UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

BURTON W. WIAND, as Receiver for OASIS INTERNATIONAL GROUP, LTD, OASIS MANAGEMENT, LLC, and SATELLITE HOLDINGS COMPANY,

Plaintiff,

v.

Case No. 8:20-cv-00862-VMC-TGW

CHRIS AND SHELLEY ARDUINI, et al.,

Defendants.

_____/

DEFENDANT, JOSEPH MARTINI, JR.'S RULE 26(A)(1) INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant, Joseph

Martini, Jr., makes the following initial disclosures based on current reasonably available

information. These initial disclosures are made without prejudice to Mr. Martini, Jr.'s right to

use information discovered during the course of discovery to support his claims in this action.

(i) The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

Joseph Martini, Jr. 16 Solar Ridge Rd Trumbull, CT 06611 martini.joseph@gmail.com

Joseph Martini, Sr. 108 Heritage Hills, Unit B Somers, NY 10589 profjtm@gmail.com 914-342-3903

Michael DaCorta

(ii) A copy – or a description by category and location – of, all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment:

- 1. Email communications to and from the custodian martini.joseph@gmail.com.
- 2. Transaction records and agreements related to Strata Capital, Inc., the DaCorta

Group, Inc., and/or Oasis Management.

3. Financial records pertaining to transactions between Joseph Martini, Jr. and Strata

Capital, Inc., the DaCorta Group, Inc., and/or Oasis Management.

(iii) A computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Not applicable at this time.

(iv) For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

None.

Dated: November 6, 2020.

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/s/ Josef Y. Rosen

JOSEF Y. ROSEN, ESQ. Florida Bar No. 112719 josef.rosen@gray-robinson.com FREDERICK S. SCHRILS, ESQ. Florida Bar No. 0604003 frederick.schrils@gray-robinson.com Attorneys for Defendants, Joseph Martini and Joseph Martini, Jr.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via

email this 6th day of November, 2020, to:

JOHN W. WAECHTER Primary: jwaechter@eflegal.com Secondary: dturner@eflegal.com COURTNEY L. FERNALD Primary: cfernald@eflegal.com Secondary: tdillon@eflegal.com BEATRIZ MCCONNELL Primary: bmcconnell@eflegal.com Secondary: tdillon@eflegal.com ALICIA GANGI Primary: agangi@eflegal.com Secondary: tdillon@eflegal.com **ENGLANDER and FISCHER LLP** 721 First Avenue North St. Petersburg, Florida 33731-1954 Phone: (727) 898-7210/Fax: (727) 898-7218 Attorneys for Plaintiff

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/s/ Josef Y. Rosen

Josef Y. Rosen, Esq.