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STATE OF MINNESOTA DISTRICT COURT

COUNTY OF OTTER TAIL SEVENTH JUDICIAL DISTRICT

- -

Precision Locating, LLC,
Arvig Enterprises, Inc.

Plaintiffs,

vs.

Martin D Starkebaum,

Defendant.

Appellate Court File: N/A
District Court File: 56-CV-25-198

Transcript of Proceedings

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MOTION HEARING

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The above-entitled matter came before the Honorable Kevin M. Miller, Judge of District Court, at the Otter Tail County Courthouse, Fergus Falls, Minnesota, on October 2, 2025, via Zoom technology.

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APPEARANCES

For the Petitioners: Kurt Erickson
80 S. 8th Street, Ste 1300
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For the Defense: Vincent Ella
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Dana Eifert
Official Court Reporter

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(Proceedings commenced.)

THE COURT: All right. At this time, the Court will call the matter of Precision Locating, Arvig Enterprises versus Martin Starkebaum; file 56-CV-25-198. I have Mr. Erickson here on behalf of plaintiff. I have Mr. Ella and Mr. Burg present here today.

We have a couple motions before the Court. The first motion is the motion, or at least the first one that I'm going to address, will be the motions to quash the deposition of the minor child. And Mr. Ella or Mr. Burg, this is your motion. The Court did also receive the letters with correspondence, and I will address those in any order also. Whether they were considered or not, so I will take care of that in any order. So I don't know who is going to address -- it looks like Mr. Ella has unmuted. So you may proceed.

MR. ELLA: Thanks, Your Honor. You know, I think there's a basic point in this case that's relevant to both motions, which is regarding the defamation claim, it's undisputed that Defendant didn't make this statement on Facebook. And I think Plaintiffs acknowledge this. They sort of don't want to believe it, but it's undisputed. And I say that for relating to both motions because the testimony of Mr. Starkebaum's daughter is not necessary to our defense that he didn't make the

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statement. And I also think that the fact that he didn't make the statement calls out for a summary judgment motion, you know, unless the Plaintiffs want to drop that claim, in that that would narrow issues for trial, and I know I'm getting into the second motion.

But with regard to the motion to quash, as I pointed out in our brief, the testimony of Mr. Starkebaum's daughter is not relevant to a dispute where Mr. Starkebaum didn't make the statement. The statement was made by someone who's not a party to the case. And it was made about someone who's not a party to the case, and not even, and no longer is an employee of the Plaintiffs, or either of them.

And I've indicated in our briefing as well that we would not intend to call or would stipulate that we're not going to call the minor daughter as a witness at trial, so there's just, you know, if you look at the balance of equities here, this would be a really traumatic experience for a thirteen-year-old girl. You know, paired with the issue that there's really no need whatsoever for her testimony on a defamation case where the Defendant didn't make the statement. And, obviously, we just submit that it's wholly inappropriate to put her through this. Really, under the Rule 26 standard, it's just not necessary. They don't need her testimony.

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THE COURT: All right. And Mr. Erickson, responding to that. We'll stay on just this motion first.

MR. ERICKSON: Judge, I would refer you to their answer. In their answer at affirmative defenses fifteen and sixteen. They argue and affirm to the Court, "Plaintiff's claims of defamation and defamation per se are barred because the statements are the truth or substantially the truth." That's what it says. That's what they raised after they got our amended complaint. They said, "Plaintiff's claims of defamation and defamation per se are barred by qualified privilege." That's paragraph sixteen. That's what they said after getting our amended complaint.

Complaint is very clear that Mr. Mayen posted, but that Plaintiff, excuse me, that Defendant was in fact involved in making these statements. And I understand their position that they don't believe that that's what occurred, but that's an issue for the jury with regard to it, and one bit are they withdrawing affirmative defenses fifteen and sixteen. For Mr. Ella to come up here and say that, in fact, well, these are not issues, it's wholly inappropriate. And then maintain these affirmative defenses that go directly to what Evelyn Starkebaum knows or doesn't know is outrageous.

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It's outrageous that you can do that on the one hand, raise the defenses after getting the amended complaint, and then on the other hand, say oh, they're completely unnecessary. And what I really don't appreciate is the arguments in this brief, in which they say that this is harassment, oppression, an attempt to basically impugn or otherwise destroy Evelyn Starkebaum, don't even have the courage to say that in the oral argument. So I'm going to order a transcript of this hearing because the evidence with regard to harassment, the evidence with regard to oppression, there's zero. There's zero evidence that we've engaged in that. And the argument by Mr. Ella here that there are facts in the record with regard to harassment or annoyance, there is utterly none. So that argument is being made almost as a harassment of Plaintiff's attorneys as well.

So let's go directly into the merits of the claim. We talk about the fact that within minutes of Plaintiff knowing about this and telling Mr. Starkebaum's attorney that this was happening, the Facebook post was immediately taken down. Immediately taken down. We talk about the fact that Mr. Guthmiller, the slamming of Mr. Guthmiller's character was done by Mr. Starkebaum to Mr. Mayen, and that Mr. Mayen regurgitated that in the answer to -- or not the answer, but in the Facebook post.

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We talk about the defamation of Shane Lester, and basically accusing him of criminal conduct with regard to this. I mean, that's just, that's just outrageous. And let's let the jury decide this.

THE COURT: All right. Mr. Ella, any response? I do see in your answer when I popped that back open because I -- it's been a while since I looked at it. It does certainly say that --

MR. ERICKSON: Judge, I had one other --

THE COURT: Oh, I, I --

MR. ERICKSON: -- point. I forgot --

THE COURT: -- I apologize. Oh, go ahead.

MR. ERICKSON: No. No, no, I had finished my marks and I had forgotten. If you don't think that this is important, look at the testimony and cross examination by Jerry Burg of Matt Guthmiller, which we put into the record. As my colleague, colleague said in her papers, they go up and down asking about the intricacies of what happened, supposedly, with Ms. Starkebaum. So the idea that on the one hand you can say it's wholly, it's wholly inappropriate and improper, and oh by the way it's also harassing even though we don't have any facts of harassment. But on the other hand, we'd like to know your take on all of these facts. We'd like to know whether you sat on the couch and watched TV or played

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video games with him. We'd like to know whether or not you were clothed or unclothed. We'd like to know if you in any way touched her. We'd like to know whether you've had any criminal convictions with regard to this. All that's fair game in terms of Guthmiller; it's not fair game with Evelyn Starkebaum. That's outrageous.

THE COURT: All right. Mr. Ella?

MR. ELLA: Well, I don't quite understand counsel's statements about harassment. I mean we can use whatever --

MR. ERICKSON: I'll tell you what the statements are --

THE COURT: Hold on. No. Hold on. Hold on. But, Mr. Ella, specifically, I just want to ask, when you have it in the answer that you say that the claims are barred because the statements are true or substantially the truth, I mean, that's one affirmative defense you're putting forth in your answer.

MR. ELLA: Well, that's a standard defense to defamation.

THE COURT: It's -- but well, it's there though. I mean --

MR. ELLA: It is.

THE COURT: -- there's no --

MR. ELLA: Yeah. I would, I would point out

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that Mr. Erickson doesn't represent Mr. Guthmiller. He's not even an employee of Mr. Erickson's client. And it's undisputed that Mr. Starkebaum didn't make the statement, and Plaintiffs are trying to make a claim that he caused the defamatory statement to be made, but that is not actually a cause of action under Minnesota law. That's not a thing. That's not a claim. You have to publish a statement. He did not publish his statement. That's undisputed. Mr. Mayen says under oath, repeatedly, it was me. It was all me. And Mr. Starkebaum says, it wasn't me, it wasn't me. And the administrator of the Facebook group says it was Mr. Mayen, so. You know we just don't need to get to truth because it's undisputed that he didn't make the statement. And, you know, I, I think that -- it's not relevant and the idea of having a thirteen-year-old girl sit for a deposition about whether someone touched her on her buttocks and whatever else, is -- you can say it's harassing, but it's just, it's, it's burdensome. It's not fair to a non-party witness in a civil case that was started by, obviously, started by Plaintiffs. And so yeah, we asserted an affirmative defense of truth, but we have a stronger defense, which is, he didn't make the statement. So. And that's in the record. That's in their amended complaint. We put in the testimony in the affidavits. So, I think it's just,

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there's no -- I don't understand what -- and then you know, I would ask Mr. Erickson too, what is Ms. -- what is this minor girl going to say that's going to support their case? Right? --

MR. ERICKSON: That it didn't happen.

MR. ELLA: Well, she's told police it did. You said that they -- she was found --

MR. ERICKSON: No.

MR. ELLA: -- to be not credible.

MR. ERICKSON: Yeah.

THE COURT: Yep. We're --

MR. ELLA: -- (Indiscernible.)

THE COURT: -- I'm not going to have back and forth, though, so Mr. Ella, you know, don't pose any questions. I'll go back to Mr. Erickson if he wants to add something on this. So you may continue.

MR. ELLA: I mean, he, you know, it's undisputed that he wasn't convicted of anything. We have -- and that's another point, is we have an ample record of the police report, the police interview, a videotape of the interview. What more do they need? Why do they need to go over this again and traumatize this young girl again about something that's so far removed from anything relevant in this civil case? It -- I mean, I don't know what she would say or not say. We have the -- we have

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the police report. We've said we're not going to call her as a witness at trial. That should be enough to preclude the deposition testimony. We, we don't need her testimony to defeat the defamation case on summary judgment because he didn't, -- defendant didn't make the statement. It's undisputed.

MR. ERICKSON: Can I respond?

THE COURT: Yes, Mr. Erickson.

MR. ERICKSON: Okay. Are you willing to withdraw paragraphs fifteen and sixteen, affirmative defenses?

MR. ELLA: So --

MR. ERICKSON: Yes or no?

MR. ELLA: Your Honor, we can't withdraw the affirmative defense of truth because --

MR. ERICKSON: You can or cannot?

MR. ELLA: -- it's pretty -- there's --

THE COURT: I think he said he can't, is what --

MR. ELLA: -- there's three people named, and there's reasons to believe that the statements for all of them were true or substantially true. And a blanket withdraw of an affirmative defense like that is too blunt of an instrument here.

THE COURT: So what you're asking then is,

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Mr. Erickson is supposed to just figure out who, where the truth might lie with which of the three individuals, and he's supposed to guess that without depositions? I mean --

MR. ERICKSON: Exactly right.

THE COURT: -- you're not really giving him, you know, he's asking regarding that, and you're saying, well, there might be because we have three. But you're, you're forcing him to guess which of the statements may apply to which of the three individuals may have a truth component, and I don't know how he's supposed to find that out without -- you know, explain to me how you would find that out without a deposition for the folks that he believes are necessary rather than leave him guessing on which ones they may apply or may not apply too.

MR. ERICKSON: Am I continuing, or are those your questions --

THE COURT: That's, that's --

MR. ERICKSON: -- to Ella, and I'll continue after?

THE COURT: Yep. I'll come back to you. I'm asking --

MR. ERICKSON: All right. All right.

THE COURT: -- Mr. Ella that one.

MR. ERICKSON: Yep.

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MR. ELLA: They, they have ample evidence of what she said.

THE COURT: That's not answering my question, though.

MR. ELLA: No, I understand. We don't, we don't need to get to the truth defense because we have he didn't make the statement defense. But what is, again, what is she going to say in a deposition if she says the same thing? Does that prove that it's true or not true? You know, he hasn't been convicted. He's not a party to this case. And it's just not, it's just not relevant, and it's just not appropriate. It's very aggressive to say we're going to say we're going to take a deposition of a fourteen-- thirteen-year-old girl about a Facebook post that the Defendant didn't make; it's just under the balancing test and Rule 26, it's not relevant. It's not appropriate. It's, it's, it is harassing. And he --

THE COURT: All right. I'm going to go back to Mr. Erickson, he's, he's got his opportunity. I had interrupted there, so Mr. Erickson, you may continue.

MR. ERICKSON: Yeah. And I'm going to say that it's going to be a jury question with regard to whether or not this was a statement, not just by Mr. Mayen, and we agree it's a statement by Mr. Mayen, but we also believe and have testified repeatedly that consistent

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with the verbiage, consistent with the tactic of referring to people frequently as pedophiles, that it is in fact the statement of his, together with Mr. Mayen, with regard to this. And we'll point to the fact, and the jury can decide this. The jury can decide whether or not Mr. Mayen was telling the truth. And in fact, that there was a violation of the rules of professional conduct by Mr. Burg in soliciting this statement without telling Mr. Mayen that it was a statement against his interest. That's laid out in detail in the deposition of Mr. Mayen with regard to this. --

MR. ELLA: That's --

MR. ERICKSON: -- Mr. Mayen was not -- hold it. It's my turn to talk, Mr. Ella.

That was laid out in detail in the statement of Mr. -- not the statement, the deposition of Mr. Mayen with regard to this. And then the jury can decide. They can say, hey guess what, we think it's only a statement of Mr. Mayen, even though he wasn't told that it was a statement against interest. Even though he wasn't represented at the time that he, he gave a statement to Mr. Burg. They can decide at that point whose statement it is. That's fine. Don't have an issue with that. We'll abide by what the jury has to say.

THE COURT: All right. We're going to move to

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the motion to amend the scheduling order, Mr. Ella.

MR. ELLA: Thanks, Your Honor. Just want to note that this last issue raised by counsel is not part of any pending motion, and that Mr. Mayen was deposed after his statement and stuck to his story, and was represented.

Your Honor, we come before the Court to ask for an extension of the scheduling order. I came into this case mid-stream, but when I did in August, discovery was going full throttle, and depositions had not been completed. In fact, Plaintiff's depositions were completed yesterday after, I believe, two requests for extensions by Plaintiffs, which we agreed to. And so, you know, regardless of how we got here, I mean, I put in my brief that majority of the requests for extensions were from the other side, all of which we accommodated, and the amended answer discovery spilled over, you know, way over the August 31st deadline. We're now into October, and obviously, you can't bring a dispositive motion without -- without discovery. And so we think it's appropriate and that the Court would appreciate a chance to narrow the issues for trial. As you know, it's our position, we think it's undisputed that our client, the Defendant, didn't make the defamation statement, and there's no fact dispute, and so I think that's a perfect issue for

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summary judgment. And it would be in the interest of court efficiency to have a dispositive motion before we go to trial. And that could eliminate the need, you know, for this testimony of, you know, of, well, anyone's testimony on the defamation issue.

So specifically, you know, it's a twenty-eight-day lead time, so we'd be looking for a deadline or even perhaps a hearing date that's, as Mr. Burg said, November 15 or later. I would maybe say, you know, sometime after Thanksgiving, we can get going on our brief now that we've finished depositions yesterday. And there's no prejudice to the other side. They want to bring a motion for punitive damages, I guess. There's no prejudice. This is a bit of an unusual case. It's been heavily litigated and depositions have been postponed numerous times, and that's, you know, not anyone's fault. I recognize that we should've asked for an extension before the deadline, but I'm here to request that the Court exercise its discretion to give us more time for motion practice before just dropping this in the hands of an Otter Tail County jury.

THE COURT: All right. And Mr. Erickson.

MR. ERICKSON: So, Judge, here's what happened. We gave the Plaintiff an extensive -- excuse me, the Defendant, an extensive amended verified complaint, and

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we proposed doing discovery through the end of August. That's what we did. We proposed that. The Defendant agreed to it. And then the Court issued an order to that effect, amending the scheduling order. And paragraph thirteen of the scheduling order specifically provides for a good cause standard, and the fact that if you're going to ask for something after the time period has lapsed, you have to, under Rule 6, show not only good cause, but you have to show excusable neglect. This argument with regard to changing the dates of the deposition is misleading, and here's why it's misleading.

The depositions of Schmidt and Guthmiller, and Lester, and then the institutional depositions of the two corporate defendants were all set at the end of August. So the idea that's being propounded to you, the idea that they were going to be taken and then a summary judgment motion was going to be made by August 31st, is utter nonsense. It never was going to happen. They were setting these depositions at the very end of the discovery period. There was no chance, zero, that there was going to be a summary judgment motion with regard to this. So when you hear, oh, they've been set repeatedly and stuff like that. We have changed the dates after the time period for discovery, that's true. The idea that it was repeatedly changed within the discovery period is

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false.

The other thing is, for purposes of scheduling in this case, we repeatedly, before the Labor Day weekend, tried to contact both Mr. Ella and Mr. Burg with regard to scheduling, which included scheduling of the depositions. And they both repeatedly refused to meet with us before the no-- before the dispositive deadline passed. They only would meet after Labor Day. That's their business. They can do that. But there's a consequence to that with regard to failing to meet and ask for an expansion of the period before the period runs. Okay.

So what is the, what is the issue with regard to -- well, let me put it to you this way, I didn't hear anything about changing the trial date in Mr. Ella's argument. Nothing. So we're on as far as I know for December 16th. He's put in writing that he wants to get some kind of four-month extension. He never met and conferred, nor did Mr. Burg ever meet and confer with regard to changing the trial date. The only way this case gets resolved, whether it's by settlement or by Court action, is to have a firm trial date. There's nothing in this record indicating that we can't get this matter tried on or about December 16th, which is Your Honor's order with regard to this.

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All right. Let's talk about the summary judgment motion. The summary judgment motion, if they were going to make one based on all of these arguments that they've made in their answer, could easily have been drafted and prepared before the argument was taken, or excuse me, before the time period, and they haven't done that. And what that -- the hardship that that works, is that we're now going to have to do a summary judgment motion and spend time and money in this case that otherwise would not be necessary with regard to this. Noteworthy, in what he had to say, was that they're not going to bring a summary judgment motion with regard to breach of contract. When we did a meet and confer on other issues, at a different time period, they acknowledged that there's a fact issue regarding breach of contract. So the idea that the summary judgment motion is going to eliminate the case, not true. Case will go forward on claims that they're not going to make a motion on because they don't have a basis for doing that. And I think that it's critical that in fact that we go forward without that expense.

With regard to any motions that they believe are necessary as a matter of law, they can make those motions either as a directed verdict motion or they can make them as a judgment, judgment as a matter -- JMOV motion at

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trial. We're going to be a trial for sure.

THE COURT: All right. Mr. Ella.

MR. ELLA: Yeah, if I could make a suggestion, again, sort of addressing both motions. If we were, if the Court were considering, even considering, having this minor daughter or minor girl deposed, if we were allowed to bring a summary judgment motion, and it's pretty straightforward summary judgment motion, that if we could defer a ruling on the motion to quash until after summary judgment, we could avoid the deposition all together if that claim is dismissed. Which I believe it would be. There'd be plenty of time to, you know, if for some reason the motion was denied to rule on the motion to quash or to have a deposition or a trial deposition. You know, I really just don't feel like this thirteen-year-old girl needs to be subjected to this. That would be a way to efficiently avoid the hardship and trauma of a thirteen-year-old girl, you know, being deposed over something like, like, this.

And I do want to say that Mr. Erickson mischaracterized my statement in our meet and confer. We -- he didn't ask about trial dates. I think it's inherent in our request and it's in our motion that we want to push back the trial date. We got stuck on summary judgment, and he wanted to talk about what the

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grounds for summary judgment would be. And I did not say that there was a fact issue with regard to the breach of contract claim. I said, there might be. I said there might be, but I said the defamation count should be -- they should dismiss it.

MR. ERICKSON: Yeah. So I'll respond if the Court wants me to.

THE COURT: You can.

MR. ERICKSON: Yeah, so the argument here, at what point in time, at what point in time, does the, does the Defendant have to come up with facts showing that there would be harassment or oppression or any of the things that he's talking about here? There's not a scintilla of evidence in the record on that. Not a scintilla. And to make that argument without any evidence is just completely inappropriate.

And then the other thing with regard to that is, we have specifically told the Court at the end of our motion, whatever safeguards the Court wants to put in place with regard to this, that's fine. We'll abide by the Court's safeguards if the Court believes that any safeguards are necessary with regard to the deposition. The only critical safeguard that I know of is that if we're going to -- if Mr. Starkebaum, who is present at this hearing according to his thing, according to the

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Zoom conference notice here, if he's going to attend, then Judge, we need to go, the closest one is the Anoka County Courthouse. We need to go through -- everyone needs to go through the metal detector for purposes of taking the deposition. That's the only safeguard that I know of that's necessary here. But that is necessary if Mr. Starkebaum is going to attend. He's a party. He has a right to attend. That's fine. That's the only safeguard that has to be in place with regard to this.

THE COURT: All right. Anything further, Mr. Ella, for the Court? And I realize I've got one pending and these pending, and we've got a pending trial date, so I need to get some things out rather quickly.

MR. ERICKSON: Judge, I do have one question.

THE COURT: Oh, go ahead. Sure.

MR. ERICKSON: Which is, are we coming in-person or are we doing the pre-trial on November 10th via Zoom?

THE COURT: I usually make people be in-person, but --

MR. ERICKSON: Okay.

THE COURT: -- there's a request for Zoom, I usually, it's my practice, and I think that's our guidelines under the, you know, whatever we call the presumed hearing things, I think they're supposed to be

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in-person, and that's usually how I do it unless otherwise either agreed upon by the parties or there's some other reason such as weather or something like that.

MR. ERICKSON: Judge, we'll plan on being there in person.

THE COURT: All right. And that's, like I said, it's exceptional circumstances that I would otherwise allow it to be Zoom.

MR. ELLA: Judge, can I just make one overarching comment?

THE COURT: Sure.

MR. ELLA: It's undisputed the Defendant didn't make the post. If you look at their amended complaint, they don't even allege it. They allege--

MR. ERICKSON: That's not true.

THE COURT: Hold on. Hold on. Hold on, though. I mean, this is, we're getting into some arguments that are starting to make me feel like it's an argument that would be made to the finder of fact because, you know, and this is just hypothetical, and I've read through these things, if I, let's just say, I direct someone to make a post, I don't know that I would be allowed to say well I didn't -- I wasn't the one that put it on there. I may -- and I'm guessing this might be the argument of Plaintiff -- but if I direct someone to post something, I

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think there -- that's probably the argument that might be being made. And I don't know it's as easy to just say well that person wasn't -- and Mr. Erickson can correct me if I'm wrong, but I'm guessing they're going to say that Mr. Mayen posted at the behest or direction or whatever term they might use, of Mr. Starkebaum. I don't think you get to say, well, I wasn't the one that actually just put it up there. If people want, I think that's a finder of fact potentially would be making that determination. But I don't think defamation is precluded if I direct someone to take an action, not that it was -- and I know there's going to be arguments of whether this was just discussions and did it on their own, that's -- but those all seem to be getting real close to things that finders of fact determine as opposed to me sitting. Cause I'm guessing that's -- Mr. Erickson is not going to agree with you saying that Mr. Starkebaum had nothing to do with the post or the information. In fact, he's argued here today using that Mr. Starkebaum has used similar language and description of these individuals and such. That they're going to be arguing he essentially directed the post despite, and I realize there's depositions that says something different, but that's usually what most of my trials involve, is someone saying one thing and someone saying something else.

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MR. ELLA: Yeah, but there's no one saying --

MR. ERICKSON: Judge, we agree --

MR. ELLA: -- (indiscernible) --

MR. ERICKSON: -- on all counts.

THE COURT: Okay. Mr. Ella.

MR. ELLA: There's no evidence that it was directed by Starkebaum, and they can't -- they don't have any evidence, and --

THE COURT: Well, and --

MR. ERICKSON: That's not true.

THE COURT: -- and I would just argue, or not argue, but state, you know, there are arguments that can be made that circumstantial evidence, language usages --

MR. ERICKSON: Right.

THE COURT: -- those types of things. --

MR. ERICKSON: That's right.

THE COURT: -- You know, I'm not making any determination on that, but there are -- there are things that can be argued on that, and I think those become, again, get real close to some factual issues that the finders of facts are in charge of, not me.

MR. ERICKSON: Agreed, Judge.

THE COURT: So, Mr. Ella, anything else that you would like to further put on the record here before I take this under advisement?

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MR. ELLA: No, Your Honor.

THE COURT: All right. And that will conclude the hearing. I will get these orders out as quickly as possible so folks know the direction we're heading.

Thank you, everyone.

MR. ERICKSON: Thank you.

(Proceedings concluded.)

MINNESOTA JUDICIAL BRANCH

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STATE OF MINNESOTA DISTRICT COURT

COUNTY OF OTTER TAIL SEVENTH JUDICIAL DISTRICT

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Precision Locating, LLC,
Arvig Enterprises, Inc.
Plaintiffs,

vs.
Martin D Starkebaum,
Defendant.

Appellate Court File: N/A
District Court File: 56-CV-25-198

REPORTER'S CERTIFICATION

- -

I, Dana Eifert, hereby certify that I am an official court reporter in the Seventh Judicial District of the State of Minnesota; that as such reporter I digitally recorded the proceedings in the above-entitled action; that I thereafter transcribed to typewriting the foregoing transcript from the digital recordings taken in Otter Tail County, Minnesota on October 2nd, 2025; and that the foregoing transcript consisting of twenty-five (25) pages, constitutes a full, true, and accurate transcription of said proceeding.

Dated: October 21, 2025

/s/ Dana Eifert
Dana Eifert
Electronic Court Reporter
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