

EXHIBIT C
ADAM SINN - April 08, 2015

Page 45

1 A. Yeah. To my knowledge, yes.
2 Q. Do you remember asking her to set you up with a
3 girl that works at her office?
4 A. I do.
5 Q. And she told you that someone named Paul had a
6 friend who was interviewing at Atlas. Do you remember
7 that?
8 MR. BUSCHI: Object to the form.
9 A. I believe so.
10 Q. (By Mr. Berg) And by "Atlas," that means Atlas
11 Commodities, the party in this litigation?
12 A. I would assume so.
13 Q. Who was Paul's buddy?
14 A. I have no idea.
15 Q. Who is Paul?
16 A. Can I see the conversation?
17 Q. Well, I'm just asking --
18 A. Oh, I assume her husband.
19 Q. Lisa Rich is married to someone named Paul?
20 A. Correct.
21 Q. Okay. And do you recall her telling you that
22 her husband's friend was interviewing at Atlas?
23 A. I -- yeah. I recall something like that.
24 Yeah.
25 Q. Okay. And you said: You should do a

Page 46

1 background check on them?
2 A. I don't recall that, but if I said -- if I said
3 that, yes.
4 Q. What else did you say about Atlas to Lisa Rich?
5 A. Nothing I'm aware of.
6 Q. What did you say to her about Craig Taylor?
7 A. Nothing I'm aware of.
8 Q. And after you said to do a background check,
9 you said there was no response. Do you recall that?
10 A. Not off the top of my head.
11 Q. Do you remember thinking it was funny?
12 A. I don't recall.
13 Q. What did you mean by "do a background check"?
14 A. You know, do a -- you know, like employers do
15 background checks on employees and employees can, you
16 know, do the same on their employers, you know, ask
17 around, like, as in do not blindly, you know, walk into
18 a situation, do some research.
19 Q. That's what you meant by that?
20 A. A background check? Yes.
21 Q. In your conversation with Lisa Rich?
22 A. Yeah. It was your standard, you know, if
23 you're going to work for somebody, you need to do a
24 little bit of a homework before you sign up for, you
25 know, the situation.

Page 47

1 Q. I see. So, what you meant about "do a
2 background check" on Atlas was what you would have said
3 about any company?
4 A. Even if I was hiring someone, I'd tell them the
5 same thing.
6 Q. So, if someone said, "hey, I'm going to
7 interview at XYZ corporation," you would say, "you
8 should do a background check on them, LOL"?
9 MR. BUSCHI: Object to the form.
10 A. Yeah. I mean, even when I hire someone, you
11 know, I tell them to ask around and to make sure they
12 do all their homework before, you know, working for me.
13 So, yeah. Generally speaking, it's just, you know,
14 good advice.
15 Q. (By Mr. Berg) It's your testimony that you
16 didn't mean to single out Atlas in this case?
17 A. No.
18 Q. No, that's not your testimony or, yes, it is?
19 A. Oh, no. It's -- my testimony is that, you
20 know, I would -- Atlas just happened to be the name in
21 that conversation. I would switch them in or out with
22 anybody that someone was interviewing with, including
23 myself.
24 Q. So, this wasn't a particular focus of yours to
25 deride Atlas? It was just, hey, whenever you go apply

Page 48

1 for a job somewhere, make sure you find out about the
2 company you're going to work for? It's just general
3 advice is what you're saying?
4 MR. BUSCHI: Object to the form.
5 A. Correct.
6 Q. (By Mr. Berg) That's correct?
7 A. Correct.
8 Q. Do you remember later that same day sending a
9 text to Jensep Park saying "hearing Atlas stories"?
10 A. I don't.
11 Q. Do you remember saying in that same
12 conversation with Jensep Park "cannot stop laughing"?
13 A. I don't recall that.
14 Q. Do you recall less than seven minutes later
15 saying "I'm learning shit"?
16 A. No. I don't recall.
17 Q. Do you recall that same day saying "PR's Atlas
18 stories are well worth the 20 bucks"?
19 A. I mean, I don't recall the -- no, I don't
20 recall those conversations.
21 Q. Who was PR?
22 A. Dave Acevedo.
23 Q. "PR" stands for Paul -- David Acevedo?
24 A. Well, it stands for "Puerto Rican."
25 Q. That's how you referred to David Acevedo?