

IN THE CIRCUIT COURT FOR THE STATE OF OREGON
FOR THE COUNTY OF CLACKAMAS

MAX ZWEIZIG,)	
)	
Plaintiff,)	
)	
vs.)	NO. 19CV01547
)	
TANYA ROTE and TIMOTHY ROTE,)	
husband and wife; and NORTHWEST)	
HOLDING, LLC, an Oregon limited)	
liability company,)	
)	
Defendants.)	
_____)	

DEPOSITION OF MAX ZWEIZIG

Appearing Remotely From
Cherry Hill, New Jersey

Taken on behalf of the Defendant

Monday, December 21, 2020

1 BE IT REMEMBERED THAT, pursuant to Oregon
2 Rules of Civil Procedure, the deposition of MAX ZWEIZIG was
3 taken remotely by LaRisa Y. Giacomini, a Certified
4 Shorthand Reporter for Oregon, California, Idaho, and a
5 Registered Professional Reporter, that pursuant to Oregon
6 Revised Statute 44.320 said reporter is empowered to
7 administer oaths to witnesses, that the above-named witness
8 was placed under oath on Monday, December 21, 2020,
9 commencing at the hour of 10:04 a.m.

10
11 APPEARING REMOTELY

12 For Plaintiff: ALBERTAZZI LAW FIRM
13 By: Anthony Albertazzi
14 296 SW Columbia
Suite B
Bend, Oregon 97702

15 For Defendant: Timothy Rote
16 Pro Se

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REPORTED REMOTELY FROM DESCHUTES COUNTY

Monday, December 21, 2020, 10:04 a.m.

MAX ZWEIZIG,

called as a witness herein in behalf of the Defendant,
having been first duly sworn on oath by the Certified
Shorthand Reporter, was examined and testified as follows:

EXAMINATION

BY MR. ROTE:

Q. Can you state your full name for the record,
please?

A. Maximilian Douglas Zweizig. And I want --
now, that we're on the record, I would like to make sure
that I have on the record this deposition is being done
under a little bit of duress.

The things that you're doing out there on the
internet is not very fair to me being -- sitting in this
position under this kind of pressure from you, answering
questions from you, especially directly from you. So I
want to make sure that was on the record. That's all.

Q. Have you ever been arrested and/or convicted
of a felony or misdemeanor?

A. No, sir.

Q. what did you do to prepare for this deposition

1 today?

2 **A. I drove over here.**

3 Q. Have you discussed this lawsuit with anyone
4 else, signed any statements or affidavits relating to this
5 lawsuit or posted anything about this lawsuit on the
6 internet?

7 MR. ALBERTAZZI: I would object to the extent
8 that seeks any communication with me or any other
9 attorney, otherwise you can answer.

10 **A. No.**

11 BY MR. ROTE:

12 Q. Your answer? What's your answer?

13 **A. No.**

14 Q. No. Have you read any witness statement or
15 seen any other evidence before this deposition?

16 **A. I don't think so.**

17 Q. Do you have a history of drug or alcohol
18 abuse?

19 **A. No, I do not.**

20 Q. Are you under the effect of any medication
21 that may influence your ability to answer the questions
22 presented to you in this deposition?

23 **A. Presented to who?**

24 Q. Presented to you.

25 **A. No, sir.**

1 Q. would you like to review the transcript of
2 this deposition and make any changes before it's entered
3 into the record?

4 A. **I would like to reserve that right. Yes.**

5 MR. ROTE: We would as well, Mr. Albertazzi.

6 MR. ALBERTAZZI: So noted.

7 MR. ROTE: Okay.

8 MR. ALBERTAZZI: I haven't ordered a
9 transcript yet. If I do, I'll let you know.

10 BY MR. ROTE:

11 Q. Your responses to discovery were paper thin.
12 Have you provided every document that you have
13 in your possession on the claims of this lawsuit?

14 A. **To the best of my knowledge, yes.**

15 Q. When did you discover the quitclaim deed?

16 MR. ALBERTAZZI: Mr. Rote, would you mind
17 clarifying which quitclaim deed you're talking about?

18 MR. ROTE: April 24th, 2017, I believe is the
19 date. The document was in your -- was in a
20 deposition you took of us. Plaintiff's document
21 00001.

22 THE WITNESS: What are we referencing now?

23 BY MR. ROTE:

24 Q. The quitclaim deed, when did you discover the
25 quitclaim deed?

1 A. I'm not going to answer any questions that go
2 against attorney/client privilege.

3 Q. Did you discover it independently or was it
4 provided to you by your attorney?

5 A. I'm not going to answer that question because
6 it may violate attorney/client privilege.

7 Q. Your attorney's not made an objection on this
8 question. It's not about attorney/client privilege.

9 Did you independently discover the quitclaim
10 deed?

11 A. As I sit here today, I don't remember.

12 Q. When did you discover the warranty deed
13 between Northwest Holding and Tanya Rote?

14 A. Do you have a piece of paper to show me or can
15 you point to an exhibit?

16 Q. It's actually your exhibit. Your exhibit,
17 page number three.

18 MR. ALBERTAZZI: I'm -- are you talking about,
19 Mr. Rote, our deposition exhibits from when we took
20 yours and Mrs. Rote's deposition last week?

21 MR. ROTE: Yes. That's correct. And it also
22 is the only two documents that were provided so far
23 in discovery. The quitclaim deed and the warranty
24 deed are the only two documents that you have
25 provided in discovery.

1 BY MR. ROTE:

2 Q. Are you familiar with the warranty deed, Max?

3 A. **I'm not sure which document you're referring**
4 **to.**

5 Q. You only provided two documents in response to
6 discovery. It was one of two.

7 A. **I've never heard the term "warranty deed". So**
8 **I don't know what you're talking about.**

9 Q. You have not looked at the data you provided,
10 the documents you provided in discovery?

11 A. **I'm sorry. Can you repeat the question?**

12 Q. I said you have not looked at the documents
13 you have provided in discovery?

14 A. **I'm sure I have looked at them. As I sit here**
15 **today, I don't remember is my answer.**

16 Q. You don't remember looking at the warranty
17 deed? That's your answer?

18 A. **No. My answer is to your question when did I**
19 **discover that.**

20 Q. You don't remember that?

21 A. **I believe I answered that.**

22 Q. Was it -- to jog your memory, was it before
23 counsel -- before you hired counsel or after?

24 A. **As I sit here today, I don't remember.**

25 Q. I want to refer to Exhibit 1 that we provided,

1 Defendant's Exhibit 1, opinion and order.

2 (Exhibit 1 identified.)

3 Q. Do you recall engaging in fraudulent transfer
4 litigation from 2014 to 2018?

5 A. I do recall that case. Yes, sir.

6 Q. And you recall the opinion by Judge Hernandez
7 in favor of me and the other defendants?

8 A. Yes, sir. That is an interesting opinion. I
9 don't agree with it, of course. That wasn't my case. I
10 also find it extremely interesting that -- had you not done
11 anything you did -- somehow you got away with that.

12 You know, somehow you flim-flammed and got
13 away with that -- at that case. And had you not done any
14 of the things that you did with your blog, you wouldn't owe
15 me half a million dollars today. Only because of your
16 actions did you not walk away from this whole thing. That
17 was really stupid, sir.

18 THE REPORTER: I'm sorry. Hold on. Hold on.

19 Your voice cut out. I didn't hear you.

20 BY MR. ROTE:

21 Q. Are you going to answer my questions or are
22 you going to use this as a platform to make your
23 statements?

24 A. Sir, I'm answering your questions. You've
25 done a lot of things to me over the years and you requested

1 that I be here at this deposition. Frankly, I don't know
2 what information I have for you, but you seem to think I
3 have some information for you, so I'm appearing at this
4 deposition as I am supposed to do.

5 And you have a very aggravated witness here
6 because you have been unrelenting for 20 years torturing
7 myself, my family, my attorneys. You have successfully
8 denied me my right to counsel by asking one of my
9 attorneys, Given your age how many children --

10 MR. ROTE: Mr. Albertazzi, I'm going to object
11 to --

12 A. -- how many children have you raped. Okay.
13 You asked my attorney how many children he has raped, sir.
14 You like to fly under the radar and you like to do these
15 actions and then you like to step back from them, like, you
16 know, oh, I didn't do that.

17 Or I don't know what you think, but everybody
18 else sees your actions. And I think it's pretty important
19 that everybody sees your actions, sir. Your credibility
20 has stretched beyond belief and perhaps you should consider
21 that before you keep going as your own attorney.

22 You walked into a courtroom with \$150,000
23 against you and walked out losing a million. You're not
24 good at it, sir. You should probably stop.

25 MR. ROTE: You have the benefit of continued

1 counsel all this time.

2 MR. ALBERTAZZI: Objection. Do not answer
3 anything related to communications or agreements
4 between yourself and me or any other attorney that
5 represented you.

6 THE WITNESS: Yes, sir.

7 BY MR. ROTE:

8 Q. Do you recall a deposition in August of 2017
9 on the same fraudulent transfer case?

10 A. I do not.

11 Q. You do not remember having your deposition
12 taken in August 2016?

13 A. I had a lot of depositions taken as a result
14 of the things that you've done to me, my family, and my
15 attorneys. And also included judges once in a while. So
16 no, I do not.

17 Q. Do you recall in August 2016 that Linda
18 Marshall admitting to having driven by the Sunriver
19 property?

20 A. You have a deposition that you can show me
21 that indicates that?

22 Q. No, I do not.

23 A. Are you telling me that Linda Marshall said
24 this in a deposition?

25 Q. I'm saying the August 2016 deposition she

1 admitted to driving by the Sunriver house.

2 when did you discover the ownership of the
3 Sunriver property or the existence of the Sunriver
4 property?

5 **A. That would go against attorney/client**
6 **privilege. I do not remember the date and I will tell you**
7 **that. And I have no idea where you're going with Linda**
8 **Marshall. No. I don't remember anything that you're**
9 **talking about about that.**

10 Q. You placed a lien on the Sunriver property as
11 well as a lis pendens. Are you aware of that?

12 Did you hear my question?

13 **A. I don't know.**

14 Q. Ward Greene's firm, Williams Kastner, placed
15 the lien on the Sunriver property?

16 **A. Okay.**

17 Q. Do you know that?

18 **A. Yes, sir.**

19 Also, I'm going to trust what you're saying in
20 that. And believe me that's tough. I don't trust a lot of
21 what you say, but if you're saying that happened I have to
22 believe that you're consulting a piece of paper that
23 indicates that. So, fine.

24 Q. Yeah. We -- I can continue to give you the
25 same kind rhetoric back and forth so --

1 **A. You do whatever you want, sir. This is your**
2 **deposition --**

3 Q. And I'm trying to take it.

4 **A. You do whatever you want.**

5 THE REPORTER: Excuse me.

6 MR. ROTE: I'm trying to take it.

7 THE REPORTER: Hold on. I can only report one
8 person at a time.

9 BY MR. ROTE:

10 Q. Ready to go on?

11 **A. You asked me here, sir. Some of your answers**
12 **-- I have been -- I have been asked to tell the truth, the**
13 **whole truth, and nothing but the truth.**

14 That whole truth part seems to be the problem
15 where you're concerned. So a lot of times you're asking me
16 questions that have other circumstances surrounding them
17 and I'm going to make sure they're mentioned.

18 Q. Are you ready to go on? I've got lots of
19 other questions for you.

20 **A. I'm sure you do.**

21 Q. Okay. You're aware that the lis pendens
22 caused the sale of the property to fail?

23 **A. I'm not aware -- no. I'm not aware of that.**
24 **If that property failed, I was not there with you. I don't**
25 **know the particulars of what happened there. Properties**

1 fail for a lot of reasons. I have no idea why your
2 property failed to sell.

3 Q. How long have you been following or aware of
4 the Sunriver property?

5 A. As I sit here today, I don't remember.

6 Q. Was it in 2004, 2015, 2016?

7 Does that jog your memory?

8 A. I believe I answered your question.

9 Q. Joel Christiansen owns half the judgment you
10 referred to earlier?

11 A. I believe you may be talking about an
12 attorney.

13 Q. That's correct.

14 A. I don't know what Joel Christiansen owns or
15 has.

16 Q. What role did Joel Christiansen play in filing
17 the lis pendens?

18 Do you know?

19 A. You have to be aware of these areas that
20 you're going into that have already been discussed that I'm
21 not supposed to go into.

22 THE REPORTER: I'm sorry. What was that?

23 MR. ROTE: I said there was no objection to
24 that question.

25 THE REPORTER: Thank you.

1 **A.** If you need me to tell you again that I'm not
2 going to go into answers that would go into attorney/client
3 privilege, then I'll be happy to say that as my answer.

4 BY MR. ROTE:

5 Q. So we need to note that for the record because
6 that is not an attorney/client privilege question.

7 when did you discover the Sunriver property
8 was being marketed for rent on VRBO?

9 **A.** **As I sit here today, I don't remember.**

10 Q. Have you filed a malpractice claim against
11 Williams Kastner?

12 MR. ALBERTAZZI: Objection as to relevance.

13 You can answer it.

14 **A.** **No.**

15 BY MR. ROTE:

16 Q. Why was Williams Kastner fired?

17 MR. ALBERTAZZI: Object.

18 THE WITNESS: I would like to answer that
19 question.

20 MR. ALBERTAZZI: Hold on.

21 **A.** **Yeah. I'm sorry.**

22 Williams Kastner quit because you sent an
23 e-mail to Ward saying, Given your age how many children
24 have you raped. You denied me that right to counsel.

25 Thank you for asking the question.

1 BY MR. ROTE:

2 Q. Are you aware that Michael Montag who
3 represented us -- Northwest Holding at the time -- I want
4 to refer you to Exhibit 2.

5 (Exhibit 2 identified.)

6 Q. Do you have it?

7 A. **Not yet, sir.**

8 MR. ALBERTAZZI: If it's possible to enable
9 screen sharing, I can bring these up if that would be
10 easier.

11 THE WITNESS: I think I have it now. If I
12 can't get one, sir, I'll let you know, but I got this
13 one.

14 MR. ALBERTAZZI: All right.

15 BY MR. ROTE:

16 Q. Are you aware that Michael Montag offered you
17 alternative property as opposed to pursue this lawsuit
18 against Tanya Rote?

19 A. **Sir, the award -- the half-million-dollar**
20 **award given by the jury -- the jury -- sorry -- was a**
21 **cash award. Not interested in getting into a land deal**
22 **with a completely untrustworthy person.**

23 So you can sell your land. You can sell
24 whatever you need to sell and I imagine you probably will
25 have to. And you can pay your judgment. The award was for

1 a cash judgment.

2 Q. -- to do so. That is correct.

3 A. **I'm sorry. I talked over you. Can you say**
4 **that again?**

5 Q. Yeah. I'm just restating. You refuse to
6 accept that property?

7 A. **Sir, the property had no objective value.**
8 **It's a subjective value commodity. You can't even say a**
9 **statement of, here, I am offering you X amount of money.**
10 **It is a subjective commodity, so it doesn't even work. You**
11 **can't just offer something and say whatever --**

12 I'm sorry. What's that, sir?

13 Q. Do you consider yourself a real estate expert?

14 A. **No, I don't, but I consider myself to have**
15 **common sense.**

16 Q. Let's go to Exhibit 3 please.

17 (Exhibit 3 identified.)

18 A. **I have it.**

19 Q. Okay. On the last page, can you give me the
20 date that that was signed on page four?

21 A. **This is your document, sir.**

22 Q. It is.

23 A. **It is.**

24 Q. When did you --

25 A. **I'm not going to discuss your documents.**

1 These are your documents for your case. And I'm not going
2 to discuss your documents for your case.

3 MR. ROTE: Mr. Albertazzi, I'm having a very
4 difficult time deposing Max. He seems to want to
5 interject a commentary here.

6 I'm trying to decide -- get an observation
7 from him, a comment, or an acknowledgment of when
8 this document -- when he first became aware of this
9 document.

10 MR. ALBERTAZZI: And so your question is when
11 did you first become aware of Deposition Exhibit
12 Number 3?

13 MR. ROTE: Correct.

14 MR. ALBERTAZZI: Okay. So you can answer
15 that, Mr. Zweizig.

16 THE WITNESS: Okay. As I sit here today, I
17 don't remember when I became aware of this. I
18 basically would challenge the authenticity of almost
19 any document you said you prepared. You forged
20 subpoenas to other attorneys before. I mean, it's
21 very difficult to trust any document that you --

22 MR. ROTE: Enough. Enough of the nonsense.
23 Okay. Let's get to the questions. Answer my
24 questions. You'll have your day in court if that's
25 what you choose and you can show up and do that.

1 THE WITNESS: No. You're choosing that, sir.

2 MR. ROTE: Right now --

3 THE WITNESS: You're choosing the day in
4 court.

5 MR. ROTE: This is not your deposition. This
6 is my deposition. I'd like --

7 THE WITNESS: I understand that.

8 MR. ROTE: -- like to be able to complete it
9 without --

10 THE WITNESS: I understand.

11 MR. ROTE: -- without the ongoing commentary.
12 okay?

13 THE WITNESS: I appreciate that desire. I
14 appreciate you not telling me it's my day in court
15 and I want it. I don't want it. I want you to pay
16 your judgment. And you can go on and have all the
17 real estate and houses and everything that you want.

18 Your life doesn't concern me, sir. What
19 you've done to mine does. So don't tell me that I'm
20 looking for a day in court. You're the one causing
21 all of this to happen.

22 MR. ROTE: You filed this lawsuit.

23 THE WITNESS: Yes, sir. You're not paying
24 your judgment. You need to pay your judgment. If
25 you think I'm not going to try and get you to pay

1 your judgment -- if you choose not to pay it, then
2 that would be silly on your part.

3 BY MR. ROTE:

4 Q. How about Exhibit 4?
5 Can you take a look at Exhibit 4?
6 (Exhibit 4 identified.)

7 A. **I have it.**

8 Q. Okay. When did you first receive notice of
9 this Exhibit 4 from Williams Kastner?

10 MR. ALBERTAZZI: I guess I'm going to object
11 if you're asking him when he got information from
12 Williams Kastner because that could get into
13 attorney/client privilege.

14 The question is when did he become aware of
15 the existence of this agreement. I mean, is that
16 what you're trying to ask?

17 If you can narrow it that way, you know, that
18 might help. When did he become aware of the
19 existence of this document. Not assuming that it's
20 valid -- not valid, authenticate or not. When did he
21 become aware. I don't have any objection to that.

22 BY MR. ROTE:

23 Q. Okay. When did you become aware of this
24 document?

25 A. **As I sit here today, I don't remember.**

1 Q. This document was filed almost two years ago.
2 Does that jog your memory?

3 A. **That's something you're saying. I don't**
4 **believe you.**

5 Q. The document was filed in a summary judgment
6 motion almost two years ago.

7 A. **If you say so.**

8 Q. Does that jog your memory?

9 A. **No. It does not jog my memory.**

10 Q. Let's go to Exhibit 5 please.

11 (Exhibit 5 identified.)

12 A. **I have it.**

13 Q. All right. On the left-hand side about three
14 quarters of the way down on J, area J, you see Tanya Rote's
15 ownership percentage of Northwest holding?

16 A. **This is your tax return or somebody else's tax**
17 **return. It's not mine.**

18 Q. It's Northwest Holding's tax return.

19 A. **Okay. I don't know anything about Northwest**
20 **Holding's tax return. I'm not comfortable commenting on**
21 **documents for Northwest Holding.**

22 MR. ALBERTAZZI: what's the question about
23 item J, Mr. Rote? Maybe you can just ask the
24 question.

25 BY MR. ROTE:

1 Q. The ownership percentage, you see that on item
2 J?

3 A. Okay. I see it.

4 Q. Okay. What does it say?

5 A. Says profit, loss, capital, beginning, ending.

6 Q. What are the percentages?

7 A. I don't know. 25, 25, 25. Isn't that
8 supposed to add up to something? Is it 75 it's supposed to
9 add up to? I don't understand what I'm looking at. This
10 is your document.

11 And, again, I would challenge the authenticity
12 of any document that you would give me.

13 MR. ROTE: That gets old, Mr. Albertazzi.

14 THE WITNESS: It can get hold. You're right.
15 It has gotten old.

16 MR. ALBERTAZZI: Are you asking him just to
17 repeat what he sees on that?

18 MR. ROTE: He answered 25 percent. That's
19 fine. It's the after document commentary. You know,
20 we showed I think professional courtesy to you during
21 our depositions. And I'm going to -- I'm going to
22 ask that of Mr. Zweizig if he can summon that up.

23 THE WITNESS: Well, I'm trying, sir, but like
24 I explained in the beginning of this, you're putting
25 myself and my family in danger while you're asking me

1 to come here and give a deposition. So I'm sorry for
2 your look.

3 MR. ALBERTAZZI: So let's proceed with the
4 questions.

5 THE REPORTER: I'm sorry. I cannot hear you.

6 BY MR. ROTE:

7 Q. Let's go to Exhibit 7 please.

8 (Exhibit 7 identified.)

9 A. **I have it.**

10 Q. So that is a -- I'll represent to you that's a
11 VRBO home-away marketing statement that we provided to your
12 counsel.

13 Do you see that Tanya Rote's identified up
14 above as an owner and member?

15 A. **I see that.**

16 Q. All right. Let's go to Exhibit 8 please.

17 (Exhibit 8 identified.)

18 A. **I have it.**

19 Q. Okay. This a declaration from your attorney
20 tear Taryn Basauri, former attorney. Notes that the
21 quitclaim -- on paragraph three the quitclaim was dated
22 April 24th, 2017. It was submitted as a document in
23 opposition to the motion for summary judgement.

24 Do you see that?

25 MR. ALBERTAZZI: Mr. Rote.

1 THE WITNESS: I'm sorry. I didn't hear.

2 MR. ALBERTAZZI: I'm sorry. Which paragraph
3 number did you say? I'm just trying to follow along.

4 MR. ROTE: Paragraph three, three.

5 THE WITNESS: Can you repeat the question?

6 BY MR. ROTE:

7 Q. Referring to paragraph three, do you see that
8 Taryn Basauri has admitted into evidence there for the
9 first time the quitclaim deed? You see it by reference?

10 A. I do.

11 Q. Go ahead and read that paragraph.

12 Okay. And the date of that -- the date of
13 that deposition by Taryn Basauri on page two, do you see
14 it's dated March 1st, 2019, on page two?

15 A. Looking for it. You're saying there's a date
16 there?

17 Q. Right after --

18 A. Yeah. I see it.

19 Q. Okay.

20 A. I got it.

21 Q. Okay. Referring back to paragraph four, you
22 see that she made reference -- Taryn did -- to the
23 secretary of state's documentation as to a member's
24 interest on that date, December 11, 2017?

25 A. Couple things. I don't understand what a

1 **member's interest is. What is that?**

2 Q. That's the question we're going to get to.

3 Do you understand LLC or partnership law at
4 all, tax law or any other?

5 A. No.

6 Q. No. So do you understand that a member has an
7 ownership interest in an LLC or partnership?

8 Do you understand that?

9 A. **You're telling me that right now. Are you**
10 **saying that the members are you and Tanya.**

11 Q. Members are me and Tanya. They were.

12 A. **Oh. Any other members?**

13 Q. Even if that were true no other members need
14 to be disclosed. Do you understand that?

15 A. **Sure.**

16 Q. Okay. And on that same document dated March
17 1, 2019, it is on paragraph five, do you see that it is
18 referencing a general warranty deed of the Sunriver
19 property?

20 Do you see that?

21 A. **Yeah. I see what it says.**

22 Q. would these be the approximate dates then that
23 on or before this declaration was provided that you became
24 aware of the quitclaim and warranty deed or was it before
25 that?

1 **A. As I sit here today, I don't remember.**

2 Q. Okay. Like to look at Exhibit Number 9
3 please.

4 (Exhibit 9 identified.)

5 **A. I have it.**

6 Q. Okay. would you go to paragraph three on the
7 second page, starting at line one?

8 **A. You're saying second page?**

9 Q. Page two.

10 **A. Got it.**

11 Q. Line one.

12 **A. Yep.**

13 Q. You see it says, My office informed
14 Mr. Zweizig of these transfers?

15 **A. I see that.**

16 Q. You also see that, Mr. Zweizig also informed
17 my office that Mr. Rote has previously been listed as an
18 owner of the Sunriver property on VRBO?

19 **A. VRBO is what? Is that a website?**

20 Q. It is. It's a marketing website --

21 **A. Okay.**

22 Q. -- for vacation rental property.

23 You see that Ms. Basauri is acknowledging that
24 you were -- you informed her or her office about some
25 content on the Sunriver property that was on VRBO?

1 Do you see that on lines two and three?

2 A. Yeah. I see it.

3 Q. Okay. Do you see on line five that in a
4 addition to other information provided by Mr. Zweizig's
5 internet research?

6 A. I'm not seeing the words "internet research".
7 Sorry.

8 Q. It's on line five.

9 A. Okay. Got it.

10 Q. Can you tell me what that internet research
11 was?

12 A. I don't remember.

13 Q. Can you tell me when you did that internet
14 research?

15 A. I cannot. I don't remember.

16 Q. Remember how far back -- do you happen to know
17 when you discovered the Sunriver property?

18 A. I think I answered that, but as I sit here
19 today I don't remember that.

20 I'm going to need a break in about five
21 minutes.

22 Q. Probably a good time to break if you'd like.

23 A. Okay.

24 (Pause in proceedings at 10:36 a.m.)

25 (Proceedings resumed at 10:42 a.m.)

1 Q. All right. I think we left off with Exhibit 9
2 and I want to restate again for the record -- or ask the
3 question again how long you've been following the Sunriver
4 property on VRBO?

5 A. I believe I answered that.

6 Q. Do you have any documents that you turned over
7 to -- that you saved that would identify when you
8 discovered the Sunriver property? It appears that Taryn
9 Basauri makes reference to information you provided.

10 A. I believe I've turned over all the documents I
11 have.

12 THE REPORTER: I'm sorry. What was the
13 question?

14 BY MR. ROTE:

15 Q. I asked if there were additional documents
16 that Taryn -- that Mr. Zweizig has turned over or
17 identified or saved that he should have turned over by now
18 by reference to Taryn Basauri's statement in the Exhibit
19 Number 9.

20 A. That was a long time ago. As I sit here
21 today, I don't remember.

22 Q. So I, again, restate that you've only turned
23 over two documents to us in discovery. And Taryn Basauri's
24 declaration makes it clear that you provided information to
25 her, including documents.

1 Do you not have those documents? Is that your
2 position?

3 **A. As I sit here today, I don't remember. There**
4 **may be things that were printed out from a website that you**
5 **had. It's your website. So it may be a document that you**
6 **already have. I don't know.**

7 MR. ROTE: Well, I'll note for Mr. Albertazzi
8 that according to Taryn Basauri there are other
9 documents that Mr. Zweizig has provided on his
10 discovery data of VRBO that we're still looking to
11 receive from you.

12 THE WITNESS: If you can identify any
13 documents, I'd be happy to turn them over. Like I'm
14 telling you, I don't know if documents that you're
15 alleging are missing were responsive or not.

16 BY MR. ROTE:

17 Q. well, we'll have to -- the Exhibit Number 9
18 made reference to that and you've just been deposed on
19 that. And it is clear that you provided other documents to
20 Taryn Basauri on your discovery data of the Sunriver
21 property. So we do, in fact, want those documents.

22 **A. That's fine. I'm saying -- to clear it up --**
23 **it's not clear to me. So you're saying it's clear. Fine.**

24 Q. Good. Go to Exhibit Number 10.

25 (Exhibit 10 identified.)

1 Q. Do you have it?

2 A. **Not yet.**

3 Yes, I have it.

4 Q. Okay. I'll represent to you that this is a
5 rental agreement between Northwest Holding and a renter of
6 that property.

7 Under paragraph one, under term, do you see
8 the date there?

9 A. **I see the date there.**

10 Q. And is it November 29th -- 25th to November
11 29th, 2013?

12 A. **That's what the document says.**

13 THE REPORTER: I'm sorry. Your voice cut out
14 again.

15 BY MR. ROTE:

16 Q. I'd like to go to the last page of that same
17 document.

18 A. **I'm at the last page.**

19 Q. Do you see that Tanya Rote is listed as
20 manager and, in fact, signed that document?

21 A. **I see on the document that there is a
22 signature that reads in handwriting Tanya Rote.**

23 Q. She's identified as the manager?

24 A. **Underneath whoever signed it that says Tanya
25 Rote, it says manager Tanya Rote. Yes, sir.**

1 Q. And the date it was executed, do you see May
2 24th, 2013?

3 A. **I do see that.**

4 Q. Okay. Back up to the page two, it says,
5 Please make checks payable. It's about the middle of the
6 page. Do you see that?

7 A. **I do see that.**

8 Q. And it says Northwest Holding LLC.
9 Do you see that?

10 A. **I do see that.**

11 Q. All right. Go to Exhibit Number 11 please.

12 A. **Is that your company you're saying that has
13 those members? Is that what you're saying?**

14 Q. Go to Exhibit 11 please.
15 (Exhibit 11 identified.)

16 Q. Do you have it?

17 A. **There it is. Sorry. Go ahead.**

18 Q. So you see that this is a sell document. If
19 you look on line two, do you see who the seller is?

20 A. **I see that.**

21 Q. And you see on line four that it is the
22 Sunriver property that's the topic of this -- subject of
23 this litigation?

24 A. **I see that as well.**

25 Q. Okay. I'll represent to you that this is an

1 offer that failed because of the lis pendens you filed.

2 were you aware of that?

3 **A. I think I already answered I'm not aware why**
4 **any real estate sales that you made were successful or**
5 **failed. I'm not there with you.**

6 Q. Do you know that the lis pendens caused a lien
7 that caused the buyers to want to exit the purchase of the
8 property?

9 **A. That's a lot of clauses. And I'm not there.**
10 **I don't know. I don't know how I can answer your question.**
11 **I'm not trying to be difficult. I'm just -- I wasn't there**
12 **with you. I don't know.**

13 Q. Do you know what a lis pendens is?

14 **A. Not really.**

15 Q. Okay. Your attorney hasn't disclosed to you
16 or educated you on what a lis pendens is?

17 **A. Can't answer that question.**

18 Q. You can answer that question.

19 MR. ALBERTAZZI: No. Hold on. I'm just going
20 to instruct him not to answer that, Mr. Rote. You're
21 asking him what his attorney has educated him about.
22 It's fine to ask him if he knows what something is.

23 I don't object to that, but I object to your
24 asking him what he learned or what communications
25 were made by his attorney to him because that's

1 attorney/client privilege.

2 BY MR. ROTE:

3 Q. Did Sandra wear (ph) educate you on what a lis
4 pendens is?

5 A. Sir, I'm not going to talk to you about other
6 people.

7 Q. Is Sandra wear still your fiancé?

8 A. I really don't believe that's any of your
9 business. And given what you've done with anybody that
10 comes in contact with me, I don't think that that is very
11 responsible of me to talk about anyone. I will tell you
12 that your information is sadly out of date. That's the
13 answer you're going to get.

14 Q. The Clackamas County case 19CV14552 you were
15 represented by the Professional Liability Fund; is that
16 correct?

17 A. Are you telling me I was represented by an
18 attorney?

19 Q. Nina Cook who was hired by the Professional
20 Liability Fund. Can you confirm that?

21 A. I believe I did have Nina Cook as somebody I
22 knew in regard to all this.

23 Q. Did you file a malpractice claim against Linda
24 Marshall?

25 A. No.

1 Q. Can you tell me why the PLF represented you
2 during that litigation?

3 A. I think they have a phone number. I think
4 you're starting to get into an area of conversations with
5 an attorney that -- I don't think that's an area we should
6 get into. You're welcome to ask them.

7 Q. You don't know why you were represented by the
8 PLF?

9 MR. ALBERTAZZI: I guess I would object on
10 relevance. He can answer it if he knows as long as
11 it doesn't venture into what would -- what he was
12 advised by an attorney.

13 A. Yeah. Because of the attorney/client
14 privilege area, I don't think I can answer that.

15 BY MR. ROTE:

16 Q. Did you file this lawsuit to just harass Tanya
17 Rote?

18 A. No, sir. I am trying to collect a half
19 million dollar that will likely in my opinion turn into a
20 million dollar judgment against you which you could simply
21 pay. Anything happening to Tanya Rote, you're causing.
22 You don't need to be doing any of this.

23 Q. You filed this lawsuit against Tanya Rote?

24 A. I believe this is fraudulent transfer lawsuit.
25 And as I've told you, I'm not an attorney. I'm not sure

1 you're characterizing this properly, but if you say that
2 that's how it's worded, then that's how it's worded.

3 MR. ROTE: I don't have any other questions.

4 MR. ALBERTAZZI: I just wanted to do a little
5 bit of follow-up just to -- just to clear up the
6 record here on this discovery issue.

7 I am going to e-mail an exhibit here. I've
8 got two exhibits actually. And, Mr. Rote, I'm going
9 to e-mail those to you and then the court reporter.
10 I'm going to e-mail those to her as well, so that I
11 can put these in the record. So just give me a
12 moment here while I do that. And once you receive
13 them, please let me know.

14 MR. ROTE: What e-mail address are you using?

15 MR. ALBERTAZZI: I'm using
16 Tim@rote-enterprises.com or which one do you want me
17 to use?

18 MR. ROTE: That's fine.

19 MR. ALBERTAZZI: Okay. So the first -- I just
20 sent it and it has two attachments. The first one is
21 named Discovery Responses. And I would like to have
22 that be Exhibit Number 12 to this deposition.

23 (Exhibit 12 identified.)

24 Q. The second one is called Twitter post and I'd
25 like that to be Exhibit 13.

1 (Exhibit 13 identified.)

2 MR. ROTE: The first one appears to be your
3 deposition exhibit responses; is that accurate?

4 MR. ALBERTAZZI: Yes. So Exhibit 12 is the
5 formal response that my office did to your request
6 for production of documents. And you -- and I see
7 attached onto there some documents starting at 000001
8 to 14.

9 THE REPORTER: I'm sorry. I can't hear you,
10 Mr. Rote.

11 MR. ROTE: I said those are documents that I
12 have also represented -- presented here in this
13 deposition as well as the quitclaim and warranty deed
14 and the others. I think a title report. So, yeah.

15 MR. ALBERTAZZI: Okay. So, anyway, there was
16 some comments made before that only two documents had
17 been produced. And I wanted to clarify for the
18 record that -- that this here is what was produced,
19 which is Exhibit Number 12, was the response to
20 production of documents.

21 And I think, Mr. Rote, you acknowledge here
22 that, yes, you did receive that?

23 MR. ROTE: Correct.

24 MR. ALBERTAZZI: As to discovery from other
25 attorneys, I just wanted to clarify that to my

1 knowledge there has just been one request for
2 production of documents from you, Mr. Rote. And I've
3 actually reproduced those here in the response. They
4 number from 1 to 47.

5 Are there any other discovery requests,
6 document requests, in this case that you have
7 submitted to Mr. Zweizig?

8 MR. ROTE: Yes. We submitted a request for
9 production to Williams Kastner some time ago as you
10 know and -- but I think that these requests are
11 identical. So they did not respond to it, so I
12 think --

13 MR. ALBERTAZZI: So what I am hearing from you
14 is that Williams Kastner did not produce anything in
15 response to your request; is that accurate?

16 MR. ROTE: That's correct.

17 MR. ALBERTAZZI: Okay. Just clarifying.

18 So this was intended to -- Exhibit 12 was
19 intended to be the complete response, so I just
20 wanted to have that put on the record for
21 clarification purposes.

22 And if you have additional questions relating
23 to that, you can certainly ask them.

24 The next item is Exhibit Number 13. And this
25 is a Twitter post that I brought up during your

1 deposition, Mr. Rote, last week. And you asked me to
2 e-mail this to you which I did.

3 MR. ROTE: Correct.

4 MR. ALBERTAZZI: Okay. I wanted to know if
5 this is something that -- this type of public
6 communication is going to continue or if it's going
7 to stop during the pendency of this litigation while
8 we're not wanting to taint the jury?

9 MR. ROTE: So I have taken that down at your
10 request or at least I interpreted that to be your
11 request.

12 MR. ALBERTAZZI: All right. And that this
13 type of communication then won't -- won't be posted
14 while the case is pending; is that our agreement?

15 MR. ROTE: No. I haven't necessarily agreed
16 to that. I have agreed to curtail anything that is
17 that specific, but I'll continue to post on my blog.

18 MR. ALBERTAZZI: Okay. But this Twitter post
19 which is Exhibit 13 has been taken down you say?

20 MR. ROTE: At your request I took it down.

21 MR. ALBERTAZZI: Okay. All right. And, once
22 again, it's not -- the purpose here -- main purpose
23 is to not have communications out there that could
24 contaminate the jury pool.

25 what you say that's not related to this case

1 is certainly something that you can do should you
2 choose to do that, but these kind of personal attacks
3 on Mr. Zweizig and his attorneys is not appropriate
4 and I'm hoping it doesn't continue.

5 If it does continue, I'll take it up with the
6 court. I'm assuming based on our discussions today
7 it won't, but if it does, I will take it up with the
8 court.

9 MR. ROTE: There may be a time when we need to
10 do that.

11 MR. ALBERTAZZI: Okay. And so I just wanted
12 to make that clear.

13 So with that, I don't have any follow-up. And
14 are you done with your questioning now, sir?

15 MR. ROTE: Yeah.

16 MR. ALBERTAZZI: Okay. So we can close this
17 deposition. And then I just wanted to make sure the
18 court reporter got those exhibits.

19 If you didn't get them, please let me know.

20 And I guess we'll go ahead and conclude. I'm
21 going to log off.

22 MR. ROTE: Okay.

23 MR. ALBERTAZZI: Thank you.

24 (Deposition concluded at 11:05 a.m.)

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REPORTER'S CERTIFICATE

I, LARISA Y. GIACOMINI, Registered Professional Reporter and Certified Shorthand Reporter for the State of Oregon, California and Idaho, hereby certify that, pursuant to Oregon Rules of Civil Procedure, MAX ZWEIZIG, appeared remotely at the time and place set forth in the caption hereof; that at said time and place I reported remotely in stenotype all testimony adduced and other oral proceedings had in the foregoing matter; that thereafter my notes were transcribed through computer-aided transcription, under my direction, and that the foregoing pages, numbered 1 to 40, both inclusive, constitutes a full, true and accurate record of all such testimony adduced and oral proceedings had, and of the whole thereof. Further, that I am a disinterested person to said action.

WITNESS my hand at Bend, Oregon, this 29th day of December, 2020.



LARISA Y. GIACOMINI, RPR, CSR
Oregon CSR No. 10-0415
Expiration September 30, 2022
California CSR No. 5734
Expiration June 30, 2021
Idaho CSR No. SRL-981
Expiration June 30, 2021

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