



Ann Toney &lt;ann@anntoneylaw.com&gt;

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**Fitzsimmons/Stobby**

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**Brie Mills** <brie@sadatlawgroup.com>  
To: Ann Toney <ann@anntoneylaw.com>

Mon, Aug 17, 2020 at 7:13 PM

Hi Ann,

Thank you for letting me know. On Friday, Mr. Holtz told me that Clarke was interested in having a virtual meeting with Lee. I thought that was a constructive suggestion. We didn't have a chance to respond to the offer before Mr. Holtz informed me he was no longer representing Clarke. Accordingly, I'm reaching out to you with our proposal.

Lee is open to speaking with Clarke, but we believe the conversation would be more productive with the help of a mediator. Having a neutral third party would help temper emotions on both sides and keep the meeting on track. In addition, we would require a couple things from Clarke as a show of his good faith desire to work towards a resolution.

First, Clarke would need to take down all social media and other online posts and not post anything new. Second, as is the case with all mediations, both parties would need to sign a confidentiality agreement, which would cover anything said or written during the process.

In the meantime, I think it would be helpful for the two of us to speak over the phone. Please feel free to call me on my cell at your convenience: 310-745-0808.

Best regards,

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