

**From:** [REDACTED] <[REDACTED]>

**To:** "jeffrey E." <jeevacation@gmail.com>

**Subject:** Fwd: Draft Settlement Agreement

**Date:** Fri, 09 Feb 2018 15:12:13 +0000

**Attachments:** Confidential\_Settlement\_Agreement\_Noam\_Chomsky\_4813-4853-4620\_v.2.docx

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[REDACTED]  
HBRK Associates Inc.  
575 Lexington Avenue 4th Floor  
New York, NY 10022  
tel [REDACTED]  
fax [REDACTED]  
cell [REDACTED]

Begin forwarded message:

**From:** "Kelly, William" <[REDACTED]>

**Subject:** RE: Draft Settlement Agreement

**Date:** February 9, 2018 at 10:11:14 AM EST

**To:** [REDACTED] <[REDACTED]>

**Cc:** Sam Bain <[REDACTED]>

Rich:

I am available today any time after 2:30 and before 6:00. Just let me know what works best for you.

In the meantime, I made some minor changes to the draft agreement (to clean up typos and to eliminate the requirement that Noam deliver W-9s). All of the changes are chown on the attached.

Bill

 [http://www.nixonpeabody.com/images/np\\_firm\\_sig/images/NP\\_Mono\\_brightBlue\\_RGB\\_cropBottomLeft\\_sigBlock.i](http://www.nixonpeabody.com/images/np_firm_sig/images/NP_Mono_brightBlue_RGB_cropBottomLeft_sigBlock.i)

**William E. Kelly**  
Senior Counsel

T [REDACTED] C [REDACTED] F 866-743-4899  
Nixon Peabody LLP | 100 Summer Street | Boston, MA 02110-2131  
[REDACTED] | [@NixonPeabodyLLP](mailto:[REDACTED]@NixonPeabodyLLP)

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**From:** Richard Kahn [[mailto:\[REDACTED\]](mailto:[REDACTED])]

**Sent:** Friday, February 9, 2018 10:07 AM

EFTA00892539

To: Kelly, William <[REDACTED]>  
Cc: Sam Bain <[REDACTED]>  
Subject: Re: Draft Settlement Agreement

please advise on a time today to review housekeeping issues such as power to transfer interests, real prices, etc.  
thank you

[REDACTED]  
HBRK Associates Inc.  
575 Lexington Avenue 4th Floor  
New York, NY 10022  
tel [REDACTED]  
fax [REDACTED]  
cell [REDACTED]

On Feb 8, 2018, at 5:26 PM, Kelly, William <[REDACTED]> wrote:

*Confidential*  
*For Settlement Purposes only*

Rich:

In order to keep things moving, I am sending for your review a preliminary draft of the Confidential Settlement Agreement between Noam and Bainco. I am sending this simultaneously to my client, so I must take the usual reservation of the right to make corrections and revisions in response to their comments. Please let me know if you have any corrections, comments or concerns.

Bill

 [http://www.nixonp\[REDACTED\]images/np\\_firm\\_sig/images/NP\\_Mono\\_brightBlue\\_RGB\\_cropBottomLeft\\_sigBlock.i](http://www.nixonp[REDACTED]images/np_firm_sig/images/NP_Mono_brightBlue_RGB_cropBottomLeft_sigBlock.i)

**William E. Kelly**  
Senior Counsel  
[REDACTED]  
T [REDACTED] | C [REDACTED] F 866-743-4899  
Nixon Peabody LLP | 100 Summer Street | Boston, MA 02110-2131  
[REDACTED] | [@NixonPeabodyLLP](#)

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<Confidential Settlement Agreement Noam Chomsky 4813-4853-4620 v.1.docx>