

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov

IN RE: CASE NO.: 09-34791-RBR
ROTHSTEIN ROSENFELDT ADLER, P.A., CHAPTER 11
Debtor.

**NOTICE OF TAKING RULE 2004 EXAMINATION
DUCES TECUM VIA VIDEO CONFERENCE OF
CORPORATE REPRESENTATIVE OF QTASK, INC.**

Herbert Stettin ("Stettin" or "Trustee"), the Chapter 11 Trustee of Rothstein Rosenfeldt Adler, P.A. ("RRA" or "Debtor") by and through the undersigned attorney, pursuant to D.E. #1699 entered in this action, will examine the Corporate Representative of Qtask Inc., (hereinafter "Qtask") with knowledge of (a) financial affairs of Qtask, (B) investment into Qtask by any person or entity, and (c) transfers of money by Qtask to any person or entity, under oath on **September 20, 2011, beginning at 12:00 noon, local Fort Lauderdale, FL time (EDT), and at Veritext National Deposition & Litigation Services, 550 South Hope Street 1775, Los Angeles, CA 90071.** The examination may continue from day to day until completed.

The Examinee is required to produce all of the documents described on the attached Exhibit A, subject to the Definitions and Instructions provided below, to the Trustee's counsel at 350 East Las Olas Blvd., Suite 1000, Fort Lauderdale, FL 33301, or via e-mail, by no later than 12:00 noon, local Fort Lauderdale, FL time (EDT), on September 16, 2011.

The examination is pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1, and will be taken before an officer authorized to record the testimony. The scope of the examination shall

be as described in Bankruptcy Rule 2004. Pursuant to Local Rule 2004-1 no order shall be necessary.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served electronically to all CM/ECF subscribers on the attached list on this 2nd day of September, 2011.

I HEREBY CERTIFY that I am admitted to the Bar of the United States District Court for the Southern District of Florida and I am in compliance with the additional qualifications to practice in this court set forth in Local Rule 2090-1(A).

BERGER SINGERMAN
Counsel to Trustee, Herbert Stettin
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By: /s/ Charles H. Lichtman
Charles H. Lichtman
Florida Bar No. 501050
[REDACTED]
Andrew M. Hinkes
Florida Bar No. 17848
[REDACTED]

SERVICE LIST

Geoffrey S. Aaronson on behalf of Creditor FEP Victims Group
[REDACTED]

Thomas L Abrams on behalf of Defendant Rubin Vine
[REDACTED]

Alberta L. Adams on behalf of Interested Party St. Paul Fire and Marine Ins. Co.
[REDACTED]

Melissa Alagna on behalf of Creditor Investors Risk Advantage LLC
[REDACTED]

Joaquin J Alemany on behalf of Intervenor The Daily Business Review
[REDACTED]

Grisel Alonso on behalf of Defendant United States of America
[REDACTED]

Brett M Amron on behalf of Creditor Todd Snyder
[REDACTED]

Eric N Assouline on behalf of Creditor Nick Wilder
[REDACTED]

Scott L. Baena on behalf of Defendant Centurion Structured Growth LLC
[REDACTED]

Jeffrey P. Bast on behalf of Creditor Todd Snyder
[REDACTED]

Christopher G Berga on behalf of Defendant ABS Capital Funding, LLC
[REDACTED]

Eval Berger on behalf of Attorney Official Committee of Creditors
[REDACTED]

Jeffrey M Berman on behalf of Creditor Emess Capital, LLC
[REDACTED]

John G. Bianco III on behalf of Creditor Edward Morse
[REDACTED]

Gary S Blake on behalf of Creditor Litton Loan Servicing LP
[REDACTED]

Mark D. Bloom on behalf of Defendant TD Bank, N.A.
[REDACTED]

Mark D. Bloom on behalf of Witness TD Bank, N.A.
[REDACTED]

Mark F Booth on behalf of Creditor VRLP1, LLC
[REDACTED]

Robert C Buschel on behalf of Defendant Qtask, Inc., a California corporation
[REDACTED]

Darol H M Carr on behalf of Creditor Blue Oak Construction, LLC
[REDACTED]

Francis L. Carter on behalf of Creditor Circle K Family, LLC
[REDACTED]

David C. Cimo on behalf of Plaintiff Herbert Stettin
[REDACTED]

Roderick F. Coleman on behalf of Creditor Prince International Ventures, LLC
[REDACTED]

Ileana Cruz-Bongini on behalf of Creditor Coquina Investments
[REDACTED]

Carlos L De Zayas on behalf of Defendant ABS Capital Funding, LLC
[REDACTED]

Joseph A. DeMaria on behalf of Creditor Gibraltar Private Bank and Trust
[REDACTED]

Robert F. Elgidely on behalf of Plaintiff Herbert Stettin
[REDACTED]

Robert C Furr on behalf of Creditor Greenwood Capital Partners, LLC
[REDACTED]

David L Gay on behalf of Defendant Herbert Stettin
[REDACTED]

John H Genovese on behalf of Petitioning Creditor Aran Development Inc.
[REDACTED]

Michael I Goldberg on behalf of Attorney Official Committee of Creditors
[REDACTED]

Jason B Gonzalez on behalf of Defendant Republican Party of Florida
[REDACTED]

Lawrence Gordich on behalf of Creditor Investors Risk Advantage LLC
[REDACTED]

Gregory S Grossman on behalf of Creditor Fifth Third Bank
[REDACTED]

Nancy E Guffy on behalf of Plaintiff Thirteen Aqua Holdings Ltd
[REDACTED]

Jordi Guso on behalf of Debtor Rothstein Rosenfeldt Adler, PA
[REDACTED]

Hollie N Hawn on behalf of Creditor Broward County Records, Taxes & Treasury
[REDACTED]

John L. Heller
[REDACTED]

John B. Hutton III on behalf of Defendant TD Bank, N.A.
[REDACTED]

John B. Hutton III on behalf of Plaintiff TD Bank, N.A.
[REDACTED]

Geoffrey D Ittleman on behalf of Creditor Steven Bitton
[REDACTED]

Allan A Joseph on behalf of 3rd Party Plaintiff Jody Alu
[REDACTED]

Bruce A Katzen on behalf of Creditor Emess Capital, LLC
[REDACTED]

Brian R Kopelowitz on behalf of Defendant Chris M. Salamone & Associates
[REDACTED]

Harris J. Koroglu on behalf of Creditor American Express Travel Related Services Company, Inc.
[REDACTED]

Seth Lehrman on behalf of Interested Party Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.
[REDACTED]

Michael D Lessne on behalf of Defendant Marcy Lippman
[REDACTED]

David M. Levine on behalf of Interested Party Harden & Associates, Inc.
[REDACTED]

Joan M Levit on behalf of Attorney Official Committee of Creditors
[REDACTED]

Charles H Lichtman on behalf of Defendant Herbert Stettin
[REDACTED]

John E Lucian on behalf of Defendant Mary Noa
[REDACTED]

Matthew A Mannering on behalf of Defendant RL Pearson and Associates, Inc.
[REDACTED]

Alan K. Marcus on behalf of Defendant Iris Peter
[REDACTED]

Isaac M Marcushamer on behalf of Defendant Rothstein Rosenfeldt Adler, P.A.
[REDACTED]

Jason S Mazer on behalf of Plaintiff Herbert Stettin
[REDACTED]

Frank F McGinn on behalf of Creditor Iron Mountain Information Management, Inc.
[REDACTED]

Paul J McMahon on behalf of Interested Party Philip Arvidson

[REDACTED]

James C. Moon on behalf of Creditor Banyon 1030-32, LLC

[REDACTED]

Norman A Moscowitz on behalf of Defendant Berenfeld Spritzer Schechter & Sheer, LLP

[REDACTED]

Barry E. Mukamal

[REDACTED]

Arthur C. Neiwirth on behalf of Interested Party Arthur Neiwirth

[REDACTED]

Ronald G Neiwirth on behalf of Interested Party Jeffrey Epstein

[REDACTED]

Ari Newman on behalf of Defendant TD Bank, N.A.

[REDACTED]

Timothy J Norris on behalf of Defendant Landing Rock Group, L.L.C.

[REDACTED]

Office of the US Trustee

[REDACTED]

Paul L. Orshan on behalf of Defendant Monarch Capital Fund, Ltd.

[REDACTED]

Christian A Petersen on behalf of Respondent Al Lamberti

[REDACTED]

Gary S Phillips on behalf of Defendant Barry Lipsitz

[REDACTED]

Patricia A Redmond on behalf of Creditor Coquina Investments

[REDACTED]

Ivan J Reich on behalf of Interested Party Columbia Casualty Company

[REDACTED]

Claudio Riedi on behalf of Creditor Gibraltar Private Bank and Trust
[REDACTED]

Heather L. Ries on behalf of Creditor Nova Bank
[REDACTED]

David L Rosendorf on behalf of Creditor Razorback Funding, LLC
[REDACTED]

Alex P Rosenthal on behalf of Defendant MLC 350, LLC
[REDACTED]

Luis Salazar on behalf of Defendant Stuart Rosenfeldt
[REDACTED]
[REDACTED]
[REDACTED]
m

William G Salim Jr on behalf of Creditor Ben Varon
[REDACTED]

Reggie David Sanger on behalf of Creditor Marika Tolz
[REDACTED]

Harry R Schafer on behalf of Defendant Marcy Lippman
[REDACTED]

Steven D Schneiderman on behalf of U.S. Trustee Office of the US Trustee
[REDACTED]

Matthew H Scott on behalf of Counter-Defendant Carolina Casualty Insurance Company
[REDACTED]

Patrick S. Scott on behalf of Defendant Marcy Lippman
[REDACTED]

Frank P Scruggs on behalf of Plaintiff Herbert Stettin
[REDACTED]

Michael D. Seese on behalf of Defendant Kimberly Rothstein
[REDACTED]

Steven E Seward on behalf of Defendant Kimberly Rothstein
[REDACTED]

Bradley S Shraiberg on behalf of Counter-Defendant Carolina Casualty Insurance Company
[REDACTED]

[REDACTED]

James D. Silver on behalf of Attorney Conrad & Scherer, LLP

[REDACTED]

Paul Steven Singerman on behalf of 3rd Pty Defendant Herbert Stettin

[REDACTED]

Jason Slatkin on behalf of Defendant Katie Adler

[REDACTED]

Steven J. Solomon on behalf of Defendant Suntrust Bank, N.A.

[REDACTED]

Jeffrey R Sonn on behalf of Petitioning Creditor Roger Wittenberns,

[REDACTED]

James B Sowka on behalf of Interested Party Columbia Casualty Company

[REDACTED]

Jesus M Suarez on behalf of Plaintiff Herbert Stettin

[REDACTED]

Joel L Tabas on behalf of Intervenor-Defendant Whitney Education Group, Inc.

[REDACTED]

Jeffrey A Tew on behalf of Creditor Gibraltar Private Bank and Trust

[REDACTED]

Melinda S Thornton on behalf of Creditor Miami-Dade County Tax Collector

[REDACTED]

Marika Tolz

[REDACTED]

Rhett Traband on behalf of Defendant Caro Group, L.L.C.

[REDACTED]

Trustee Services Inc 2

[REDACTED]

Peter F. Valori on behalf of Creditor Caro Group, LLC

[REDACTED]

Theresa M Van Vliet on behalf of Plaintiff Herbert Stettin

[REDACTED]

Laura J. Varela on behalf of Defendant Barry Lipsitz

[REDACTED]

Victor H Veschio on behalf of Defendant Bank Of America, N.A.

[REDACTED]

Michelle T Visiedo on behalf of Creditor Caro Group, LLC

[REDACTED]

Henry S Wulf on behalf of Creditor 123 MA Exchange One LLC

[REDACTED]

DEFINITIONS

A. "You" and "your" mean the Examinee whose deposition is being taken in accordance with this notice.

B. "Person" as used herein means any natural person or any entity, including without limitation any individual, firm, corporation, company, joint venture, trust, tenancy, association, partnership, business, agency, department, bureau, board, commission, or any other form of public, private or legal entity. Any reference herein to any public or private company, partnership, association, or other entity include such entity's subsidiaries and affiliates, as well as the present and former directors, officers, employees, attorneys, agents and anyone acting on behalf of, at the direction of, or under the control of the entity, its subsidiaries or its affiliates.

C. "Documents" means the original or copies of any tangible written, typed, printed or other form of recorded or graphic matter of every kind or description, however produced or reproduced, whether mechanically or electronically recorded, draft, final original, reproduction, signed or unsigned, regardless of whether approved, signed, sent, received, redrafted, or executed, and whether handwritten, typed, printed, photostated, duplicated, carbon or otherwise copied or produced in any other manner whatsoever. Without limiting the generality of the foregoing, "documents" shall include correspondence, letters, telegrams, telexes, mailgrams, memoranda, including inter-office and intra-office memoranda, memoranda for files, memoranda of telephone or other conversations, including meetings, invoices, reports, receipts and statements of account, ledgers, notes or notations, notes or memorandum attached to or to be read with any document, booklets, books, drawings, graphs, charts, photographs, phone records, electronic tapes, discs or other recordings, computer programs, printouts, data cards, studies, analysis and other data compilations from which information can be obtained. Copies of documents, which are not identical duplications of the originals or which contain additions to or deletions from the originals or copies of the originals if the originals are not available, shall be considered to be separate documents.

"Documents" also includes all electronic data including, but not limited to, e-mails and any related attachments, electronic files or other data compilations which relate to the categories of documents as requested below. Your search for these electronically stored documents must include all of your computer hard drives, floppy discs, compact discs, backup and archival tapes, removable media such as zip drives, password protected and encrypted files, databases, electronic calendars, personal digital assistants, proprietary software and inactive or unused computer disc storage areas. All requests for documents expressly include a request for the production of all original, un-altered metadata associated with the documents to be produced. All electronically stored information shall be produced in its native format. All electronically stored information which is encrypted shall be produced in unencrypted form, or with all information necessary for the information to be unencrypted. All electronically stored information requested herein which originated or is currently maintained on the Qtask system must be provided in a format which will allow the Trustee to review it on the system referred to as the "Shadowbox 2" system.

D. "Communications" means any oral or written statement, dialogue, colloquy, discussion or conversation and, also, means any transfer of thoughts or ideas between persons by means of documents and includes any transfer of data from one location to another by electronic or similar means.

E. "Related to," "relating to," "referring to" or "references" means containing, constituting, showing, mentioning, reflecting, evidencing, discussing, describing or pertaining, in any way, directly or indirectly, to the subject matter identified in the Request, and includes any documents supporting, denying, underlying or used in the preparation of any document called for by each Request.

F. The conjunctions "and" and "or" mean "and/or" so as to encompass the broader of the two possible constructions, not disjunctively so as to exclude any information or documents otherwise within the scope of any Request.

G. Pronouns include and encompass the alternative forms of the pronoun, whether masculine, feminine, neuter, singular or plural, and are not to be interpreted to exclude any information or documents otherwise within the scope of the Request.

H. When appropriate, the singular form of a word should be interpreted in the plural as may be necessary to bring within the scope of the Request any documents which might otherwise be construed to be outside the scope of the Request.

I. Unless otherwise specified, the time frame for each Request is from and including January 1, 2006 to the present.

J. "Qtask" as used herein shall refer to Qtask, Inc.

INSTRUCTIONS

1. You are to produce all documents in your possession, custody or control including, without limitation, all documents that are in the files (whether personal, business or any other files), possession, custody or control of your attorneys, beneficiaries, advisors, accountants, consultants, employers, agents, including brokers, employees or representatives, or any other person or entity from whom you have the right to secured or compel the production of the requested documents. If, for any reason, you are unable to produce in full any document or the document is otherwise damaged, produce such document to the fullest extent possible and then state the date and circumstances of its destruction, the person who destroyed the documents, and the person who ordered its destruction.

2. Documents shall be produced as they are kept in the ordinary and usual course of business or organized and labeled to correspond to the categories set forth below. File folders, labels and indices identifying documents requested herein shall be produced intact with such documents. Documents attached to each other shall not be separated.

3. Where a claim of privilege is asserted as a basis for not producing any document requested, for each such document state the following:

- a. The basis for the privilege (attorney-client, work-product doctrine, or other);
- b. the type of document (letter, memo, etc.);
- c. the date of the document;
- d. the author of the document and all recipients;
- e. the relationship between or among the parties privy to the communication;
- f. if applicable, the bates stamp number;
- g. if applicable, the nature of the legal advice sought or rendered;
- h. the current location of the document; and
- i. if applicable, the litigation for which the document was prepared.

EXHIBIT "A"

1. All documents and communications related to any cash payment, checks or wire transfers directly to Russell Adler or Robert Buschel directly or indirectly, or to any entity with which Russell Adler or Robert Buschel are involved or in any way affiliated.
2. All documents and communications related to the general ledgers of Qtask.
3. All documents and communications relating to any wire transfers made or received by or on behalf of Qtask.
4. All documents and communications relating to any checks written and deposits made by Qtask or on behalf of Qtask, and all Qtask monthly balance statements.
5. All documents and communications relating to any investment monies received by Qtask or by any person on behalf of Qtask from any person, party or entity, including but not limited to RRA, Russell Adler or Robert Buschel.
6. All documents and communications relating to the use of any investment monies received by Qtask or on behalf of Qtask from any person, party or entity.
7. All documents and communications related to all financial statements, customer sales and marketing information, customer account records, proprietary interests, copyrights, patents, trademarks and other intellectual property rights (including website rights), training and operations material and memoranda, personnel records, pricing information, and financial information and trade secrets concerning or relating to Qtask not already requested herein.
8. All documents and communications relating to accounts receivable or other records which set forth the names and addresses of all persons or business enterprises that are indebted to Qtask and the amounts of such indebtedness.

9. All documents and communications relating to the Federal income tax returns, state income tax returns and other local tax returns of Qtask.
10. All documents and communications relating to the transfer of any money or property interest or financial interests made by Qtask, or on behalf of Qtask to any person, or entity.
11. All documents and communications relating to the periodic, fiscal and calendar year financial statements of Qtask since 2006 including but not limited to balance sheets, statements of profit and loss, listings of accounts receivable and payable and documents reflecting transactions or accounts between Qtask and its shareholders, officers, directors and employees.
12. All documents and communications relating to the client/customer contracts or agreements related to Qtask.
13. All documents and communications relating to payroll ledgers and payroll tax information for all employees and independent contractors of Qtask.