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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

\* \* \* \* \*

T-PEG, INC., and \*  
TIMBERPEG EAST, INC., \*

v. \*03-C-462

STANLEY J. ISBITSKI, and \*  
VERMONT TIMBER WORKS, INC. \*

\* \* \* \* \*

DEPOSITION OF JONATHAN VINCENT,  
Taken at the Law Offices of Whittington  
Law Associates, PLLC, 35 South Main  
Street, Hanover, New Hampshire 03755, on  
Wednesday, March 31, 2004, commencing at  
9:00 a.m.

Carolynne A. Beck, CSR, Deposition Reporter

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1 case?  
 2 A. I don't remember.  
 3 Q. What was the nature of your testimony?  
 4 A. I think it was a corporate issue.  
 5 Q. Do you know who -- was Timberpeg suing  
 6 the other party?  
 7 A. I was called to depose, I'm not sure just  
 8 how the suit was brought.  
 9 Q. Do you know how the suit came out?  
 10 A. No, I think it was settled in some way.  
 11 Q. Are you aware of any other suits involving  
 12 Timberpeg and corporate issues?  
 13 A. No.  
 14 Q. Where in Massachusetts was that deposition  
 15 given?  
 16 A. Springfield, I believe. It was a while  
 17 ago, it's a little fuzzy.  
 18 Q. Would you tell me your date of birth,  
 19 please.  
 20 A. June 15th, 1949.  
 21 Q. And where do you reside?  
 22 A. Norwich, Vermont.  
 23 Q. And street address?

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1 A. 267 Main street.  
 2 Q. Who is your employer?  
 3 A. Timberpeg.  
 4 Q. And by Timberpeg, what do you mean  
 5 precisely?  
 6 A. I work for Timberpeg Design Services or  
 7 Timberpeg Services, Inc., I believe is the  
 8 corporate entity, I'm really not involved  
 9 in that part.  
 10 Q. Can you tell me how, if at all, Timberpeg  
 11 Services, Inc. is related to Timberpeg  
 12 East?  
 13 A. We do work on behalf of Timberpeg East or  
 14 for, I shouldn't say on behalf of,  
 15 essentially we do design work for  
 16 Timberpeg East.  
 17 Q. Do you do design work for any other  
 18 entities?  
 19 A. Yes, other Timberpeg companies.  
 20 Q. Those would be the four operating  
 21 companies?  
 22 A. Well, three others.  
 23 Q. All right, so four all together?

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1 A. Mm hmm.  
 2 Q. That's east, south, why don't you just  
 3 tell me the names.  
 4 A. East, South, West and Pacific.  
 5 Q. Do you know if those are under common  
 6 ownership?  
 7 A. I don't know what the ownership is.  
 8 Q. All right, do you do, are you an employee  
 9 of T-Peg, Inc.?  
 10 A. My check is from, I believe, I didn't  
 11 check it recently, Timberpeg Services,  
 12 Inc., is the corporate entity, I believe,  
 13 that I'm employed by.  
 14 Q. Have you ever heard of T-Peg, Inc.?  
 15 A. Yes, it's the corporate name that goes on  
 16 our copywrite applications.  
 17 Q. Do you know who owns T-Peg, Inc?  
 18 A. No.  
 19 Q. And you don't know who owns the four  
 20 operating companies either?  
 21 A. No.  
 22 Q. You don't know whether the operating  
 23 companies or any of them is owned by

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1 T-Peg, Inc?  
 2 A. No, I don't.  
 3 Q. Do you know where Timberpeg Services,  
 4 Inc., is incorporated?  
 5 A. No. I wasn't involved in that, we are in  
 6 New Hampshire, could be New Hampshire, I  
 7 don't know.  
 8 Q. Do you know how old of a company it is?  
 9 A. Which company?  
 10 Q. Timberpeg Services, Inc.  
 11 A. No, I don't know exactly when it was  
 12 formed.  
 13 Q. I looked it up on the New Hampshire  
 14 corporate database and didn't find it, nor  
 15 did I find Timberpeg Design Services, you  
 16 don't have any information as to why they  
 17 wouldn't be listed?  
 18 MR. WILL: I'll object to the  
 19 question, you can answer it if you can.  
 20 A. No, I don't know.  
 21 Q. You don't know, are you an associate of  
 22 Timberpeg East?  
 23 MR. WILL: I will object to the

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<p>1 extent that it calls for a legal 2 conclusion, you can answer. 3 A. I'm not sure exactly what that means, so I 4 don't know how to answer that. 5 Q. Do you have authority to take actions on 6 behalf of Timberpeg East? 7 MR. WILL: Same objection, you 8 can answer. 9 A. No. 10 Q. Do you have authority to take actions on 11 behalf of T-Peg, Inc? 12 MR. WILL: Same objection, you 13 can answer. 14 A. No. Wait a minute, let me go back. On 15 behalf of, the only place I have anything 16 to do with T-Peg, Inc., is in filling out 17 copywrite apps, so if that's an action, 18 yes. 19 Q. And who assigned you that function? 20 A. I believe Steve Woods asked me to do it. 21 Q. And when was that? 22 A. I don't remember, I've been doing it for 23 many years, ten years, eight years, I'm</p>	<p>1 Q. All right. Do any of the companies that 2 you do design services for through 3 Timberpeg Services, Inc., make log homes? 4 A. Could I have that question again, do I -- 5 Q. Make log homes. Repeat the question. 6 (The record was read as requested.) 7 A. No. Yes, I should answer that, we have 8 on occasion, incorporated logs into 9 buildings, one or two posts, and that's 10 the extent of it, but that's not a log 11 home. 12 Q. All right. To whom do you report at 13 Timberpeg Services, Inc. 14 A. Richard Neroni. 15 Q. Neroni, that's N-e-r-o-n-i? 16 A. Mm hmm, yes. 17 Q. And what is Mr. Neroni's title at 18 Timberpeg Services, Inc. 19 A. I'm not exactly sure, I believe he's chief 20 operating officer. 21 Q. Do you know if he's also chief operating 22 officer at T-Peg, Inc. 23 A. Don't know.</p>
<p>1 not sure. 2 Q. Have you heard of Traditional Management, 3 Inc.? 4 A. Yes. 5 Q. What is that? 6 A. I believe it's a holding company, I don't 7 know much more than that. 8 Q. What's your understanding of what 9 companies or stocks it holds? 10 A. Don't know. 11 Q. Do you have any interaction with 12 Traditional Management, Inc? 13 MR. WILL: Object to the form, 14 you can answer. 15 A. As a corporate entity, no. 16 Q. In any other fashion, do you have an 17 interaction with it? 18 A. It's the address I use when I send 19 interoffice to Steve. 20 Q. The address for him? 21 A. TMC, yes. 22 Q. Not the address for you? 23 A. For him.</p>	<p>1 Q. Do you know if he has any office at 2 Timberpeg East? 3 MR. WILL: I'll object to the 4 form, he can answer the question. 5 Q. By office I mean as an officer? 6 A. I don't believe so, he is president of 7 Timberpeg South, Inc. 8 Q. How long have you reported to Richard 9 Neroni? 10 A. Twelve years. 11 Q. And what's your title at Timberpeg 12 Services, Inc? 13 A. Director of design services is the way I 14 was hired. Director, design services, I 15 didn't write the title. 16 Q. And the title's been the same over those 17 12 years? 18 A. Yes, I usually put it down as director of 19 design, because that's what I do. 20 Q. Where do you physically work out of? 21 A. 112 North Main Street, West Lebanon. 22 Q. Do you know who the CEO of Timberpeg 23 Services, Inc. is?</p>

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