
From: jeffrey E. <jeevacation@gmail.com>
Sent: Wednesday, December 10, 2014 5:01 PM
To: Peggy Siegal
Cc: [REDACTED]
Subject: Re: Attorney-Client Privileged Communication

get the first 426 and have gary agree now to finance=175 or pay 150 now. not sure why this can't be done in a phone call.

On =ed, Dec 10, 2014 at 12:35 PM, Peggy Siegal <[REDACTED]></=> wrote:

What's going on. I don't understand. It =eels like Gary does not have the money to pay me...which is exactly what I=was saying for three years. He is a thief.

From: Martin B. O'Connor II [mailto:[REDACTED]]
Sent: Wednesday, December 10, 2014 10:10 AM
To: [REDACTED] <[REDACTED]>;
Peggy Siegal
Subject: RE: Attorney-Client Privileged Communication

Jim and Peggy,

I am back in the office this afternoon and will call you, Jim and thereafter reach out to Jamie.

M

Martin B. O'Connor, II, Esq.
O'Connor, Morss & O'Connor, P.C.
Mailing Address:
P.O. Box 979
Elizabeth, New Jersey 07207-0979
For Federal Express and Hand Deliveries:
Liberty Hall Center
1085 Morris Avenue, 5th Floor
Union, New Jersey 07083

908-3-4-5660 <tel:[REDACTED]> (telephone)
908-3-4-5786 <tel:[REDACTED]> (facsimile)

This e-mail message from the law firm of O'Connor, Morss & O' Connor is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

Please be advised that based on current IRS rules and standards, the advice contained herein is not intended to be used, nor can it be used, for the avoidance of any tax penalty that the IRS should assess related to this matter. That said, please do not hesitate to call me if you have any further questions regarding this matter.

From: georgej@gtlaw.com <mailto:georgej@gtlaw.com> [georgej@gtlaw.com <mailto:georgej@gtlaw.com>]
Sent: Tuesday, December 09, 2014 10:04 AM
To: Martin B. O'Connor II; Peggy@peggysiegal.com <mailto:Peggy@peggysiegal.com>
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 firm's 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, P.A. | 401 East Las Olas Boulevard Suite 2000 | Fort Lauderdale, FL 33301
Tel 954.768.8280 <tel:954.768.8280> | Fax 954.759.5580 <tel:954.759.5580> | Cell 954.895.2655
<tel:954.895.2655>

georgej@gtlaw.com <mailto:georgej@gtlaw.com> | www.gtlaw.com <http://www.gtlaw.com/>

</=pan>

From: Dyce, Jamie =. [mailto:JRDyce@duanemorris.com <mailto:JRDyce@duanemorris.com>]
Sent: Monday, December 08, 2014 5:33 PM
To: George, James R. (Shld-FTL-LT)
Cc: mboc@ocomo.com <mailto:mboc@ocomo.com>
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<=pan style="FONT-SIZE:7.5pt;FONT-FAMILY:"Arial","sans-seri=";COLOR:#1f497d">
Associate

Duane Morris LLP
1540 Broadway
New York, NY 10036-4086
P: 212.471.1888 <tel:212.471.1888>
F: 212.202.7790 <tel:212.202.7790>

jrdyce@duanemor=is.com <mailto:jrdyce@duanemorris.com>
www.duanemorris.co= <http://www.duanemorris.com>

In compliance with U.S. Treasury Regulation=, please be advised that any tax advice given herein (or in any attachment= was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding tax penalties or (ii) promoting, =arketing or recommending to another person any transaction or matter addre=sed herein.

From: georgej@gtlaw.com <mailto:georgej@gtlaw.com> mailto:georgej@gtlaw.com
<mailto:georgej@gtlaw.com>]
Sent: Monday, December 08, 2014 3:53 PM
To: Dyce, Jamie R.
Subject: RE: Call Today

YES

From: Dyce, Jamie =. [mailto:JRDyce@duanemorris.com <mailto:JRDyce@duanemorris.com>]
Sent: Monday, December 08, 2014 3:53 PM
To: George, James R. (Shld-FTL-LT)
Cc: mboc@ocomo.com <mailto:mboc@ocomo.com>
Subject: RE: Call Today

I need a few, can we do 4:3=? Thanks.

Jamie R. Dyce<=pan style="FONT-SIZE:7.5pt;FONT-FAMILY:"Arial","sans-seri=";COLOR:#1f497d">
Associate

Duane Morris LLP
1540 Broadway
New York, NY 10036-4086
P: 212.471.1888 <tel:212.471.1888>
F: 212.202.7790 <tel:212.202.7790>

jrdyce@duanemor=is.com <mailto:jrdyce@duanemorris.com>
www.duanemorris.co= <http://www.duanemorris.com>

In compliance with U.S. Treasury Regulation=, please be advised that any tax advice given herein (or in any attachment= was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding tax penalties or (ii) promoting, =arketing or recommending to another person any transaction or matter addre=sed herein.

From: georgej@gtlaw.com <mailto:georgej@gtlaw.com> mailto:georgej@gtaw.com
<mailto:georgej@gtlaw.com>]
Sent: Monday, December 08, 2014 2:24 PM
To: Dyce, Jamie R.
Cc: mboc@ocomo.c=m <mailto:mboc@ocomo.com>
Subject: FW: Call Today

Jamie

Martin asked that I speak w=th you this afternoon as you suggested. Does 4:00 p.m. work with your sche=ule?

Jim

From: George, Jame= 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 =. [mailto:JRDy=e@duanemorris.com <mailto:JRDyce@duanemorris.com>]
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

I'm sorry, I cannot=do today. Monday afternoon?

Jamie R. Dyce<=pan style="FONT-SIZE:7.5pt;FONT-FAMILY:"Arial", "sans-seri=";COLOR:#1f497d">
Associate

Duane Morris LLP
1540 Broadway
New York, NY 10036-4086
P: 212.471.1888 <tel:212.471.1888>
F: 212.202.7790 <tel:212.202.7790>

jrdyce@duanemor=is.com <mailto:jrdyce@duanemorris.com>
www.duanemorris.co= <http://www.duanemorris.com>

In compliance with U.S. Treasury Regulation=, please be advised that any tax advice given herein (or in any attachment= was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding tax penalties or (ii) promoting, =arketing or recommending to another person any transaction or matter addre=sed herein.

From: Martin B. O'&=39;Connor II [mailto:m=oc@ocomo.com <mailto:mboc@ocomo.com>]
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 p.m.? I have included our=dial in details - 1-888-363-4734 <tel:1-888-363-4734> – Access Code 4236591. Ple=se reply all.

Best,

Martin B. O'Connor, II, Esq.
O'Connor, Morss & O'Connor, P.C.</=pan>

Mailing Address:
P.O. Box 979
Elizabeth, New Jersey 07207-0979

For Federal Express and Hand Deliveries:

Liberty Hall Center

1085 Morris Avenue, 5th Floor

Union, New Jersey 07083
908-354-5660 (telephone)
908-354-5786 (facsimile)

This e-mail message from the law firm of O'Connor, Morss & O'Connor is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

Please be advised that based on current IRS rules and standards, the advice contained herein is not intended to be used, nor can it be used, for the avoidance of any tax penalty that the IRS should assess related to this matter. That said, please do not hesitate to call me if you have any further questions regarding this matter.

For more information about Duane Morris, please visit [<http://www.DuaneMorris.com>](http://www.DuaneMorris.com)
[<https://ur=defense.proofpoint.com/v2/url?u=http-3A__www.DuaneMorris.com&d=AwM=Ag&c=Uk4MC68c_p3FA5jX7N-Q91WDvpli5Y9kf-6DmZwtkEl&r=1qaxH1obFrC=1ZjXTLmvq-XQ54-3vnWu_Aa10Rq_gx4&m=DKfW-tX1Apo_1nJJnXzIS-V_N0G7JJGdZa=8uaLNIEg&s=ecC7yGnwTHG8PLmmheTu8fd2jrCTvamrok6wB8Yu_cE&e=>](https://ur=defense.proofpoint.com/v2/url?u=http-3A__www.DuaneMorris.com&d=AwM=Ag&c=Uk4MC68c_p3FA5jX7N-Q91WDvpli5Y9kf-6DmZwtkEl&r=1qaxH1obFrC=1ZjXTLmvq-XQ54-3vnWu_Aa10Rq_gx4&m=DKfW-tX1Apo_1nJJnXzIS-V_N0G7JJGdZa=8uaLNIEg&s=ecC7yGnwTHG8PLmmheTu8fd2jrCTvamrok6wB8Yu_cE&e=>)

Confidentiality Notice: This electronic mail transmission is privileged and confidential and is intended only for the review of the party to whom it is addressed. If you have received this transmission in error, please immediately return it to the sender. Unintended transmission shall not constitute waiver of the attorney-client or any other privilege.

If you are not an intended recipient of confidential and privileged information in this email, please delete it, notify us immediately at postmaster@gtlaw.com <mailto:postmaster@gtlaw.com>, and do not use or disseminate such information.

--

please note

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of JEE. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have

received this communication in error, please notify us immediat=ly by return e-mail or by e-mail to
jeevacation@gmail.com <mailto:jeevacation@gmail=com> , and destroy this comm=nication and all copies thereof,
including all attachments. copyright -=ll rights reserved