

Re: 4:16-cv-1969 - Candace Curtis, et al v. Candace Kunz-Freed, et al

From: Adraon Greene (agreene@gallowaylawfirm.com)

To: blowintough@att.net

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Date: Friday, June 23, 2017 at 12:16 PM PDT

Opposed.

Sent from my iPhone

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On Jun 23, 2017, at 1:51 PM, Rik Munson <blowintough@att.net> wrote:

All -

Based upon the attached email communication thread, that began December 29, 2016, soon after the RICO matter was submitted to the District Court, we will be asking to supplement the Record on Appeal by taking Mr. Mendel's deposition under Federal Rule of Civil Procedure 27(b).

It should be noted there has been no mention of this "incurred debt" in any financial disclosures and no balance sheet has ever been produced. Like Ms. Carole Brunsting, Plaintiff Curtis has a right to know the particulars regarding the "incurred debt" which Mr. Mendel states the Brunsting Trusts are being held as a surety for the payment of. Moreover, Mr. Mendel's client is burdened under a federal injunction, that remains in full force and effect, and we would would like the record to reflect the reasons for the continued refusal to obey the affirmative commands in that Order.

Please consider this our certificate of conference. We will assume the motion is opposed unless informed to the contrary.

Thank you

Rik Munson

<1_Mendel Email Threads.pdf>