

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

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

**Cc:** Valeria Chomsky <[REDACTED]>

**Subject:** Fwd: FW: settlement agreement

**Date:** Wed, 06 Feb 2019 21:02:12 +0000

**Attachments:** Chomsky\_-\_Settlement\_Agreement\_(red-line\_of\_initial\_draft\_by\_Hirsch).DOCX;  
Chomsky\_-\_Mutual\_Release.DOCX

**Inline-Images:** image001.png; image002.png; image003.png

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What do you think about these?

Noam

----- Forwarded message -----

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

**Date:** Wed, Feb 6, 2019 at 1:24 PM

**Subject:** FW: settlement agreement

**To:** Noam Chomsky <[REDACTED]>, Valeria Chomsky <[REDACTED]>

**Cc:** Jason B. Curtin <[REDACTED]>

Noam and Valeria - here is the latest documents. Perhaps you should review them before we chat. I think you've looked at the Settlement Agreement but I've also attached the Releases document. Let me know when you've reviewed this material and we'll set up a call.

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**From:** Vincent Pisegna

**Sent:** Wednesday, February 06, 2019 3:20 PM

**To:** 'Jillian Hirsch' <[REDACTED]>; 'George A. Berman' <[REDACTED]>

**Cc:** Jason B. Curtin <[REDACTED]>

**Subject:** RE: settlement agreement

Attached is a redline of Jillian's proposed Settlement Agreement and a draft Releases document for your review.

By email to you dated January 15, 2019, I forwarded to you the name of Bob Holdway of Fiduciary Trust to act as successor trustee but have not heard back from you. Please confirm that he is acceptable.

Per the "game plan" below that we previously agreed-to, there are still a number of documents which you need to produce. Jillian, you need to draft a motion to approve the settlement and George, you have a host of mostly transactional documents to draft. Can we get those loose ends cleaned up so we can send notice out to the interested parties before the March 13 hearing with the hope that we can obtain court approval that day and complete the settlement. The parties entered into the settlement agreement almost a month ago.

Thanks.

Vincent J. Pisegna

Krokidas & Bluestein LLP

600 Atlantic Avenue

Boston, MA 02210

Tel: [REDACTED]

Fax: [REDACTED]  
[REDACTED]

[www.kb-law.com](http://www.kb-law.com)

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**From:** Vincent Pisegna

**Sent:** Monday, January 14, 2019 5:24 PM

**To:** Jillian Hirsch <[REDACTED]>; George A. Berman <[REDACTED]>

**Cc:** Jason B. Curtin <[REDACTED]>

**Subject:** RE: settlement agreement

Per our call today, here is the game plan for putting together the final documentation:

1. Tax counsel re Note - VP is working on this. Hope to have something soon. Jillian or George, can you get me the last two tax returns for the Trust. Thanks.
2. Institutional trustee - I hope to send you a name shortly.
3. Settlement agreement - JH will prepare a draft.
4. Releases - VP will prepare a draft.
5. Motion for approval of settlement - JH will prepare a draft.
6. Notice to daughters - JH thinks Harry has spoken with them and that they can await the formal documentation when they assent to the settlement.
7. Waiver of principle distributions - GB.
8. Waiver of POA by Noam - GB.

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9. Resignation of trustees - GB.
10. Assent of children and grandchildren to settlement - GB.
11. Checks for \$750,000, \$45,000 for NC legal reimbursement, \$45,000 for HC legal reimbursement, \$5,000 for NC mediators fee reimbursement
12. Documentation of distribution of Note to NC - VP.
13. Stipulations of dismissal - JH.

Please let me know if any changes are necessary. Thank you for your cooperation.

Vincent J. Pisegna

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**From:** Jillian Hirsch <[REDACTED]>  
**Sent:** Friday, January 11, 2019 1:47 PM  
**To:** Vincent Pisegna <[REDACTED]>; George A. Berman <[REDACTED]>  
**Cc:** Jason B. Curtin <[REDACTED]>  
**Subject:** RE: settlement agreement

4pm is fine.

Jillian B. Hirsch | Attorney at Law

logo2

275 Grove Street, Suite 2-400 | Newton, MA 02466

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t [REDACTED]  
[REDACTED] | [www.hirschlawllc.com](http://www.hirschlawllc.com)

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**From:** Vincent Pisegna <[REDACTED]>  
**Sent:** Friday, January 11, 2019 1:45 PM  
**To:** Jillian Hirsch <[REDACTED]>; George A. Berman <[REDACTED]>  
**Cc:** Jason B. Curtin <[REDACTED]>  
**Subject:** RE: settlement agreement

As it turns out 4:00 is better for me on Monday and 11:00 is not very good.

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**From:** Jillian Hirsch <[REDACTED]>  
**Sent:** Friday, January 11, 2019 12:31 PM  
**To:** George A. Berman <[REDACTED]>; Vincent Pisegna <[REDACTED]>  
**Cc:** Jason B. Curtin <[REDACTED]>  
**Subject:** RE: settlement agreement

11 works for me.

Jillian B. Hirsch | Attorney at Law



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t [REDACTED]  
[REDACTED] | [REDACTED]

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**From:** George A. Berman <[REDACTED]>  
**Sent:** Friday, January 11, 2019 12:25 PM  
**To:** Jillian Hirsch <[REDACTED]>; Vincent Pisegna <[REDACTED]>  
**Cc:** Jason B. Curtin <[REDACTED]>  
**Subject:** RE: settlement agreement

I am pretty flexible Monday, but for the sake of suggesting a time, how about 11 or 4?

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**From:** Jillian Hirsch [[mailto:\[REDACTED\]](mailto:[REDACTED])]  
**Sent:** Friday, January 11, 2019 12:09 PM  
**To:** Vincent Pisegna  
**Cc:** George A. Berman; Jason B. Curtin  
**Subject:** RE: settlement agreement

That works for me. What time is best?

Jillian B. Hirsch | Attorney at Law



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**From:** Vincent Pisegna <[REDACTED]>  
**Sent:** Friday, January 11, 2019 10:52 AM  
**To:** Jillian Hirsch <[REDACTED]>  
**Cc:** George A. Berman <[REDACTED]>; Jason B. Curtin <[REDACTED]>  
**Subject:** settlement agreement

Can we do a call on Monday to discuss the work to finalize the settlement, e.g., drafting a settlement agreement?

Vincent J. Pisegna

EFTA01029083

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