

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
IN AND FOR HILLSBOROUGH COUNTY, STATE OF FLORIDA  
CIVIL DIVISION

NITRO MOBILE SOLUTIONS, LLC.,  
a Florida Limited Liability Corporation,

Plaintiff,

Case No. 17-CA-010953  
Division J

v.

EYE C SOLUTIONS, LLC,  
A Florida Limited Liability Corporation, and  
LISA MONNET, an individual,

Defendants.

\_\_\_\_\_/

EYE C SOLUTIONS, LLC, and  
LISA MONNET,

Counterclaim Plaintiffs,

v.

NITRO MOBILE SOLUTIONS, LLC,  
PETE SLADE, and MOLLY SLADE,

Counterclaim Defendants.

\_\_\_\_\_/

**UNSWORN DECLARATION OF ALEX MATHEU**

I, Alex Matheu affirm the following:

I am over 18 years old and have personal knowledge of the facts set forth in this  
declaration.

1. I was an employee of Nitro Mobile Solutions, LLC between June 1, 2017 and  
November 21, 2017, the period during which Lisa Monnet began working with Nitro.

EXHIBIT MM

2. I was aware that the Nitro offices at 501 East Kennedy Blvd., Suite 910, Tampa, Florida were under audio and video surveillance, and that the Nitro's research and development investment via its Artificial Intelligence also allowed for voice recording and detection in various areas of the office.
3. I overheard multiple conversations where Ms. Monnet had talked about Richard Branson and the Virgin Group's investment into Nitro.
4. I had been assigned tasks to complete in preparation of the Richard Branson and Virgin Group's investment into Nitro.
5. I executed a Virgin Confidentiality Agreement that I had been required to sign in person.

*Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on*                     Mar 19                    , 2018.

  
\_\_\_\_\_  
ALEX MATHEU

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
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PETE SLADE, and MOLLY SLADE,

Counterclaim Defendants.

\_\_\_\_\_ /

**UNSWORN DECLARATION OF JONATHON RUBIN**

I, Jonathon Rubin affirm the following:

I am over 18 years old and have personal knowledge of the facts set forth in this  
declaration.

1. I was an employee of Nitro Mobile Solutions, LLC between June 1, 2017 and  
November 21, 2017, the period during which Lisa Monnet began working with Nitro.

2. I was aware that the Nitro offices at 501 East Kennedy Blvd., Suite 910, Tampa, Florida were under audio and video surveillance, and that the Nitro's research and development investment via its Artificial Intelligence also allowed for voice recording and detection in various areas of the office.
3. I overheard multiple conversations where Ms. Monnet had talked about Richard Branson and the Virgin Group's investment into Nitro.
4. I had been assigned tasks to complete in preparation of the Richard Branson and Virgin Group's investment into Nitro.
5. I executed a Virgin Confidentiality Agreement that I had been required to sign in person.

*Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on \_\_\_\_\_ March 19, 2018.*

  
\_\_\_\_\_  
JONATHON RUBIN

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
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PETE SLADE, and MOLLY SLADE,

Counterclaim Defendants.

\_\_\_\_\_/

**UNSWORN DECLARATION OF WILLIAM WAGAR**

I, William Wagar affirm the following:

I am over 18 years old and have personal knowledge of the facts set forth in this  
declaration.

1. I was an employee of Nitro Mobile Solutions, LLC between June 1, 2017 and  
November 21, 2017, the period during which Lisa Monnet began working with Nitro.

2. I was aware that the Nitro offices at 501 East Kennedy Blvd., Suite 910, Tampa, Florida were under audio and video surveillance, and that the Nitro's research and development investment via its Artificial Intelligence also allowed for voice recording and detection in various areas of the office.
3. I overheard multiple conversations where Ms. Monnet had talked about Richard Branson and the Virgin Group's investment into Nitro.
4. I had been assigned tasks to complete in preparation of the Richard Branson and Virgin Group's investment into Nitro.
5. I executed a Virgin Confidentiality Agreement that I had been required to sign in person.

*Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on* MARCH 19, 2018.

  
WILLIAM WAGAR

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
IN AND FOR HILLSBOROUGH COUNTY, STATE OF FLORIDA  
CIVIL DIVISION

NITRO MOBILE SOLUTIONS, LLC.,  
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PETE SLADE, and MOLLY SLADE,

Counterclaim Defendants.

\_\_\_\_\_/

**UNSWORN DECLARATION OF ZACHARY MARNER**

I, Zachary Marner affirm the following:

I am over 18 years old and have personal knowledge of the facts set forth in this declaration.

1. I was an employee of Nitro Mobile Solutions, LLC between June 1, 2017 and November 21, 2017, the period during which Lisa Monnet began working with Nitro.

2. I was aware that the Nitro offices at 501 East Kennedy Blvd., Suite 910, Tampa, Florida were under audio and video surveillance, and that the Nitro's research and development investment via its Artificial Intelligence also allowed for voice recording and detection in various areas of the office.
3. I overheard multiple conversations where Ms. Monnet had talked about Richard Branson and the Virgin Group's investment into Nitro.
4. I had been assigned tasks to complete in preparation of the Richard Branson and Virgin Group's investment into Nitro.
5. I executed a Virgin Confidentiality Agreement that I had been required to sign in person.

*Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on* March 20, 2018.

  
\_\_\_\_\_  
ZACHARY MARNER



IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
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CIVIL DIVISION

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PETE SLADE, and MOLLY SLADE,

Counterclaim Defendants.

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**UNSWORN DECLARATION OF ZACHARY MARNER REGARDING MEETING WITH LISA  
MONNET**

I, Zachary Marner, affirm the following:

I am over 18 years old and have personal knowledge of the facts set forth in this declaration.

1. I was an employee of Nitro Mobile Solutions, LLC between June 1, 2017 and November 21, 2017, the period during which Lisa Monnet began working with Nitro.

2. On or around Monday, November 6 or Tuesday, November 7, Ms. Monnet arrived at Nitro and requested that I, along with Jennifer Richardson, Erin Corcoran and Zachary Marner follow her to her office.
3. Ms. Monnet began the meeting reiterating the seriousness of the Virgin Confidentiality Agreements that she had required everybody at Nitro to sign. Ms. Monnet wanted to ensure that nobody was discussing anything outside of the office, as she claimed she has witnessed Richard Branson sue other people over a breach of his confidentiality agreement.
4. Upon receiving our affirmation that we were not discussing the Virgin and Richard Branson opportunity outside of Nitro, Ms. Monnet began talking about the specific things that needed to be done prior to the deal closing.
5. Erin Corcoran was told that she was “lucky” and “off the hook” as “Richard liked his financials done in a certain way” and that “he had people for that.”
6. Ms. Monnet talked about marketing and “how we’ll soon have access to all the Virgin Group’s marketing materials,” and how we’ll then have people to leverage expertise from. Ms. Monnet told us “we’ll need to hire someone to handle all public relations and communications efforts, and it needs to be someone with the proper knowledge and experience.”
7. The meeting with Ms. Monnet left me wondering if she was trying to indicate that we may not have much to offer once the Virgin Group’s people were involved.

*Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on* March 20, 2018.

  
\_\_\_\_\_  
ZACHARY MARNER

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
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PETE SLADE, and MOLLY SLADE,

Counterclaim Defendants.

\_\_\_\_\_/

**UNSWORN DECLARATION OF JENNIFER RICHARDSON**

I, Jennifer Richardson affirm the following:

I am over 18 years old and have personal knowledge of the facts set forth in this declaration.

1. I was an employee of Nitro Mobile Solutions, LLC between June 1, 2017 and November 21, 2017, the period during which Lisa Monnet began working with Nitro.

2. I was aware that the Nitro offices at 501 East Kennedy Blvd., Suite 910, Tampa, Florida were under audio and video surveillance, and that the Nitro's research and development investment via its Artificial Intelligence also allowed for voice recording and detection in various areas of the office.
3. I overheard multiple conversations where Ms. Monnet had talked about Richard Branson and the Virgin Group's investment into Nitro.
4. I had been assigned tasks to complete in preparation of the Richard Branson and Virgin Group's investment into Nitro.
5. I executed a Virgin Confidentiality Agreement that I had been required to sign in person.

***Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on*** March 20, 2018, ***2018.***

  
\_\_\_\_\_  
JENNIFER RICHARDSON

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LISA MONNET, an individual,**

**Defendants.**

\_\_\_\_\_/

**EYE C SOLUTIONS, LLC, and  
LISA MONNET,**

**Counterclaim Plaintiffs,**

**v.**

**NITRO MOBILE SOLUTIONS, LLC,  
PETE SLADE, and MOLLY SLADE,**

**Counterclaim Defendants.**

**UNSWORN DECLARATION OF ROBERT MEYERS**

**I, Robert Meyers affirm the following:**

**I am over 18 years old and have personal knowledge of the facts set forth in this  
declaration.**

- 1. I was an employee of Nitro Mobile Solutions, LLC between June 1, 2017 and  
November 21, 2017, the period during which Lisa Monnet began working with Nitro.**

2. I was aware that the Nitro offices at 501 East Kennedy Blvd., Suite 910, Tampa, Florida were under security surveillance, and that Nitro's research and development investment via its Artificial Intelligence also allowed for voice monitoring and detection in the office.
3. I overheard multiple conversations where Ms. Monnet had talked about Richard Branson and the Virgin Group's investment into Nitro.
4. I had been assigned tasks to complete in preparation of the Richard Branson and Virgin Group's investment into Nitro.
5. I executed a Virgin Confidentiality Agreement that I had been required to sign in person.

*Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on March 20<sup>th</sup>, 2018.*

  
\_\_\_\_\_  
ROBERT MEYERS

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LISA MONNET.

Counterclaim Plaintiffs,

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PETE SLADE, and MOLLY SLADE,

Counterclaim Defendants.

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**UNSWORN DECLARATION OF BRIAN MADIGAN**

I, Brian Madigan affirm the following:

I am over 18 years old and have personal knowledge of the facts set forth in this declaration.

1. I was an employee of Nitro Mobile Solutions, LLC between June 1, 2017 and November 21, 2017, the period during which Lisa Monnet began working with Nitro.

2. I was aware that the Nitro offices at 501 East Kennedy Blvd., Suite 910, Tampa, Florida were under audio and video surveillance, and that the Nitro's research and development investment via its Artificial Intelligence also allowed for voice recording and detection in various areas of the office.
3. I overheard multiple conversations where Ms. Monnet had talked about Richard Branson and the Virgin Group's investment into Nitro.
4. I had been assigned tasks to complete in preparation of the Richard Branson and Virgin Group's investment into Nitro.
5. I executed a Virgin Confidentiality Agreement that I had been required to sign in person.

*Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on March 20, 2018.*

  
\_\_\_\_\_  
BRIAN MADIGAN