

Exhibit B - Excerpts from Dennis Donat testimony at deposition of September 24, 2010.**Page 4**

14 DENNIS DONAT

15 called as a witness by the Defendant, having first been
16 duly sworn, was examined and testified as follows:

17 MR. IRMSCHER: We're here today with Mr. Dennis
18 Donat. He is the financial representative of the
19 company. He will be able to provide testimony, I
20 believe, in all seven of the categories that are
21 included in the notice that I believe was originally
22 scheduled for deposition August 2nd, 2010. If there
23 is something he can't provide, we'd like to reserve
24 the right to supplement; but we think he can meet all
25 these categories at this point and he is prepared to

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1 do so.

2 MR. FOUNTAIN: Okay.

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Q. As a result -- let's step back for a second. Do you know
6 that in the fall of 2008 Heartland obtained from Forest
7 River a list of dealers that Forest River had invited to
8 its private trade show, right?

9 A. I understand that.

10 Q. Okay. When did Heartland get that list?

11 A. I have no knowledge.

12 Q. Did you ever try to find out?

13 A. No.

14 Q. What did Heartland use that list for?

15 A. I don't have specific knowledge.

16 Q. What general knowledge do you have?

17 A. Only what counsel has told me.

18 Q. And what is that?

19 A. Allegedly it was used to contact Forest River dealers.

20 Q. Anything else?

21 A. Not to my knowledge.

22 Q. As a result of contacting Forest River dealers, did
23 Heartland obtain any particular gain?

24 MR. IRMSCHER: Objection, lack of foundation.

25 Q. I'm sorry. As a result of Heartland contacting Forest

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1 River dealers using that dealer list, did Heartland gain
2 anything?

3 A. Not to my knowledge.

4 Q. Did you do anything to try to find out?

5 A. No.

6 Q. Did Heartland obtain any additional sales of products by
7 using the list of Forest River dealers who were planning
8 to attend the private Forest River dealer show?

9 A. Not to my knowledge.

10 Q. Did you do anything to try to find out?

11 A. No.

12 Q. Item two on the notice of deposition says that you are
13 here to talk about Heartland sales of products as a result
14 of obtaining the list of Forest River dealers who were
15 planning to attend the private Forest River trade show.
16 Are you the person who is supposed to be testifying about
17 that?

18 MR. IRMSCHER: I'm not aware of any sales we got
19 as a result of obtaining the list. He's here to talk
20 about all the sales that are on the spreadsheet and
21 all the profits associated with that.

22 MR. FOUNTAIN: Do you have a witness who will
23 talk about category 2?

24 MR. IRMSCHER: I'm not aware of any sales that
25 are in that category. You've never told us what

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1 sales are in that category.

2 BY MR. FOUNTAIN:

3 Q. On the dates of Forest River's trade show, according to
4 e-mails we received from Heartland, 18 dealers,
5 thereabouts, also showed up at Heartland's place of
6 business. Did you know that?

7 A. No.

8 Q. You never saw that e-mail?

9 A. Not that I recall.

10 Q. Do you know how many sales Heartland got as a result of
11 anything that happened on October 22nd and 23rd?

12 A. No.

13 Q. Have you done anything to try to find out?

14 A. No.