

EXHIBIT A

Fitz-Patrick, Kay

From: Fitz-Patrick, Kay
Sent: Tuesday, June 16, 2020 20:47
To: 'Michael Adler'; Ben Meiselas; harmeet@dhillonlaw.com
Cc: Richard E. Gottlieb (RGottlieb@manatt.com)
Subject: Brunner v. Square: Arbitration Demand
Attachments: PPP_Lender_List_200601-508.pdf

Michael, Ben, and Harmeet:

By this note, we hereby demand arbitration of plaintiff's claims in the above matter.

We are in receipt of the promissory note entered into between Sweet Laurel and Celtic Bank, and which governs all disputes arising out of the PPP loan at issue here.

In the complaint, you allege that plaintiff acted as Sweet Laurel's agent with respect to the loan, and the arbitration provision requires the arbitration of all disputes arising under or in connection with the Promissory Note, including claims by agents and/or beneficiaries of the PPP Program. Please let us know by Friday, June 19, 2020 whether your client would be willing to stipulate to the dismissal of the claims against Square pending arbitration.

We have already advised you that Square made no loans under the Paycheck Protection Program and that, on that basis alone, it should be dismissed. Further to our early resolution efforts, we call your attention to the SBA's list of lenders participating in PPP as of June 1, 2020. Square is not on the list. I've attached a searchable PDF, and refer you to the official link, which is found at: https://www.sba.gov/sites/default/files/2020-06/PPP_Lender_List_200601-508.pdf

We are available to discuss at your convenience.

Sincerely,
Kay

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Associate

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