

From: [REDACTED] >
To: Amanda Skarbnik <[REDACTED]>
Subject: Re: Attorney-Client Privileged Communication
Date: Tue, 09 Dec 2014 17:21:51 +0000

Thx. Will get to Jeffrey.

Sent from my iPhone

On Dec 9, 2014, at 12:20 PM, Amanda Skarbnik <[REDACTED]> wrote:

See below. Thanks [REDACTED]!

From: [REDACTED] [mailto:[REDACTED]]
Sent: Tuesday, December 9, 2014 10:05 AM
To: [REDACTED]; Peggy Siegal
Subject: Attorney-Client Privileged Communication

Martin and Peggy

As I mentioned to Martin when we spoke this morning, Ms. Dyce advised me yesterday evening that Gary has been working diligently to obtain financing to pay the \$150,000 part of the payment due Peggy under the proposed agreement. As you can see from the e-mail below, Gary hopes to have an answer regarding financing today. She has not wanted Gary to sign the agreement when Gary is still working on the financing because Gary would be exposed to liability for attorney fees if he defaults on the \$150 payment. (At least that explains why she was unresponsive).

She also explained that the reserve fund of \$40,000 has, or is exhausted, by professional fees for the estate and trust (predominantly her firms services for an extended period of time).

Therefore, she advises me that Gary is prepared to make immediate payment of the \$426 but needs more time than 15 days for the \$150. (What she would really like is for Gary to pay Peggy over time). As Martin mentioned getting the money out of Gary's hands makes sense. Perhaps the most cost efficient route, subject to Peggy's approval, is to revise the agreement to provide that Gary will make immediate payment of the \$426 by wire and give him 45 or 60 days to obtain financing for the \$150 and tell Ms. Dyce that this has to be wrapped up this week otherwise Peggy will seek her remedies in court.

I will let you know if I hear from Ms. Dyce regarding the financing today. I doubt it.

Jim

James R. George
Shareholder
Greenberg Traurig, [REDACTED] | 401 East Las Olas Boulevard Suite 2000 | Fort Lauderdale, FL 33301
[REDACTED] | [REDACTED]

<image001.jpg>

From: Dyce, Jamie R. [mailto: [REDACTED]]
Sent: Monday, December 08, 2014 5:33 PM
To: George, James R. (Shld-FTL-LT)
Cc: [REDACTED]
Subject: RE: Call Today

Thanks for speaking with me today. I spoke with Gary, he has a meeting with Capital One tomorrow and a call expected from Bank of America. I will let you know as soon as I have an update.

Jamie R. Dyce
Associate

Duane Morris LLP
1540 Broadway
New York, NY 10036-4086
[REDACTED]

[REDACTED]

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From: [REDACTED] [mailto: [REDACTED]]
Sent: Monday, December 08, 2014 3:53 PM
To: Dyce, Jamie R.
Subject: RE: Call Today

YEs

From: Dyce, Jamie R. [mailto: [REDACTED]]
Sent: Monday, December 08, 2014 3:53 PM
To: George, James R. (Shld-FTL-LT)
Cc: [REDACTED]
Subject: RE: Call Today

I need a few, can we do 4:30? Thanks.

Jamie R. Dyce
Associate

Duane Morris LLP
1540 Broadway
New York, NY 10036-4086
[REDACTED]

[REDACTED]

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From: [REDACTED] [mailto: [REDACTED]]
Sent: Monday, December 08, 2014 2:24 PM
To: Dyce, Jamie R.
Cc: [REDACTED]
Subject: FW: Call Today

Jamie

Martin asked that I speak with you this afternoon as you suggested. Does 4:00 [REDACTED] work with your schedule?

Jim

From: George, James R. (Shld-FTL-LT)
Sent: Monday, December 08, 2014 8:23 AM
To: 'Dyce, Jamie R.'; Martin B. O'Connor II
Cc: Pat Zwarycz
Subject: RE: Call Today

Jamie

What time should I call you?

Jim

From: Dyce, Jamie R. [[mailto:\[REDACTED\]](mailto:[REDACTED])]
Sent: Friday, December 05, 2014 3:45 PM
To: Martin B. O'Connor II
Cc: George, James R. (Shld-FTL-LT); Pat Zwarycz
Subject: RE: Call Today

[REDACTED] sorry, I cannot do today. Monday afternoon?

Jamie R. Dyce
Associate

Duane Morris LLP
1540 Broadway
New York, NY 10036-4086
[REDACTED]

[REDACTED]

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From: Martin B. O'Connor II [[mailto:\[REDACTED\]](mailto:[REDACTED])]
Sent: Friday, December 05, 2014 2:47 PM
To: Dyce, Jamie R.
Cc: Jim George; Pat Zwarycz
Subject: Call Today

Jamie,

Could we have a call today at 5:30 p.m.? I have included our dial in details - [REDACTED]
[REDACTED]. Please reply all.

Best,

Martin B. O'Connor, II, Esq.
O'Connor, Morss & O'Connor, P.C.
Mailing Address:
P.O. Box 979
Elizabeth, New Jersey 07207-0979

EFTA00357185

For Federal Express and Hand Deliveries:
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Union, New Jersey 07083
908-354-5660 (telephone)
908-354-5786 (facsimile)

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