

1 RE: [REDACTED] CONCEPCION and
2 [REDACTED] CONCEPCION

3 DOL: [REDACTED] 2014
4 CLAIM NO: [REDACTED]
5 OUR FILE NO: [REDACTED]

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EXAMINATION UNDER OATH OF [REDACTED] CONCEPCION
VOLUME 1 of 1, Pages 1 through ^

Wednesday, [REDACTED], 2014
10:00 a.m. to 2:50 p.m.
9300 South Dadeland ~~Blvd.~~ Boulevard
Miami, Florida 33156
two spaces before ZIP Code

(Stenographically) Reported by:
[REDACTED]
Florida Professional Reporter

this is not a deposition

~~Deposition~~ taken before [REDACTED]

[REDACTED] Florida Professional Reporter and
Notary Public in and for the State of Florida at
Large in the above cause.

----- what about the interpreter?

THE COURT REPORTER: Do you swear the
testimony you are about to give will be the truth,
the whole truth, and nothing but the truth?

THE WITNESS: I do.

THEREUPON,

[REDACTED] CONCEPCION,

uncap

Having been first duly sworn, was examined and
testified as follows:

DIRECT EXAMINATION

BY MRS. SAMPLE:

Q. Good morning, Mrs. Concepcion, my name
is [REDACTED] Sample and I represent Tower Hill in this
matter.

MR. VAZQUEZ: My name is [REDACTED] Vazquez
and represent [REDACTED] Concepcion and [REDACTED]
Concepcion.

I received a letter dated October 9th
from [REDACTED], it was
signed by [REDACTED] Sample and there is a series ---

MRS. SAMPLE: I am going to go through

1 the letter.

2 MR. VAZQUEZ: Real quick statements on
3 it.

4 MRS. SAMPLE: Again, we are here for an
5 EUO pursuant to the policy. I am not sure where
6 you are going with this ^{add ,} but if there is objections
7 or anything like that there is no litigation.

8 MR. VAZQUEZ: No, there is no
9 objection, I just want to make sure that we get on
10 the record how we have responded to your request
11 and your letter dated November 9th.

12 MRS. SAMPLE: And I am going to mark it
13 and go through all that today once we start.

14 MR. VAZQUEZ: Correct. With respect to
15 number one, we have ---

16 MRS. SAMPLE: [REDACTED] I am going to go
17 through each one with the insured ^{add ,} not with you.

18 You are not the insured so I need to
19 ask Mrs. Concepcion the questions and I am going to
20 go through each category.

21 MR. VAZQUEZ: Let me just make sure
22 that it's clear, that we are not responding today
23 with respect to the personal and corporate tax
24 returns which is number 15. We object, there is no
25 reason whatsoever to turn over these tax returns.

1 And let me just finish very briefly.

2 MRS. SAMPLE: I am not going to allow
3 you to finish because we are here to take the
4 **uncap** Examination under oath of your client and of the
5 insured and if at the time I ask about those
6 individual inquiries you want to instruct your
7 client not to answer a question, obviously you
8 can't object because this isn't litigation, but if
9 you want to instruct her not to respond to that
10 inquiry based on your direction that's fine, you
11 can do that, **Not** in the forefront.

12 MR. VAZQUEZ: I have an obligation to
13 the insured as their lawyer to represent to you
14 what we have produced in response to your October **keep together**
15 9th letter. I have a series of documents which I
16 am turning over to you and you might as well mark
17 them.

18 MRS. SAMPLE: I plan on doing that when
19 I go through my EUO.

20 Q. (By Mrs. Sample) Mrs. Concepcion, can
21 you please state your full name for the record.

22 A. [REDACTED] Concepcion.

23 Q. Do you go by any other names?

24 A. No.

25 Q. Do you have a middle initial?

1 A. No.

2 Q. What is your current address, Mrs. ^{keep together}
3 Concepcion?

4 A. Miami,
5 Florida [REDACTED].

6 Q. Going forward I am going to refer to
7 that address as the subject property. Okay?

8 A. Okay.

9 Q. Or the property, this property, I am
10 referring to only that address, unless I indicate
11 otherwise? ^{no ?}

12 A. Okay.

13 Q. And do you have a driver's license,
14 Mrs. Concepcion?

15 A. Yes.

16 Q. For purposes of identification can you
17 get that out for us today?

18 A. Yes, of course.

19 Q. We are going to mark the driver's
20 license as Exhibit 1. [REDACTED] with a
21 date of birth [REDACTED].

22 Mrs. Concepcion, are you married?

23 A. Yes.

24 Q. What is your ^{add 's} husband name?

25 A. [REDACTED] Concepcion.

1 Q. Does he reside at the subject property
2 with you?

3 A. Correct.

4 Q. Mrs. Concepcion, have you ever had your
5 examination under oath taken before?

6 A. No.

7 Q. What you are here for today is called
8 **and** examination under oath, it's pursuant to your
9 policy with Tower Hill. And you are sworn to tell
10 the truth under oath today and we are going to be
11 asking you questions about the claim that you have
12 submitted against Tower Hill.

13 Do you understand?

14 And as you have been doing, I am going
15 to ask that you give verbal responses to my
16 questions rather than nods of the head, because we
17 do have a court reporter here today taking down
18 everything here that you say **no ?**

19 A. Okay.

20 Q. In addition, if you don't understand my
21 question, you can ask me to go ahead and rephrase
22 it and that way I can make sure that your answer is
23 responsive to what I am trying to seek. Okay?

24 A. Okay.

25 Q. If you are giving me an approximation