

Candace Kunz-Freed

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1 if you did respond one way or the other?
2 A. I don't believe it elicited a response. It
3 just says --
4 Q. That's how she was going to do it?
5 A. Yes.
6 Q. Did you think that would be an appropriate way
7 to do it?
8 MR. REED: Objection, form.
9 THE WITNESS: Typically, if that was --
10 Q. (By Ms. Bayless) I'm sorry. If that was what?
11 A. If that's what was done.
12 Q. Did you ever have any contact with the
13 temporary administrator when he was acting in this case?
14 A. No.
15 Q. Did he ever call you?
16 A. No.
17 Q. Asked you for information in any form?
18 A. Not that I'm aware.
19 Q. And how about the, there was a master appointed
20 in the Federal court that Candace filed initially?
21 A. No.
22 Q. You didn't talk to him either?
23 A. No.
24 Q. Or provide any information?
25 A. No.

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1 MS. BAYLESS: Pass the witness.
2 MR. SPIELMAN: All right. Okay.
3 MS. BAYLESS: You want to come down here.
4 MR. SPIELMAN: No. Unless anyone has a
5 problem hearing me, I wouldn't want to recreate this
6 pile of strangeness as it is.
7 MS. BAYLESS: The court reporter, you can
8 hear.
9 THE COURT REPORTER: Yes.
10 EXAMINATION
11 BY MR. SPIELMAN:
12 Q. Ms. Freed, we've met throughout the course of
13 your deposition and you understand that I represent Amy
14 Brunsting in this lawsuit that has been filed by Carl
15 Brunsting and also the lawsuit that's been filed by
16 Candace Curtis; correct?
17 A. That's correct.
18 Q. Other than in the context of your position
19 today, you and I have never met before or worked
20 together on any other projects?
21 A. Not that I'm aware.
22 Q. Me either. All right. I want to go back to
23 the signing process or the process that your firm or the
24 firm used when a client comes in to sign a document that
25 has been created. Can you talk to us a little bit more

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1 about that process. How does that work?
2 A. From the signing appointment.
3 Q. Correct. How does that signing appointment get
4 scheduled, first of all?
5 A. So that would typically go on the calendar and
6 that's my due date to have the document prepared and
7 reviewed for that date. And then my assistant would get
8 it, make the appropriate amount of copies, which was
9 three. We always sign three originals. One for the
10 trust binder, one for the originals to go in a fire safe
11 or safety deposit box, and the law firm would keep a
12 signed copy or signed original, if you will.
13 The client would come in for the appointment. They
14 were given the documents to review prior to the attorney
15 coming in. If they were complicated documents, wordy,
16 then that time would be shortened and I would sit down
17 with the client and go through the document itself, make
18 sure it said what they wanted it to say and it was
19 appropriate, they had not changed their mind from the
20 time they called us and the time the document was
21 produced.
22 And then we would get the notary in, sometimes I
23 would act as a notary, and sign the document three
24 times.
25 Q. As far as the documents that we've been talking

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1 about in this case, except for the documents that you
2 may have gone to Nelva Brunsting's house for, was this
3 process you just described the process that was followed
4 with the different trust documents that we have been
5 talking about in your deposition so far?
6 A. That's correct.
7 Q. Specifically that would include what has been
8 previously marked as Exhibit 2, which is the restatement
9 of the Brunsting living trust, correct?
10 A. That restatement was signed when I was not
11 there. But that would be a normal course. That's how I
12 was trained.
13 Q. In preparing for your deposition, did you have
14 any conversations with any of the folks that were on
15 staff, as it were, at the time to see if that process
16 specifically was done with regard to the restatement?
17 A. I did not.
18 Q. But by the time we get to Exhibit 5, which was
19 the qualified beneficiary designation from June of 2010,
20 the process you described is the one you followed with
21 respect to Ms. Brunsting?
22 A. Yes.
23 Q. Okay. And when you, and the same thing with
24 Exhibit 6, which is August 2010, the qualified
25 beneficiary designation, is that correct?