

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

In re: MV REALTY PBC, LLC, <i>et al.</i> , Debtors.	Chapter 11 Cases Case No. 23-17590-EPK (Jointly Administered)
MV REALTY PBC, LLC, a Florida limited liability company, <i>et al.</i> , Plaintiffs, v. OFFICE OF THE ATTORNEY GENERAL, STATE OF FLORIDA DEPARTMENT OF LEGAL AFFAIRS, <i>et al.</i> , Defendants.	Adv. No. 23-01211-EPK

**Rule 26(a)(3)(A)(i) Pretrial Disclosure of Witnesses
by the State of North Carolina**

Pursuant to Rule 26(a)(3)(A)(i) of the Federal Rules of Civil Procedure, made applicable to this adversary proceeding through Rule 7026 of the Federal Rules of Bankruptcy Procedure, Defendant State of North Carolina, by and through Joshua H. Stein, Attorney General (“North Carolina”), makes these pretrial disclosures.

I. The name and, if not previously provided, the address and telephone number of each witness that North Carolina expects to present at the evidentiary hearing in this Adversary Proceeding:

1. Matthew Dundon – contact information provided to Plaintiffs’ counsel.

II. The name and, if not previously provided, the address and telephone number of each witness that North Carolina may present at the evidentiary hearing in this Adversary Proceeding:

1. Antony Mitchell – contact information with Plaintiffs’ counsel.
2. Amanda Zachman – contact information with Plaintiffs’ counsel.
3. David Manchester – contact information with Plaintiffs’ counsel.
4. Any person included on any other parties’ witness list.
5. Any and all persons necessary for rebuttal and/or impeachment purposes.

III. North Carolina designates the following witnesses whose testimony it may present by deposition in this Adversary Proceeding:

1. Antony Mitchell (as 30(b)(6) representative of MV Realty)
2. Teresa McCalop
3. Yolanda Frasier
4. Bennie Davis
5. Roshawn Walker
6. Sabrina Abney
7. Syidah Mateen
8. Daniel Mosteller (as 30(b)(6) representative of North Carolina Department of Justice)
9. Steven Mange (as 30(b)(6) representative of North Carolina Department of Justice)

The parties have discussed entering into stipulations regarding the introduction of exhibits the parties intend to offer as evidence at the evidentiary hearing in this proceeding. To the extent that the parties cannot reach agreement on a stipulation to the authenticity and/or admissibility of any exhibits North Carolina intends to offer into evidence, North Carolina reserves the right to

supplement this witness list to include one or more witnesses to establish the authenticity and/or admissibility of those exhibits.

This the 2nd day of February 2024.

JOSHUA H. STEIN
Attorney General

/s/ Brian D. Rabinovitz
Brian D. Rabinovitz
N.C. Bar No. 41538
Special Deputy Attorney General and
Policy Litigation Counsel
brabinovitz@ncdoj.gov

Keith T. Clayton
N.C. Bar No. 39583
Special Deputy Attorney General
kclayton@ncdoj.gov

N.C. Department of Justice
Consumer Protection Division
P.O. Box 629
Raleigh, NC 27602
Phone: (919) 716-6000
Facsimile: (919) 716-6050

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 2, 2024, a true and correct copy of the foregoing was served via CM/ECF on the following parties to this adversary proceeding:

Michael D. Seese: mseese@seeselaw.com;
John C. Gekas: john.gekas@saul.com;
Angela C. de Cespedes: Angela.deCespedes@saul.com;
Megan Warshawsky: megan.warshawsky@saul.com;
Emily R. Robbins: emily.robbins@saul.com;
Nathan Henderson: Nathan.henderson@saul.com
Allison Carr: acarr@attorneygeneral.gov;
Melissa L. Van Eck: mvaneck@attorneygeneral.gov;
Debra D. Warring: dwarring@attorneygeneral.gov;
Lauren Michaels: LMichaels@attorneygeneral.gov;
Daniel Bahls: Daniel.Bahls@mass.gov;
Schuyler Daum: Schuyler.Daum@mass.gov;
Eric Carnevale: Eric.Carnevale@mass.gov;
Renee Cadmus: renee.cadmus@law.njoag.gov;
Keith Clayton: kclayton@ncdoj.gov;
Brian Rabinovitz: brabinovitz@ncdoj.gov;
Trish Lazich: trish.lazich@ohioago.gov;
Lawrence Helkowski: lawrence.helkowski@ohioago.gov;
Alison Archer: alison.archer@ohioago.gov;
Heather Crockett: heather.crockett@atg.in.gov;
Leona Frank: Leona.Frank@atg.in.gov;
Patrick Crotty: Patrick.Crotty@myfloridalegal.com;
Celine Funk Granai: Sasha.FunkGranai@myfloridalegal.com;
Ellen Lyons: Ellen.Lyons@myfloridalegal.com;
Jennifer DaSilva: Jennifer.DaSilva@myfloridalegal.com;
Jennifer Pinder: Jennifer.Pinder@myfloridalegal.com;
Sean Saval: Sean.Saval@myfloridalegal.com;
Miles Vaughn: Miles.Vaughn@myfloridalegal.com
James Timko: jtimko@deanmead.com
Asa Edwards: aedwards@ncdoj.gov
Christopher Meyer, Christopher.meyer@law.njoag.gov
G. Steven Fender, steven.fender@fender-law.com

/s/ Brian D. Rabinovitz

Brian D. Rabinovitz
Special Deputy Attorney General and
Policy Litigation Counsel
North Carolina Department of Justice