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|  | **Q.** (BY MS. TISDALE) Mr. Goodman, did you  represent Ms. Gelbe, now Pinkus, in the  negotiation of the premarital agreement  executed between she and Mr. Pinkus?  A. Yes.  **Q.** When did she hire you?  A. It was in July of 2008. I believe it  Was the 20th of July.  **Q.** Did you have an engagement letter  with Ms. Gelbe?  A. Yes.  **Q.** I’m going to show you what’s been previously marked as Exhibit 2, which is your document Bates Stamped SG 001070. Please refer to just to the last four numbers from now on.  A. Yes, I see it.  (Exhibit No. 2 Marked)  **Q.** (BY MS. TISDALE) Is that a complete copy of your engagement letter with Ms. Gelbe?  A. It is.  Q. What date was this executed?  A. July 20, 2008.  **Q.** And when was the Premarital  Agreement executed?  A. about four months later.  **Q.** Okay.  **Q.** Look at Exhibit 3, which is  your document Bates Stamped SG  1089.  A. Yep.  (Exhibit No. 3 Marked)  **Q**. (BY MS. TISDALE) Is that a  complete copy of the executed  Premarital Agreement?  A. Yes.  Q. What is the date the parties  Executed the premarital agreement?  **A.** November 14, 2008.  Q. Do you know what date the  Parties got married?  A. December 27,2008.  Q. Previously, you stated that  You were not able to be present at the  premarital agreement execution?  A. That is correct.  Q. You did meet with Ms. Gelbe, at your office on November 14, 2008,  though? | 9 |  | A. Yes.  **Q.** Okay.  **Q.** Please see Exhibit 4, which is your  document Bates Stamped SG 002036.  A. Yup.  (Exhibit No. 4 Marked)  **Q.** (BY MS. Tisdale) Is this a copy of  The Premarital Agreement that was in your files  On November 14, 2008?  A. Yes.  Q. And did you speak with Ms. Pinkus about the Premarital Agreement in your files on November 14, 2008?  A. Yes.  Q. Can you describe your November 14, 2008 meeting?  A. I was in the middle of a trial on November 14, 2008, and I knew the parties planned to sign the Premarital Agreement that day. So, Allison came to my office and we went through the Premarital Agreement page-by-page together.  Q. And when you met with Ms. Gelbe on Novembe4 14, 2008, did she  appear to be in a pleasant mood?  A. Sure, I would say that.  **Q.** When you met with Ms. Gelbe on November 14, 2008, did she appear to be rational during the conversation?  A. Yes.  **Q**. When you met with Ms. Gelbe on November 14, 2008, did she appear to be fully coherent?  A. Yes.  Q. She didn’t mention to you that she felt pressured, or under the influence of any coercion or duress?  A. No.  Q. If she had, you would have instructed stopped her from signing the Premarital Agreement, right?  A. Yes, I believe so.  Q. Did Ms. Gelbe have the opportunity to review descriptions of the property and liabilities owned by Mr. Pinkus before Ms. Gelbe executed the Premarital Agreement?  A. Yes, she came into my office in September of 2008 and we went over Mr. Pinkus’ property and debts. | 11 |
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|  | **Q.** How did you know what Mr. Pinkus’ assets and liabilities were?  A. Mr. Pinkus provided Ms. Pinkus and me a memorandum setting out his assets and debts—I think that was in early September.  **Q.** Did you ever ask Mark Pinkus to clarify anything about the assets and liabilities in the memoranda?  A. Yes.  **Q.** Was Mr. Pinkus forthcoming to you with a response?  A. Yes.  **Q.** In what way was Mr. Pinkus forthcoming about his assets and liabilities prior to the execution of the Premarital Agreement?  A. We had 2 or 3 in-person meetings, both attorneys and both parties, to discuss the terms of the premarital agreement and to clarify questions each party had about the other’s assets—mainly, the questions arose related to Mr. Pinkus’ business interests.  **Q.** Did you ever make any request of Mr. Pinkus or his attorney asking for  additional information that Mr. Pinkus refused to comply with?  A. No, not that I recall.  **Q.** Are you aware of any occasion when Mr. Pinkus told your client that he would not give her information that she requested?  A. No.  **Q.** And did Ms. Gelbe leave you with the impression that she was pleased with the work you did on her behalf in negotiating the terms of the premarital agreement?  A. Yes.  **Q.** What specifically did she do or say that left you with this impression?  A. Allison told me something to the effect that she was appreciative of my efforts in negotiating the premarital agreement and fighting for her rights.  **Q.** When did Allison say this to you?  A. On the morning of November 14, 2008, before she and Mark executed the Premarital Agreement. | 13 |  |  | 15 |
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