

**From:** "jeffrey E." <jeevacation@gmail.com>  
**To:** Richard Kahn <[REDACTED]>  
**Subject:** Re:  
**Date:** Mon, 21 May 2018 20:04:51 +0000

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im aware of the rule. as we discussed but this is hardly a difficult issue. and certainly not a prohibition. that is nonsense. also have you calculated the amount . as i do not know the original amounts. ?

On Mon, May 21, 2018 at 9:59 PM Richard Kahn <[REDACTED]> wrote:

Richard Kahn  
HBRK Associates Inc.  
575 Lexington Avenue 4th Floor  
New York, NY 10022  
[REDACTED]  
[REDACTED]  
[REDACTED]

Begin forwarded message:

**From:** Max Kohlenberg <[REDACTED]>  
**Subject:** RE:  
**Date:** May 21, 2018 at 3:45:25 PM EDT  
**To:** 'Richard Kahn' <[REDACTED]>

Rich -

Sorry for the delay on the income distribution information. I'll try to get that for you tomorrow.

I'm afraid I disagree (as does Harry's attorney) as to the existence of legal issues relating to liquidation of the trusts. As you know, the trusts avoided federal and Massachusetts estate tax at Carol's death by virtue of qualifying for the marital deduction. Unless the termination is handled properly the deferred tax could be triggered on the entire remaining balance. It's not an insurmountable problem, but it needs to be done right and Noam's attorneys and Harry's attorney and I need to be on the same page about whatever settlement is worked out (and how it's documented) or we could all be in big trouble over taxes.

I really do hope that Noam can be prevailed upon to let his attorneys speak with Harry's. I'm in the middle here and whether or not I'm sued by anyone there won't be a settlement until the real "parties in interest" start communicating.

A. Max Kohlenberg  
Howland Evangelista Kohlenberg Burnett, LLP  
One Financial Plaza - Suite 1600  
Providence, Rhode Island 02903

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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-----Original Message-----

From: Richard Kahn [mailto:[REDACTED]]  
Sent: Monday, May 21, 2018 3:29 PM  
To: Max Kohlenberg  
Subject:

max,

you were going to provide me proof of all the income going to noams account? thx  
harry has stated that there are legal issues preventing him from liquidation NONSENSE  
if I were you i would weigh in sooner rather than in another forum..

Richard Kahn  
HBRK Associates Inc.  
575 Lexington Avenue 4th Floor  
New York, NY 10022

[REDACTED]  
[REDACTED]  
[REDACTED]

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please note

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