. ALEXANDER: So you can ask her whatever 15 questions you want, but again, we have gone over 16 and reviewed just to make sure there was nothing 17 else we could produce to you, and we have confirmed 18 that the information that is contained within all 19 of the other e-mails is attorney-client privilege. 20 BY MR. MALATESTA: 21 Q I would like to go to the second e-mail listed 22 on the privilege log, the second amended privilege log. 23 Do you have that document in front of you, 24 Ms. Radosevich? 25 A I have the privileged e-mails, a stack of them</p>

<p style="text-align: right;">Page 26</p> <p>1 in front of me.</p> <p>2 Q Please pull up the second one listed or</p> <p>3 identified on the privilege log so that it is in front</p> <p>4 of you. Do not show it to me as I don't want to know</p> <p>5 its contents or substance.</p> <p>6 A Okay.</p> <p>7 Q What is the time of the communication</p> <p>8 referenced?</p> <p>9 A Can you scroll down, please, so I can get my</p> <p>10 bearings on which document belongs where as I didn't</p> <p>11 prepare the privilege log?</p> <p>12 And can you scroll up, please.</p> <p>13 So you're asking about the second entry?</p> <p>14 Q Yes.</p> <p>15 A I believe it to be 5:47 p.m., but I would need</p> <p>16 to verify that with my counsel.</p> <p>17 Q Is that because you're unsure of which actual</p> <p>18 communication is referenced within the privilege log?</p> <p>19 A Well, there's a couple of different ones that</p> <p>20 look similar. I believe that to be the case, that it's</p> <p>21 5:47 p.m., but I would want to confirm it. I was not</p> <p>22 prepared to testify about the privileged communication.</p> <p>23 Q Now, earlier we took a look at Mr. Rodriguez's</p> <p>24 e-mail to both yourself and Bob Harris, correct?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 27</p> <p>1 Q Do you agree with the privilege log's</p> <p>2 assertion that Mr. Rodriguez was requesting legal advice</p> <p>3 from Off Lease Only's employment counsel regarding the</p> <p>4 plaintiff's request for leave?</p> <p>5 A I agree with what my attorney stated, which</p> <p>6 was that the communication following that e-mail was</p> <p>7 considered privileged.</p> <p>8 Q Do you agree with what's written here under</p> <p>9 that communication as the basis for the withholding or,</p> <p>10 I guess, not withholding that document?</p> <p>11 A I also agree with my attorney's statement that</p> <p>12 that entry will be removed and amended, so that document</p> <p>13 will no longer be on the privilege log since it was</p> <p>14 produced.</p> <p>15 Q What is the basis for this second</p> <p>16 communication being withheld as privileged?</p> <p>17 A I believe the document speaks for itself. If</p> <p>18 you would like me to read the privilege log into the</p> <p>19 record, I will be happy to do so, but I will not invade</p> <p>20 the attorney-client privilege.</p> <p>21 Q I didn't ask what the substance of the</p> <p>22 document was. I asked what the basis was.</p> <p>23 A The document states that the basis for the</p> <p>24 withholding of the document is response to request for</p> <p>25 legal advice from Off Lease's employment counsel</p>
<p style="text-align: right;">Page 28</p> <p>1 regarding Plaintiff's request for leave.</p> <p>2 Q Would you agree that if Mr. Rodriguez's</p> <p>3 original e-mail was not a request for legal advice, that</p> <p>4 calls into question whether or not the response would be</p> <p>5 a response to a request for legal advice?</p> <p>6 A No.</p> <p>7 Q Why not?</p> <p>8 A You asked me if I agree. I don't agree. I</p> <p>9 rendered legal advice, and I will not disclose that</p> <p>10 information.</p> <p>11 Q I'm not asking whether --</p> <p>12 MS. ALEXANDER: Frank, she just told you the</p> <p>13 e-mail contains legal advice, so I don't know what</p> <p>14 other basis she can provide to you without waiving</p> <p>15 that privilege.</p> <p>16 It says there that it's talking about his</p> <p>17 request for leave. I don't know what more</p> <p>18 information we can provide without breaching the</p> <p>19 attorney-client privilege.</p> <p>20 BY MR. MALATESTA:</p> <p>21 Q So let's take a step back. Do you know what</p> <p>22 the outcome of Mr. Robbins' request for leave to go to</p> <p>23 Brazil was?</p> <p>24 A Yes.</p> <p>25 Q What was the outcome?</p>	<p style="text-align: right;">Page 29</p> <p>1 A He was given two weeks off, and we denied his</p> <p>2 request for six to eight weeks off. We denied his</p> <p>3 request to work remotely from Brazil, and we granted his</p> <p>4 request for two weeks of vacation.</p> <p>5 Q Where did Mr. Robbins request six to eight</p> <p>6 weeks of time off?</p> <p>7 A In his e-mail.</p> <p>8 Q Oh, I didn't want to do that.</p> <p>9 Okay. Is this the e-mail you're referring to,</p> <p>10 or was it a different e-mail?</p> <p>11 A My recollection is that he requested time off</p> <p>12 from August through October, which equates to six to</p> <p>13 eight weeks. I don't recall him using the language "six</p> <p>14 to eight weeks," but the time off that he had requested</p> <p>15 was about that period of time.</p> <p>16 Q Do you see in this bottom paragraph where it</p> <p>17 says, "The process normally takes six to eight weeks"?</p> <p>18 A Okay.</p> <p>19 Q Did he say that it was going to be a normal</p> <p>20 process or that it was going to be a different process?</p> <p>21 MS. ALEXANDER: Object to the form.</p> <p>22 THE WITNESS: I don't know.</p> <p>23 BY MR. MALATESTA:</p> <p>24 Q Well, read the paragraph.</p> <p>25 A I read the paragraph.</p>

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1 Q Did he say that it would take a full six to  
2 eight weeks or something less?  
3 A It doesn't say either. He's speculating.  
4 Q What did he speculate?  
5 A At the very best it would be a 30-day  
6 turnaround, but the way I read it is it could be longer.  
7 Q Did you have any telephone conversations with  
8 Mr. Robbins on August 15th, 2019?  
9 A I don't recall the date, but I did speak to  
10 him after his request.  
11 Q Are you -- what did you speak to him about  
12 after his request?  
13 A His request.  
14 Q What did you two discuss with specificity?  
15 A To the best of my recollection, we discussed  
16 his request for an extended leave of absence. I advised  
17 that we could not provide him with an extended leave of  
18 absence.  
19 I looked in our payroll system and noticed  
20 that at that time he appeared to have 72 hours of paid  
21 time off available, so I told him that we would be  
22 generous and give him an extra eight hours for 80 hours  
23 of PTO.  
24 I told him he could not work remotely in  
25 Brazil because that was not something that would be

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1 A Go ahead.  
2 Go ahead.  
3 Q I'm sorry.  
4 A I'm ready.  
5 Q So this appears to be a chain e-mail of  
6 communication between yourself and Mr. Robbins, correct?  
7 A Correct.  
8 Q Did Mr. Robbins have access to his e-mail  
9 while he was in Brazil?  
10 A It appears that he did.  
11 Q You do not know?  
12 A He was in Brazil, and he was e-mailing me, so  
13 it appears that he did.  
14 Q What were the expectations, if any, of  
15 Mr. Robbins to perform work while he was in Brazil?  
16 A He was told he could not work remotely, but as  
17 leaders of the company, we always have our phones with  
18 us, and we get e-mails even when we're on vacation.  
19 Everybody does, leaders.  
20 Q Is there any written communication that says  
21 that he was told he couldn't work remotely that you're  
22 aware of?  
23 A I would have to go back and review the  
24 e-mails, but I did tell him that on the phone.  
25 Q Did you also tell Mr. Robbins that if he

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1 approved. I told him that if he couldn't -- we  
2 discussed that if he needed longer than two weeks, the  
3 company just could not give that to him.  
4 Q This is Exhibit 1. Please take a moment and  
5 review the e-mail, and let me know when you're ready to  
6 discuss it.  
7 A Okay.  
8 Q Is this an e-mail you sent to Mr. Robbins?  
9 A Yes.  
10 Q Did Mr. Robbins ever follow up with you  
11 regarding the status of his return, either verbally,  
12 through e-mail or text message, after August 15th, 2019?  
13 A Yes.  
14 Q When is the first time he followed up with  
15 you?  
16 A I don't recall.  
17 Q Do you recall the substance of the first time  
18 he called?  
19 A I don't believe he called me.  
20 Q Was there another means of communication?  
21 A I remember an e-mail.  
22 Q This has been identified as Exhibit 2. And  
23 let me give you a chance to read through it, and then  
24 we'll talk about it. Let me know when you're ready for  
25 me to scroll down.

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1 needed a few more days, that he had to let you know?  
2 A I recall telling him he had 80 hours, and that  
3 was it. That's all that we could give him, which  
4 equates to two weeks.  
5 Q Did Mr. Robbins work on Monday, September --  
6 or excuse me. Strike that.  
7 Did Mr. Robbins work on Monday, August 18th,  
8 2019?  
9 A Define "work."  
10 Q Did he go into the office?  
11 A August 18th?  
12 Q Yeah.  
13 A I don't know. I would have to check the  
14 records.  
15 Q Do you know when he flew out of the country?  
16 A Not without looking at the records.  
17 Q How do you believe the two-week period was  
18 supposed to be laid out?  
19 A He would have his regular workdays he would be  
20 off. He was normally off on Sunday, so his first day of  
21 PTO would have been the Monday after he left and Monday  
22 through Saturday. And I believe --  
23 Q I'm sorry. I cut you off there.  
24 A He took off an additional day during the week  
25 because everybody has two days off, so he would have

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1 received 40 hours for the first week and 40 hours for  
 2 the second week, and that was the only time that was  
 3 approved for him to be off.  
 4 Q Does Mr. Robbins in this e-mail communicate to  
 5 you that, quote, "So everything is looking very good  
 6 now, and I will be back to work next week," end quote?  
 7 A That's what it says.  
 8 Q What did you take that to understand on  
 9 August 28th, 2019?  
 10 A That he would be back to work as scheduled  
 11 next week.  
 12 Q Did you have an understanding of what day he  
 13 would be back to work?  
 14 A He was expected to be back to work on Monday  
 15 as his regularly scheduled next day of work.  
 16 Q Do you understand that this e-mail appears to  
 17 indicate that it's up in the air what day he will come  
 18 back?  
 19 A I understand that the e-mail doesn't state  
 20 what day of the week he would be back, but we did not  
 21 grant him additional leave, and he didn't request it.  
 22 Q Did you reply to this e-mail questioning why  
 23 he wouldn't be back Monday for certain?  
 24 MS. ALEXANDER: Form.  
 25 THE WITNESS: I did reply. If you want to

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1 Q What about your response made sure that he was  
 2 supposed to be back to work?  
 3 A You asked of the intention. I told you my  
 4 intention. I don't understand the question.  
 5 Q So here you reply to his e-mail with "Hi,  
 6 Andy. I hope all is well with you and that you were  
 7 able to make it home safely. Can you please give me an  
 8 update?"  
 9 Is that a correct recitation of what you sent  
 10 to Andy?  
 11 A Yes.  
 12 Q Were you aware, when you sent that e-mail,  
 13 that Mr. Robbins was not on the Monday conference call?  
 14 A Yes.  
 15 Q Had you taken any affirmative actions  
 16 whatsoever between Monday, September 2nd, 2019, at  
 17 around 9 a.m. and this e-mail Wednesday, September 4th,  
 18 2019, at around 9 a.m. to investigate, counsel,  
 19 terminate, or any other action whatsoever as a result of  
 20 Mr. Robbins' absence from that conference call?  
 21 MS. ALEXANDER: Object to the form.  
 22 THE WITNESS: That was a very long question.  
 23 I don't understand the question.  
 24 BY MR. MALATESTA:  
 25 Q Did you take any affirmative action before

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1 scroll up, I can tell you what it says.  
 2 BY MR. MALATESTA:  
 3 Q Okay. What did you reply?  
 4 A "Andy, that is great news. Please keep me  
 5 updated as to when you plan to return. Are you also  
 6 communicating with Ray?"  
 7 MR. MALATESTA: Can we read back what she  
 8 read, Madam Court Reporter?  
 9 THE REPORTER: Yes.  
 10 (The following answer was read:  
 11 "A 'Andy, that is great news. Please keep  
 12 me updated as to when you plan to return.  
 13 Are you also communicating with Ray?")  
 14 BY MR. MALATESTA:  
 15 Q Do you want to reread that? I think there was  
 16 a word or two missing there.  
 17 A Sure. "Andy, that is great news. Please keep  
 18 me updated as to when next week you plan to return. Are  
 19 you also communicating with Ray?"  
 20 Q Why did you ask Mr. Robbins when he planned to  
 21 return if you understood he was supposed to return  
 22 Monday?  
 23 A Because his e-mail didn't state that, and I  
 24 wanted to make sure he understood he was supposed to be  
 25 back at work.

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1 this e-mail to counsel, terminate, or start the process  
 2 for termination for Mr. Robbins?  
 3 A No.  
 4 Q Is Mr. Robbins still an employee of Off Lease  
 5 Only on Wednesday, September 4th, 2019, at 9:09 a.m.?  
 6 MS. ALEXANDER: Object to the form.  
 7 THE WITNESS: In the course of the  
 8 investigation into Mr. Robbins, it was determined  
 9 that he abandoned his job on Monday, September 2nd,  
 10 which I did not know when I sent this e-mail.  
 11 BY MR. MALATESTA:  
 12 Q I want to clarify on that. You didn't know he  
 13 abandoned his job, or you didn't know he was on the  
 14 call?  
 15 MS. ALEXANDER: Object to the form.  
 16 THE WITNESS: I didn't know -- I'm sorry.  
 17 What did you say, Abbye?  
 18 MS. ALEXANDER: I was just saying that he  
 19 didn't say anything about the call. I was  
 20 objecting to his question. You can answer.  
 21 THE WITNESS: What was the question?  
 22 MR. MALATESTA: Madam Court Reporter?  
 23 (The following question was read:  
 24 "Q I want to clarify on that. You didn't  
 25 know he abandoned his job, or you didn't

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1 know he" -- and then there was an objection.)  
 2 MR. MALATESTA: I'll restate the question.  
 3 BY MR. MALATESTA:  
 4 Q I want to clarify. You didn't understand he  
 5 abandoned the job or that he wasn't on the call?  
 6 A I didn't know that he had abandoned his job at  
 7 the moment I sent this e-mail.  
 8 Q However, you were aware that he wasn't on the  
 9 call already.  
 10 A I was aware that he wasn't at work.  
 11 Q When you sent this e-mail, you were aware that  
 12 he -- strike that.  
 13 What do you mean you were aware that he wasn't  
 14 at work?  
 15 A I reached out to him because he wasn't at  
 16 work.  
 17 Q How did you learn Mr. Robbins wasn't at work?  
 18 A Someone asked me. I don't remember who it  
 19 was, whether it was Bob Harris or Mr. Fischer, somebody  
 20 asked me if I had heard from Andy because they advised  
 21 that he was not at work.  
 22 Q Well, were either of those individuals on  
 23 location in Miami, to your knowledge, on Wednesday,  
 24 September 4th, 2019?  
 25 A I don't know.

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1 A As of the date of this e-mail or -- define  
 2 what you mean.  
 3 Q Well, let's do the date of this e-mail. What  
 4 was your understanding the date of this e-mail as to the  
 5 foreseeability or lack thereof of the FMLA alleged  
 6 event?  
 7 A I wouldn't call it an FMLA alleged event  
 8 because he wasn't eligible for FMLA.  
 9 Q We can get into that, but I want to focus on  
 10 the foreseeability. What is your understanding of  
 11 whether or not Mr. Robbins was required to -- I'm not  
 12 going to change my question. What was your  
 13 understanding?  
 14 A Can you repeat the question?  
 15 Q Was this a foreseeable or unforeseeable  
 16 request?  
 17 A I don't know.  
 18 Q Did you take any steps to learn about whether  
 19 or not it was a foreseeable or unforeseeable event the  
 20 week of August -- or excuse me -- September 4th, 2019?  
 21 A I don't recall.  
 22 Q Did you conduct any investigation whatsoever  
 23 as to Mr. Robbins' medical concerns with Mr. Robbins or  
 24 his medical doctor or someone else?  
 25 A There were several parts of that question.

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1 Q That's not it.  
 2 Take a second and review the e-mail, and let  
 3 me know when I should scroll down.  
 4 A You can scroll down.  
 5 Scroll down.  
 6 Okay.  
 7 Okay.  
 8 Okay.  
 9 Q Did Mr. Robbins request FMLA leave on  
 10 Wednesday, September 4th, 2019, at 5:09 p.m.?  
 11 A The e-mail states that he did, yes.  
 12 Q What is your understanding of what his request  
 13 was or e-mail was?  
 14 A Well, the words say, "I imagine this may need  
 15 to be processed with FMLA or something."  
 16 Q What was your understanding, as the recipient  
 17 of the e-mail and the chief human resources officer, as  
 18 to whether or not Mr. Robbins requested FMLA?  
 19 A He requested FMLA.  
 20 Q Was this a fore -- do you understand the  
 21 difference between a foreseeable FMLA event and an  
 22 unforeseeable FMLA event?  
 23 A Yes.  
 24 Q To your understanding, did Mr. Robbins  
 25 experience a foreseeable or an unforeseeable event?

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1 Can you repeat the question?  
 2 MR. MALATESTA: Madam Court Reporter?  
 3 (The following question was read:  
 4 "Q Did you conduct any investigation  
 5 whatsoever as to Mr. Robbins' medical  
 6 concerns with Mr. Robbins or his medical  
 7 doctor or someone else?")  
 8 MS. ALEXANDER: Object to the form.  
 9 THE WITNESS: I did not contact Mr. Robbins'  
 10 doctor in Brazil, if that's what you're asking me.  
 11 I did not.  
 12 BY MR. MALATESTA:  
 13 Q Did you request additional information from  
 14 Mr. Robbins?  
 15 A I believe I told him, which I'm sure you're  
 16 going to show me the e-mail next, that I would send him  
 17 FMLA documentation, which is the process for requesting  
 18 information.  
 19 Q Do you know what the American with  
 20 Disabilities Act and the Florida Civil Rights Act are?  
 21 A Yes.  
 22 Q Are you aware that some employers may be  
 23 responsible for providing reasonable accommodations  
 24 under those two laws?  
 25 A Yes.

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1 Q When you received this e-mail, did you  
2 understand that Mr. Robbins was requesting to work  
3 remotely until his procedure?  
4 MS. ALEXANDER: Object to the form.  
5 THE WITNESS: You might want to scroll down a  
6 little bit because I think it's at the end, what  
7 you're asking about.  
8 I see that Mr. Robbins was advising that he  
9 was going to continue to e-mail and use the chat.  
10 BY MR. MALATESTA:  
11 Q Did you interpret this, when you received it  
12 in September of 2019, as Mr. Robbins requesting to work  
13 remotely until he could be scheduled for his surgery?  
14 MS. ALEXANDER: Object to the form.  
15 THE WITNESS: No.  
16 BY MR. MALATESTA:  
17 Q What was your understanding of when  
18 Mr. Robbins would need FMLA leave based upon this  
19 communication?  
20 A My understanding, based on the way the e-mail  
21 is written, that Mr. Robbins was going to have surgery  
22 in the future.  
23 Q Did he communicate that he could continue  
24 working remotely until said surgery?  
25 A He indicated that he will e-mail and use the

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1 BY MR. MALATESTA:  
2 Q Do you have any reason to believe that  
3 Mr. Robbins would have required more than 12 weeks to  
4 have surgery and return to work?  
5 A I don't know how much time Mr. Robbins needed.  
6 Q What did he communicate to you in this e-mail?  
7 A The e-mail states, "If all goes well, I can be  
8 back at work by end of next week, the 13th, or I will be  
9 looking to be back by the 21st."  
10 Q Do you have any reason to believe he would  
11 have been out more than 12 weeks?  
12 A I can't. I don't know how much time he  
13 needed. This is what he stated, but he also stated in a  
14 previous e-mail that he would be back to work at the  
15 time this was written.  
16 Q What e-mail are you referring to?  
17 A When he said that he would be back the  
18 following week because he obtained his visa.  
19 Q Are you referring to the e-mail before he was  
20 diagnosed by his medical physician?  
21 MS. ALEXANDER: Object to the form.  
22 THE WITNESS: I'm referring --  
23 BY MR. MALATESTA:  
24 Q Is it this one?  
25 A Yes.

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1 chat, but we had already declined his request to work  
2 remotely, and he didn't have access to our system.  
3 Q Could you have not provided him with a VPN and  
4 given him access to your system?  
5 A We would not provide access to the VPN in a  
6 foreign country, no.  
7 Q Why not?  
8 A It would open the company up to vulnerable --  
9 it would make the company vulnerable to hacking.  
10 Q So you don't believe that Brazil offers secure  
11 VPN services to its residents and businesses?  
12 A I am not an IT professional. I'm just telling  
13 you that is why we don't offer remote work in a foreign  
14 country.  
15 Q In response to this request, did you do any  
16 investigation or evaluation of whether or not that  
17 request to work remotely would constitute an undue  
18 hardship?  
19 MS. ALEXANDER: Object to the form.  
20 THE WITNESS: As I already testified that I  
21 didn't believe he was requesting a reasonable  
22 accommodation and we had already declined his  
23 request to work remotely, that would not have been  
24 a reasonable accommodation for the reasons I  
25 testified.

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1 Q Is it this one that we're looking at --  
2 A Yes.  
3 Q -- dated Wednesday, August 28th, 2019, at  
4 9:05 a.m.?  
5 A Yes.  
6 Q Had Mr. Robbins seen a physician as of  
7 Wednesday, August 28th, 2019?  
8 A I don't --  
9 MS. ALEXANDER: Object to the form.  
10 BY MR. MALATESTA:  
11 Q Are you going to answer?  
12 A I did answer.  
13 MS. ALEXANDER: I think I cut her off.  
14 MR. MALATESTA: Did you catch anything?  
15 THE REPORTER: I got "I don't," and then I got  
16 the objection.  
17 BY MR. MALATESTA:  
18 Q If you would please repeat your answer,  
19 Ms. Radosevich. I think we spoke over each other maybe.  
20 A I don't know.  
21 Q Did you ask Mr. Robbins at any time --  
22 MS. ALEXANDER: Object to the form.  
23 BY MR. MALATESTA:  
24 Q -- when he first saw a physician?  
25 A No.

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1 Q Do you know when Mr. Robbins went for  
2 diagnostic testing between August 28th and  
3 September 4th, 2019, when he made his FMLA request?  
4 A You would have to look at Mr. Robbins'  
5 testimony or the documents. I can't testify without  
6 something in front of me.  
7 Q Well, I asked if you knew, not what documents  
8 say. I asked what you knew about him going to see  
9 physicians and going under diagnostic testing between  
10 August 28th and September 4th, 2019.  
11 MS. ALEXANDER: She already -- it's already  
12 asked and answered. She's already informed you  
13 that she doesn't know.  
14 MR. MALATESTA: I don't believe she said that.  
15 Madam Court Reporter or --  
16 BY MR. MALATESTA:  
17 Q Is that what your testimony is,  
18 Ms. Radosevich?  
19 A I don't know what Mister -- at that time I did  
20 not know when Mr. Robbins went for diagnostic testing.  
21 Q Did you reach out to Mr. Robbins to learn  
22 about his situation?  
23 A Other than what you see in the e-mails, no.  
24 Q Why not?  
25 A Well, I reached out to him, and I responded to

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1 A Unless he had made arrangements with his  
2 supervisor to not be on the call, he would have been  
3 expected to be on the call.  
4 Q Even on vacation.  
5 A Even on vacation, unless he had made previous  
6 arrangements.  
7 Q So it's your sworn testimony here today that  
8 unless you are excused specifically, even when you're on  
9 vacation, you must attend the GM call for Mondays with  
10 Off Lease Only.  
11 MS. ALEXANDER: Objection, I believe that  
12 misstates her testimony.  
13 THE REPORTER: I didn't get your answer if you  
14 answered, ma'am.  
15 THE WITNESS: I didn't answer because she's  
16 correct, it does misstate my testimony.  
17 THE REPORTER: Okay.  
18 BY MR. MALATESTA:  
19 Q How did I misstate your testimony?  
20 A That's not what I said.  
21 Q You just said she's correct, it does misstate  
22 your testimony. I asked you how I misstated your  
23 testimony. I want to get the record correct. This  
24 isn't a gotcha. I just want to understand.  
25 A All right. I'll tell you.

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1 his initial e-mail, and then after that I had to  
2 determine if he was eligible for FMLA.  
3 Q Okay. What conclusion did you reach as to  
4 eligibility?  
5 A He was not eligible for FMLA.  
6 Q Why not?  
7 A He abandoned his job.  
8 Q When did he abandon his job?  
9 A That Monday, September 2nd, I believe.  
10 Q It's your position that he wasn't on vacation  
11 September 2nd, 2019?  
12 A It is my position he was not on an approved  
13 vacation on September 2nd as he was supposed to be back  
14 at work.  
15 Q Did you expect him to be in the office on  
16 Monday?  
17 A I expected him to be back at work on Monday,  
18 and he --  
19 Q What did that mean -- I'm sorry. Keep going.  
20 A And there was a mandatory conference call that  
21 Monday for which he did not appear, and he did not  
22 advise his supervisor that he would not be on the call,  
23 which renders it a no call, no show.  
24 Q Would you have expected Mr. Robbins to be on  
25 that call if he was on vacation?

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1 MS. ALEXANDER: It's also confusing, Frank.  
2 I'm not quite sure that your questioning was very  
3 clear as to whether they were supposed to work on  
4 vacation or they're excused because of vacation.  
5 BY MR. MALATESTA:  
6 Q Were you confused by the question,  
7 Ms. Radosevich?  
8 A Yes.  
9 Q Okay. Let me ask it this way: Was  
10 Mr. Robbins required to be on the GM call for  
11 August 18th, 2019, the first day of his scheduled  
12 vacation?  
13 A No.  
14 Q Why not?  
15 A He was on excused vacation. He was excused  
16 from the call.  
17 Q Was Mr. Robbins responsible for being on the  
18 August 25th, 2019 GM call?  
19 A No.  
20 Q Was Mr. Robbins responsible for reviewing his  
21 e-mails after he was notified that the Miami location  
22 would be closed on Sunday by Ms. Ejola Cook?  
23 A So the question is confusing because the  
24 question seems to indicate that Ms. Ejola Cook said that  
25 the store would be closed on Sunday, which is not what

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1 the e-mail I think you're referring to.  
 2 Q The e-mail was on Sunday, but the store would  
 3 be closed on Monday, so let me reask that.  
 4 Did Ms. Cook send out an e-mail indicating  
 5 that the Miami location would be closed on Monday,  
 6 September 2nd, 2019, which was also Labor Day?  
 7 A It would be closed for -- the e-mail that I  
 8 recall stated that it would be closed for retail  
 9 business, but the leaders of the store were still  
 10 expected to be available as is part of the hurricane  
 11 plan.  
 12 Q Is this the e-mail you're referring to? Maybe  
 13 you want me to go up.  
 14 A Is that the e-mail you were referring to?  
 15 Q Yes, this is the e-mail I was referring to.  
 16 So does it say -- what does it say about  
 17 tomorrow, Monday the 2nd?  
 18 A Broward, Congress, and Miami will be closed.  
 19 Q Does it clarify anything about retail business  
 20 as to Monday the 2nd?  
 21 A Yes.  
 22 Under "Closures," she mentions that "At 5 p.m.  
 23 today our Broward and Congress stores will be closing  
 24 for retail business."  
 25 Q What does that have to do with Monday the 2nd

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1 Friday, August 30th and September 3rd, 2019.  
 2 A I really don't recall.  
 3 Q Was there any conversation regarding  
 4 Mr. Robbins with another employee of Off Lease during  
 5 that same period?  
 6 A Between myself and any employee of the  
 7 company?  
 8 Q Yes.  
 9 A I don't recall.  
 10 Q Were you on that Monday conference call?  
 11 A I was.  
 12 Q Do they take roll call during the call?  
 13 A Yes.  
 14 Q Was Mr. Robbins' name called?  
 15 A I'm sure it was. I don't remember.  
 16 Q Did Mr. Rodriguez speak up or yourself speak  
 17 up and say that Mr. Robbins was still on vacation?  
 18 A I don't remember.  
 19 Q Did anyone during that meeting raise concern  
 20 over Mr. Robbins' absence?  
 21 A I don't remember.  
 22 Q At any time on September 2nd, 2019, were you  
 23 involved in any discussions on whether or not to  
 24 terminate Mr. Robbins' employment?  
 25 MS. ALEXANDER: Object to the form.

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1 with the Miami location?  
 2 A The way I read it is that they would also be  
 3 closed for retail business on Monday the 2nd.  
 4 Q But that's not what it says, correct?  
 5 A That was my interpretation.  
 6 Q Do you know whether or not Ray Rodriguez  
 7 reached out to Mr. Robbins about any responsibilities he  
 8 may have allegedly for September 2nd or September 3rd,  
 9 2019?  
 10 A I don't know.  
 11 Q Did you speak to Mr. Rodriguez at any time  
 12 over that weekend into the week regarding Mr. Robbins'  
 13 status?  
 14 A The question is very vague. Over the weekend  
 15 and into the week?  
 16 Q Yes, between the period of, let's say, Friday  
 17 the 30th through September the 3rd.  
 18 A What day of the week was September the 3rd?  
 19 Q The 3rd would have been Tuesday.  
 20 A No. We had a hurricane going on, and we were  
 21 working -- my job as HR on the hurricane team, I was  
 22 responsible for all of the employees in the company. I  
 23 really wasn't focused on Mr. Robbins.  
 24 Q So there was no conversation regarding  
 25 Mr. Robbins between yourself and Mr. Rodriguez between

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1 THE WITNESS: I don't think so, but I don't  
 2 recall.  
 3 BY MR. MALATESTA:  
 4 Q What about September 3rd, 2019?  
 5 A I don't think so, but I don't recall.  
 6 Q What about September 4th, 2019?  
 7 A I would say yes, on September 4th.  
 8 Q What was the earliest time of any discussions  
 9 related to Mr. Robbins' termination?  
 10 A I don't recall specifically.  
 11 Q Was it before or after you received an e-mail  
 12 from Mr. Robbins requesting FMLA?  
 13 A I don't recall specifically.  
 14 Q Are you aware that there is a note that was  
 15 taken by you, which was withheld as a part of the  
 16 privilege log, regarding a telephone conference that  
 17 took place on September 4th, 2019?  
 18 A Yes.  
 19 Q Do you -- does that note in any way indicate  
 20 the time that that conference call took place?  
 21 A I don't have it in front of me, so I don't  
 22 know.  
 23 Q Can you pull it up since you should have the  
 24 entire privilege stack in front of you?  
 25 A I don't have that document in front of me.

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1 All I have are the e-mails. I would need to consult  
2 with my counsel.  
3 MS. ALEXANDER: And I would like to put on the  
4 record that this was not set up as a subpoena duces  
5 tecum, so the fact that she doesn't have these  
6 documents is no reflection on her. She was not  
7 told to bring any documents to the deposition.  
8 BY MR. MALATESTA:  
9 Q Who was on the call?  
10 A I don't know. I don't have it in front of me,  
11 so I don't know.  
12 Q So you have no knowledge of who was on that  
13 call that you took notes for September 4th, 2019.  
14 A I can't --  
15 MS. ALEXANDER: Object to the form.  
16 THE WITNESS: I'm sorry. Go ahead, Abbye.  
17 MS. ALEXANDER: I was just objecting to the  
18 form.  
19 THE WITNESS: I can't testify as to that  
20 document without looking at it.  
21 BY MR. MALATESTA:  
22 Q I'm not asking you to testify to the document.  
23 I'm asking if you know who was on the call.  
24 A Well, if I took notes from a call, I would  
25 have written notes as to who was on the call, and

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1 MS. ALEXANDER: Object to the form.  
2 THE WITNESS: Procedures today or the  
3 procedure in September 2019?  
4 BY MR. MALATESTA:  
5 Q In September of 2019. Thank you for  
6 clarifying.  
7 A Generally, a request for termination is made,  
8 an investigation is conducted, and the request would be  
9 escalated up to the CEO who would ultimately make the  
10 decision.  
11 Q In the case of Mr. Robbins, what individual  
12 made the request for termination?  
13 A In the case of -- because you asked generally,  
14 I answered generally, but when it comes to a leadership  
15 team position, Mr. Fischer would be more involved and  
16 may initiate the request.  
17 Q In the case of Mr. Robbins, did he initiate  
18 the request?  
19 A I don't recall. And I would -- any answer to  
20 the contrary would invade an attorney-client privilege.  
21 Q Well, I'm not asking what legal opinions you  
22 issued. Somebody -- so let's back up then.  
23 Who was the first person to raise the issue of  
24 whether or not to terminate Mr. Robbins, to your  
25 knowledge?

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1 without looking at it, I don't know.  
2 Q You have no recollection.  
3 A I don't know. I'm not looking at it. You  
4 would have to -- again, I didn't bring it to the  
5 deposition, so I don't know.  
6 MS. ALEXANDER: I just received information  
7 that it should have read on the privilege log that  
8 it was the 5th, not the 4th. We need to amend the  
9 privilege log as to that. This conversation was  
10 actually on the 5th.  
11 MR. MALATESTA: For the notes?  
12 MS. ALEXANDER: Yes.  
13 MR. MALATESTA: Okay.  
14 MS. ALEXANDER: That may help clear things up  
15 a little bit.  
16 MR. MALATESTA: Is that the same thing that  
17 was amended to be incorporated, that same  
18 communication, the verbal communication?  
19 MS. ALEXANDER: Let me confirm that.  
20 Benny, can you -- yes.  
21 MR. MALATESTA: Well, that answers my  
22 question. All right.  
23 BY MR. MALATESTA:  
24 Q Describe the procedures and steps that Off  
25 Lease Only takes when an employee is terminated.

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1 A I don't recall.  
2 Q Do you know whether or not it was Ray  
3 Rodriguez?  
4 A I don't recall.  
5 Q Do you know whether it was you?  
6 MS. ALEXANDER: She already said she doesn't  
7 recall.  
8 MR. MALATESTA: I'm narrowing it down.  
9 THE WITNESS: You can continue to narrow it  
10 down, and my response will be "I do not recall."  
11 BY MR. MALATESTA:  
12 Q Okay. Was it Mr. Fischer?  
13 A I do not recall.  
14 Q Take a moment to review this document, and let  
15 me know when you would like me to scroll down.  
16 A You can scroll.  
17 Q Are you ready?  
18 A Yep.  
19 Q Are you familiar with this document?  
20 A Yes.  
21 Q What is it?  
22 A It's a separation report.  
23 Q Did you complete this separation report?  
24 A I did.  
25 Q How did you know to complete the separation

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1 report?  
 2 A Well, when an employee is terminated, a  
 3 separation report is completed to alert the rest of the  
 4 HR team to terminate the employee in the system.  
 5 Q How did you learn that Mr. Robbins had been  
 6 terminated?  
 7 A Because I sent the e-mail terminating his  
 8 employment.  
 9 Q Did anyone give you instruction to terminate  
 10 Mr. Robbins?  
 11 A Yes.  
 12 Q Who?  
 13 A Mr. Fischer.  
 14 Q When Mr. Fischer gave you that instruction,  
 15 was he aware that Mr. Robbins had requested Family  
 16 Medical Leave?  
 17 A Yes.  
 18 Q What was the date that you received the  
 19 instruction to process the termination of Mr. Robbins?  
 20 A I believe it was September 5th. The date that  
 21 I was told to terminate him, the effective date of the  
 22 termination is September 2nd.  
 23 Q At any point in time prior to your -- well,  
 24 let's take a look at that.  
 25 Is this a true and accurate copy of this

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1 BY MR. MALATESTA:  
 2 Q I'm showing you what will be marked as  
 3 Exhibit 6. Please take a moment and read the e-mail and  
 4 let me know when you need me to scroll down.  
 5 A Okay.  
 6 Okay.  
 7 Q Are you familiar with this e-mail?  
 8 A Yes.  
 9 Q What is this e-mail?  
 10 A It's an e-mail from me to Andy Robbins  
 11 informing him of his job abandonment.  
 12 Q What's the date of the e-mail?  
 13 A September 5th, 2019.  
 14 Q Is this a true and accurate copy of the  
 15 e-mail?  
 16 A It appears to be.  
 17 Q Actually, I'm going to put that back up.  
 18 Do you know whether this e-mail was sent to  
 19 Mr. Robbins' personal e-mail or his business e-mail?  
 20 A I believe it was sent to his personal e-mail  
 21 as his Off Lease Only e-mail had been disabled.  
 22 Q When did you disable his Off Lease Only  
 23 e-mail?  
 24 A To the best of my recollection, September 4th.  
 25 Q Was that after he requested FMLA?

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1 separation report?  
 2 A It looks to be, yes.  
 3 Q Okay. Please take a moment to review this --  
 4 oh, I didn't put it up.  
 5 Please take a moment to review this. This has  
 6 been identified as Exhibit 13. Let me know when you  
 7 would like to scroll down.  
 8 A Okay.  
 9 Okay.  
 10 Q Oh, I gave you the wrong one. We can continue  
 11 with this one. I'm sorry. But let's just keep going.  
 12 I guess it's all in the chain, so --  
 13 MS. ALEXANDER: Frank, at some point -- I  
 14 don't want to lose your train of concentration, but  
 15 at some point please keep in mind we need to take a  
 16 lunch break.  
 17 MR. MALATESTA: I've got about 15 minutes left  
 18 probably.  
 19 MS. ALEXANDER: All right. I thought you said  
 20 it was going to be a couple hours.  
 21 MR. MALATESTA: It has been a couple hours.  
 22 Off the record.  
 23 (A discussion was held off the record, and a  
 24 break was taken for lunch at 1:15 p.m. The  
 25 proceedings continued at 2:05 p.m.)

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1 A To the best of my recollection, yes.  
 2 Q Why did you disable his e-mail on  
 3 September 4th?  
 4 A It is company procedure that when someone is  
 5 not an active employee, whether they be terminated or on  
 6 leave of absence, their access is disabled.  
 7 As Mr. Robbins had requested a leave of  
 8 absence, that was just -- I was just following  
 9 procedure.  
 10 Q Did you e-mail Mr. Robbins to his Off Lease  
 11 Only e-mail requesting his personal e-mail the evening  
 12 of September 4th, 2019?  
 13 A I believe I did.  
 14 Q That document has not been produced to us. Do  
 15 you know whether or not you provided that to your  
 16 attorney?  
 17 A I would have to check with my attorney.  
 18 MR. MALATESTA: Have you seen that e-mail,  
 19 Ms. Alexander or Mr. Menaged?  
 20 MS. ALEXANDER: I don't recall seeing it, but  
 21 that doesn't mean that they didn't produce it. I  
 22 just came into the case a little bit later.  
 23 MR. MALATESTA: Would the defendant be willing  
 24 to look and see if that is there for me and follow  
 25 up?

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1 MR. MENAGED: I can look.  
 2 MS. ALEXANDER: You can go on with the --  
 3 MR. MALATESTA: Not like today. I just mean  
 4 like after this. Yeah. Thank you.  
 5 BY MR. MALATESTA:  
 6 Q This is another e-mail that has been  
 7 identified or will be identified as Exhibit 12. Please  
 8 take a moment to review it and let me know when you  
 9 would like me to scroll down.  
 10 A Okay.  
 11 Okay.  
 12 Okay.  
 13 Q Are you familiar with this e-mail?  
 14 A Yes.  
 15 Q Is this Mr. Robbins' response after he  
 16 received the job abandonment e-mail?  
 17 A I believe so, yes.  
 18 Q Is this a true and accurate copy of the  
 19 e-mail?  
 20 A It appears to be.  
 21 Q Did Mr. Robbins communicate that he was  
 22 going -- strike that.  
 23 Did Mr. Robbins communicate that he was  
 24 undergoing diagnostic testing on Monday during the  
 25 conference call?

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1 A Are you asking me to speculate?  
 2 Q No. Do you know whether or not individuals  
 3 with a serious health condition are allowed to undergo  
 4 diagnostic testing as a part of their FMLA leave?  
 5 MS. ALEXANDER: Object to the form. That  
 6 depends on whether they were entitled to FMLA or  
 7 not.  
 8 MR. MALATESTA: Well, I'll restate the  
 9 question.  
 10 BY MR. MALATESTA:  
 11 Q Did you conduct any investigation, after  
 12 receiving this new information, to assess whether or not  
 13 Mr. Robbins was entitled to FMLA while he was undergoing  
 14 this procedure on Monday, September 2nd?  
 15 A After receiving this e-mail, I conducted no  
 16 further inquiries as to Mr. Robbins' medical --  
 17 purported medical issues because he had already  
 18 abandoned his position on September 2nd and was not  
 19 entitled to FMLA.  
 20 Q For clarity, you're saying he abandoned his  
 21 position while he was undergoing this diagnostic  
 22 testing, correct? Assuming he actually underwent it.  
 23 A For clarity, I'm testifying that Mr. Robbins  
 24 failed to inform his supervisor that he would not attend  
 25 a mandatory conference call, which was a no call, no

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1 A During what conference call?  
 2 Q The Monday GM conference call. I'll restate  
 3 the question.  
 4 In this e-mail did Mr. Robbins communicate to  
 5 you that he was undergoing diagnostic testing during the  
 6 Monday GM conference call?  
 7 A Are you asking me if he stated in this e-mail  
 8 that he was having a procedure done on Monday during the  
 9 conference call?  
 10 Q Yes.  
 11 A That's what he stated, yes.  
 12 Q Do you have any reason to dispute that?  
 13 A There are a lot of things in dispute, which is  
 14 why we're in litigation, so I don't know.  
 15 Q Well, do you have any facts or information  
 16 that would dispute him undergoing that procedure on a  
 17 Monday?  
 18 A At the time that this e-mail was written?  
 19 Q At any time.  
 20 A At the time that this e-mail was written, I  
 21 had no information about his procedure other than what's  
 22 in this e-mail.  
 23 Q Do you know whether or not his diagnostic  
 24 testing on Monday would have been covered by the Family  
 25 Medical Leave Act?

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1 show, for whatever reason it was. He didn't advise that  
 2 he wasn't going to be on the call. Therefore, he  
 3 abandoned his job.  
 4 Q Who takes the minutes and keeps the minutes to  
 5 the GM finance directors' call?  
 6 A I don't know if minutes are taken.  
 7 Q Is there an agenda that's created?  
 8 A Generally, no.  
 9 Q Are there any records of when GM finance calls  
 10 take place?  
 11 A Yes.  
 12 Q Was there a GM finance call that took place,  
 13 to your knowledge, on September -- or excuse me -- on  
 14 Labor Day 2018?  
 15 A I don't recall, but I believe the GM  
 16 conference call started in January 2019.  
 17 Q Did the GM finance director call take place on  
 18 Memorial Day 2019?  
 19 MS. ALEXANDER: Object to the form. I'm not  
 20 sure that it's just a GM finance call.  
 21 BY MR. MALATESTA:  
 22 Q Do you understand what conference call I'm  
 23 referring to in the prior question, Ms. Radosevich?  
 24 A My understanding is you're asking me generally  
 25 about the GM finance call that takes place every Monday.

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1 Q That was a specific question about whether or  
2 not one took place on Memorial Day 2019.  
3 A I don't recall.  
4 Q Are Memorial Day and Labor Day significant  
5 sales days for the dealerships?  
6 A Yes.  
7 Q Are you aware of any GM or finance director  
8 call taking place on a major sales day like that?  
9 A I guess I don't know what you mean by --  
10 MS. ALEXANDER: Object to the form.  
11 BY MR. MALATESTA:  
12 Q Well, would Memorial Day and Labor Day be in  
13 the top ten sales days of the year?  
14 A I don't know. We're open for business.  
15 Q What would be the biggest sales day for the  
16 company?  
17 A Sometime probably in March.  
18 Q Fair enough.  
19 (Short discussion held off the record.)  
20 BY MR. MALATESTA:  
21 Q Take a moment and review this and let me know  
22 when you need me to scroll down.  
23 This is Exhibit 13.  
24 A Okay.  
25 Okay.

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1 BY MR. MALATESTA:  
2 Q You don't recall any issues?  
3 A I don't know what you're referring to.  
4 MS. ALEXANDER: Same objection.  
5 BY MR. MALATESTA:  
6 Q So those three didn't take a vacation at the  
7 same time in July of 2019, as far as you remember?  
8 A I don't know.  
9 Q You don't recall?  
10 A I don't know.  
11 MS. ALEXANDER: She says she doesn't know. If  
12 you want to give her specifics, maybe it would help  
13 her, but your questioning is really vague, and I'm  
14 not quite sure what you're looking for.  
15 BY MR. MALATESTA:  
16 Q You don't recall any concerns regarding upper  
17 management taking vacations in July of 2019 at the Miami  
18 dealership.  
19 A You can ask me the same question over and  
20 over, and my response will be the same. I don't know.  
21 Q Did Mr. Rodriguez ever raise concerns that the  
22 general sales manager, Alberto Maradiaga, had overstayed  
23 his vacation in July of 2019?  
24 A I'm either not aware of that, or I don't  
25 recall.

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1 I believe I reviewed this already, right?  
2 Q I believe so, but it's up to you whether you  
3 want to continue.  
4 A Okay. I've already seen this.  
5 Q Are you familiar this e-mail?  
6 A Yes.  
7 Q What is this?  
8 A It's an e-mail to Andy Robbins regarding  
9 his -- a response to his response to the job abandonment  
10 e-mail.  
11 Q Is it a true and accurate copy of the e-mail?  
12 A It appears to be.  
13 Q At the Miami dealership, were there issues  
14 with Mr. Rodriguez allowing vacations for himself, his  
15 general sales manager, and his finance director in July  
16 of 2019?  
17 MS. ALEXANDER: Object to the form.  
18 THE WITNESS: I don't understand the question.  
19 BY MR. MALATESTA:  
20 Q Were there issues or controversies at Off  
21 Lease Only regarding vacations taken by Ray Rodriguez,  
22 Andrew Robbins, and/or the general sales manager around  
23 that same time period?  
24 MS. ALEXANDER: Same objection.  
25 THE WITNESS: I don't know.

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1 Q Was Mr. Maradiaga ever fired or reprimanded  
2 for overstaying his vacation in July of 2019?  
3 A I'm not aware of Mr. Maradiaga overstaying his  
4 vacation, and I don't recall him being disciplined.  
5 Q Do you know whether or not Mr. Maradiaga was  
6 on the July 15th GM finance director call?  
7 A I don't know.  
8 Q Do you know whether he was on a scheduled  
9 vacation on July 15th?  
10 A I don't know.  
11 MS. ALEXANDER: And just for the record,  
12 you're asking her about other employees from over a  
13 year ago or just about a year ago with no basis and  
14 no background, so her saying she doesn't recall,  
15 she hasn't reviewed any documents. She hasn't gone  
16 back into the system. This is just out of the  
17 blue.  
18 MR. MALATESTA: It's not out of the blue in  
19 any way, shape, or form, but --  
20 MS. ALEXANDER: You may not think so, but I  
21 mean, she wasn't prepared for this. You didn't ask  
22 her to go back and look at her records from the  
23 past year.  
24 MR. MALATESTA: Well, I don't have any  
25 additional questions at this time.

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1 CROSS-EXAMINATION  
 2 BY MS. ALEXANDER:  
 3 Q Rebecca, if somebody -- if an employee was to  
 4 make arrangements because they're running late coming  
 5 back from vacation or sought authorization to miss a  
 6 scheduled call due to unforeseen circumstances, would  
 7 that be an excused absence?  
 8 A If they requested it in advance?  
 9 Q Yes.  
 10 A Most likely, yes.  
 11 Q Obviously, there are certain circumstances  
 12 where it would not be excused, but if that person had  
 13 sought authorization ahead of time and that  
 14 authorization was granted, then that would be an excused  
 15 absence from that call, correct?  
 16 A Yes.  
 17 Q Okay. You were asked questions about the best  
 18 sales days for Off Lease. Do you even know what that  
 19 meant?  
 20 A No.  
 21 Q Does Off Lease run sales?  
 22 A No.  
 23 Q So unlike other car dealerships or non-used  
 24 car dealerships that run Labor Day sales or Memorial Day  
 25 sales, Off Lease does not do that.

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1 Q Okay. At any point before you sent that  
 2 e-mail on Wednesday, did he ever mention anything to you  
 3 or to your knowledge to anybody else about having health  
 4 issues?  
 5 A No.  
 6 Q And then did you receive any response to your  
 7 "What's your status?" e-mail in the morning of the 4th  
 8 before that e-mail at 5:09 p.m.?  
 9 A No.  
 10 Q So at that point, in addition to the Monday no  
 11 call, no show and the Tuesday no call, no show, he was a  
 12 no call, no show on Wednesday; is that correct?  
 13 MR. MALATESTA: Objection to form.  
 14 THE WITNESS: Correct.  
 15 BY MS. ALEXANDER:  
 16 Q Okay. Was he a no call, no show on Wednesday  
 17 by the time you got the e-mail from him saying that he  
 18 was not feeling well?  
 19 A To my recollection, I sent the e-mail at  
 20 9:09 a.m., and it's strange because it was exactly eight  
 21 hours later that he responded at 5:09 p.m., after the  
 22 workday.  
 23 Q And you started putting his FMLA paperwork  
 24 together or doing the investigation into it, and that's  
 25 when you determined that he had already abandoned his

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1 A No.  
 2 Q I know there's been a lot of questioning going  
 3 back and forth regarding September 4th and Mr. Robbins  
 4 asking for FMLA leave. That e-mail was in the evening;  
 5 is that correct?  
 6 A I believe it was at 5:09 p.m.  
 7 Q Okay. And earlier that day, you had sent him  
 8 an e-mail asking him for an update, correct?  
 9 A Correct.  
 10 Q And he had not been at work on Monday or  
 11 Tuesday, and so on Wednesday -- he hadn't even showed up  
 12 on Monday or Tuesday; is that correct?  
 13 A Yes.  
 14 Q And he missed the call on Monday.  
 15 A Yes.  
 16 Q So on Wednesday when nobody has heard from  
 17 him, you sent him an e-mail saying, "What's your  
 18 status?"  
 19 MR. MALATESTA: Objection to form.  
 20 BY MS. ALEXANDER:  
 21 Q What was the purpose of you sending that  
 22 e-mail, "What's your status?"  
 23 A I wanted to know where he was.  
 24 Q Because you hadn't heard from him?  
 25 A Hadn't heard from him.

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1 job, correct?  
 2 A Correct.  
 3 Q And when you grant a two-week vacation, what  
 4 do you -- do you expect that they're going to follow up  
 5 with you and say, "Okay. This is the day I'm coming  
 6 back," or do you just expect that "I gave them two  
 7 weeks. They'll be back the next day after the two weeks  
 8 expires?"  
 9 MR. MALATESTA: Objection to form.  
 10 MS. ALEXANDER: What's wrong with the form?  
 11 MR. MALATESTA: Leading.  
 12 MS. ALEXANDER: It's cross-examination. We've  
 13 been through this.  
 14 MR. MALATESTA: It is not cross-examination.  
 15 MS. ALEXANDER: It is cross-examination. You  
 16 did direct. I'm doing cross.  
 17 MR. MALATESTA: This is your witness.  
 18 MS. ALEXANDER: It's still cross-examination.  
 19 If you put my witness on the stand during your case  
 20 in chief and then I go to question her, it's still  
 21 cross-examination.  
 22 MR. MALATESTA: It's still not proper to use  
 23 leading questions.  
 24 MS. ALEXANDER: I disagree, but I will  
 25 rephrase the question just to be safe.

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1 Madam Court Reporter, can you read back that  
2 last question?  
3 THE REPORTER: Sure.  
4 (The following question was read:  
5 "Q And when you grant a two-week vacation,  
6 what do you -- do you expect that they're  
7 going to follow up with you and say, "Okay.  
8 This is the day I'm coming back," or do you  
9 just expect that "I gave them two weeks.  
10 They'll be back the next day after the two  
11 weeks expires?")  
12 MS. ALEXANDER: You know what, I'm going to  
13 leave that question. I don't believe it's leading.  
14 It's also your witness today, not my witness. You  
15 called her. So I'm going to leave the question. I  
16 don't think that it's leading.  
17 Rebecca, if you know the answer to my  
18 question, you can go ahead and answer.  
19 THE WITNESS: When an employee at Off Lease  
20 Only takes a vacation and it's approved, they're  
21 approved to be out for that period of time, and  
22 they're expected to return to work on the next  
23 scheduled work day.  
24 BY MS. ALEXANDER:  
25 Q Do you expect to have to hear from an employee

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1 would be the equivalent of 10 working days?  
2 A Yes.  
3 Q Okay. Give me one second, please.  
4 Just give me one second.  
5 Okay. So you were asked a lot of questions  
6 regarding your status as an attorney for Off Lease or in  
7 your capacity of -- let me rephrase that.  
8 You were asked a series of questions regarding  
9 your legal capacity with Off Lease Only. Did you serve  
10 as legal counsel for Off Lease Only prior to joining the  
11 dealership as corporate counsel?  
12 A Yes.  
13 Q Tell me a little bit about that.  
14 A When I worked for the Ticktin Law Group  
15 starting in 2012, Off Lease Only was one of my clients  
16 for employment-and-labor-related matters.  
17 Q So you were used to giving them legal advice  
18 on those related matters.  
19 A Yes.  
20 Q And then you became corporate counsel for Off  
21 Lease.  
22 A Correct.  
23 Q Did you continue with those duties of  
24 providing advice on labor and employment during that  
25 time?

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1 as to when they're coming back when they're granted two  
2 weeks?  
3 A No.  
4 Q So when do you -- when Mr. Robbins left for  
5 his vacation, when did you expect that he was going to  
6 be back in the office or the dealership? I keep saying  
7 office, but I mean dealership.  
8 A Monday, September 2nd.  
9 Q And why is it that you expected him back on  
10 Monday, September 2nd?  
11 A That was his next regularly scheduled workday  
12 after his vacation.  
13 Q And at any time did Mr. Robbins tell you that  
14 it was going to depend on when he could get back or when  
15 he could get a plane ticket?  
16 A No.  
17 Q So the company's understanding was that he was  
18 granted two weeks, not a day over, and that he was to be  
19 back after that two weeks.  
20 A Yes.  
21 Q And in your calculations, what is considered  
22 two weeks?  
23 A Eighty hours.  
24 Q So would that be 14 days? Or actually, not 14  
25 days because he gets some scheduled days off, so it

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1 A Yes.  
2 Q And when you became the chief human resource  
3 officer, did you give up any of those duties?  
4 A No.  
5 Q So when you -- so what's the difference in the  
6 roles between chief human resource officer and your role  
7 as corporate counsel? Do you have different duties,  
8 additional duties? Tell me about that.  
9 A In my role as corporate counsel, I handle all  
10 of the labor and employment matters. Additionally, I  
11 handle some business-related matters.  
12 My job was expanded, when I took over the HR  
13 department, to include human resources duties. I no  
14 longer handle the business-related matters, but I still  
15 handle all employment-related matters.  
16 Q Okay. And so at different points of the day,  
17 at any time of the day, you could get one of the members  
18 of the company or employees coming -- let me strike  
19 that.  
20 At any point of the day, Mark or Ejola or  
21 anybody else, managers could come in and seek legal  
22 advice from you on labor and employment issues.  
23 A Yes.  
24 Q They don't have to set up an appointment to  
25 come in and talk to you or specifically say, "I need

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1 some legal advice?"  
 2 A No.  
 3 Q What is your understanding when you're having  
 4 a conversation with somebody and it involves something  
 5 to do with the law? Or they're seeking advice from you?  
 6 A It is privileged.  
 7 Q Okay. Do you stop the conversation and say,  
 8 "I just want to make sure that you know this is  
 9 attorney-client privilege?"  
 10 A No.  
 11 Q You just have an understanding that when  
 12 somebody comes to you for legal advice, that's protected  
 13 by the attorney-client privilege.  
 14 A Yes. Based on eight years of representing Off  
 15 Lease Only, yes.  
 16 Q And that goes for anybody that comes to you  
 17 for legal advice. If your sister was to call you and  
 18 ask you for legal advice, that's still protected by the  
 19 attorney-client privilege, correct?  
 20 A Correct.  
 21 MS. ALEXANDER: Benny, can you share screen  
 22 Rebecca's Florida Bar that she talked about,  
 23 Florida Bar?  
 24 THE REPORTER: Her what? I'm sorry.  
 25 MS. ALEXANDER: Florida Bar. Sorry. I can

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1 Florida Bar website.  
 2 Q And were you the one that input this  
 3 information?  
 4 A Yes.  
 5 Q And this is, in fact -- you would confirm that  
 6 this is, in fact, you?  
 7 A That is me.  
 8 Q And under -- I just saw it -- okay. Stop  
 9 there, Benny.  
 10 This is the second page of that document. Can  
 11 you confirm that this is the true and accurate copy of  
 12 your Florida Bar profile, to your knowledge?  
 13 A To my knowledge, it is, yes.  
 14 Q Okay. And what does it say for -- well,  
 15 "Sections," you're part of the Labor and Employment Law  
 16 group.  
 17 A Yes.  
 18 Q Under "Practice Areas," does it say "Labor and  
 19 Employment"?  
 20 A Yes.  
 21 Q And your "Firm Position," what does it say  
 22 there?  
 23 A Corporate counsel.  
 24 Q And where does it say that you currently work?  
 25 A Off Lease Only.

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1 mumble sometimes.  
 2 BY MS. ALEXANDER:  
 3 Q Rebecca, you were asked a series of questions  
 4 about your LinkedIn profile earlier today, and you also  
 5 testified that you don't have social media. Do you --  
 6 how often do you even go onto LinkedIn?  
 7 A Not very often. I'm not looking for a job, so  
 8 I -- I don't use social media, so I don't message  
 9 people. I don't use it. So it's there.  
 10 I know that people in my department use  
 11 LinkedIn for recruiting purposes, but I don't recruit,  
 12 so I don't really use it.  
 13 Q Okay. So you would have no reason to update  
 14 it.  
 15 A No, not really.  
 16 Q Because you're not looking to get business  
 17 from there.  
 18 A I'm not looking to get business, and I'm not  
 19 seeking other employment.  
 20 Q Okay. I'm going to show you what we're going  
 21 to mark as Defendant's No. 1 to the deposition, or we  
 22 can make it No. 11, whatever the last number is.  
 23 Can you take a look at this document and tell  
 24 us what this is?  
 25 A This looks like my member profile on the

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1 MS. ALEXANDER: Okay. I have no further  
 2 questions.  
 3 Frank, do you have any other questions?  
 4 MR. MALATESTA: I'm not sure. Just a second.  
 5 No additional questions.  
 6 MS. ALEXANDER: Rebecca, would you like to  
 7 read or waive?  
 8 THE WITNESS: Read.  
 9 MS. ALEXANDER: Are you ordering it, Frank?  
 10 MR. MALATESTA: Yes.  
 11 MS. ALEXANDER: We'll take a copy.  
 12 (The proceedings concluded at 2:39 p.m.)  
 13 (Plaintiff's Exhibits 1, 2, 6, 12, 13, 24, and  
 14 Defendant's Exhibit 1 were marked for  
 15 identification.)  
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<p style="text-align: center;"><b>A</b></p> <p><b>abandon (1)</b> 47:8</p> <p><b>abandoned (13)</b> 13:15;14:8,17;37:9, 13,25;38:5,6;47:7; 64:18,20;65:3;72:25</p> <p><b>abandonment (4)</b> 14:4;60:11;62:16; 67:9</p> <p><b>ABBYE (5)</b> 2:;4:15;37:17;54:16; 84:11</p> <p><b>able (5)</b> 5:16;15:11,14;16:18; 36:7</p> <p><b>above-referenced (1)</b> 84:</p> <p><b>absence (8)</b> 30:16,18;36:20; 52:20;61:6,8;70:7,15</p> <p><b>accepted (1)</b> 12:21</p> <p><b>access (5)</b> 32:8;43:2,4,5;61:6</p> <p><b>accommodation (2)</b> 43:22,24</p> <p><b>accommodations (1)</b> 41:23</p> <p><b>accurate (8)</b> 16:1;17:6,18;58:25; 60:14;62:18;67:11; 80:11</p> <p><b>acknowledge (1)</b> 4:3</p> <p><b>Act (3)</b> 41:20,20;63:25</p> <p><b>acting (2)</b> 7:5,6</p> <p><b>action (4)</b> 36:19,25;83:;11</p> <p><b>actions (1)</b> 36:15</p> <p><b>active (1)</b> 61:5</p> <p><b>actual (2)</b> 10:15;26:17</p> <p><b>Actually (7)</b> 12:13;16:18;22:21; 55:10;60:17;64:22; 75:24</p> <p><b>addition (1)</b> 72:10</p> <p><b>additional (6)</b> 33:24;34:21;41:13; 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