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**From:** Martin B. O'Connor II <[REDACTED]>  
**Sent:** Friday, December 5, 2014 3:51 PM  
**To:** jeffrey E.  
**Cc:** Peggy Siegal  
**Subject:** FW: Follow up

Jeffrey,

My timing is to get this signed ASAP.

Best,

Martin B. O'Connor, II, Esq.  
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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.

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From: Martin B. O'Connor II  
Sent: Friday, December 05, 2014 10:49 AM  
To: Peggy Siegal; [REDACTED]; Jim George  
Subject: FW: Follow up

All,

Please find Jamie R. Dyce, Esq.'s response to my call and e-mail. I will coordinate a time to speak to her this afternoon and update you all after we speak. My goal is to get this signed ASAP.

Best,

Martin B. O'Connor, II, Esq.  
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From: Dyce, Jamie R. [REDACTED]  
Sent: Thursday, December 04, 2014 6:40 PM  
To: Martin B. O'Connor II  
Cc: Jim George  
Subject: RE: Follow up

I am in Court tomorrow morning in Queens, not sure when I will be back in the office. Can we plan to speak in the afternoon on finalizing? Thanks for following up.

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

From: Martin B. O'Connor II [mailto:[REDACTED]]  
Sent: Thursday, December 04, 2014 6:05 PM  
To: Dyce, Jamie R.  
Cc: Jim George  
Subject: Follow up

Jamie

Further to my voicemail I am writing to follow up on the revised document. Please provide any final comments (although I believe our draft should be the execution draft) so we can attend to execution ASAP. Thank you and I would appreciate hearing from you. M

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