

From: Jeevacation <jeevacation@gmail.com>
To: Eileen Alexanderson <[REDACTED]>
Subject: Re: Fyi re meeting last Thursday
Date: Sat, 06 Oct 2012 14:24:27 +0000

Did Leon see What press release???

Sorry for typos

On Oct 6, 2012, at 9:41 AM, Eileen Alexanderson <[REDACTED]> wrote:

From: Alan S Halperin [mailto:[REDACTED]]
Sent: Thursday, October 04, 2012 03:33 PM
To: Eileen Alexanderson
Subject: Re: please review the attached

Thanks, Eileen. I am fine with the press release.

As for the meeting, I could sense Leon's (understandable) frustration. I keep coming back to two fundamental facts: we have a serious problem if we do nothing; and there are risks in fixing the problem. I therefore am striving for the alternative that presents the least amount of risk given the amounts involved, the unusual nature of the current structure and the concern that, given the person and industry, the grantor could be an unfair target. I am concerned about a purchase of the remainder interest because: (i) if we are wrong as to the value, it exposes Leon to gift tax; (ii) it is very complicated; and (iii) the statute of limitations never runs.

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From: "Eileen Alexanderson" <[REDACTED]>
To: Alan S Halperin/PaulWeiss@PaulWeiss
Date: 10/04/2012 02:40 PM
Subject: please review the attached

Three of the trusts for the benefit of Leon's children funded the acquisition through a newly formed LLC. Leon has a .001% interest through the GP that is the LLC.
Since this will be released to the public, please read and tell me if the language is acceptable given that ownership structure.
Thanks.
Good meeting, though, obviously still a work in progress. Best, Eileen

Eileen Alexanderson

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