Exhibit 8

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
Case No. 1:21-MD-2989-CMA
- -x
IN RE JANUARY 2021 SHORT SQUEEZE
TRADING LITIGATION
- -x
March 21, 2023
8:34 a.m. PST

***** CONFIDENTIAL *****

Virtual Videotaped
Deposition of ABRAHAM HUACUJA,
taken by Defendant, pursuant to Notice,
held remotely, before Sharon Pearce, RDR,
CRR, CRC, NYRCR, a Registered Diplomate
Reporter, Certified Realtime Reporter, and
Notary Public of the State of New York.

* * *

A P P E A R A N C E S:

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ALSO PRESENT:
HOWARD BRODSKY, Videographer
NICHOLAS LIN

* * *

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THE VIDEOGRAPHER: Good morning. Here begins the video recorded virtual remote deposition of Abraham Huacuja --

THE WITNESS: Yes, correct.

THE VIDEOGRAPHER: -- appearing from his location in Santa Maria, California. This deposition is taken by the defendant in In Re January 2021 Short Squeeze Trading Litigation, Case No. 1:21-MD-2989-CMA, in the United States District Court, Southern District of Florida.

Today is Tuesday, March 21, 2023. The time is 8:34 a.m. Pacific Daylight Time. My name is Howard Brodsky, and I'm the legal video specialist in association with Veritext Legal Solutions with offices located in New York, New York. The court reporter is Sharon Pearce in association with Veritext.

Counsel have stipulated that the court reporter shall enter all

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appearances for this proceeding into the stenographic court record and further agree that the court reporter may swear the deponent in remotely.

Will the court reporter please swear in the witness.

A B R A H A M H U A C U J A,

having first been duly sworn by Sharon Pearce, the Notary Public, was examined and testified as follows:

EXAMINATION

BY MR. SLIFKIN:

Q. Could you please state your full name for the record.

A. My name is Abraham Jacier Huacuja.

Q. So Mr. Huacuja, what is your current address?

A. Current address is [redacted]

Q. Okay. Have you ever been deposed before?

A. Who what does deposed mean? I'm not sure what that is.

Q. Okay. So the proceeding that's taking place today is called a deposition.

A. Oh. Yeah. Yeah. Okay. Go ahead. Go ahead.

Q. So the court reporter will tell you she can't actually get us both at once.

A. Yes.

Q. So it will be question, answer, question, answer. Okay?

A. Okay. Got it.

Q. So have you ever been deposed before? That is to say, have you ever participated in a proceeding such as the one we're doing today?

A. No, never.

Q. Have you ever been involved in any legal proceedings?

A. No, just small ones like speeding tickets and stuff like that.

Q. Okay. So speeding tickets is on the criminal side.

A. Oh, okay.

Q. Have you ever been involved in any criminal proceedings?

A. No.

Q. Okay.

A. Other than a speeding ticket, I guess.

Q. Have you ever been involved in any other civil proceedings where you're suing someone or someone is suing you?

A. No.

Q. Do you understand that you are a plaintiff in this action?

A. Yes, I am a plaintiff.

Q. And what do you understand that to mean?

A. That I am -- I am part of the -- I'm sorry. I'm here I guess as -- I'm sorry. Just trying to find the words. I'm here as, like, a representative on the behalf of I guess this case, the lawsuit case.

Q. Have you ever heard the term class action before?

A. Yes.

Q. Okay. What do you understand a class action to be?

A. Class action is a group of participants or a group of people that have -- I guess have had something happen to them and they just get together and -- it's like a -- instead of having one lawsuit, this is, like -- this involves a lot of people, which kind of -- it's a culmination of a lot of people, I guess.

Q. Okay. So you understand I take it that this proceeding is a class action or at least a putative class action.

A. Yes. Yes.

Q. Okay.

A. I understand this is a class action.

Q. And have you ever been involved in a class action prior to this one?

A. No.

Q. Currently, are you involved in any other litigation other than the Robin -- than the short squeeze litigation

that is the one we're dealing with today?

A. No. This is it.

Q. Okay. What do you understand your responsibilities to be as a plaintiff?

A. To just make sure everything -- like, make sure my lawyers are doing their job and to make sure everything is fair for everyone else I guess that can't be here, or I guess it's a class action, so there's a lot of people that can't really be here.

Q. Okay. When you say your lawyers, who are you referring to?

A. The Rosen Law Firm.

Q. The Rosen Law Firm?

A. Yeah.

Q. Is that Mr. Kim?

A. Yeah.

Q. And have you dealt with anybody else at the Rosen Law Firm?

A. Yeah. There have been several people that I've spoken with in emails with.

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Q. Without going into the substance of any conversations, can you tell me, like, how frequently you speak to the folks at the Rosen Law Firm?

A. I would say a couple of times a month, maybe two or three.

Q. Okay.

A. Depending on the situation. Maybe even more.

Q. And is the -- again, don't go into who said what. I'm just going to ask you what the topics are.

Is the topic of those conversations these proceedings?

A. No. The topics are usually about information that I have regarding the case.

Q. I see.

Well, let me back up a little bit.

Do you recall that you produced certain documents and records in this matter?

A. Yes. For this -- the Robinhood

case, I -- yeah. I produced -- so I guess you would say that Robinhood, the company, has produced the files and I have them with me.

Q. Okay I'm asking a slightly different question.

Were you asked to search your records for materials about this litigation?

A. Yes, I was asked to search.

Q. Okay. And when were you asked to search?

A. I don't remember the exact dates, but pretty early on joining the law firm.

Q. And can you tell me what you did in your search.

A. I looked up the files from my phone, all the Robinhood -- the statements that I had for Robinhood and the statements that I had for my bank. I looked up any kind of web information that I had. I am -- I do -- I'm a YouTuber. I did some videos as well, and I showed them

the videos that I did about the case. Those are several things.

Q. Okay. And again, when did you do that search?

A. I don't know the exact dates. But it was pretty early on.

Q. Okay. And when did you provide materials to your lawyers?

A. As -- I don't know. I did the search, and within a week, I provided the info. And then I think also there was stuff that they asked for afterwards, so then it took some additional time. It wasn't all at once. It was, like, you know, kind of spread out.

Q. Okay. And when was the last time you gave materials to your lawyers relevant to this matter?

A. I think, like, a few -- a week ago or a few weeks ago, I think. Yeah. There was something that they just wanted to double check that I had it. I think it was just about my searches on YouTube. That's what it was.

Q. Okay. So you said you're a YouTuber.

So in your words, explain to me what you meant by that.

A. I create content on a website that I -- pretty much I videotape myself, or mostly, it's a gaming website, so I'll be playing video games, and I will just share that in a video format on YouTube.

Q. Okay. And did you give those YouTube videos to your lawyers?

A. I gave them the links to the videos. I did not give them the -- I don't have the hard files anymore. So I -- but they have the links. It's the same thing.

Q. And that's a link to the YouTube site, is it?

A. Yes.

Q. Okay. And do you also -- and so -- and again, you gave them the links when? Like, recently, or some time ago?

A. Both. Both.

Q. And again, how -- how recent was

the last time that you gave these YouTube links to your counsel?

A. The links -- you have to -- can you clarify a little bit? Like, what links? Because I -- there's two different types of links. There's links that I made YouTube videos, and there's also links that I sent them that I just watched YouTube, and these are the YouTube videos that I watched for reference.

Q. Okay. So that's very helpful.

A. But I didn't create them.

Q. So let's start with the links to the content that you created.

When did you send those to your counsel?

A. Yeah. I don't remember. That was, like, further in the past.

Q. And the links to the materials that you watched on YouTube, when did you send those to your counsel?

A. Those -- about a week ago or so.

Q. Okay. Can you tell me just generally what you did to prepare for this

litigation.

Let me rephrase that.

Can you tell me generally what you did to prepare for this deposition, that is to say, the proceedings today.

A. I looked over the material that was sent to me. And I made sure that I could log into the Exhibit Share, and I downloaded Zoom, and I was able to do a test, just several things to prepare.

Q. Okay. And when did you do that?

A. Yesterday and the day before. Just yesterday, I think, was the majority of it.

Q. You said you looked over materials that were sent to you.

Are you with me?

A. Yes.

Q. Okay. Who sent you those materials?

A. The Rosen Law Firm.

Q. Okay. Did any of those materials help you remember facts?

A. No, not necessarily.

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Q. Okay. Did you speak to anyone in preparation for your deposition today?

A. Yes. I spoke to my lawyers.

Q. Okay. Did you speak to anyone other than your lawyers?

A. No.

Q. And when did you speak to your lawyers?

A. In regards to this --

Q. Yes, to this --

A. Yesterday.

Q. Okay. And did you speak to them about this deposition before yesterday?

A. Yes.

Q. Okay. And when was that?

A. I think throughout the whole process, they just mentioned that it's probably going to happen, and this is probably what's going to go down. So just a preparation.

Q. Okay. And about how long did you spend preparing for this deposition?

A. Not long, to be honest. Not long. I'm a really busy person.

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Q. Okay. Okay. So maybe you can just tell me a little bit about your personal background, starting with your education.

A. Okay.

Q. So when did you graduate high school?

A. '99.

Q. Okay. And so what education did you have post-high school?

A. After high school, I went to college. I have two degrees. I have two bachelors of science in art, fine art --

Q. Okay.

A. Fine arts and media.

Q. Okay. So if you graduated in '99, did you go straight to college?

A. Yes. I went straight to college. I did four years. And then I got a job in Ireland. And after two years, I came back to the U.S., and I went to school again for another four years.

Q. So that first -- that first degree you took from I guess 1999 until --

what -- 2000 when?

A. I don't know exactly, but it was around 2005 or '4. It was a four-year degree.

Q. Okay. So that first four-year degree, where did you go?

A. I went to the Art Institute in California.

Q. Okay. And is that in Santa Monica?

A. Yeah. That's in Santa Monica.

Q. Okay. And what was your degree in?

A. It's some bachelor's of fine -- bachelor's of art and -- media and art, something like that. I think that was the degree.

Q. What was your major?

A. Just art. Just fine arts or arts. Media arts.

Q. Okay. And then you took a job in Ireland, you said?

A. Yes.

Q. And then you came back to the

United States, and you got another degree.

A. Yes.

Q. Okay. That second degree, first, where was it?

A. That was in Seattle -- well, Redmond, Washington. Redmond, Washington.

Q. Okay. And what was the name of the institution you attended?

A. DigiPen Institute of Technology.

Q. Okay. And what degree did you take?

A. That's the fine arts -- fine arts degree. Fine arts and animation.

Q. Okay. Okay. So high school, first degree, second degree. I'm going to ask you some questions about them altogether. Okay?

A. Okay.

Q. Okay. So during that period, when you were studying in high school or for either of your degrees, did you ever study economics?

A. There was a course, I believe, on economics here and there, but it was

just, like, maybe one or two courses, one for each degree.

Q. Did you ever study finance?

A. No.

Q. Did you ever study accounting?

A. No.

Q. So in your economics classes, did you ever study the stock market?

A. No.

Q. Have you ever heard the phrase "market efficiency"?

A. I believe I heard the phrase "market efficiency."

Q. Okay. When did you first hear the phrase "market efficiency"?

A. I don't recall.

Q. Okay. What do you understand market efficiency to mean?

A. The market is just working as it should be. That's -- I mean, I didn't study it or anything, so from my understanding, that's what it means.

Q. Okay. So are you currently employed?

A. Yes.
Q. Okay. Who is your employer?
A. Chumash Casino Resort.
Q. Okay. And how long have you worked for Chumash Casino Resort?
A. For about eight to nine years.
Q. And what is your job title there?
A. I am currently employed as a poker dealer.
Q. Has that always been your job at Chumash?
A. No.
Q. Okay. So tell me what jobs you had at Chumash.
A. I was a -- entered as a slots technician, and then I became a lead technician, and now a poker dealer. And actually going to soon -- within the next couple of weeks, I will be a table games dealer.
Q. Okay. And for how long have you been a poker dealer?
A. For less than a year, but around

a year. Around a year but less, a little bit less than a year.

Q. Okay. So you started doing that in 2022. Is that fair?

A. Yeah. That's fair.

Q. Okay. So if we would think of -- if you think back to 2020 and 2021, what was your role at Chumash?

A. Actually, there was an in-between job there. I was a poker brush before I was a dealer. But it was the same amount of time. It was less than half a year or around half a year. And then before that was -- I was a lead technician. Yeah.

Q. Okay. And in 2020 and 2021, like, during Covid, were you actually working, or were you at home?

A. During Covid, the casino closed down. And -- yeah. They closed down the -- yeah. The casino closed down, so we weren't working. But they paid us for I think several weeks or a month or so. And then the casino opened back up shortly

after with a bunch of restrictions.

Q. And when was that, do you recall?

A. I don't recall the exact dates.

Q. Okay. So this lawsuit is called In Re January 2021 Short Squeeze Trading Litigation.

Are you aware of that?

A. Yes.

Q. Okay. So in January 2021, were you working or were you at home?

A. I don't recall. I have to think about it. But I don't recall off the top of my head what I was -- if I was working during that time or not.

Q. Okay. Did you spend any time working from home?

MR. KIM: When?

MR. SLIFKIN: During Covid.

A. Working -- I have to clarify. Working at the casino or working how?

Q. So I'm asking you a question.

During Covid, when there were restrictions in place --

A. Yes.

Q. -- did you do any work from home?

A. No.

Q. Okay. Okay. So do you currently invest in the stock market?

A. Yes, I do.

Q. Okay. And for how long have you been investing in the stock market?

A. For years. I don't know exact time. But it's been a couple of years now.

Q. Okay. So did you -- again, this litigation is -- in its title, it refers to January 2021.

A. Yes.

Q. Were you investing in the stock market at that point in time?

A. Yes, I was, and before then.

Q. Okay. And for how long had you been investing in the stock market as of January of 2021?

A. I don't recall.

Q. Was it years? Weeks? Days?

A. Years.
Q. Years. Okay.
Do you recall why you started investing in the stock market?
A. Not necessarily. I think Robinhood was -- the app was I think popular at the time, and I wanted to get into it.
Q. Okay. So you referred to Robinhood.
A. Yes.
Q. What do you understand Robinhood to be?
A. Robinhood is an application on the phone that lets you buy and sell stocks.
Q. Okay. And I take it you were at least a Robinhood customer.
A. I still am.
Q. Okay. And do you recall when you opened your Robinhood account?
A. No, I don't know when I opened it.
Q. Okay. So why did you decide to

use Robinhood?

A. It was basically the only thing out there at the moment -- I know there was other stuff, but it was the easiest thing out there to use.

Q. Okay. I think you said you still have a Robinhood account.

A. Yes, I do.

Q. Do you actively trade in your Robinhood account?

A. No. It's actually been a while since I've traded in my Robinhood account.

Q. Okay. So do you have other accounts?

A. Yes.

Q. Can you tell me --

A. For stocks?

Q. For stocks. Yes.

A. Yes. In SoFi.

Q. SoFi. Okay.

When did you open your SoFi account?

A. Pretty much after -- or during January when all the short squeeze

happened.

Q. So you referred to January of 2021.

A. Yes, 2021.

Q. Okay. And you used the word "short squeeze" in your last answer.

Can you tell us in your own words what you understand a short squeeze to be.

MR. KIM: Form. Are we talking about right now? Before? Limited in time?

Q. You just used -- okay. You just used the word "short squeeze."

A. Yes.

Q. You referenced January 2021.

A. Yes.

Q. Are you with me? Okay.

A. Yes.

Q. What did you mean by short squeeze?

A. So there -- a stock will get -- will get shorted, and then when different -- different -- there's two

parties. When one party shorts a stock, then the second party will buy that stock, making the people who shorted the stock either have to keep paying interest in -- when they started shorting it, and -- or they'll have to sell their stock at an undesirable expense to them, and -- if that stock keeps going up. So that's basically the gist of a short squeeze.

Q. Okay. Let's start with short. What do you understand a short position to be?

A. A short position is when someone buy -- borrows it -- because you're selling a stock, so you're borrowing it and then selling it to buy it later. And you want to -- you want to buy it at a lower cost, and you would take -- you would take the difference. So that's how you would make your money by shorting the stock.

Q. Okay. Have you heard the phrase "long position"?

A. Yes.

Q. Okay. What do you understand a long position to be?

A. I am actually more of a long position buyer myself. So basically, you buy a stock, and you hold it, and you just don't let it go.

Q. Okay. And a short position is what? The opposite? That's --

A. Yes. Basically, they're banking on trying to make a profit quickly.

Q. A profit until the stock went up.

A. Down.

Q. Okay.

A. Shorting it. Because they're shorting it.

Q. So that's -- that's a transaction where the intended outcome is that the price of the stock goes down.

A. Yes. The short --

Q. Okay.

A. The shorting.

Q. Okay. And a short squeeze, as you put it previously, that's an attempt

to what? Drive the price of the stock up in order to hurt the shorts?

MR. KIM: Objection to form.

You can answer.

A. The short squeeze is basically when -- the shorts are betting it to go down, and the short squeeze is buyers -- they just buy the stock so -- they're just buying the stock so the price goes up. And if the people that are squeeze -- or the shorting is -- the people that are shorting the stock will have to sell at an unfavorable amount, basically.

Q. Okay. And in your understanding, there were short squeezes that were being attempted in January 2021?

MR. KIM: Objection to form.

Assumes facts. Calls for speculation.

Q. You can answer.

A. Yes. I don't -- I believe that's what was going on. I mean, that's what I was banking on as well.

Q. And when you say that's what you were banking on, what do you mean by that?

A. I was banking on there being a short squeeze.

Q. Do you mean, like, in your own investing, you were assuming or hoping that there was going to be a short squeeze?

A. Yes.

Q. And you were going to make a profit from that?

A. I was hoping to. Yes.

Q. Okay. So I'll come back to that.

You told me that you opened the SoFi account in I believe January of 2021.

Did I get that right?

A. Yeah. Around that time I remember opening it. I don't know the exact date.

Q. Okay. Have you ever had -- and do you still have that SoFi account?

A. Yes. Yes, I do.

Q. And is that the account in which you trade securities?

A. It is now, yes.

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Q. Okay. Okay. So you mentioned Robinhood. You mentioned SoFi.

Have you ever had any other accounts in which you trade securities?

A. No. No. Just those two.

Q. Okay. And I take it you started with Robinhood. Then you opened your SoFi account.

And is it fair to say that at some point, you moved your assets from Robinhood to SoFi?

MR. KIM: Objection to form.

A. I moved some of them.

Q. Okay. Do you still have any assets held at Robinhood?

A. Yes, I do.

Q. Okay. Tell me approximately how much in dollar terms.

A. I don't know exactly off the top of my head. It's around [redacted] -- I'm not sure.

Q. When you say [redacted], you mean [redacted] or --

A. Yes.

Q. Or [redacted]

A. [redacted] Yes.

Q. Okay.

A. [redacted]

Q. Okay. I'm sorry. The video kind of slowed down for a second there, so I had trouble hearing you.

Do you have any recollection as to what securities you currently hold at Robinhood?

A. What securities. Yeah. I know some of them. But I don't -- I don't recall all of them at the moment.

Q. Okay. Can you give me the ones you remember?

A. Tesla for sure.

Q. Okay. And with respect to SoFi, approximately what are the, you know, dollar amount of your holdings at SoFi?

A. Same thing. I don't know the exact amount at the moment. But it's [redacted]. Actually, it's [redacted] maybe.

Q. Okay. And do you recall any of the securities that you hold at SoFi?

A. Yes. Same thing. Tesla.

Q. Okay. Any other companies that you recall?

A. There's a couple of other companies. But it's only a small amount. The majority is Tesla.

Q. Okay. So let's go back to the period 2020.

Let's start with when you opened your Robinhood account. Okay?

Prior to January 2021, you don't remember precisely when. Is that fair?

A. Yes.

Q. But we can look that up; right?

A. Okay. Yeah. We can.

Q. Okay. I mean, do you recall filling out a form when you opened your Robinhood account?

A. An online form? I believe there is some small agreement. I don't exactly recall at this point in time. But just to open an account in their website, I

believe I signed something.

Q. Okay. There was, like, an online application that you had to complete.

A. I think so. I don't recall exactly.

Q. Okay. So at that point in time, did you have any, you know -- any strategy with respect to trading stocks in mind?

A. Yeah. Yeah, I did.

Q. Okay. And what was that?

A. The very start of my investing career, I wanted to learn, so I just didn't -- had stocks in securities that I -- that I -- that I trusted or that I -- how do I say it -- that I was comfortable with or that I used, as stuff that I do from, like, I guess day-to-day life, stuff that I know about. So that's what I would invest in.

Q. Okay. So let me see if I understood that correctly.

So you would buy stock in companies whose products or services you

used in everyday life and who -- whose products or services you felt comfortable with. Is that fair?

MR. KIM: Objection.

A. Yeah. It's stuff that I used from day-to-day life, stuff that I was comfortable with, stuff that I knew.

Q. Do you recall any of the securities you --

A. Yes.

Q. -- bought? Oh, okay.

So could you tell me what you remember.

A. I invested in Starbucks, I invested in Nintendo, and to Blizzard Entertainment. I invested in Nvidia, AMC -- not AMC. I'm sorry. My mistake. It's AMD. AMD Software and just several other companies that I was comfortable with.

Q. Okay. So Starbucks is obviously the coffee shop company; right?

A. Yes. Yes.

Q. Right. And Nintendo is the

game --

A. Yes.

Q. -- platform.

Blizzard is also a game manufacturer?

A. Yes.

Q. Nvidia and AMD, are they chip manufacturers?

A. Yeah, for video cards. Video cards.

Q. Okay. I take it you're a video gamer.

A. Yes, I am.

Q. Okay. So let's wind forward a little bit to January of 2021.

By that point in time, had your investing strategy changed at all?

A. Yes.

Q. Okay. How had it changed?

A. I was able to do more research and figure out a little bit more about the stocks. Actually, when Covid hit, I was -- I -- I pulled out all of the stocks that I felt that didn't really -- weren't

doing much for me in the stock market, and I reallocated them to places where I felt would make me more a profit.

Q. Okay. So when you say when Covid hit, you're referring to March of 2020.

A. Yeah. Around that time. I think -- I don't know the exact date or time, but I can -- it's in the stock. You'll see a dip really, really harshly at a certain point.

Q. Okay. And at that point in time, did you, like, just exit all the stocks you held?

A. No. No. I didn't exit all the stocks. I exited the ones that I felt weren't going to do much for me, and then I -- after, say, a few days of taking them out, I put them back in, which was really lucky. I put them back in right at the bottom of that dip when Covid hit. And I made a pretty good profit from that. But yeah. I put them back in. On the specific securities that I felt -- after

doing more research, I felt a lot of specific companies that I chose at that point in time would make more of a profit as a long-term investment.

Q. And so help me out with the timeframe.

Is this, like, April/May of 2020?

A. I don't know the exact dates.

Q. Okay. But --

A. Around -- around when Covid hit, or -- it didn't hit -- because I was looking at the news, and I was aware of Covid when it was in China. And it didn't get to the U.S. yet. And nothing happened to the stock market at the time. But I do -- I was keeping track of the stock, and it does dip pretty hard. When the stock -- when the stock market dipped, that's when I see in my head as Covid hitting the U.S., when the stock market first dipped.

Q. So you're talking about the steep decline in, say, the S&P 500 that

occurred in the spring of 2020, I take it.

A. Yes.

Q. Okay.

A. That's what it was.

Q. Okay. And so you sold some of your portfolio at that point in time?

A. Yes, I sold some of my portfolio at that point in time.

Q. Okay. And then you started investing in different stocks.

A. Yes. Yes.

Q. Okay. And do you recall what stocks you were investing in I think you said for the long term?

A. Yes. That's when I started investing in Tesla.

Q. You know, this is not relevant to this, but Elon Musk is one of my clients.

So do you have a Tesla?

A. No, I don't. But I would love to have one. I just don't have the money for it right now.

Q. So you invested in Tesla -- well

so, you invested in Tesla sort of after the spring of 2020, I take it.

A. Yes.

MR. KIM: Objection to form.

A. I was always looking at Tesla even before the Covid, and I was doing a lot of research, but I never actually -- I don't think I've ever actually invested until that point in time.

Q. Okay. And so why did you pick Tesla?

A. Because I researched the company, and I have a lot of faith in the company and Elon Musk as well. So I put my money in it.

Q. And how much time did you spend researching Tesla?

A. I spent hours, days, weeks. I spent a lot of time researching Tesla.

Q. Okay. And what was your expectation for Tesla stock when you purchased it?

A. My expectations for Tesla is for it to keep growing as a long-term

investment. I am not -- I just wanted to put my money somewhere and let it sit and not have to babysit my money from day to day.

Q. And what made you think that Tesla was a good long-term investment? What was it specifically?

A. It was not, like, a specific thing. It was just the whole company as a whole and what they do. It's not any specific thing. It's everything they do, everything they strive for, everything they have accomplished, not only in Tesla but in SpaceX. Elon Musk is just I think a phenomenal person, and he's -- he's trying to make the world better. So I want to put my money, help him out.

Q. I take it -- and I think you already told me you still hold Tesla stock both in Robinhood and in SoFi?

A. Yes.

Q. And if I'm recalling correctly, if you purchased in sort of the spring of 2020, that has been a very profitable

investment.

A. Yes.

Q. Okay. So -- so that -- so you were explaining to me how your investment strategy changed over time.

A. Yes.

Q. You know, and you explained to me how you invested in Tesla, having done lots of research.

Were there any other companies that you invested in in that same way?

A. No.

Q. Okay. Now let's wind forward to January of 2021.

Did your investment strategy change at all?

A. Yes, for the short squeeze. Yes, it did.

Q. Okay. And so what was your strategy in January of 2021?

A. I -- I did research again. I did a lot of research on shorting stocks and what a short squeeze was. And I studied specific stocks that I was -- that

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I was noticing and that a lot of people were talking about at the time. And so I just researched it, and I felt that a short squeeze was going to occur. So that's -- I invested my money as kind of a short-term, like -- like, to have a game for the short-term. It wasn't a long-term plan. It was kind of like a short-term thing.

Q. And the short-term game would be from the squeeze.

A. Yes.

Q. Okay. And do you recall -- well, let me back up.

So how did you first hear of there being a potential short squeeze?

A. I believe from the news, from people at work talking about it, and a lot of YouTube. I watch a lot of YouTube as well. I heard a lot from YouTube. There was a lot of content on YouTube about it at the time.

Q. And do you -- do you recall what particular companies' stocks that you

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learned about in the context of this short squeeze?

MR. KIM: Objection to form.

A. There were several stocks. I don't remember all of them.

Q. Well, what do you remember?

A. GME was the biggest one, just GameStop. AMC was the next biggest one. And there was a Bed Bath & Beyond and Nokia. And there were several others.

Q. Okay. And of those stocks, do you recall which you invested in?

A. Yes. In AMC and Nokia.

Q. And why did you pick AMC and Nokia?

A. The biggest reason is just because they were being shorted an incredible amount, just like GameStop. It's the same -- the same reason GameStop was being -- because they were being shorted, basically, and -- too much, basically.

Q. So you said -- okay. So -- okay. So let's talk about AMC first.

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You said when you invested in Tesla, that you had a lot of faith in the company, and you described Elon Musk as I think you said a phenomenal person; right?

A. Yeah. Yeah.

Q. Okay. So what was your understanding of AMC's business?

A. AMC is a movie theater. I loved going to AMCs. They're also a great company. But at the time, I knew that they weren't doing so well because of Covid.

Q. Okay. Did you have any intention of holding your AMC securities for the long term?

A. I think I mentioned before it was just for the short squeeze.

Q. Okay. Do you know who the CEO of AMC was at the time?

A. No, I do not.

Q. Okay. Do you have any opinion as to whether that CEO of AMC was a phenomenal person?

A. No, I don't.

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MR. KIM: Objection to form.

Q. Okay. Did you have any understanding as to what AMC's strategy -- business strategy was when you invested in it?

A. At the time, no, I did not.

Q. Okay. Let's talk about Nokia, then, for a second.

Did you have an understanding of Nokia's business in January of 2021?

A. The same thing applies to Nokia as AMC in my understanding of the company.

Q. Well, could you -- okay. Could you unpack that for me a little bit?

So Nokia is not a movie theater company.

A. No, no.

Q. No.

A. They're -- I know them more for phone -- phone company. They made phones in the past. And --

Q. What was your understanding of the -- and what was your understanding of the state of Nokia's business in January

of 2021?

A. I figured that it was doing the same as AMC. They were just on a downtrend because of Covid.

Q. Any intention of holding Nokia for the long run?

A. No.

Q. Okay. Just wanted to make profit from the a short squeeze in the short run?

MR. KIM: Objection to form.

A. Yes.

Q. Okay. Did you know who the CEO of Nokia was?

A. No.

Q. Any view as to that person's business acumen?

MR. KIM: Objection. Calls for speculation. If he doesn't know who it is, then -- I mean -- anyway, you can answer the question.

A. Yeah. I don't know. I don't know.

Q. Okay. So you mentioned GME.

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Is that GameStop, I take it?

A. Yes.

Q. So GME is the ticker for GameStop?

A. Yes.

Q. The stock symbol. Okay.

So did you consider investing in GME?

A. I did consider it. But I ultimately did not.

Q. Okay. Why not?

A. At the moment, I believed that -- well, there were several -- I think there were two factors. So one of them was the stock was pretty high at the moment, and I felt that if there was a short squeeze, that it wouldn't go up much higher, so that's why I banked with AMC and Nokia.

Q. Okay. And you also mentioned I think Bed Bath & Beyond.

Did you consider investing in Bed Bath & Beyond?

A. Yes. I think I've considered

all or most of them. I didn't know all of the stocks that were going to be short squeezed. I had no idea which ones. But I did know the more popular ones were the ones that were shorted the most. And those were the ones that I -- you know, that I looked for, the ones that were shorted the most.

Q. Okay. So there was a greater potential for short squeeze in the short term. Is that --

MR. KIM: Objection to form.

A. If that's how it would -- yeah.

Q. Okay. Have you ever retained an investment or financial advisor?

A. Are you asking me if I had an advisor for my financials? No.

Q. Yes.

A. Just me.

Q. Okay. And your decisions are made, therefore, on your own research?

A. Yes.

Q. And is that, like, internet research?

A. Yes.

Q. Okay. And you mentioned I think listening to or watching videos on Yahoo.

Is that where you get most of your information before you make an investment decision?

MR. KIM: Objection to form.

A. No. I -- YouTube. YouTube is the place I would go for the most information.

Q. Oh, yes. I misspoke. I apologize.

A. That's okay.

MR. KIM: Hey, Dan, I don't want to break your flow. But I think we're close to an hour. So, you know, if you want to wrap up this subtopic, we could take a break -- you know, a brief break after that or if you want to take a break now.

MR. SLIFKIN: Yeah. Totally fine. Let me just take a few more minutes.

MR. KIM: Okay.

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BY MR. SLIFKIN:

Q. Okay. So you told me about watching YouTube videos.

Do you read any newsletters or publications about investing? And I'm focusing now on January of 2021.

A. No. I am not actually -- I'll tell you something. I'm not a big reader. I am actually [redacted]. So it's -- [redacted]

Q. All right. I'm sorry to hear that. I was unaware. I'm sorry. I apologize.

Do you -- well, okay. So you told me about watching YouTube videos.

Do you listen to podcasts?

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A. Yeah. Every now and then.

Q. And to be clear, I'm specifically asking about materials that you considered before you made investment decisions in January of 2021.

Are you with me?

A. Yes.

Q. And so in that context, did you listen to podcasts?

A. Yes. I believe there were some YouTube podcasts at that time that I was listening to.

Q. Okay. So it would still be on YouTube.

And did you watch any TV shows about investing?

A. No. I don't watch TV at all.

Q. Okay. And you have told me about your -- you told me about your [redacted]

So do you follow any other social media other than, like, YouTube videos in the context of investment decisions?

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MR. KIM: In 2020?

Q. In 2021.

MR. KIM: 2021.

A. It would just mainly be YouTube. That would be -- mainly YouTube is where I went.

Q. Okay. Do you have a TikTok account?

A. I do now. But I don't think I had one in the past.

Q. Okay. Just one more question.

You told me about, like, what you did before you invested in Tesla.

So before you made your AMC and Nokia investment decisions, how much time did you spend researching those companies?

A. I never really researched those companies.

Q. Okay. So the research you did just had to do with the short squeeze?

A. Yes.

Q. Is that fair? Is that -- I just didn't hear you.

A. Yes.

Q. Is that a yes?

A. Yes. Yes.

Q. Okay. So is it fair to say you never looked at the, you know, fundamentals of AMC or Nokia?

MR. KIM: Objection to form.

A. I don't know what you mean by fundamentals.

Q. The business metrics for those companies.

A. No, I did not look at any kind of business metrics for those companies.

Q. And you didn't form an opinion as to what the value of those companies was, the real value of those companies was.

MR. KIM: Objection to form. Calls for speculation.

A. I don't know. I don't know what that was.

Q. Okay. Well, why don't we take a break. What do you want? Ten minutes?

MR. KIM: Yeah. Ten minutes is fine.

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THE VIDEOGRAPHER: All right, Counsel. The time is 9:28. We are off the record.

(Recess)

THE VIDEOGRAPHER: The time is 9:39. We're on the record.

BY MR. SLIFKIN:

Q. Okay. Mr. Huacuja, did you speak to anyone on the break.

A. Yeah.

Q. Who did you speak to?

A. Phillip.

Q. Okay. And did you discuss this deposition?

A. Yeah. I just wanted -- I actually -- I contacted -- I think we were just -- I just wanted to know if I was doing okay. That's what I wanted.

MR. KIM: Well, I mean, let's not -- you know, we're getting into some substance of some attorney-client communications. So I'm going to direct him not to answer any questions related to the content of our

communications.

Q. Okay. Let me show you a document which we're going to mark as exhibit -- what's the number? 1. Okay. And I think Megan is going to upload that, and we'll let you know what to do.

MS. VINCENT: You should refresh on Exhibit Share and you should be able to see it.

MR. SLIFKIN: Let me see if I hit refresh, I see Exhibit 1.

MS. VINCENT: Yeah.

(Huacuja Exhibit 1, YouTube links, Bates P00002619, was hereby marked for identification, as of this date.)

Q. Do you have Exhibit 1 in front of you?

A. Yeah, I see it.

Q. Okay.

MR. KIM: Make sure you scroll through the -- you know, the entire exhibit --

THE WITNESS: Okay. Thank you.

HUACUJA - CONFIDENTIAL

MR. KIM: -- you know, once something is populated.

THE WITNESS: Okay.

BY MR. SLIFKIN:

Q. Okay. And so Exhibit 1 bears the Bates Nos. P00002619 through 2639.

Let me know when you've had a chance to, like, look through this document. You don't have to read the whole thing, but just -- because first I'm going to ask you to identify it for me. Okay?

A. Okay. Yeah. I looked through it.

Q. Okay. Do you recognize this document?

A. Yes.

Q. Okay. Can you tell us what it is, please.

A. This is basically all of the research that I did on YouTube on the dates that I did -- that I looked at the videos, specific videos. That's what the dates are there.

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Q. Okay. So -- okay. Is this something that you provided to your counsel to be part of the production of materials in this matter?

A. Yes.

Q. Okay. And when did you give it to your counsel?

A. This was within -- I think it was within this week, I think, because they asked for -- they asked for it. So --

Q. Okay. Well, I mean, we got it yesterday. So I haven't had the opportunity to look at all these links. And for that reason, I'm actually going to hold this deposition open. We can see if we need to call you back.

But let's at least --

MR. KIM: Well, we'll take that -- we'll take that as a request, and we'll take that under advisement.

MR. SLIFKIN: Yeah. I figured you would do that, but we can sort that out later.

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BY MR. SLIFKIN:

Q. But -- so explain to me how you put this document together, Exhibit 1.

A. I went to YouTube, and I looked at my search history.

Q. Okay. And beyond that, what -- if that was the first step, then what did you do?

A. I copied and pasted. That was it.

Q. Okay. And are these all the videos that you watched prior to making your investment decisions for AMC and Nokia?

A. I am not 100 percent sure because of the search options in YouTube are not user friendly. But this would be the majority of them, yes.

Q. Okay. Okay. And how much time did you spend watching these videos?

A. I wouldn't watch the full video.

Q. Okay. But I mean in -- let's focus now on the videos that are identified on pages 2619 through 2624.

Do you see that?

A. Yeah.

Q. Okay. So that's -- that's from January 24th through January 28th.

Do you see that?

A. Yes.

Q. Okay. Do you know approximately how much time it took you to watch those videos?

A. I don't know the exact time.

Q. Okay. One second. If you go to the second page of the document, there's the date January 25, 2021.

Do you see that?

A. Yes.

Q. And it says "AMC Stock (Major Short Squeeze Update)."

Do you see that?

A. Yes.

Q. Okay. Do you know who posted that?

A. Not at the moment.

Q. Okay. Did you in fact watch that video?

A. Yeah. If it's there, I'm pretty sure I watched it, because it was in my history.

Q. Okay. Do you recall if any of these videos that we identified on pages 2619 through 2624 -- do you recall if any of them were particularly influential in helping you make your investment choices?

A. I wouldn't say that.

Q. Okay. Did any one of the videos stand out above the others?

A. No, I wouldn't say that either.

Q. Okay.

A. Not how I do my research.

Q. Okay. So -- what was the last thing you said? I'm sorry?

A. That's not how I do my research.

Q. Okay. So how do you do your research? Now I'm talking specifically about during the time period in January of 2021.

MR. KIM: Objection to form. Asked and answered.

A. So the way I do my research is I

look at multiple different people's perspectives, and I come up with my own perspective upon that.

Q. Okay. But I'm asking a sort of a simpler question. How did you select these videos over other videos?

A. When you -- when you look up on YouTube, usually they're the first couple of pages, the first couple of ones that are at the top when do you a specific search. Or actually, they're also -- I think there's an algorithm that YouTube does. So if you watch one video, YouTube kind of -- its algorithm will suggest another video for you to watch, and that's sort of a kind of chain reaction, sort of. You'll watch one, they'll suggest other ones, and now you will watch those, and it will suggest other ones, so on and so forth. It's just the YouTube algorithm.

Q. Okay. Back in that time period in January of 2021, were you watching whatever it is that YouTube suggested, or were you making a selection?

A. Both.

Q. Okay. So how did you make your selection?

MR. KIM: Objection to form.

A. I would make my selection by just -- I think the biggest thing was if -- there were I think two factors. One of the biggest things is how many views did that video have. And the more views I would watch it as well because the more views something has, the more -- I would say the more informative the video might be because the amount of views. Also, the thumbnail. The thumbnail is the little -- the diagram, the picture that you see when you click on the video. That also influenced me as well, how good the thumbnail was.

Q. Okay. Okay. Let me mark as Exhibit 2 --

MR. SLIFKIN: Megan, Tab 34.

MS. VINCENT: Yes.

Q. Let me mark as Exhibit 2 -- and it should populate shortly --

A. I see it.

Q. -- a letter from the Rosen Law Firm to my law firm dated February 27, 2023.

(Huacuja Exhibit 2, A letter dated February 27, 2023, was hereby marked for identification, as of this date.)

MR. SLIFKIN: I do not have it. Let me see here.

Q. Okay. I'm not going to -- I'm just going to focus you on page 1 to 2 of the letter in the portion that concerns you, that has your name there, Mr. Huacuja.

Do you see that?

A. Yes.

Q. Okay. So this -- well, okay.

Let me -- let me ask you first, for that box where your name appears --

A. Yes.

Q. -- do you have any understanding of what this shows?

A. Yes, I do.

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Q. What does it show?

A. My handles for the different media outlets that I use.

Q. Okay. And so when you say handles, what do you mean by that?

A. It's my -- the names that I use online as a username.

Q. Okay. And are you, in fact, a participant in all the different that are identified here in the box for your name account?

MR. KIM: Objection to form.

A. What do you mean participant?

Q. Okay. I mean, first, it says [redacted]

What does that show?

A. That means on [redacted] I have an account under [redacted]

Q. Okay. And similarly you have a YouTube account, I take it.

A. Yes.

Q. A Discord account.

A. Yes.
Q. A Steam account.
A. Hmm?
Q. Is that a yes? The court reporter --
A. Yes.
Q. Yeah. Okay. And all the way down, that's also LinkedIn, Messenger, Instagram, TikTok, Twitter, Twitch, Patreon, DeviantArt, Pinterest, WhatsApp, and Reddit; right?
A. That's correct.
Q. Okay. Do you actively use each of these social media accounts?
A. No, I don't.
Q. Okay. Back in January of 2021, which of these accounts did you have?
A. I don't recall which accounts I had and which I didn't at that time, because I did add in -- after the incident, I did enter some of these accounts.
Q. Okay. Back in 2021, which of these accounts were you actively using, if

you recall?

A. It would probably be Facebook, YouTube, Discord, Steam, and the -- yeah. That's pretty much it. Messenger for sure. And Twitch for sure. Patreon for sure. And that's pretty much -- I did add a little bit of Reddit at the time too.

Q. Okay. On Reddit, did you recall any sub-Reddits that you used at that time?

A. At what time?

Q. January of 2021.

A. After the incident, I did use Reddit more often. I think during the time, I was just -- I made the account for research, basically, because during my -- during my research on YouTube, Reddit was, you know, a popular topic and also one of the major I think factors that contributed to all of this stuff. So I made -- I think that's when I made a Reddit account at that time, or I had my -- I don't recall if I made it then or if I got my old account. I don't recall. But I do

remember going to Reddit at that time just to -- just to look and see what's going on in Reddit.

Q. So you referred to the incident in your prior answer.

What were you -- what did you mean by "the incident"?

A. When Robinhood turned off the buy button.

Q. Could you say that again? I didn't catch it.

A. When Robinhood disabled the ability to purchase stocks on specific stocks.

Q. Okay. Let me show you another document. Tab 28.

(Huacuja Exhibit 3, A Reddit thread dated January 26, 2021, was hereby marked for identification, as of this date.)

Q. Okay. Do you have Exhibit 3, sir?

A. Yes. I'm looking through it right now. Okay.

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Q. Okay. So do you know what Exhibit 3 is?

A. It looks like a thread or a post on Reddit, Wallstreetbets post.

Q. Okay. Have you heard of Wallstreetbets on Reddit before?

A. Before -- before when?

Q. Before today.

A. Yes.

Q. Okay. When did you first learn about Wallstreetbets on Reddit?

A. Around the time of the incident, like, I'd say about a few weeks before.

Q. Okay. And did you review Wallstreetbets on Reddit at all?

A. Yes.

MR. KIM: Objection to form.

A. Yes, I did view it.

Q. Okay. And was that before the incident, as you put it?

A. Yes. I viewed it before the incident.

Q. Okay. So this you see is dated January 26, 2021.

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Do you see that?

A. Yes, I see that.

Q. Okay. And if you go to the second page of the document, if you look towards the bottom, it says "KyleKicksRocks."

Do you see that?

A. Yes.

Q. It says, "Is AMC still the plan?"

A. Yeah, I see that.

Q. Okay. Do you know if you reviewed this prior to your investment in AMC?

A. I can say that I did not view this specifically at all until now.

Q. Okay. But you were looking at Wall Street bets prior to your investment decisions in Nokia and AMC, I take it.

MR. KIM: Objection to form.

A. I was -- I was just researching -- I just wanted to see what it was so all about, I guess. I just researched -- research. That's what it

was.

Q. Okay. But you don't think you saw this particular Reddit --

A. Well, I know for a fact that I did not read this specific thread.

Q. Okay. And why do you know that for a fact?

A. Because a lot of this -- like, there's a lot of different factors. But one is that I would remember it, and number two, I would just browse. I wouldn't read deep into any of this stuff, because I really dislike Reddit. I think Reddit is a horrible website that is -- it's not where you want to go for information.

But I went here for research just to see what it's all about. Like, I'm trying to research something before I put my money in it, so I came here to see what it's all about so I can make a better investment decision. That's why I came here. And I just -- for research. That's all it was.

So if I even saw this thread, I would only maybe read the first line at the very top and then move on to the next one. I would not go through the whole thing. I would not even read most of this stuff, because I find Reddit to be a waste of time and a waste of brain cells, to be honest.

Q. Okay. So I'm a little confused.

So if that's your view, I mean, what -- I mean, what are you researching when you looked at Wallstreetbets on Reddit back in January of 2021?

MR. KIM: Objection to form. Asked and answered. I mean, he has already answered your question.

A. I mentioned before that I was just researching what they were talking about, what all the commotion was, what -- everything that was going on so I could make an informative opinion on what I was about to do.

Q. Okay. So you weren't -- so you weren't, you know, researching particular

companies. You were just researching what was going on on Reddit. Is that fair?

A. Yes. That is fair to say.

Q. Okay. I get it. Right.

And what was your conclusion about what was going on?

A. That -- that a whole -- that a lot of people found a way to -- to do a short squeeze. Yeah. Basically that a lot of people sort of tripped onto the discovery of making a short squeeze happen.

Q. I see.

So did it -- was it your understanding, based upon your research, that a lot of people were coordinating their trading?

MR. KIM: Objection to form.

Calls for speculation.

A. No. I don't believe that at all.

Q. Okay. So what did you think was going on amongst these Reddit users?

MR. KIM: Objection to form.

Calls for speculation.

A. I have no idea what was going on.

Q. No. I asked you what you thought at the time.

MR. KIM: Objection.

Q. Did you have any thoughts?

MR. KIM: Calls for speculation. Argumentative.

A. Yeah. I don't know what was going on at the time.

Q. I didn't ask you that, sir.

I asked you what you were thinking.

MR. KIM: Objection to form. Asked and answered. Argumentative.

A. I was thinking that these guys found -- found a way to form a short squeeze.

Q. Okay. And when you say "these guys," you mean the people who were posting things on Reddit.

A. That's correct.

MR. KIM: Objection to form.

HUACUJA - CONFIDENTIAL

Q. Okay. Have you heard the term "Meme stock"?

A. Yes.

Q. When did you first hear the term "Meme stock"?

A. Around the same time that I found out about GameStop.

Q. So that began around about January of 2021?

A. Yes.

Q. Okay. And for the court reporter, I said Meme, M-E-M-E.

So what was your understanding of what a Meme stock was?

A. My understanding of a Meme stock. So it's -- a Meme is basically a joke, without the stocks -- without stocks. So just the word "Meme" by itself is basically a joke or something to be -- to laugh at or some kind of humorous depiction of, you know, something that -- that's kind of satire, just something comical. And it's just a stock. I guess in that tense, it's just a stock

that's, like, a funny stock -- I didn't -- I don't know the exact meaning of a Meme stock. But that's what I concluded, that it was just some kind of satire on the specific stock, so something funny was going on basically.

Q. Was it your understanding that -- well, withdrawn.

Did you think, back in January of 2021, that AMC was a Meme stock?

MR. KIM: Objection to form. Calls for speculation.

A. I -- personally, I don't know. But people were calling them Meme stocks. So --

Q. Yeah. Sir, I didn't ask if you knew. I was just asking what was going on in your head.

What were you thinking?

MR. KIM: Objection to form. Asked and answered. Calls for speculation.

A. Thinking about if they were Meme stocks or not?

HUACUJA - CONFIDENTIAL

Q. Yeah. Did you think in your own mind that AMC was a joke?

MR. KIM: Objection. Calls for speculation. If you know.

A. No. I did not think AMC was a joke.

Q. Okay. Did you think Nokia was a joke?

A. No.

Q. Did you think either AMC or Nokia were Meme stocks?

MR. KIM: Objection to form. Asked and answered.

A. I don't know if they were or they weren't.

Q. Okay. You didn't have any view in that regard.

A. No.

MR. KIM: Objection to form. Asked and answered.

Q. Okay. Did you think that any stocks back in January of 2021 were Meme stocks?

A. I don't know. I didn't care

about that aspect of it.

Q. Okay. So you had heard the phrase "Meme stock" back in January of 2021; right?

A. Yes.

Q. And you had an understanding of what it meant; right?

MR. KIM: Objection to form. Asked and answered.

A. Yes, somewhat.

Q. And you didn't have any view as to whether any particular stock was or wasn't a Meme stock.

MR. KIM: Objection to form. I mean, you're going to keep asking the same questions?

A. I think I've answered that question before.

Q. Yeah. Could you do it again, please?

MR. KIM: No. He's not going to do it again.

MR. SLIFKIN: Are you instructing him not to answer?

HUACUJA - CONFIDENTIAL

MR. KIM: Yeah. If you keep asking the same questions, he's going to give the same answer. We're going to waste everyone's time.

MR. SLIFKIN: Are you instructing him not to answer?

MR. KIM: Yes, I am.

MR. SLIFKIN: Okay. Is that an assertion of privilege?

MR. KIM: It's not. It's an assertion of common sense and let's not waste time. You acknowledged that you're repeating the same question. So are we going to sit here and you're going to ask him the same question multiple times until you get an answer that you like? Let's go.

MR. SLIFKIN: Okay.

BY MR. SLIFKIN:

Q. Back in January of 2021, is it true that you didn't have any view as to whether any particular stock was or wasn't a Meme stock?

MR. KIM: Objection to form.

Asked and answered.

A. Isn't that the same question, sir?

Q. Could you please answer the question?

A. I have --

MR. KIM: Objection to form.

Asked and answered.

A. I don't know about that. I didn't care about Meme stocks.

Q. Okay.

A. I didn't know what they were. Same answer.

Q. Okay. Is it fair to say what you really cared about was whether or not there was a short squeeze going on?

MR. KIM: Objection to form.

A. That was the only thing that I was looking at.

Q. Okay. Okay. Let me show you -- let me show you -- okay. So before I show you another document, are you familiar with what's called the complaint in this matter?

A. The complaint for this Robinhood lawsuit?

Q. Yes.

A. The short squeeze -- yes.

Q. Okay. Actually, that's what I want to actually go to first.

MR. SLIFKIN: Can we just -- can you just post to whatever this is, Exhibit Share, the amended consolidated class action complaint.

(Huacuja Exhibit 4, Certification, was hereby marked for identification, as of this date.)

MR. KIM: Is that supposed to be Exhibit 4? Exhibit 4 is something else.

MR. SLIFKIN: Exhibit 4 -- Exhibit 4 is Exhibit A to the complaint. But --

THE WITNESS: So you want me to look --

MR. SLIFKIN: -- I want you to look first at Exhibit 5.

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(Huacuja Exhibit 5, Amended Consolidated Class Action Complaint, was hereby marked for identification, as of this date.)

THE WITNESS: 5. Okay. Hold on one second. Yeah. Okay. I scrolled -- I scrolled through it.

BY MR. SLIFKIN:

Q. Okay. Have you ever -- so do you have Exhibit 5 in front of you?

A. Yes.

Q. Okay. Have you ever seen this document before?

A. Yes, I have.

Q. Do you have an understanding as to what it is?

A. Yeah. The gist of it.

Q. All right. Just -- I'm starting with what the document is.

Could you identify the document for us.

A. It is the amended consolidated class action complaint.

Q. Okay. And did you review this

document prior to its filing in court?

A. I don't know. I believe I did, but I'm not positive it was before or after the filing.

Q. Okay. I understand you just told me how, you know, you have [redacted] and you [redacted]

A. Yes.

Q. So, I mean, do you actually recall reviewing this document?

A. I did view this document -- yes, I did. I remember the length of it, and I remember the title. And I also remember that -- our names, because it was -- one of the first things I saw it was in beginning -- yeah. There it is. My name is right there in the beginning as a plaintiff. So I did skim it. I did see -- yeah. I do recall it.

Q. Okay. So -- okay. Now go back to Exhibit 4, please.

A. Okay.

Q. Do you have that now?

A. Yes, I do.

Q. Okay. Let me focus you on the second page. Do you see it says "Certification" at the top?

A. On the second page. Yes. Certification.

Q. Okay. So we're on the second page of Exhibit 4.

And is that your signature at the bottom?

A. Yes, that is. I remember signing it.

Q. Okay. So let's go to the third page of the exhibit, which is -- has the heading "Schedule A."

Do you see that?

A. Yes, I see it.

Q. And there's your name there.

Okay. Do you know what this document is?

A. Yes, I do.

Q. Schedule A?

A. Yes.

Q. Okay. Can you tell us what it

is, please.

A. This is my purchases and my sales of the AMC and Nokia. Did you get that?

Q. Okay. So --

A. Did you get that?

Q. Could you just say it again?

A. Yes. These are my purchases and my sales of AMC and Nokia.

Q. Okay. AMC and Nokia stock; right?

A. Stock. Stock.

Q. And the purchases were all done on January 27, 2021; is that right?

A. Yes, all on Robinhood.

Q. And the sales were all done, all made on January 28, 2021.

A. Yes.

Q. Is that right?

A. That's correct.

Q. Okay. And is this an accurate representation of your trading in AMC and Nokia stock in January of 2021?

A. Yes. I believe this was pulled

from Robinhood's -- my records from Robinhood.

Q. Okay. You see in the column price.

A. The column of where? Price? Yes.

Q. Price. Do you see that?

A. Yes.

Q. Okay. So let's first take a look at the purchases.

Are you with me?

A. Yes.

Q. Okay. So there are -- let's look -- first look at AMC.

Again, are you with me?

A. Yes.

Q. There are multiple entries for purchases of AMC stock on January 27th.

Do you see that?

A. Yes.

Q. And they're at different prices.

Do you see that?

A. Yes, I do.

Q. And the prices are descending on

this schedule.

A. Yes.

Q. Okay. So -- okay. Why did you decide to make multiple purchases of AMC stock on January 27th?

MR. KIM: Objection to form.

A. So there was a lot that was actually going on on my thinking behind this. At first, I just wanted to put a little bit in, and then I decided to put more in, and then I thought more about it, and I decided to put -- I think -- I believe I put all of it in, all of it that I had.

Q. Did you say all that you had? You cut off.

A. All that I had in the stocks. Yes. All that I had investing stocks.

Q. Okay. So did you sell securities prior to making these purchases?

A. Yes, I did.

Q. Okay. Which securities did you sell?

A. All of my securities.
Q. All the -- that includes Tesla?
A. Yes. That includes Tesla.
Q. Okay. So all of the securities you had at Robinhood, did you sell all of those in order to make these purchases?
A. Yes. Yes, I did.
Q. Did you sell securities out of any other account?
MR. KIM: Objection.
A. No. All I had was Robinhood.
Q. So you didn't have SoFi?
A. I don't believe that I had any investments in SoFi at the time.
Q. Okay. Did you put any additional monies into Robinhood in order to fund these purchases?
A. No.
Q. Okay. So why did you decide to do this in steps?
MR. KIM: Objection. Form. Calls for speculation.
A. I don't recall at the time.
Q. Okay. You told me earlier you

decided to put in a little bit and then put in more and then put in everything.

Do you recall that? You just testified --

A. Yes.

Q. -- to that?

A. Yes, I do.

Q. Okay. So what happened during the day to make you -- make you think that way?

A. My thinking behind the whole thing. And actually, it's kind of funny. My -- my belief in Tesla actually made me do this.

Q. Can you explain that?

A. Yeah. I am long Tesla. I'm really committed, and I see it as, like, you're either all in or you're all out. So that's sort of kind of my thinking behind this whole thing. And then you -- the short squeeze was -- well, I felt that it was going to happen because of all the research that I did.

Q. Okay. So I'm a little confused.

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So you say you were long Tesla. You still hold Tesla.

A. Yes.

Q. Right?

So those are purchases that you made subsequent to January 28th of 2021; right?

A. Yes.

Q. Okay. And so given that, why did you sell your Tesla securities in January of 2021 in order to buy AMC and Nokia?

MR. KIM: Objection to form. Asked and answered.

A. You're asking why I sold Tesla?

Q. Yeah.

MR. KIM: Same objection.

A. So like I said, like, I really felt like the short squeeze was going to happen, and that's why I sold Tesla and basically said, like, you're all in or you're all out. So that's why I was -- that's why I made the small amount of purchases in the very beginning. But then

I thought about it. I was, like, you know, this -- either I'm all in or I'm all out. So I started putting more and more into AMC and Nokia. And I was going back and forth between them. I wasn't just doing all AMC and all Nokia. I was doing some AMC, some Nokia, some AMC, some Nokia.

Q. Okay. And are these -- to your recollection, are these purchases identified on Schedule A in chronological order at least within the security?

A. I can't tell you that unless I see the times. So I don't know.

Q. Okay. You see -- let's just focus on AMC for a second. You see the -- you know, it starts with a thousand shares, and then it has 15 shares, and then it has 105 shares.

Do you see that?

A. Yes.

MR. KIM: Dan, I can tell you this is a schedule that we prepared, the Rosen Law Firm prepared. And just

looking at it, I mean, it seems to me that it was sorted by price per share.

A. Yeah. It looks like it's sorted by price. It's not sorted by --

Q. Okay.

MR. KIM: And you guys -- I mean, look, you guys have all his documents, you know, you and Robinhood. So, you know, you know what the order of these trades were. And sometimes each of these entries don't reflect an actual trade. Right? Some of these could be broken up themselves by Robinhood. So, you know, this is something that we prepared. So I just want to make the record clear for that.

MR. SLIFKIN: Okay. That's very helpful.

BY MR. SLIFKIN:

Q. Okay. Do you have any recollection as to what was happening to AMC stock during the day on the 20 -- on January 27, 2021?

A. Yeah. It was fluctuating.

Q. Okay. So you were monitoring the price during the day as you were making your purchase decisions?

A. Yes.

Q. Okay. Is that also true of Nokia?

A. Yes.

Q. Okay. And just for the record, to be really clear, were you monitoring the price of Nokia during the day on January 27, 2021, while you were making your purchase decisions?

A. Yes.

Q. And do you have any recollection of what was happening with respect to Nokia stock during that day?

A. Like, in the stock market, if it was going up or down? I was monitoring it, yes.

Q. Yeah. And do you recall was it going up? Was it going down? Was it fluctuating? Do you have any memory?

A. It was fluctuating.

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Q. Okay. Okay. So I take it that you then sold all of your AMC and Nokia stock the next day, January 28th.

A. Yes.

Q. Okay. Why did you decide to pull out of the -- your investments in Nokia and AMC stock?

A. Because of -- like I mentioned before, the incident, which was Robinhood disabling the buy button.

Q. Okay. And when did you first -- okay. So let me just ask you this differently.

So when did you learn of Robinhood disabling the buy button, as you put it?

A. I learned on that specific day when their markets opened. I didn't know for a fact that that's what they did. I thought it might have been a bug or a glitch in their software. And I was wondering what was going on. I had no idea -- I did not receive any kind of warning or any kind of email that this was

going to happen prior or even during the whole incident. I didn't receive anything. And I was on the app, and I -- Robinhood opens at a specific time every -- every day. And I was up before that time, and during that time, because I was going to monitor the stocks, because I was going to pull out when the short squeeze happened. So that's why I was there monitoring it. And when the -- when Robinhood finally opened up their market, I guess, their button wasn't available. I thought it was maybe a bug. I tried to reset it, the phone. I tried to reopen their app. It wasn't working. So then I went to -- I went online to try to figure out what was going on. A lot of people were having the same problem. And then I figured out, you know, that they actually -- they did this on purpose.

Q. Okay. And was it after figuring that out that you made the decision to sell the securities, AMC and Nokia?

A. Yes. I did not know how long

they were going to do this for. I had no idea that they could even do this in the first place. I was unaware and unsure about any -- anything that they were doing or what they could do on top of it. If they could do this, then what else could they do? I had no idea. So I decided to pull out all of my stocks as soon as possible so I can mitigate or cut my losses, basically.

Q. Okay. In your mind -- so you understood that Robinhood was not allowing users of its platform to make any further purchases of certain stocks, I take it.

A. Yes, at that time.

Q. Did you know if those stocks were available for purchase on other platforms?

A. At that time, I did not know.

Q. Okay. So what was it about the inability for Robinhood users to purchase those stocks that caused you to make a sell order?

A. I'm sorry. Can you rephrase

that question?

Q. What was it about the inability of Robinhood users to purchase certain stocks that caused you to place a sell order?

MR. KIM: Objection to form. Asked and answered.

A. Well, if you disable the buy button, there's only one way a stock can go. I mean, when this happened, and I figured out that they disabled that option, like, immediately after, a light bulb went in my head, like, what the fuck are they doing? Because the only way a stock can move is down if no one can buy a security anymore. I mean, it would be the same if no one can sell a security. It's a simple supply-and-demand situation. I mean, if no one can sell anything and only people can buy, of course the price is going to raise. And the same thing goes for if anyone -- if you can't buy anything and you can only sell, the price is going to go down. It's obvious.

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And like I said, I didn't know for how long they were going to do this. I had -- no one told me. I was on their app the whole time. They didn't bother to send me any kind of message at all. I was on their app before their market opened, after their market opened, during the, market -- the whole -- during the whole thing was happening. I didn't get any kind of notification. I didn't get any email. I didn't get anything on their app. I was on their app the whole time. Nothing. So I decided to pull out because I didn't know how long this was going to last. I had no idea what else they could do. And I just -- it was just horrible. So I just decided to cut my losses.

Q. So you spoke about, you know, the inability to purchase AMC and Nokia at least.

You were referring specifically to on the Robinhood app, I take it.

A. Yes.

Q. You were unaware of whether

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those stocks were available to purchase through other brokers.

A. I did not bother, because I did not have stocks with other brokers.

Q. Okay. Can we just --

MR. SLIFKIN: Megan, can you pull up Tab 8.

So I'm just going to move to another exhibit, Mr. Huacuja.

(Huacuja Exhibit 6, A Robinhood article dated January 28, 2021, was hereby marked for identification, as of this date.)

Q. So Exhibit 6 should be up.

A. I see it.

MR. KIM: Some of the page the seem slow to populate. I don't know if that's just me or --

MR. SLIFKIN: Oh, yeah. No. It's me too. Oh, no. It's everybody. So -- but it's not terribly long.

A. All right. I see it.

Q. Okay. And you see this is dated January 28, 2021?

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A. Let me see. At the very top? Yes.

Q. Right. And you see it's -- it says "Robinhood" at the very top. And then the --

A. Yes.

Q. And there's a logo. That's the Robinhood logo, I take it?

A. Yes.

Q. It says "Keeping Customers Informed Through Market Volatility."

Do you see that?

A. Yes.

Q. Okay. Have you ever seen this document before?

A. No.

Q. Did you see it on January 28, 2021, in your recollection?

MR. KIM: Objection to form.

Asked and answered.

A. No, not that I can remember.

Q. Okay. Okay. We can put that down.

MR. SLIFKIN: Okay. Let's put

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up Tab 5.

(Huacuja Exhibit 7, A Twitter Post, was hereby marked for identification, as of this date.)

MR. KIM: Dan, we've been going for an hour, I think. So, you know, I don't want to break your flow, but maybe we could take a couple of minutes to stretch our legs, you know, after you're done with any of the questioning. Or do you think this is a good time to take, like, three or four minutes? Five minutes?

MR. SLIFKIN: Five minutes. Why not? Okay.

MR. KIM: Okay. All right.

MR. SLIFKIN: Okay. Thanks.

THE VIDEOGRAPHER: Off the record, then, Counsel. The time is 10:27. We are off the record.

(Recess)

THE VIDEOGRAPHER: The time is 10:34. We are on the record.

BY MR. SLIFKIN:

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Q. Okay. So we were talking about certain restrictions, trading restrictions that Robinhood imposed in January of 2021.

Are you with me?

A. Yes.

Q. Do you know if any other brokers put similar restrictions in place at the same time?

MR. KIM: Objection to form.

A. This is at the time --

Q. In January of 2021. Yes.

A. Yeah. I did not know. I wasn't aware until -- I found out later.

Q. Okay. And what did you find out later?

A. That there was other companies that made restrictions, but they weren't as severe as Robinhood.

Q. Okay. But at the time you made your decisions in -- on January 28, 2021, you only knew about Robinhood; is that correct?

A. Yeah. I only knew about Robinhood.

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Q. Okay. So let me mark a couple more documents.

MR. SLIFKIN: Tab 12, Megan.

Q. So exhibit -- one second -- Exhibit 7 is a Twitter post which has your name on the top of it.

Do you see that?

A. It's still loading for me.

Q. Oh, I'm sorry.

A. I'm trying to refresh. I don't know what's going on. It's just loading. Okay. There it goes.

Q. Okay. Do you have Exhibit 7 in front of you?

A. Yes.

Q. Do you know what Exhibit 7 is?

A. Looks like a Twitter post.

Q. Okay. Do you know who made this Twitter post?

A. It looks like I did.

Q. And a few questions.

There's a picture of a raven, I guess. Is that a raven?

A. Yes.

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Q. Okay. And is that an identifier for you?

A. Yes, it is.

Q. Okay. And below that, it says "Streamlabs.com."

Do you see that?

A. Yes.

Q. [redacted]

A. Yes.

Q. Okay. What is [redacted]?

A. [redacted] is one of my handles. It stands for [redacted], which is actually my computer -- I built this myself, and my computer's name is [redacted] So I'm [redacted] This is [redacted] So that's where [redacted] comes from. Streamlabs is the software that I use to stream online.

Q. Okay. So explain to me what Streamlabs does.

A. Streamlabs is basically -- it -- it's a software -- it's a recording software that records -- it records you

to -- it's -- I forget the technical term. But it just records you so you can stream your webcam or stream what you're doing with whatever media that you're doing on your computer and stream it out to a service like Twitch, like Twitch.

Q. Okay. When you say stream, you're indicating that this is a live feed.

A. Yes.

Q. Okay. As opposed to a YouTube posting, which is a recording. Is that fair?

A. Yes.

Q. And so how frequently would you -- do you use Streamlabs?

MR. KIM: Objection to form. Are we talking about a particular period of time?

Q. Yeah. I want to talk -- we're all talking about early 2021; right?

A. I don't recall the amount of times that I streamed during that time.

Q. Okay. And so this is dated

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February 18, 2021.

Do you see that?

A. Yes, I see that at the bottom there.

Q. Okay. And there's a heading which says "Live Now GameStop SEC Hearing - Going to work soon."

Do you recall what you were streaming here?

A. No, I don't recall exactly.

Q. Okay. Let me -- let's go to Tab 5. I'm going to show you a different document.

A. Oh, I remember now. I don't know if you want me to say --

Q. Okay. So what is it you remember now?

A. I remember what I was streaming at this time because of the title.

Q. And you're referring back to -- one second -- Exhibit 7?

A. The tab -- yeah. Exhibit 7. Yeah.

Q. Okay. So what were you

streaming at this time?

A. So I remember that I was streaming the GameStop SEC hearing, which was a hearing that was going to be put on by -- I don't know exactly who it was. There were several lawyers or several counsel people. I don't know who some -- I don't know, but I know this was a big thing at the time. Everyone was looking forward to seeing it. So I basically -- I turned on YouTube to watch it, or I don't know if -- I don't think it was YouTube. I turned on whatever platform had it streaming. So somebody was streaming the SEC hearing. And I was just going to watch it and watch it along with other people who wanted to watch it with me.

Q. I see.

So you were picking up, like, a live feed from somebody else and re --

A. Yes.

Q. -- broadcasting it. Is that fair?

A. That is fair to say.

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Q. Okay. Your -- like, the stuff you put on Streamlabs, is it saved at all?

A. Some of it is, and some of it isn't.

Q. You --

A. A lot of it gets deleted after a certain amount of time. A lot of it gets deleted after a certain amount of time.

Q. Have you saved any of your Streamlabs posts or live streams?

A. Yes, I have.

Q. Okay. And did you provide those to your lawyers as part of this litigation?

A. None of the stuff that I saved -- like, this specific stuff is -- the stuff that I saved was for the gaming that I do. It's not -- it doesn't have anything to do with this -- this hearing.

Q. Nothing having to do with this litigation.

A. Yeah. The litigation.

Q. And the subject matter of this litigation. Okay. Fair enough.

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Okay. So why don't we put up tab -- why don't we mark as Exhibit 8 Tab 5.

(Huacuja Exhibit 8, A thumbnail with a link, Bates P00001312, was hereby marked for identification, as of this date.)

Q. Okay. Exhibit 8 should have popped up. And it's a document with the Bates No. P00001312.

Do you see that?

A. Yes, I do.

Q. Okay. Do you recognize this document?

A. Yes, I do.

Q. Can you tell us what it is, please.

A. This is -- it looks like a thumbnail to I think my -- one of my first videos or the first video I put up about stocks.

Q. Okay. And when you say thumbnail, what do you mean by thumbnail?

A. The thumbnail is the picture --

basically the picture of my face and the text that appears on it.

Q. Okay. And I take it, if you click on the thumbnail, it takes you to the YouTube video?

A. Yes, that's correct.

Q. Okay. And the title is "How I got into Stonks."

Do you see that?

A. Yes.

Q. What -- what do you mean by "stonks"?

A. Like, a -- like, it's -- like, I guess, like, you could say it's, like, a Meme. It's the same thing as stocks but with an "n." It's more of what you -- what we call -- and "we" is referring to gamers. In the gamer language, it's -- it's sort of -- what do you call it -- it's kind of like E-speak is what you call it. It's, like, E-speak. It's, like, internet speak, usually, when people type to each other back and forth. There's a whole history about it. But it's

basically E-speak.

Q. I'm sorry. I don't know what E-speak is. So maybe you could explain that to me.

A. Yeah. So, like, just -- I guess a lot of people refer to it as, like, you know, if you've ever chatted with anybody on a phone, like a messenger, any kind of messenger app, and you're on your phone typing, and you type "LOL." What does "LOL" mean? "LOL." What is that? But it's "laugh out loud" if you actually spell it out. So the word I'm looking for is leetspeak. So that's what it's called. Leetspeak is this -- it's like a phrasing of certain words, rephrasing of other words. It's just to make it either funny or shorter or condensed in -- when you're typing to somebody online or -- yeah. In this situation, it would be to make the word "stock" be funny by saying "stonks."

Q. Okay. "LOL" I understood.

MR. KIM: These young kids and their rock and roll.

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MR. SLIFKIN: "LOL" I actually got. I'm not that far behind the time.

Q. Okay. Well, let's -- okay. So we went and clicked on that link. And let's go back to the exhibits and see if this works.

What I'd like to do is take the video file and mark it as an exhibit.

MR. SLIFKIN: Is that working or not?

Q. Okay. For whatever reason, it's not working. But let's just -- let's just be clear on the record. You know, there is a 36-minute, 50-second video that you uploaded onto YouTube, which is accessible through this thumbnail, which is identified on Exhibit 8; correct?

A. That's correct.

Q. Okay. So why did you post this video?

A. I posted this video for anybody interested in learning about stocks, I believe. I would need to watch the video

in full to tell you. But this was just my introduction into stocks and how I got into it, which is the title there. Do you see?

Q. Okay. Well, was the video an accurate reflection of your views at the time you posted it?

A. Yes. At the time I posted it. Actually, not necessarily. I think that's when I first got into stocks. I think I go over how I was when I first got into stocks and how I was at the time. And I don't recall exactly if I got into Tesla in that video. But I might or might have not. I just need to watch the video again to let you know. But I don't recall.

Q. Okay. But -- so in this video, there's a description of what -- how you got into stocks and how your views changed over time.

Is that fair?

A. Yeah.

Q. Okay. And so for each particular point in time that you

describe, are you describing accurately your views?

A. In the video? Yes.

Q. Yes.

A. I believe so.

Q. Okay. And you -- is it correct that you posted this on January 27, 2021?

A. Yes. That's what it says there.

Q. Okay. And you wrote here, "Links below are all to SoFi."

Do you see that?

A. Yes.

Q. And, at that point in time, did you have a SoFi account?

A. Yes. I believe I was just getting into SoFi at this time.

Q. Okay. Why were you posting links to SoFi?

A. Because I think as a new member of SoFi, they gave me referrals, and I wanted just to refer people to SoFi and hopefully -- like, if -- I don't know -- I forget how the referrals work, but if someone picks up the referral, they will

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get some money, and then I'll get some money too. I think that's how it worked. I'm not, like, 100 percent on that.

Q. Okay.

A. They were just referrals. That's all they were.

Q. Let me -- what I want to do now is mark Tab 31.

(Huacuja Exhibit 9, Document, was hereby marked for identification, as of this date.)

MR. SLIFKIN: Sorry. I was getting a call from somebody called Spam Risk.

THE WITNESS: It might be important.

MR. SLIFKIN: Yes. He's calling a lot of firms right now.

BY MR. SLIFKIN:

Q. Okay. So let's see if this new document is up.

A. 11?

Q. Exhibit -- I don't know what happened to 9 and 10.

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(Huacuja Exhibit 11, Schedule D, Capital Gains and Losses, was hereby marked for identification, as of this date.)

Q. [redacted]

[redacted]

[redacted]

[redacted]

A. [redacted]

Q. [redacted]

[redacted].

[redacted]

A. [redacted]

Q. [redacted]

[redacted]

A. [redacted]

[redacted]

Q. [redacted]

[redacted]

A. [redacted]

Q. [redacted]

[redacted]

[redacted]

A. [redacted]

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[redacted]

Q. [redacted]

[redacted]

[redacted]

[redacted]

A. [redacted]

[redacted]

[redacted]

[redacted]

Q. [redacted]

A. [redacted].

Q. [redacted]

A. [redacted]

Q. [redacted]

[redacted]

A. [redacted]

Q. [redacted]

[redacted]

[redacted]

A. [redacted]

[redacted]

[redacted]

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[redacted]

[redacted].

Q. [redacted]

[redacted]

[redacted]

A. [redacted]

Q. [redacted]

A. [redacted]

Q. [redacted]

A. [redacted]

Q. [redacted]

[redacted]

A. [redacted]

Q. [redacted]

[redacted]

[redacted]

A. [redacted]

[redacted]

Q. [redacted]

[redacted]

[redacted]

A. [redacted]

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[redacted]

Q. [redacted].

MR. SLIFKIN: Why don't we go off the record for maybe until -- why don't we go off the record until 2:00 and just let me see what else I have. Okay?

THE VIDEOGRAPHER: 2:00 Eastern; right?

MR. SLIFKIN: Oh, yes. Yes. Sorry. Not 2:00 California. No, no, no. Okay. So, like, five minutes.

THE VIDEOGRAPHER: Okay, Counsel. The time is 10:54. We're off the record.

(Recess)

THE VIDEOGRAPHER: The time is 10:59. We are on the record.

MR. SLIFKIN: Okay. I have no further questions at this time. It's defendant's position that we want to hold the deposition open to allow us an opportunity to review the videos,

the links to which were produced yesterday, and also the material that was produced to us this morning prior to the deposition which we didn't have time to review ahead of time. Okay?

MR. KIM: I understand your position. We'll take that request under advisement. And I think, sort of provisionally, we'll mark the transcript as Confidential pursuant to the protective order, and we'll deal with that, you know, in accordance with the protective order.

And just for the record, so there's a gap between Exhibit 8 and 11. So there's no Exhibit 9 or 10, just so it's clear on the cover sheet.

MR. SLIFKIN: Well, we tried to mark the video, and it didn't work.

MR. KIM: Okay.

MR. SLIFKIN: The technology didn't work. And I think we clicked on it twice, which is why it's 9 and 10.

HUACUJA - CONFIDENTIAL

MR. KIM: I got you.

MR. SLIFKIN: Okay.

MR. KIM: I have no questions.

MR. SLIFKIN: We can all -- thank you.

THE VIDEOGRAPHER: Okay, Counsel. I'll sign off our video today.

So here ends Media Unit No. 2. This concludes the video recorded virtual remote deposition of Abraham Huacuja taken by the defendant on Tuesday, March 21, 2023. The time is 11:01 a.m. Pacific Daylight Time, and we are going off the record.

(TIME NOTED: 11:01 a.m. PST.)

_____

ABRAHAM HUACUJA

Subscribed and sworn to before me this _____ day of _____, 2023.

_____

Notary Public