

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

In re

CASE NO. 9:08-bk-04360-ALP

ULRICH FELIX ANTON ENGLER,
PRIVATE COMMERCIAL OFFICE, INC.,
and PCO CLIENT MANAGEMENT, INC.,

CHAPTER 7
(Substantively Consolidated)

Debtors.

**TRUSTEE'S DESIGNATIONS OF DEPOSITION TESTIMONY OF
BRADLEY T. FREEMAN, ESQ. IN SUPPORT OF MOTION TO SUBSTANTIVELY
CONSOLIDATE NON-DEBTOR DOUGLAS INVESTMENTS, LLC
WITH AND INTO THE DEBTORS' BANKRUPTCY ESTATES**

ROBERT E. TARDIF, JR. (hereinafter the "Trustee"), as Chapter 7 Trustee for the substantively consolidated bankruptcy estates of Ulrich Felix Anton Engler, Private Commercial Office, Inc., and PCO Client Management, Inc. (hereinafter referred to collectively as the "Debtors"), by and through his undersigned counsel, hereby files his designations of the deposition testimony of Bradley T. Freeman, Esq. in support of the Motion To Substantively Consolidate Non-Debtor Douglas Investments, LLC With And Into The Debtors' Bankruptcy Estates [D.E. 212] (hereinafter the "Motion to Consolidate"), as follows:¹

1. F-49A, p. 7, lines 10 - 14.²
 2. F-49A, p. 126, lines 17 - 24.
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¹ A complete copy of the deposition transcript was admitted into evidence as Fidelity's Exhibit 49A (Volume 1) and 50 (Volume 2) during the final evidentiary hearing on the Motion to Consolidate conducted on June 17 and 18, 2010. Citations to the transcript shall be referred to herein as "F-49A, p. __, line(s) __" or "F-50, p. __, line(s) __," as appropriate.

² True and correct copies of the designated pages of the deposition transcript are attached hereto as Composite Exhibit A.

3. F-49A, p. 129, lines 3 – 16.
4. F-49A, p. 140, lines 7 – 16.
5. F-49A, p. 144, lines 13 – 20.
6. F-49A, p. 145, lines 23 – 25.
7. F-49A, p. 146, lines 1 – 3.
8. F-49A, p. 153, lines 4 – 19.
9. F-49A, p. 154, lines 3 – 8.
10. F-49A, p. 159, lines 3 – 25.
11. F-49A, p. 160, lines 21 – 25.
12. F-49A, p. 161.
13. F-50, p. 174, lines 5 – 17.
14. F-50, p. 175, lines 1 – 20.
15. F-50, p. 177, lines 4 – 25.
16. F-50, p. 178, lines 1 – 18.
17. F-50, p. 179, lines 16 – 22.
18. F-50, p. 182, lines 21 – 25.
19. F-50, p. 183, lines 16 – 25.
20. F-50, p. 184.
21. F-50, p. 185.
22. F-50, p. 186.
23. F-50, p. 187, lines 1 – 13.
24. F-50, p. 188, lines 12 – 21.
25. F-50, p. 191, lines 16 – 25.

26. F-50, p. 192, line 1.
27. F-50, p. 194, lines 1 – 10.
28. F-50, p. 197, lines 6 – 20.
29. F-50, p. 199, lines 11 – 19.
30. F-50, p. 200, lines 24 and 25.
31. F-50, p. 201.
32. F-50, p. 202, lines 21 – 25.
33. F-50, p. 209, lines 9 – 25.
34. F-50, p. 210, lines 1 – 6.
35. F-50, p. 221, lines 15 – 20.
36. F-50, p. 226, lines 12 – 25.
37. F-50, p. 227, line 1.
38. F-50, p. 230, lines 23 – 25.
39. F-50, p. 231, lines 16 – 25.
40. F-50, p. 232, lines 1 – 9.
41. F-50, p. 233, lines 7 – 15.
42. F-50, p. 237, lines 9 – 25.
43. F-50, p. 238, lines 1 – 13.
44. F-50, p. 244, lines 1 – 9.
45. F-50, p. 245, lines 5 – 25.
46. F-50, p. 246.
47. F-50, p. 247, lines 1 – 22.

48. F-50, p. 275, lines 13 – 25.
49. F-50, p. 276, lines 1 – 19.
50. F-50, p. 290, lines 11 – 24.
51. F-50, p. 291, lines 17 – 24.
52. F-50, p. 292, lines 23 – 25.
53. F-50, p. 293, lines 1 and 2.
54. F-50, p. 295, lines 4 – 21.
55. F-50, p. 296, lines 3 – 24.
56. F-50, p. 297, lines 2 – 25.
57. F-50, p. 298, lines 1 – 20.
58. F-50, p. 299, lines 15 – 18.
59. F-50, p. 302, lines 22 – 25.
60. F-50, p. 304.
61. F-50, p. 306, lines 23 – 25.
62. F-50, p. 307.
63. F-50, p. 308.
64. F-50, p. 309.

Respectfully submitted,

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By: /s/ Robert F. Elgidely
Robert F. Elgidely, Esq.
Florida Bar No. 111856

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Trustee's Designations Of Deposition Testimony Of Bradley T. Freeman, Esq. In Support Of Motion To Substantively Consolidate Non-Debtor Douglas Investments, LLC With And Into The Debtors' Bankruptcy Estates has been filed with the Court and thereby furnished to all creditors and parties in interest registered on the Court's CM/ECF System (including Douglas Szabo, Esq., Henderson, Franklin, Starnes & Holt, P.A., 1715 Monroe Street, P.O. Box 280, Fort Myers, FL 33902 and Steven M. Berman, Esq., Shumaker, Loop & Kendrick, LLP, 101 East Kennedy Boulevard, Suite 2800, Tampa, FL 33602) and has additionally been furnished via first class mail to Sean Moulton, Esq., Moulton Law Office, P.O. Box 631, 60 E. Wallace, Driggs, Idaho 83422, on the 25th day of June, 2010.

By: /s/ Robert F. Elgidely
Robert F. Elgidely, Esq.