

Computer Lawyer

May 30, 2018

Computer Lawyer

Via Email and Certified Mail

Mr. Aaron A. Pelley
Cultiva Law PLLC
1000 Second Avenue
Suite 3900
Seattle, WA 98104

Re: NWMJ Law Client Files

Dear Mr. Pelley:

On March 5, 2018, you entered into a Confidential Settlement Agreement and Release ("the Agreement") with Anne van Leynseele pursuant to which Ms. van Leynseele bought your interest in NWMJ Law, PLLC ("NWMJ Law"). Section 7.8.1 of the Agreement provides that NWMJ Law will disengage and return files to those clients listed on Schedule C. The remaining client files are the property of and must be returned to NWMJ Law.

We understand that you have not yet returned the files of approximately 200 clients to NWMJ Law and we have been engaged to help determine whether your failure to do so constitutes a data breach under state and/or federal law. To the extent you or anyone associated with Cultiva Law maintain unauthorized access to personal identification, medical or financial information in NWMJ Law's client files, NWMJ Law may have to report the situation to individuals and regulators, such as State Attorneys General.

NWMJ Law's primary goal is to ensure there is no unauthorized access to personal information. We therefore ask that you confirm you will return all client files in your possession, other than those related to the clients listed on Schedule C, and then, without delay, coordinate the return of the files with Ms. van Leynseele's dissolution counsel.

If you do not intend to return any NWMJ Law client files, please (1) identify those files you do not intend to return and (2) state the basis for your refusal to return the client files. Finally, if you do not intend to return certain client files, please provide any additional information you believe relevant to the issue of whether you and/or others have unauthorized access to personal information that may require 7 Point Law to notify individuals and regulators.

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May 30, 2018
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Please acknowledge receipt of this letter and take the above-described actions by June 8, 2018.

Sincerely,

A solid black rectangular redaction box covering the signature of the sender.

Computer Lawyer

MJW:gak