This message is intended for the exclusive use of the individual or entity to which it is transmitted and may contain information that is privileged, confidential and exempt from disclosure under applicable laws.

From: Aaron Pelley [mailto:aaron@cultivalaw.com]
Sent: Friday, March 16, 2018 1:15 PM
To: Joseph [redacted]
Cc: Shira Stefanik <shira@stefanikdefense.com>; Doug Hiatt <douglas@douglashiatt.net>
Subject: Settlement

Joseph ,

Your client has provided that she is deliberately breaching the contract and, pursuant to the contract, a breaching party does not excuse or allow you to breach. In short, her response, that she is holding the website content hostage is both breach and bad faith. It is Exhibit 1 in the arbitration matter.

With regards to her extensive list, I will continue to work on those items that are in the contract and required of me. Much of her list will not be met or addressed by the EOB on Monday, March 19, 2018. Those items that I can address by then, I will. However, I am meeting with attorneys regarding her deliberate and admitted breach. In the interim, with regards to copyright matters, I have hired Neil Juneja (neil@gleamlaw.com) to address those concerns. Doug Hiatt and Shira Stefanik (douglas@douglashiatt.net & shira@stefanikdefense.com) will represent me in the arbitration matter and any further matters relating to the settlement should be directed to them. Dick Dick @cultivalaw.com) will be counsel with regards to any cause of action regarding the Portland Office. With regards to her request for entry, at this time she does not have permission or authority to enter the property. We have contacted building management to let them know the same.

Finally, as it worth noting, and your expert could certainly confirm, your issue with Cultiva Law appearing in everyplace that [redacted] is searched is product of Anne's own creating. The only site or place that my social media profiles have ever known is [redacted] and PelleyLawGroup's website. Her failure to release the content means that the search engines rely on the last known place to thread the information to. All the information would easily thread to the location I have provided, cultivalaw.com. However, she is not releasing the content, thus I am not posting my new website, thus google goes to what it recalls as last known location, thus my company information appears for [redacted] searches. Seems like you would want to fix that. Which would be as easy as changing her content and removing my lawfully owned content, so that I may post mine. As an aside, as she appears to have some misguided belief that it excuses her breach, I approved her text for her site weeks ago and I still approve her text for the website.