

From: "jeffrey E." <jeevacation@gmail.com>
To: Peggy Siegal <[REDACTED]>
Subject: Re: Attorney-Client Privileged Communication
Date: Thu, 11 Dec 2014 10:30:49 +0000

can your office send me all the emails you wrote to philip michaels . thanks

On Wed, Dec 10, 2014 at 10:01 PM, Peggy Siegal <[REDACTED]> wrote:

Thank you but can you get blood out of a stone. I am telling you....as I have been telling everyone for 3 and a half years...my mother will be dead four years in February...that my brother is a desperate loser and a thief. I don't care if he has to sell his house.....he has been cheating me my whole life.

Thank you so much. Peggy

From: Martin B. O'Connor II [mailto:[REDACTED]]
Sent: Wednesday, December 10, 2014 08:39 PM
To: Peggy Siegal
Cc: jeevacation@gmail.com <jeevacation@gmail.com>; [REDACTED] <[REDACTED]>
Subject: Re: Attorney-Client Privileged Communication

Peggy

Jim and I talking to counsel at 11am. Goal and time frame is now to get document signed and your inheritance and the negotiated payment in your hands ASAP. We will be addressing the timing of the 150

Will call you after call

Best

M

Martin B. O'Connor, II, Esq.
O'Connor, Morss & O'Connor, [REDACTED].
Post Office Box 979
Elizabeth, New Jersey 07207-0979
[REDACTED]

On Dec 10, 2014, at 7:16 PM, "Peggy Siegal" <[REDACTED]> wrote:

I can not talk till tomorrow. Just got out of dentist.

Are we now giving my brother extra time to borrow the money he owes me because he spent it.
Is it legal for him to just help himself to money left for me.

Please explain what is going on.

Thank you all for your patience and my lack of comprehension.

xoxo Peggy

From: Martin B. O'Connor II [mailto:[REDACTED]]
Sent: Wednesday, December 10, 2014 03:07 PM
To: jeffrey E. <jeevacation@gmail.com>
Cc: Peggy Siegal; [REDACTED] <[REDACTED]>
Subject: Re: Attorney-Client Privileged Communication

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From: [REDACTED] [REDACTED]
Sent: Tuesday, December 09, 2014 10:04 AM
To: Martin B. O'Connor II; [REDACTED]
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, LLP | 401 East Las Olas Boulevard Suite 2000 | Fort Lauderdale, FL 33301
[REDACTED]

EFTA01002388

[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:\[REDACTED\]](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]]
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]]
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 [REDACTED]? I have included our dial in details [REDACTED]
Access Code 4236591. Please reply all.

Best,

EFTA01002391

Martin B. O'Connor, II, Esq.
O'Connor, Morss & O'Connor, [REDACTED].

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