

EXHIBIT B

From: [Jeff Meyerson](#)
To: [Beth Stanfield](#)
Cc: [Jeff Meyerson](#)
Subject: Blueacorn demand letter
Date: Thursday, May 27, 2021 6:12:04 PM
Attachments: [image535574.png](#)

[EXTERNAL E-MAIL - USE CAUTION]

Beth,

I am in receipt of your letter dated May 26, 2021 regarding the alleged infringement of your client's IP; however, in your letter you stated that we received an April 8, 2021 cease and desist and I cannot find that letter anywhere in our file. Can you please send me a copy of that letter at your convenience. I will discuss with my client and respond to you but I would ask for an extension on your current June 1 response date as it will likely take more time than 2 business days for my client to respond and/or complete the tasks that you are asking of them. I look forward to hearing from you.

Jeff

Jeff Meyerson
15205 N. Kierland Blvd, Suite 200
Scottsdale, AZ 85254
Phone: 602-606-9305



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From: [Beth Stanfield](#)
To: [Jeff Meyerson](#)
Cc: [David Morris](#); [Lyle Gravatt](#); [Jennifer Reynolds](#)
Subject: RE: Blueacorn demand letter
Date: Friday, May 28, 2021 10:27:00 AM
Attachments: [image003.png](#)
[image004.png](#)

Good morning Jeff:

Thank you for your email. We are happy to provide a copy of the April 8, 2021 letter, and my paralegal Jen Reynolds, copied here, will do so. In the meantime, could you please clarify for us the specific individuals and entities you represent and further indicate whether they are, in fact, operating the "Blue Acorn PPP" business, including all advertising, marketing, websites, sales, customer service, etc. As I am sure you can understand from the nature of our initial letter, the lack of response and escalated degree of confusion has created an imminent need for intervention. Once we receive clarification on these items, we will discuss your request for some additional time to respond to our second Cease & Desist letter.

Thanks, Beth.



BETH A. STANFIELD
Attorney | Litigation Practice Group Leader

105 Grace Street, Suite 101
Wilmington, NC 28401
(910) 408-3260 [phone + fax]
(704) 301-4050 [cell phone]
beth.stanfield@forrestfirm.com | www.forrestfirm.com

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From: Jeff Meyerson <Meyerson@radixlaw.com>
Sent: Thursday, May 27, 2021 6:12 PM
To: Beth Stanfield <beth.stanfield@forrestfirm.com>
Cc: Jeff Meyerson <Meyerson@radixlaw.com>
Subject: Blueacorn demand letter

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From: [Jennifer Reynolds](#)
To: [Beth Stanfield](#); [Jeff Meyerson](#)
Cc: [David Morris](#); [Lyle Gravatt](#)
Subject: RE: Blueacorn demand letter
Date: Friday, May 28, 2021 10:35:37 AM
Attachments: [image006.png](#)
[image001.png](#)
[image002.png](#)
[4.8.2021 blueacorn.co Correspondence via FedEx.pdf](#)

Good Morning:

Per your request, attached please find a copy of the April 8, 2021 cease and desist letter.

Thank you,
Jen



JENNIFER REYNOLDS
Greensboro Legal Assistant | Office Manager

125 S. Elm Street, Suite 100
Greensboro, NC 27401
(336) 275 - 6344 [phone + fax]

105 Grace Street, Suite 101
Wilmington, NC 28401

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Sent: Friday, May 28, 2021 10:28 AM
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Cc: David Morris <david.morris@forrestfirm.com>; Lyle Gravatt <lyle.gravatt@forrestfirm.com>; Jennifer Reynolds <jennifer.reynolds@forrestfirm.com>
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From: [Jeff Meyerson](#)
To: [Beth Stanfield](#)
Cc: [David Morris](#); [Lyle Gravatt](#); [Jennifer Reynolds](#)
Subject: RE: Blueacorn demand letter
Date: Friday, May 28, 2021 12:04:36 PM
Attachments: [image001.png](#)
[image002.png](#)
[image360349.png](#)

[EXTERNAL E-MAIL - USE CAUTION]

Beth,

Are you available for a call today?

Jeff

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Cc: David Morris <david.morris@forrestfirm.com>; Lyle Gravatt <lyle.gravatt@forrestfirm.com>; Jennifer Reynolds <jennifer.reynolds@forrestfirm.com>
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To: [Jeff Meyerson](#)
Cc: [David Morris](#); [Lyle Gravatt](#); [Jennifer Reynolds](#)
Subject: RE: Blueacorn demand letter
Date: Friday, May 28, 2021 12:25:00 PM
Attachments: [image004.png](#)
[image002.png](#)

Jeff:

I am tied up until around 2 pm eastern but will be available then. Is that 11 am your time?



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Subject: RE: Blueacorn demand letter

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From: [Jeff Meyerson](#)
To: [Beth Stanfield](#)
Cc: [David Morris](#); [Lyle Gravatt](#); [Jennifer Reynolds](#)
Subject: RE: Blueacorn demand letter
Date: Friday, May 28, 2021 12:27:42 PM
Attachments: [image001.png](#)
[image002.png](#)
[image588122.png](#)

[EXTERNAL E-MAIL - USE CAUTION]

Yes. Call me when you are available.

Jeff

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Scottsdale, AZ 85254
Phone: 602-606-9305



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From: Beth Stanfield <beth.stanfield@forrestfirm.com>
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To: Jeff Meyerson <Meyerson@radixlaw.com>
Cc: David Morris <david.morris@forrestfirm.com>; Lyle Gravatt <lyle.gravatt@forrestfirm.com>; Jennifer Reynolds <jennifer.reynolds@forrestfirm.com>
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From: [Jennifer Reynolds](#)
To: [Jeff Meyerson](#)
Cc: [Beth Stanfield](#); [Katie Greene \(katie.greene@forrestfirm.com\)](#); [Lyle Gravatt](#); [David Morris](#); [Thomas Babel](#)
Subject: [encrypt] EDNC Case No. 5:21-cv-00251-BO, Beringer Commerce, Inc. d/b/a Blue Acorn iCi v. Fin Cap, Inc. d/b/a "Blueacorn.co", et al
Date: Friday, June 11, 2021 3:06:00 PM
Attachments: [image003.png](#)

Dear Mr. Meyerson:

Enclosed we are providing to you a courtesy copy of Beringer Commerce, Inc. d/b/a Blue Acorn iCi's filings against Defendants Fin Cap, Inc. d/b/a Blueacorn.co, Blue Acorn PPP, LLC, Blue Oak Forest, LLC, Michael S. Cota, James Flores, Stephanie Hockridge Reis and Nathan Reis. Please let us know if you can accept service for these named Defendants. We will provide a password under separate cover to the encrypted link below.

If you have any questions, please do not hesitate to contact us.

Thank you,
Jen



JENNIFER REYNOLDS
North Carolina State Bar Certified Paralegal

125 S. Elm Street, Suite 100
Greensboro, NC 27401
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From: [Jennifer Reynolds](#)
To: [Jeff Meyerson](#)
Cc: [Beth Stanfield](#); [Katie Greene \(katie.greene@forrestfirm.com\)](#); [Lyle Gravatt](#); [David Morris](#); [Thomas Babel](#)
Subject: [encrypt] EDNC Case No. 5:21-cv-00251-BO, Beringer Commerce, Inc. d/b/a Blue Acorn iCi v. Fin Cap, Inc. d/b/a "Blueacorn.co", et al
Date: Friday, June 11, 2021 3:08:25 PM
Attachments: [image001.png](#)

Password for the provided encrypted link is

Thank you,
Jen



JENNIFER REYNOLDS
North Carolina State Bar Certified Paralegal

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From: [Jeff Meyerson](#)
To: [Jennifer Reynolds](#); [Beth Stanfield](#)
Cc: [Michael B. Dvoren](#); [Jonathan Frutkin](#); [Jeff Meyerson](#)
Subject: Trademark counsel
Date: Friday, June 11, 2021 4:07:04 PM
Attachments: [image066474.png](#)

[EXTERNAL E-MAIL - USE CAUTION]

Beth and Jennifer,

Can you please copy Michael Dvoren (mbd@jaburgwilk.com) on all future communications related to the trademark issues including providing him with the lawsuit documents you just sent me. He is the company's trademark counsel and will be addressing these issues moving forward. Thanks!

Jeff

Jeff Meyerson
15205 N. Kierland Blvd, Suite 200
Scottsdale, AZ 85254
Phone: 602-606-9305



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From: [Beth Stanfield](#)
To: [Jeff Meyerson](#); [Jennifer Reynolds](#)
Cc: [Michael B. Dvoren](#); [Jonathan Frutkin](#); [Lyle Gravatt](#); [Katie Greene](#); [Thomas Babel](#)
Subject: RE: Trademark counsel
Date: Friday, June 11, 2021 4:17:00 PM
Attachments: [image003.png](#)
[JUNE 11, 2021 ORDER GRANTING TRO.pdf](#)
[image002.png](#)
Importance: High

Jeff:

We are happy to do so. In the meantime, the Honorable Terrence Boyle assigned to this matter has reviewed the pleadings and our Motion for Temporary Restraining Order. A copy is attached. Please provide us with confirmation of compliance with each item of this Order by Monday, June 14, 2021.

Thank you, Beth.

/s/



BETH A. STANFIELD
Attorney | Litigation Practice Group Leader

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Wilmington, NC 28401
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(704) 301-4050 [cell phone]
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From: Jeff Meyerson <Meyerson@radixlaw.com>
Sent: Friday, June 11, 2021 4:07 PM
To: Jennifer Reynolds <jennifer.reynolds@forrestfirm.com>; Beth Stanfield <beth.stanfield@forrestfirm.com>
Cc: Michael B. Dvoren <mbd@jaburgwil.com>; Jonathan Frutkin <jfrutkin@radixlaw.com>; Jeff Meyerson <Meyerson@radixlaw.com>
Subject: Trademark counsel

[EXTERNAL E-MAIL - USE CAUTION]

Beth and Jennifer,

Can you please copy Michael Dvoren (mbd@jaburgwilk.com) on all future communications related to the trademark issues including providing him with the lawsuit documents you just sent me. He is the company's trademark counsel and will be addressing these issues moving forward. Thanks!

Jeff

Jeff Meyerson
15205 N. Kierland Blvd, Suite 200
Scottsdale, AZ 85254
Phone: [602-606-9305](tel:602-606-9305)



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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:21-CV-251-BO

BERINGER COMMERCE, INC. d/b/a)
BLUE ACORN iCi,)
)
Plaintiff,)
v.)
)
FIN CAP, INC. d/b/a "BLUEACORN.CO";)
BLUE ACORN PPP, LLC; BLUE OAK)
FOREST, LLC; MICHAEL S. COTA;)
JAMES FLORES; STEPHANIE)
HOCKRIDGE REIS; and NATHAN REIS,)
)
Defendants.)

ORDER

This cause comes before the Court on plaintiff's motion for a temporary restraining order and preliminary injunction pursuant to Rule 65 of the Federal Rules of Civil Procedure.

Plaintiff commenced this action on June 10, 2021, by filing a verified complaint alleging claims for trademark infringement, copyright infringement, cybersquatting, and unfair and deceptive trade practices. Plaintiff does business as Blue Acorn iCi and owns the registered trademark BLUE ACORN ICI, copyright of the "blue acorn" logo and artwork, and all associated intellectual property rights relating to plaintiff's "blue acorn" brand. Plaintiff alleges that defendants are operating an infringing "blue acorn" business by using unregistered logos, marks, and images that are nearly identical or confusingly similar to plaintiff's "blue acorn" intellectual property. Plaintiff further alleges that in March 2021 defendants flooded the market with their infringing "blue acorn" mark in similar channels of commerce as plaintiff's goods and services which has caused significant actual consumer confusion. Plaintiff alleges that it has recently been

inundated with complaints related to defendants' business based upon consumers' mistaken belief that plaintiff is or is associated with defendants' business. Plaintiff contends that due to the nature of the complaints and defendants' failure to provide any customer service or method by which to address its customer complaints defendants are damaging the goodwill and value associated with plaintiff's "blue acorn" brand.

Plaintiff, by its motion and verified complaint, and the exhibits attached thereto, has demonstrated that temporary injunctive relief is warranted. Specifically, plaintiff has sufficiently demonstrated on the basis of its pleadings that it will suffer irreparable injury in the form of actual consumer confusion, the likelihood of continued consumer confusion, plaintiff's inability to conduct its own business affairs due to the volume of defendants' customer complaints directed to plaintiff, and serious reputational harm such that temporary emergency relief is warranted.

Plaintiff has further demonstrated that *ex parte* relief is warranted. It has demonstrated that immediate and irreparable injury, loss, or damage will result before the defendants can be heard in opposition in light of the ongoing damage to plaintiff's reputation caused by the actual confusion experienced by defendants' consumers. Plaintiff has also shown that notice should not be required as plaintiff has recently sent two cease and desist letters to defendants who have continued in their alleged unauthorized use of infringing logos, marks, and images. Although counsel for one defendant contacted plaintiff's counsel following receipt of the second cease and desist letter, plaintiff alleges that "defendants were unwilling to cease infringing activity and offered no alternative solution to address the ongoing confusion and damages to plaintiff." [DE 1 ¶ 122].

Accordingly, it is hereby ORDERED that defendants shall:

1. Cease, desist, and refrain from all use of the words "acorn," "blue acorn," or "blueacorn" or any of their formatives in any manner and on any print or electronic platform of any kind, including but not limited to any website, social media platforms, or any online or print advertising or marketing materials;

2. Cease, desist, and refrain from all use of any acorn images, including a copy of the Acorn Logo, in any manner, including but not limited to any electronic platform, any advertising, and on any public forum;

3. Place a prominent disclaimer on the landing or home page for all websites associated with defendants' business explaining that the website and services at issue are not affiliated with, sponsored by, or otherwise connected to Blue Acorn iCi;

4. Set up an actively monitored email address and dedicated customer service line for customer inquiries and maintain sufficient trained personnel to monitor and respond to such inquiries on a timely basis;

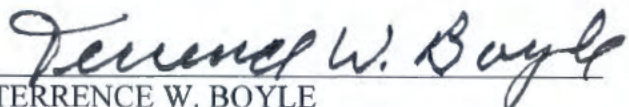
5. Provide detailed information that is prominently displayed on all websites associated with defendants' business, explaining how, where, and when to contact defendants by phone and by email.

This temporary restraining order shall remain in effect for fourteen days from the date of entry of this order. A hearing on plaintiff's request for a preliminary injunction is set for June 25, 2021, at 11:00 a.m./~~p.m.~~ at U.S. District Court Savannah City, North Carolina.

Plaintiff is hereby ORDERED to provide a security in the amount of \$1,000.00 to pay the costs and damages of any party found to have been wrongfully enjoined or restrained.

Plaintiff, through its counsel, is further ORDERED to serve a copy of this order on all defendants, including their respective counsel if known, and file proof of service of the same prior to the hearing on the motion for preliminary injunction.

SO ORDERED, this 11 day of June, 2021, at 3:00 p.m.


TERRENCE W. BOYLE
UNITED STATES DISTRICT JUDGE

From: [Jeff Meyerson](#)
To: [Beth Stanfield](#)
Cc: [Jonathan Frutkin](#); [Michael B. Dvoren](#); [Jeff Meyerson](#)
Subject: Blueacorn
Date: Monday, June 14, 2021 6:07:38 PM
Attachments: [image449613.png](#)

[EXTERNAL E-MAIL - USE CAUTION]

Beth,

Our clients (Fin Cap, Inc., Blue Acorn PPP, LLC and Blue Oak Forest, LLC only) are working diligently to comply with the TRO. They've already placed a conspicuous disclaimer on the <https://blueacorn.co/> home page and have a dedicated support page linked from the disclaimer to <https://blueacorn.co/support/>. They've also changed the logo on the YouTube channel (see <https://www.youtube.com/channel/UCAiOYwr-WYtOisKibpOI3lg>). Other actions are still in progress. We'll update you as those advance.

All of our clients' rights and remedies are expressly reserved.

Thanks,
Jeff

Jeff Meyerson
15205 N. Kierland Blvd, Suite 200
Scottsdale, AZ 85254
Phone: 602-606-9305



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Jennifer Reynolds

From: Beth Stanfield
Sent: Monday, June 14, 2021 7:41 PM
To: Jeff Meyerson
Cc: Jonathan Frutkin; Michael B. Dvoren; Lyle Gravatt; Katie Greene; Thomas Babel; Jennifer Reynolds
Subject: RE: Blueacorn

Importance: High

Jeff:

I appreciate the update. However, use of any iteration of the “blue acorn” name, including maintaining any website with any “blue acorn” component, is prohibited by Judge Boyle’s Order. In addition, I am still seeing the following infringing “blue acorn” logo on all (or almost all) of the websites your client is using.



Removing this logo from all websites or other materials may be the other actions you were referring to, but specific confirmation is needed.

Can you confirm that the infringing websites and logos will be taken down by tomorrow?

Thanks, Beth.



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From: Jeff Meyerson <Meyerson@radixlaw.com>
Sent: Monday, June 14, 2021 6:07 PM
To: Beth Stanfield <beth.stanfield@forrestfirm.com>
Cc: Jonathan Frutkin <jfrutkin@radixlaw.com>; Michael B. Dvoren <mbd@jaburgwilk.com>; Jeff Meyerson

<Meyerson@radixlaw.com>

Subject: Blueacorn

[EXTERNAL E-MAIL - USE CAUTION]

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Our clients (Fin Cap, Inc., Blue Acorn PPP, LLC and Blue Oak Forest, LLC only) are working diligently to comply with the TRO. They've already placed a conspicuous disclaimer on the <https://blueacorn.co/> home page and have a dedicated support page linked from the disclaimer to <https://blueacorn.co/support/>. They've also changed the logo on the YouTube channel (see <https://www.youtube.com/channel/UCAiOYwr-WYtOisKibpOI3lg>). Other actions are still in progress. We'll update you as those advance.

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Jennifer Reynolds

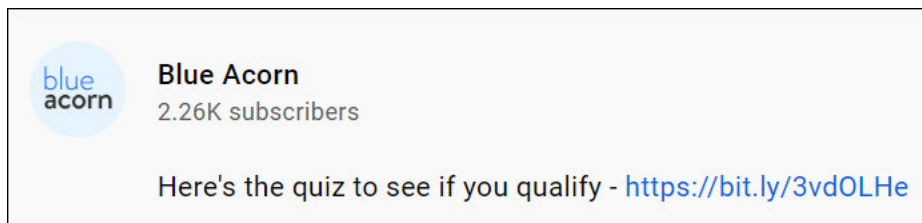
From: Beth Stanfield
Sent: Monday, June 14, 2021 8:10 PM
To: Jeff Meyerson
Cc: Jonathan Frutkin; Michael B. Dvoren; Lyle Gravatt; Katie Greene; Thomas Babel; Jennifer Reynolds
Subject: RE: Blueacorn

Importance: High

Jeff and Michael:

Unfortunately, I need to bring two more items to your attention.

First, we again appreciate your client's removal of the infringing Acorn Logo image from the landing page for your client's video on YouTube. However, for reasons that are entirely confounding, your client merely replaced the infringing Acorn Logo **with yet another infringing mark.**



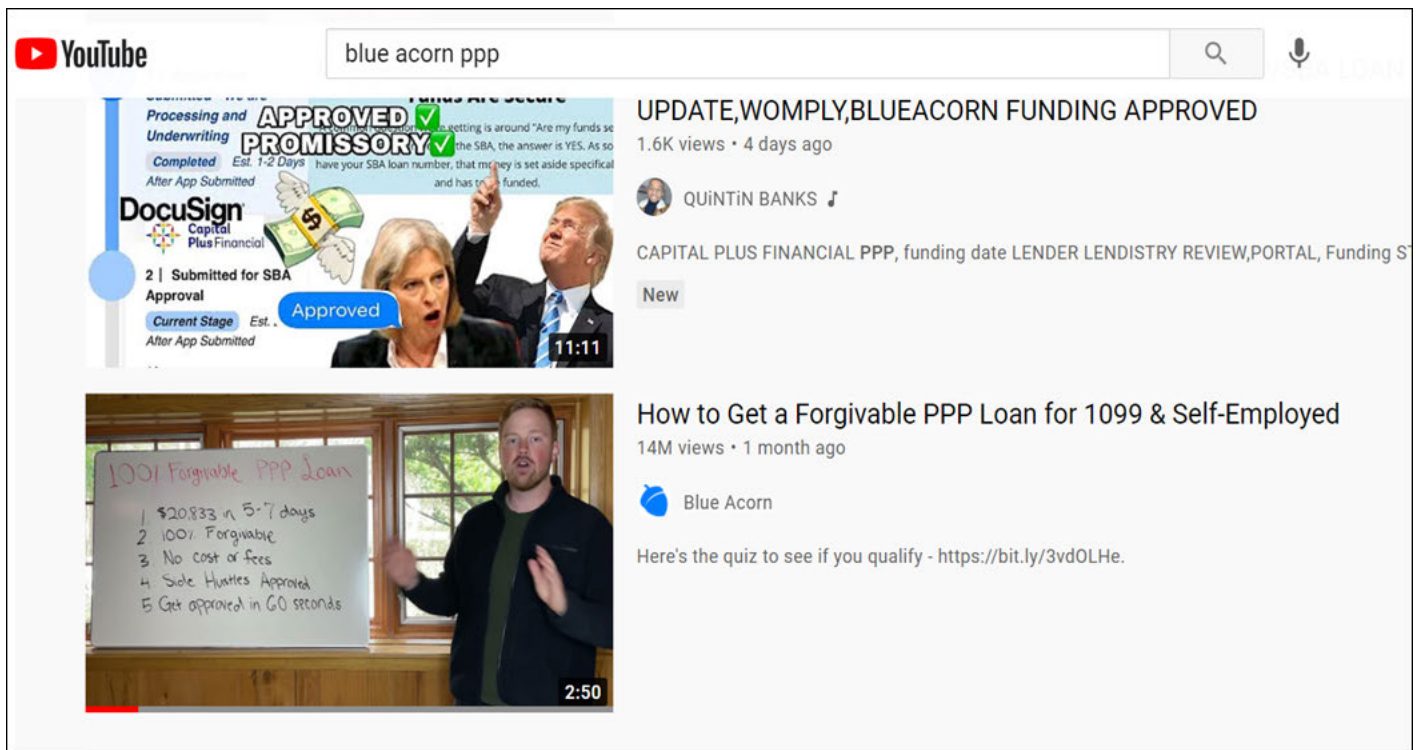
Not only is this ineffectual in curing the ongoing infringement and confusion, it continues to perpetuate it, in clear violation of Paragraph 1 of Judge Boyle's Order:

Accordingly, it is hereby ORDERED that defendants shall:

1. Cease, desist, and refrain from all use of the words "acorn," "blue acorn," or "blueacorn" or any of their formatives in any manner and on any print or electronic platform of any kind, including but not limited to any website, social media platforms, or any online or print advertising or marketing materials;

The Court's order is unambiguous and absolutely requires your client to cease and desist from using the "blue acorn" name—full stop. It has now been over three full days since this Order was issued. While we understand IT steps must be taken to effectuate the relief ordered, your client's replacement of the Acorn Logo with the equally infringing "blue acorn" name is both concerning and confounding. While this is likely obvious to everyone on this email, a contempt motion will follow if these issues are not immediately addressed.

Second, while it appears your client has taken measures to remove the blue Acorn Logo from the YouTube post, it still remains on the search result page available through YouTube when “blue acorn ppp” is searched:



Retention of the Acorn Logo on this page may have been an oversight, but it also needs to be addressed in short order.

Thanks, Beth.



BETH A. STANFIELD
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Cc: Jonathan Frutkin <jfrutkin@radixlaw.com>; Michael B. Dvoren <mbd@jaburgwilk.com>; Lyle Gravatt <lyle.gravatt@forrestfirm.com>; Katie Greene <katie.greene@forrestfirm.com>; Thomas Babel <thomas.babel@forrestfirm.com>; Jennifer Reynolds <jennifer.reynolds@forrestfirm.com>
Subject: RE: Blueacorn
Importance: High

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I appreciate the update. However, use of any iteration of the “blue acorn” name, including maintaining any website with any “blue acorn” component, is prohibited by Judge Boyle’s Order. In addition, I am still seeing the following infringing “blue acorn” logo on all (or almost all) of the websites your client is using.



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To: Beth Stanfield <beth.stanfield@forrestfirm.com>
Cc: Jonathan Frutkin <jfrutkin@radixlaw.com>; Michael B. Dvoren <mbd@jaburgwilk.com>; Jeff Meyerson <Meyerson@radixlaw.com>
Subject: Blueacorn

[EXTERNAL E-MAIL - USE CAUTION]

Beth,

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All of our clients' rights and remedies are expressly reserved.

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Jeff

Jeff Meyerson
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Phone: 602-606-9305



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From: Chris Blake <chris.blake@nelsonmullins.com>
Sent: Tuesday, June 15, 2021 4:36 PM
To: Beth Stanfield <beth.stanfield@forrestfirm.com>
Cc: John McElwaine <john.mcelwaine@nelsonmullins.com>
Subject: Beringer Commerce Inc. d/b/a Blue Acorn iCi v. Fin Cap, Inc. d/b/a "Blueacorn.co", et al., EDNC, Case No. 5:21-cv-251-BO

[EXTERNAL E-MAIL - USE CAUTION]

Beth,

Thanks for your time on the phone. This will confirm that Nelson Mullins has been retained to represent the corporate defendants named in the referenced lawsuit, Fin Cap, Inc. d/b/a "Blueacorn.co", Blue Acorn PPP, LLC and Blue Oak Forest, LLC. As I mentioned on the phone, we were just retained this afternoon and are diligently working to get up to speed on the matters in dispute. Based on what we are currently aware of, we are considering the filing of a Motion to Dissolve the TRO which we intend to file no later than the close of business on Thursday.

My full contact information is below. I am copying my partner John McElwaine so you have his email address, and John's office number in Charleston is 843-534-4302.

Best regards,

CHRISTOPHER J. BLAKE [PARTNER](#)
chris.blake@nelsonmullins.com

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NELSONMULLINS.COM [VCARD](#) [VIEW BIO](#)

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