

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL
CIRCUIT IN AND FOR ORANGE COUNTY, FLORIDA

GOLIATH VENTURES, INC.,

CASE NO.: 2025-CA-009246-O

Plaintiff,

v.

DANNY DE HEK

Defendant.

Notice of Taking Deposition *Duces Tecum*

PLEASE TAKE NOTICE that the undersigned attorney will take the deposition of:

NAME: Records Custodian of OpenAI, LLC

DATE AND TIME: November 4, 2025 at 10:00 a.m.

PLACE: Link to Video Conference will be provided to all parties.

Upon oral examination before a court reporter, notary public, or any other notary public or officer authorized by law to take deposition in the State of Florida. The oral examination will continue from day to day until completed. This deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the rules of the Court.

You must designate your corporate representative(s), the person with the most knowledge as to the matters identified in Exhibit A below, to testify on your behalf. Further, your corporate representative(s) is required to produce all items listed in Exhibit B.

Certificate of Service

I hereby certify that a true and correct copy of the foregoing document is being served, pursuant to Rule 2.516(b), Fla. R. Jud. Admin., *via* Florida Courts e-Filing Portal to the names and e-mail addresses provided by all parties, counsel of record and *pro se* parties.

PERLMAN, BAJANDAS, YEVOLI & ALBRIGHT, P.L.

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Dated: October 16, 2025.

Respectfully Submitted,

/s/ Oliver Birman

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Exhibit A –Areas of Inquiry

1. Authentication of documents produced in response to Exhibit B.

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Exhibit B – Documents to be Produced

1. All basic subscriber information for the OpenAI Account using the email: danny@dehek.com.
2. Any alternate or forwarding e-mail address of the subscriber for the email: danny@dehek.com.
3. IP address for all devices used to access the OpenAI Account using the email: danny@dehek.com.
4. All basic subscriber information for the OpenAI Account pertaining to De Hek.
5. Any alternate or forwarding e-mail address for the OpenAI Account pertaining to De Hek.
6. IP address for all devices used to access the OpenAI Account for the OpenAI Account pertaining to De Hek.
7. All searches, questions posed, conversations, or other information obtained or sought to be obtained through OpenAI related to:
 - a. Chris Delgado
 - b. Goliath Ventures
 - c. Nadia Bringas
 - d. Neil Sandhu
 - e. Nick Petrillo
 - f. Alex Bukalo
 - g. Mathew Malkemes
 - h. Matt Burks
 - i. Piers Curry
 - j. Michael Hernandez
 - k. David Panzik
 - l. Stephen Davis
 - m. Stephanie Hernandez
 - n. James Delgado
 - o. Hunter Smallback
 - p. Lee Ann Howe
 - q. Casey Holladay

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- r. Michael Chmielewski
- s. Punit Shah
- t. Vince Gratta
- u. Tomo Marjanovic
- v. Marty Birthelmer
- w. Any United States Federal Investigations
- x. Chris Tracy
- y. Jeannine Tracy
- z. BlackBlock
- aa. Wealth MD

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