

Exhibit B

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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

AIRDOCTOR, LLC,)
) Case No.:
Plaintiff,) 2:23-cv-00353
)
vs.)
) Pages 1 to 243
LONNI, INC., et al.,)
)
Defendants.)
_____)

DEPOSITION OF:
JEREMY SWEET
WEDNESDAY, SEPTEMBER 3, 2025
9:18 a.m.

REPORTED BY:
Vickie Blair
CSR No. 8940, RPR-CRR

1 Q Got it.

2 So Ideal Living Holdings, LLC, owns 100
3 percent of Ideal Living, LLC; correct?

4 A Ideal Living Holdings owns 100 percent?
5 Recently they did have a third-party investor interest,
6 a minority share that now owns a portion of it, I don't
7 know all the details, but I know there was, in the
8 last -- maybe in July, a new entity that bought in.

9 Q Do you know the name of that entity?

10 A Hmm, I don't remember. I'd have to look,
11 yeah.

12 Q And that -- that entity came in at the
13 holdings level or at -- at the management level or?

14 A At the holdings, I think, as a part of the
15 holdings, yeah.

16 Q Is that a U.S. entity that bought it?

17 A Yes, I believe they -- they created an LLC
18 or two at the holdings level, as well.

19 Q Gotcha.

20 Can you explain your answer. I'm not sure
21 I understand what you mean.

22 A So -- so, in order to own -- at the
23 holdings level --

24 Q Uh-huh.

25 A -- the entity now has an LLC there, as

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1 well, that -- that gives them a share. I -- I don't
2 know. I mean, it's a little more of an accounting
3 and -- and --

4 Q Got it.

5 A -- corporate thing, but I know they had
6 boughten in and they are at that top level.

7 Q Okay. So can you just tell me what --
8 what have you done to prepare for today? And I'm not
9 looking to hear --

10 A Yeah.

11 Q -- right now -- I'm not looking to ask you
12 who you talked to specifically --

13 A Right.

14 Q -- just generally, what -- what have you
15 done to prepare for today?

16 MS. SANDS: Objection to the extent that
17 was your answer would disclose communications between
18 your attorney and -- and you, I direct you not to
19 answer.

20 BY MR. O'CONNOR:

21 Q Yeah.

22 A Okay.

23 Q I'm asking what did you do to prepare.
24 I'm not asking you to tell me about conversations with
25 your attorney; okay?

1 A Right.

2 Q All right.

3 A Hmm, not much, I just -- you know, I kind
4 of know -- know the corporate -- I -- I -- you know, I
5 looked at the questions that -- that you were going to
6 ask or the topics --

7 Q Okay.

8 A -- and I kind of looked over my
9 information on those topics, and just refreshed myself.

10 Q When you say "you looked over my
11 information," what information did you look at?

12 A Hmm, just my general notes, my general
13 files, that sort of thing.

14 Q And those were on your computer at work?

15 A Yes.

16 Q A computer owned by whom? Ideal Living?

17 A Yes.

18 Q You've been the director of business and
19 legal affairs since when?

20 A I've been with Ideal Living for about ten,
21 11 years, around -- around there.

22 Q September, September 2014 sound right?

23 MS. SANDS: Objection.

24 THE WITNESS: I don't think that-- I
25 don't have --