

18 INSURED EXAMINATION UNDER OATH (EUO)

19 BY MR. SNORF:

20 Q. These are repeats of the document of
21 Exhibits 10 and 11, but I've pulled them out for
22 easier reading.

23 MR. SNORF: Exhibit 10 is the protective
24 safeguards endorsement on the 141 policy, and

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1 Exhibit 11 is the protective safeguards endorsement on
2 the 151 policy.

3

4 BY MR. SNORF:

5 Q. Now, you were kind enough to report -- state
6 earlier that these documents appear to be the same?

7 A. Uh-huh.

8 MR. SNORF: That "uh-huh" meant "yes"?

9 A. Yes. Sorry for that.

10 MR. SNORF: And here why: "Uh-huh" and "huh-huh"
11 only have a different of one letter. So, at least for
12 today, we're going to say "yes" or "no". All right?

13 A. Yes.

14 MR. SNORF: Perfect. Thank you.

15

16 BY MR. SNORF:

17 Q. So, as you testified earlier, the 521 had no
18 type of automatic fire alarm system at any time in the
19 building; is that right?

20 A. Right.

21 Q. And there was no service contract for the
22 maintenance of a fire protection service within the
23 521; is that a fair statement?

24 A. That is correct.

1 Q. Now, did you ever make complaint to Mixon or
2 to Dovetail or to [REDACTED] that they sold you the wrong
3 coverage?

4 A. I did not.

5 Q. My records show that the only protective
6 service you had for 521 was a burglar alarm system
7 through Paul Thompson at Action Electric; is that a
8 fair statement?

9 A. Yes.

10 Q. I want to ask you some questions, now
11 leaving the topic of the insurance policies and
12 protective safeguards endorsements. Obviously, we've
13 gone into some detail about the ambiguities about the
14 bond for deed, how much was paid, when it was signed,
15 what your ownership interest was and so forth. Did
16 you know that on March 21, 2013 that [REDACTED], and
17 [REDACTED] bought 521 ML King Drive at auction for
18 \$22,500?

19 A. I didn't.

20 Q. If you had known that, would you signed a
21 bond for deed \$55,000 on unimproved property?

22 A. Probably so.

23 Q. Do you know why the bond for deed between --
24 Well, the bond for deed, whether signed or unsigned,