

EXHIBIT J

Deposition of Erick Sullivan

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 07-cv-00630-DME-MEH

NETQUOTE, INC., a Colorado
corporation,

Plaintiff,

vs.

BRANDON BYRD, an internet user
making use of the IP Addresses
64.136.27.226 and 64.136.26.227,
and MOSTCHOICE.COM, INC., a
Georgia corporation,

COPY

Defendants.

_____/

VIDEO DEPOSITION OF ERICK SULLIVAN

October 12, 2007
10:49 a.m. - 12:25 p.m.

7000 Peachtree-Dunwoody Road
Building 15, Suite 100
Atlanta, Georgia 30328

Reported by:
Paula Parris, CCR-CVR
State of Georgia
Esquire Deposition Services
Atlanta Office Job #425102
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1 A. Okay.

2 Q. For how long did you speak with Mr.
3 Isenberg?

4 A. What was it? Maybe 15 minutes.

5 Q. Okay. And where did that conversation take
6 place?

7 A. At MostChoice.com.

8 Q. Who was present when you spoke with Mr.
9 Isenberg?

10 A. Just he and I.

11 Q. Okay. Did he show you any documents?

12 A. No.

13 Q. Did -- Well, strike that question.
14 Did you speak with Mr. Levy about this
15 deposition?

16 A. Yes.

17 Q. What did Mr. Levy tell you? And you have
18 to answer honestly obviously.

19 A. I know.

20 Q. I know he's a colorful guy, but -- You
21 know.

22 A. Let me -- I don't say everything that he
23 says.

24 Q. Right.

25 A. I don't know if it was you or whoever it

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1 was, but he was saying that he didn't really care for the
2 person that was asking the questions.

3 Q. What did he say?

4 A. Again, he didn't really care for the person
5 asking the questions. He said that he lectured a lot and
6 that he flipped the person off or something.

7 Q. When did he tell you that?

8 A. This morning when I was getting directions.

9 Q. What else did he tell you about this
10 deposition?

11 A. That was it.

12 Q. What did he tell you about the types of
13 questions you'd be asked?

14 A. Well, again, that's all he said.

15 Q. Have you spoken with anyone else at
16 MostChoice about this deposition?

17 A. Other than Caroline.

18 Q. What did you and Ms. Sellers talk about?

19 A. Basically, she was just giving me the
20 directions. I was on my way out trying to -- you know,
21 forgot how to get here, and you know, Mr. Levy was
22 walking about. Caroline was there, and I said, "Well,
23 you know, hey, you guys have been there so tell me the
24 directions." And she told me the directions on my way
25 out. Yeah. And that lawyer, and that's when he said

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1 what he said.

2 Q. So he told you that in front of Ms.
3 Sellers?

4 A. He did.

5 Q. Okay. In front of Ms. Sellers, he told you
6 that he had given me the finger yesterday?

7 A. I don't know if it was you.

8 Q. But some lawyer for NetQuote?

9 A. He said he flipped them off. I mean, I
10 don't know.

11 Q. Okay. And I just want to be clear. That
12 conversation happened in front of Ms. Sellers?

13 A. It did.

14 Q. Okay. Have you spoken with anyone else at
15 MostChoice about their depositions in this matter?

16 A. No.

17 Q. Have you met Brandon Byrd before?

18 A. No. I don't even know who that is.

19 Q. And Mr. Byrd's the other gentleman who's
20 named as a defendant in this lawsuit for sending those
21 false insurance quotation requests. That doesn't refresh
22 your recollection that you've met Mr. Byrd?

23 A. Again, I don't know. I don't have any idea
24 if he -- I don't know. He could be one of you. I
25 wouldn't know.