Exhibit I

Filed Level 1 Restricted

PURSUANT TO PROTECTIVE ORDER

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Case No.: 1:22-cv-03181-DDD-SP

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

REVEN HOLDINGS, INC. d/b/a REVEN PHARMACEUTICALS,
REVEN PHARMACEUTICALS, INC.,
BRIAN D. DENOMME,
PETER B. LANGE,
MICHAEL A. VOLK,

Defendants,

and

REVEN, LLC,
REVEN IP HOLDCO, LLC,
REVEN ONCOLOGY LICENSING, LLC, and
HEALTH ANALYTICS & RESEARCH SERVICES, LLC,

Relief Defendants.

VIDEO DEPOSITION OF LEAH SCHAATT

June 1, 2023

PURSUANT TO PROTECTIVE ORDER

Q. Did you make changes to it?
A. A few.
Q. A few is -- is three?
A. I don't recall.
Q. Did you sign it?
A. I did.
Q. And if you look at the -- the last page of the declaration, which is page 19, I see a signature there on page 19. Is that -- is that your signature?
A. That is.
Q. So tell me about your introduction to Reven. How did you first come to learn about Reven?
A. Liz Leeds made the introduction to Peter Lange.
Q. And that happened in May of 2019, correct?
A. That's correct.
Q. And -- and then you went and met with Mr. Lange in person in July of 2019; is that right?
A. That's correct.
Q. And Mr. Lange provided you with some written materials related to Reven and its drug RJX either at that meeting or around the time of that meeting; is that right?
A. That's right.

Q. And did you review those materials?
A. I did.
Q. So I'll direct you to paragraph 3 of your declaration, and let me know when you've had a chance to look that over.
A. I'm there.
Q. So I think we just discussed you -- Liz Leeds made an introduction to Mr. Lange in May of 2019. You met Mr. Lange in person in July of 2019, and in August of 2019 you emailed Mr. Lange to let him know that you were interested in proceeding with an equity investment in Reven; is that right?
A. That's correct.
Q. And this was your first investment in a private company like Reven, correct?
A. That's correct.
Q. So tell me about your investment process between May of 2019 and August of 2019. What did you do to familiarize yourself with the investment opportunity?
A. A lot of verbal conversations with Peter and eventually Michael Volk about the prospects of RJX and the development of RJX, and it sounded like a very exciting drug with great potential for -- for healing and was very much interested in being a part of that.
Q. So I think you mentioned having a lot of

verbal conversations with Mr. Lange and later Mr. Volk; is that right?
A. That's correct. And with Liz Leeds.
Q. And with Ms. Leeds. How many conversations would you say that you had?
A. I don't recall.
Q. Was it more than one?
A. Yes.
Q. More than five?
A. I don't recall.
Q. So what else did you do between May of 2019 and August of 2019 when you ultimately decided to let Mr. Lange know that you were interested in investing besides those verbal conversations that we just discussed?
A. What do you mean what else did I do?
Q. That's just what I mean. So did you do anything else besides speak to Mr. Lange and later Mr. Volk and speak to Ms. Leeds in between May of 2019 and August of 2019 that informed your decision to invest in Reven?
A. I read the materials that Peter and Michael would have provided me, discussed with my husband whether or not he and I thought that this would be a good investment and something we wanted to be a

part of. Beyond that, there would be nothing else.
Q. So you consulted with your husband?
MR. SMALL: Object to form.
A. My husband and I discussed the investment opportunity.
Q. (By Mr. Guisbond) And did you discuss the investment opportunity with anyone other than your husband, Ms. Leeds, Mr. Lange, Mr. Volk?
A. No.
Q. Did you ask Mr. Lange or Mr. Volk any questions?
A. I'm sure I did.
Q. What did you ask them?
A. I -- I can't recall exactly what I asked them. I asked -- I know that we discussed RJX and what RJX intended to -- to do as a drug; and I'm sure we talked about their FDA process, timing of getting the drug to market, general questions about RJX and its development.
Q. And so am I correct in understanding that you asked those questions verbally?
A. That's my recollection. There -- I may have emails with them where we discussed things back and forth, but a lot of the conversations that I had with them were in person or over the phone.

Q. So as you sit here today, do you recall asking any questions of Mr. Lange or Mr. Volk in that period between May 2019 and August 2019 in writing?
A. I'd have to look at my emails, but I'm sure we had conversations via email.
Q. So separate and apart from any conversations that you had via email, my question is more specific which is, as you sit here today, do you recall asking any questions of Mr. Lange or Mr. Volk during that time period in writing?
A. Other than email?
Q. No. You can include email.
A. I think I've already said that I had email exchanges with them. I don't recall what specific questions might have been asked in those emails.
Q. Do you think those emails still exist?
A. I'm sure they do.
Q. So we would request that you take a look and if you did ask -- if you did, in fact, ask any questions of Mr. Lange or Mr. Volk during that period, that you produce them in this action.
A. Okay.
Q. You can discuss it with your counsel.
So did you -- did you ask Mr. Lange or Mr. Volk for any materials other than the materials that

they had already provided to you?
MR. STALZER: Objection, form, time frame.
Q. (By Mr. Guisbond) You can answer the question.
A. I recall having a verbal conversation with Michael Volk about financial statements. I wasn't overly concerned because he assured me that they were in the process of being prepared and would be provided; and I knew they were a start-up company, didn't have revenues.
Q. Are you finished?
A. So I -- I generally knew that the financial statements would not be very robust for a start-up, no revenue company.
Q. Okay. So just to make sure that I have that, sometime between May of 2019 when you were introduced to Mr. Lange and August of 2019 when you indicated that you were interested in proceeding with an equity investment in Reven, you recall discussing Reven's financial statements with Michael Volk, correct?
A. Correct.
Q. And it was your understanding at that time that the financial statements would not be terribly robust given the state of the business venture, correct?

A. That's correct.
Q. And you did not ask for copies of those financial statements at that time, correct?
A. I don't recall if I specifically asked for copies of financial statements.
Q. Did you receive copies of financial statements during that time period?
A. No.
Q. And just to be clear, it's not your testimony that -- that you asked for copies of financial statements and weren't provided financial statements, correct?
MR. STALZER: Objection, form, time frame.
MR. GUISBOND: Same time frame.
Q. (By Mr. Guisbond) You can answer.
A. There was a general conversation with Michael Volk about their financial statements that were represented to me were in process, but they were not provided to me.
Q. And I think you said a moment ago that you understood that they would be provided at some later point in time; is that right?
A. That's right.
Q. And were they, in fact, provided at some

later point in time?
A. No.
Q. Okay. So let's talk about the documents that Mr. Lange had provided you. It looks like in reviewing -- I'm just, for reference, looking at paragraphs 1 through 4 of your declaration. And it looks like he provided some slide decks, a private placement memorandum dated August 31st, 2018, and, in addition, a subscription agreement and a shareholder slide deck dated August 2019. Am I reading that right?
A. That's right.
Q. So did you read all of those documents?
A. I reviewed them. I can't say that I read them cover to cover.
Q. Some of them are pretty long, right?
A. Absolutely.
Q. So when you say you reviewed them, how much time do you think you spent with those -- those documents?
A. I have no idea.
Q. Was it an hour?
A. Cumulatively, probably. It wasn't one point in time where I sat down and set a clock. So I reviewed them periodically, looked at different information before I made the decision to invest.

declaration?
MR. STALZER: Objection, form.
A. Absolutely not.
Q. (By Mr. Guisbond) Why not?
A. Because there's $600,000 of my investment that was used in ways that I now know and I knew then were entirely inappropriate and misrepresented to me at that dinner with Peter and subsequently in this document. It goes to their credibility. It goes to their honesty.
Q. So tell me what you were referring to a moment ago when you said there was $600,000 of your investment that were used in ways not represented on the spreadsheet. What is that?
A. 2 million minus 1.38 million is 600,000. I know now and I knew at the time that I signed my declaration that they and multiple staff members, employees -- to use the term "employee" very loosely -- contractors, I know that they were driving AMG Mercedes. I know that they were spending lavishly.
Had I known that then, I would not have invested. While they may have used my -- part of my investment to pay this approximately $1.4 million, I was led to believe that my entire investment was going to be used in the ordinary course of the -- of what would be

appropriate for a start-up, nonrevenue company.
Q. I want to be clear, though. You don't know that any portion of your investment was used to pay for any AMGs, correct?
A. They got the money somewhere. You know, have I traced every dollar? No. I'm sure Donna Walker has.
Q. And how are you sure that Donna Walker has?
A. I've read her declaration.
Q. Anything else?
A. I've read her declaration. Nothing else. I don't know her personally.
Q. You didn't -- you didn't ever inspect Reven's books and records, though, right?
MR. SMALL: Object to form.
A. I think my earlier testimony was that they were never provided to me.
Q. (By Mr. Guisbond) And is it your testimony that you requested them and that they were never provided to you or just that they were never provided to you?
A. I think that's been asked and answered.
Q. Let's do it again.
A. The discussions that I had with Michael

Volk led me to believe that financial statements were in the process of being prepared and finalized which certainly would have been required for the DPO or the IPO that was contemplated herein. However, they were never provided to me.
Q. Okay. So let's come back to paragraph 13. You don't actually know that -- that Mr. Lange, Mr. Volk, or Mr. Denomme took far in excess of the $50,000 per month represented in the spreadsheet, do you?
A. What point in time?
Q. December 2nd, 2022.
A. December 2nd, 2022, yes.
Q. And how did you know that as of December 2nd, 2022?
A. Conversations I've had with employees and other investors.
Q. So who are those employees? Who are those other investors?
A. Name names?
Q. Yes.
A. Okay. What do you want first? Employees or investors?
Q. Up to you.
A. Employees, Jenny Van Tuinen, Jim Ervin,

Andy White, Dane -- I can't remember Dane -- Dane Baruzzini. Give me a minute. Marissa. I don't recall Marissa's last name. Peter Pacult, Henk van Wyk, Mariette van Wyk.
Q. Any others?
A. That's -- there may be others. That's all I can recall right now off the top of my head.
Q. And how about investors?
A. Chris Kuzak, Kerlin Blaise, Paul -- Paul. I can't recall Paul's last name. He's an investor and also an advisor for another large investor. I've spoken -- I've spoken to so many investors. The obvious one, Lee-Ann Frost, other family member -- other Frost family members.
Q. Any others?
A. I'm sure there are others.
Q. Any others that you can recall, as you sit here today?
A. Jeff Bostow. If you'd let me look at my phone, I could tell you. That's it. That's all I can recall off the top of my head. There are others, and there's several others. I just am not --
Q. Okay. So which of those individuals that you just named told you on or before December 2nd, 2022, that Mr. Lange, Mr. Volk, and Mr. Denomme took far in

and say, "Hey, Michael, can you give me your financial statements?"

I knew -- and I believed what Michael told me to be true, that those financial statements were in the process of being prepared. So did I specifically call him back and ask him for them? No.

Q. Thank you.

Okay. Let's look at -- I got one more question on 13. So if it turns out that Reven was, in fact, taking the necessary steps to prepare its books and records for an audit, would that change your view as expressed in the declaration?

A. That was only one part of my investment decision or -- sorry. Not one part of my investment decision. That was one part of what concerned me that I learned after the fact that would have changed my mind in making an investment was the -- the lack of financial statements that were capable of being audited and the failure to disclose the extent of the payments that were for their personal benefit.

So financial statements alone, hypothetically, might have changed my investment decision because it might have disclosed the extent of the payments that were going other than -- you know, that were being used for other than ordinary course

items.

Q. All right. Let's look at paragraph 14 of your declaration. Let me know when you've had a chance to take a -- take a look at that.

A. Okay.

Q. So paragraph 14 is, among other things, quoting from an email that Mr. Lange sent to you on or about November 10th, 2019; is that correct?

A. That's correct.

Q. And that email is attached as Exhibit D to your declaration, correct?

A. Correct.

Q. So that first bullet there, Bullet A in paragraph 14, says, "We have raised $7 million in October, and we raised another 6 million so far in November."

That's a quote of a representation that Mr. Lange made to you in the email, correct?

A. Correct.

Q. Okay. So do you know, as you sit here -- well, as of December 2nd, 2022, when you signed this declaration whether Reven raised $7 million in October 2019 and at least another 6 million in November 2019?

A. I believed what Peter told me, and I know

over various times it was misrepresented to me the amount of capital that they raised. So, specifically, those two numbers, I mean, this is just a quote from the email that he sent me.

Q. And my question is at the time that you signed this declaration on December 2nd, 2022, did you know one way or the other personally whether it was accurate -- whether Peter's statement was accurate that Reven had raised $7 million in October and another at least $6 million in November of 2019?

A. I don't know. That may have been true. I don't know.

Q. And then I'm looking at the Bullet B, and this has a -- an acronym, MOU. That means memorandum of understanding, correct?

A. That's correct.

Q. So Bullet B says, "We have one MOU signed with proof of funds for 25 million from two existing shareholders. We have another group that is promising another 25 million, and a third group which is also another shareholder promising 30 million."

My question for you is at the time that you signed this declaration on December 2nd, 2022, was it your understanding that Reven had secured the $80 million in investment funds referenced in

paragraph 14, subparagraph B of your declaration?

MR. SMALL: Object to form.

Go ahead.

A. My understanding when I signed my declaration is that that was not true.

Q. (By Mr. Guisbond) And how did you come to believe that that was not true?

A. Conversations with other shareholders and with employees.

Q. And -- sorry. Let's just -- I want to try to clarify that. It was your understanding as of December 2nd, 2022, that they had not, in fact, secured 80 million, correct?

A. It's my understanding that the amounts represented in paragraph 14(b) were not raised; and that was my understanding at December 2nd, 2022.

Q. And as you read paragraph 14(b) today, do you understand those words to say that -- that that money had been raised at that time?

A. No. I read paragraph 14(b) as Peter telling me how successful they've been raising money from other investors so that it would entice -- the point of this email was not to get me to make an additional investment. It was to get me to help promote the Reven investment opportunity to other high net worth

or anyone else at Reven to find out whether those -- that $10 million in funds had, in fact, been secured from the Michigan investor?
A. No, not specifically on that point.
Q. Okay. Let's look at paragraph 16 of your declaration. Let me know when you've had a chance to familiarize yourself.
A. Okay.
Q. So this is more from the same February 13th, 2020, email from Mr. Lange; and, among other things, Mr. Lange wrote in that email to you that "We have no lawsuits from shareholders." Do you see that?
A. I see that.
Q. And did you understand Mr. Lange's statement that, quote, We have no lawsuits from shareholders, close quote, to mean that Reven or its -- any of its predecessor entities had never had any -- had never at any time had any lawsuits from shareholders?
MR. STALZER: Objection, form.
A. Yes, that's what I understood that to mean.
Q. (By Mr. Guisbond) And, as you sit here today, is that what it says?
A. Well, I had previously been told that

other things, a PPM dated July 6, 2020, that Mr. Lange provided to you in or about July of 2020; is that right?
A. That's correct.
Q. And the email and the attached July 6, 2020, PPM are attached to your declaration as Exhibit F; is that right?
A. That's right.
Q. So did you read the July 6, 2020, PPM?
A. I didn't read it cover to cover. I wasn't making another investment at that time, but I scanned it and -- all I can say is I would have scanned it and kind of skimmed through it, but I didn't read it cover to cover.
Q. Do you have any recollection of how long you spent with that document?
A. I have none.
Q. Could it --
A. Again, I wasn't making an investment at that time. So it was just information for the file about "Here's how we're doing. Everything is great. No problems."
Q. So fair to say that it was less than an hour that you spent with that document?
A. No. I don't know how much. I couldn't tell you if it was 30 minutes or an hour.

they were not the subject of any shareholder suits, and this is just affirming that. So, yes, I believed it to mean that they had never.
Q. And as you sit here today and you look at the words "We have no lawsuit from shareholders," does that mean to you that Reven or its predecessor entities never had any lawsuits from shareholders?
MR. SMALL: Object to form.
Go ahead.
A. As I sit here today, that's what I believe Peter was telling me, and that's what -- and the words say what the words say; but in context with Peter and conversations with Peter, I believe that to be what he was trying to tell me that day in that email.
Q. (By Mr. Guisbond) And did you ever follow up with Mr. Lange or anyone else at Reven to ask whether any of Reven's predecessor entities had ever been involved in any lawsuits with shareholders?
A. I did not. I believed what he told me to be true.
Q. Okay. Let's look at -- let's turn our attention to paragraphs 18 and 19 of your declaration. Let me know when you've had a chance to look those over.
A. Okay.
Q. So paragraphs 18 and 19 address, among

Q. Fair to say --
A. It wouldn't have been just one point in time. I would have -- I would have glanced back at it on, you know, multiple occasions. So it's -- it's hard to cumulatively say how much time I spent with it.
Q. Let's look on 19(g) which is on the bottom of the next page there, page 9 of your declaration. 19(g) says, "Legal proceedings. From time to time we may be involved in litigation relating to claims arising out of the operation of our business in the normal course of business," and then it continues. Do you see that?
A. I do.
Q. Do you recall reading this section of the PPM at any point in time?
A. I do.
Q. What did you understand this section of the PPM to be saying?
A. I understand it to be a general legal disclosure that's common in public filings, financial statements. I understood it to say exactly what it says, that litigation is something that happens in the ordinary course of business; but right now there's nothing material affecting -- affecting the company.
Q. Did it cause you to question anything

shares."
Do you see that?
A. I do.
Q. And so, as you sit here today, do you know if Reven did, in fact, sign an agreement for a 20 million-dollar manufacturing credit in exchange for 2 million shares?
A. What I know today -- what I've been told is that they did have a manufacturing facility ramp up to be able to -- and spent the money -- several million dollars -- to ramp up their manufacturing to be able to hit this 50,000 a month, and Reven didn't perform on that agreement.
Q. So to come back to my question, do you know if Reven signed an agreement for a 20 million-dollar manufacturing credit in exchange for 2 million shares?
A. I don't know.
Q. You don't know.
A. I don't know if this is true or not. I know today what I -- what I just stated on the record.
Q. And if they did, in fact, sign such an agreement, would that change any of your views as expressed in your declaration here?
MR. STALZER: Objection, form.

MR. SMALL: Same.
A. Again, if there was a material misstatement in this document in any regard that Peter provided to me, I would not have made an investment in 2021.
Q. (By Mr. Guisbond) Let's look at paragraph 22 of your declaration. Let me know when you've had a chance to take a look at that.
A. Okay.
Q. So paragraph 22 references a July 13th, 2021, meeting that you had with Mr. Volk and Mr. Lange, correct?
A. That's correct.
Q. Who was present at the meeting?
A. Peter, Michael, Liz Leeds, me, my husband.
Q. And at this meeting they told you that RJX was in Phase II clinical trials; is that right?
A. That's right.
Q. And was RJX in Phase II clinical trials at that time?
A. To the best of my knowledge.
Q. And then they also told you, according to your declaration, that Reven was planning a direct public offering, or DPO, in September or October likely

on the New York Stock Exchange, correct?
A. Correct.
Q. And at that meeting did either Mr. Volk or Mr. Lange guarantee to you that Reven would carry out a DPO in September or October of 2021?
A. There were no guarantees, but they certainly represented that that was the plan that they were -- that they were working toward.
Q. No guarantees, though, right?
A. Of course not.
Q. Okay. Let's look at paragraphs 23 and 24. Take a look at those, and let me know when you've had a chance to familiarize yourself.
A. Okay.
Q. So 23 and 24 deal with an email together with its attachment that Mr. Volk sent to you the day after your July 13th, 2021, meeting, correct?
A. That's correct.
Q. And that email and its attachment are attached to your declaration as Exhibit H, correct?
A. That's right.
Q. And the attachment to that email was titled, it looks like from your declaration, "Reven Holdings predirect public offering brief and deal structure," correct?

A. That's right.
Q. Did you read -- did you read that attachment?
A. I did.
Q. And upon reading that attachment, did you understand that as of that point in time that Reven had completed all of the necessary steps to carry out a direct public offering, or DPO?
A. Yes, with the exception of finalization of their audited financial statements.
Q. They hadn't filed an S-1 yet, had they?
A. No. They would have needed their financial statements to do so.
Q. So as of this point in time, you understood that Reven hadn't filed an S-1 yet, correct?
A. They hadn't filed one for this offering. I didn't -- you know, any previous filings -- I don't know if they had filed one for this offering.
Q. That's a fair clarification. Yes. I'm referring to this offering.
A. Yeah.
Q. And so --
A. I knew that it had not been filed for this offering.
Q. Correct. Thank you.

would be hard to get investment bankers engaged prior to November -- I mean -- I'm sorry -- after November.
Q. So Mr. Volk told you verbally that an audit had commenced and was ongoing, correct?
A. That's correct.
Q. And you don't have that in writing anywhere, correct?
A. I don't have anything in writing other than what is listed here in these emails.
Q. But I'm saying, generally, you don't have any emails or other text messages or notes from Mr. Volk or anyone else at Reven informing you that an audit had commenced and was -- was then ongoing, correct?
A. No.
MR. SMALL: Object to form.
THE DEPONENT: Sorry.
Q. (By Mr. Guisbond) Okay. So second and third investments were staged, but your commitment to invest $5 million kind of happened all at once; is that right?
A. That's correct.
Q. Okay. So $2 million on or around July 16th and an additional three on or around August 27th, 2021; is that right?
A. That's correct.

Q. And I want to just talk about kind of at a high level anything that we haven't covered with regard to the process that you engaged in before deciding to commit that $5 million. So tell me about any research or diligence that you did before making that investment.
A. I relied on the meeting that I had with Michael and Peter. I trusted what they told me. I relied on this email from Michael. And they're not a public company. There's nothing for me to research. There's not -- with a private company, there's not information generally available other than what Michael and Peter told me; and I relied on them. So I did not do any further research of my own.
Q. Okay. So meeting with Michael and Peter, the email and the attachment but no -- no further research, correct?
A. The phone conversation with Michael.
Q. Phone conversation with Michael. Thank you.
And then what questions did you ask Mr. Lange, Mr. Volk, or anyone else at Reven prior to making this investment?
A. We talked generally. I don't know about specific questions that I asked. We had a very long

lunch meeting, lots of conversation about what their plan was with this DPO. Again, the email, the long telephone conversation that I had with Michael explaining how he even believed that the -- when they come out with the DPO that they would be fully subscribed within hours, and that the share -- they would come out at five or seven, and we could expect the share price to immediately go up thereafter because of how fast they're going to be over -- that they would be basically oversubscribed so that the price would go up even further than the five to seven.
I had no reason to distrust what Michael was telling me. So I did not do any other research.
Q. So no questions that you can think of today?
MR. SMALL: Object to form.
MR. STALZER: Objection, form.
A. I can't think of specific questions. We had a general conversation about what their plan was.
Q. (By Mr. Guisbond) And did you make any requests of Mr. Volk, Mr. Lange, or anyone else at Reven for additional information before making that decision to invest $5 million?
A. I didn't ask for anything additional, no.
Q. You didn't ask for access to the

unaudited financials, right?
A. I did not.
Q. Okay. Did you ask who the auditor was, out of curiosity?
A. I did not. I should have.
Q. So did you consult anyone -- setting aside your husband because I understand from our prior conversations that you guys act as one when you make investment decisions.
But setting him aside, did you consult anyone in regard to this additional 5 million-dollar investment in Reven?
A. No.
Q. Let's take a look at --
MR. GUISBOND: Do you have 25? Do I have 25 somewhere?
MR. KRANTZ: Tab 25?
MR. GUISBOND: Tab 25, yeah.
A. Actually, let me rephrase that. I did consult someone else.
Q. (By Mr. Guisbond) Who did you consult?
A. Phil DeMuth.
Q. And Mr. DeMuth was and, it sounds like, remains your financial advisor?
A. He manages one of my brokerage accounts.

MR. SMALL: Object to form.
MR. STALZER: Objection, form.
A. We haven't launched a new entity to compete with Reven.
Q. (By Mr. Guisbond) Okay. Let me try it -- try it a different way. When did you first decide to band together with Ms. Frost and others to use Reven's intellectual property and proprietary technology to usurp Reven's corporate opportunities?
MR. SMALL: Object to form.
MR. STALZER: Object to form.
A. That's just an incorrect statement.
Q. (By Mr. Guisbond) Well -- okay. Why don't you tell me about Veterinary Nutraceuticals?
A. Veterinary Nutraceuticals, to my knowledge, is an idea that one of the other inventors of the Reven intellectual property is proposing as might be an alternative to Reven, to RJX; and he'd like capital to make that happen.
Q. And who is that person?
A. That's Jim Ervin.
Q. And so do -- am I correct that you just described Mr. Ervin as an inventor of RJX?
A. He is on one -- I believe he is on the family four group of patents.

Q. Okay. And we talked about Mr. Ervin earlier today, did we not?
A. We did.
Q. And at that time I think you described him as an employee of Reven, correct?
A. He was, I believe. He's not currently an employee of Reven.
Q. Are you sure?
A. I'm 90 percent certain that he's no longer an employee.
Q. So not sure?
A. I'm sure he's not an employee.
Q. Okay. So Mr. Ervin is a former employee of Reven?
A. That's my understanding.
Q. Now, you knew that -- you knew that Reven was -- was working to develop an animal division as early as back in October 2019, right?
A. I did not know about the veterinary division at that time. I've learned since that they were doing research on horses; and if there was communication about veterinary aspects of RJX, I have -- I don't recall them. There may be, but it wasn't my focus as an investor.
My focus as an investor was the FDA

process with critical limb ischemia and acute respiratory distress syndrome. So you may have a communication where somebody told me about a veterinary division. It's just not something I focused on back then.
MR. GUISBOND: Can we mark this as five?
(Exhibit 5 was marked.)
Q. (By Mr. Guisbond) So, for the record, Exhibit 5 is --
THE COURT REPORTER: Just a second.
MR. GUISBOND: Sorry. Go ahead.
THE COURT REPORTER: That's okay.
A. Okay.
Q. (By Mr. Guisbond) So, for the record, Exhibit 5 is an email from Mr. Lange to Ms. Schaatt dated the 23rd of August 2019, and it bears the Bates stamp Schaatt 0060 to 63.
MR. STALZER: Excuse me, Counsel. I'm sorry. My document has the Bates Number Schaatt 0055 --
MR. SMALL: Yeah. So do I.
MR. STALZER: -- through 59.
THE DEPONENT: Mine, too.
MR. STALZER: And so --
MR. GUISBOND: You know what? I think I'm reading the wrong Bates number maybe then. I am.

You are correct.
MR. SMALL: And I think the date you mentioned, too.
MR. GUISBOND: Yeah. Everything was wrong about that.
Q. (By Mr. Guisbond) I'll just -- I'll start over and say, for the record, Exhibit --
MR. GUISBOND: What are we on? 5?
MR. SMALL: Yes.
Q. (By Mr. Guisbond) -- is an October 2nd, 2019, email from Mr. Lange to you, Ms. Schaatt, copying Mr. Volk; and it bears the Bates stamps Schaatt 0055 through 59. How is that?
A. Okay.
Q. Okay. And so in this first email here that Mr. Lange sent you on October 2nd, 2019, you see the paragraph that says -- and I'll quote -- "As a side note, ee" we "want to launch out animal division also starting with horses and dogs which could produce revenues in 12 to 14 months."
Do you see that bit?
A. I see that.
Q. Okay. And so this is what you were referring to a moment ago when you said you may have had email exchanges that mentioned Reven's intent to launch

Q. And was that by email, by text, some other way?
A. Don't recall.
Q. Do you have emails with Jim Ervin about Veterinary Nutraceuticals?
A. We have emails that he has sent. I'm sure I do, yeah.
Q. And just to be clear, when you say you have emails that he has sent, are you drawing a distinction which is designed to make clear that you have not sent him any emails; or have you also sent Mr. Ervin emails related to Veterinary Nutraceuticals?
A. I don't recall sending him emails other than responding, "Got it. I'll look over it." I don't recall sending him emails about Veterinary Nutraceuticals.
Q. Okay. So just for our purposes today, if you sent him an email, I'm going to count that. So it sounds like your testimony is you guys have exchanged emails about Veterinary Nutraceuticals, correct?
A. Yeah. If my reply "Thanks. I'll take a look," is -- is about that, then, I guess, technically, yes.
Q. And how about text messages?
A. Fewer. I don't recall text messages with

Jim about Veterinary Nutraceuticals.
Q. Okay. Well, we -- we'd ask for those documents to be produced. So if there are text messages, we would include those in our request but at the very least, the emails.
A. Okay.
Q. And we'll talk about it with counsel.
So let's see. I might have just asked you this. That's why I need realtime. So you -- you don't remember how Mr. Ervin first reached out to you in regard to Veterinary Nutraceuticals, correct?
A. What do you mean how he reached out? I think it was by phone.
Q. Okay. So it was a phone call?
A. I think so.
Q. And since that initial phone call, have you had any other phone calls with Mr. Ervin about -- can I call Veterinary Nutraceuticals VN?
A. Sure.
Q. Okay. It looks like somebody else came up with that before me. So I won't lay claim to it, but it's a mouthful, so VN.
Have you -- have you had any other phone calls with Mr. Ervin about VN since that initial outreach?

A. Periodically over the last -- last few weeks. He's trying to find a way to make a living and I think is -- is hoping that Lee-Ann and I would participate with him as investors. So he's reached out to us periodically. Frankly, we've told him that we're busy with this, the reason that we're here this week; and until we hear back from our counsel, we're not -- we're not prepared to move forward with any more conversations.
Q. And how did you communicate that to Mr. Ervin?
A. Probably by phone. My recollection is it was by phone just in the last week or so since we were subpoenaed for this.
Q. So how many -- how many phone calls would you say that you've had with Mr. Ervin about VN?
A. Less than three.
Q. So two?
A. Two, three maybe.
Q. So by my count, we've got the initial outreach?
A. Right.
Q. Jim called you about VN. We've also got one this past week where it sounds like you told him that you were going to put this on ice. So there's two.

Any other phone calls that you can recall?
A. What's today? Thursday? Yesterday.
Q. You talked to Jim Ervin about VN yesterday?
A. Jim called me yesterday, and I took his call.
Q. What did you talk about?
A. He was concerned that someone had gotten into Henk's email and that his idea had been shared with Peter, Michael, and Brian, and asked if I had told anyone about his idea; and I told him I absolutely had not.
Q. And was that true? Had you not told anyone?
A. Other than Lee-Ann and I and our counsel.
Q. I don't want to hear about what you tell your counsel.
A. Right. So that would be it. We have not talked about this with anyone to my -- maybe telling my husband about Jim Ervin's new idea.
Q. And that's -- that's because you were keeping it a secret?
MR. STALZER: Objection, form.
A. We signed an NDA. He wanted us to sign an NDA. So --