

EXHIBIT B

Lisa Meador (States Attorney)

From: Lisa Meador (States Attorney)
Sent: Monday, July 11, 2016 4:21 PM
To: Hays, Brian; Thomas Nowinski (States Attorney)
Cc: Fross, Roger; Cardelle B. Spangler; Matthew Pryor (mpryor@shakmancompliance.com)
Subject: RE: Recorder Draft Motion

Brian-

I will forward this to Ed and Cedric, as well as Jim Gleffe, General Counsel for the Recorder. I will be in touch after I have had an opportunity to discuss this with my client.

Thank you,
Lisa

Lisa Meador
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From: Hays, Brian [<mailto:BHays@lockelord.com>]
Sent: Monday, July 11, 2016 3:38 PM
To: Lisa Meador (States Attorney); Thomas Nowinski (States Attorney)
Cc: Fross, Roger; Cardelle B. Spangler; Matthew Pryor (mpryor@shakmancompliance.com)
Subject: Recorder Draft Motion

Lisa

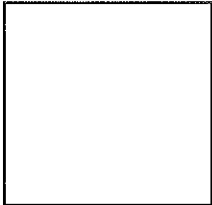
Pursuant to Judge Schenkier’s standing orders, attached is a draft Motion for Rule to Show Cause asking the court to allow discovery and to order Ed Michalowski and Cedric Giles to respond under oath to the violations set forth in the motion and in the RCA reports to explain to the court why they should not be held in civil contempt. Please call me after you have had a chance to review this with your client to see if we can resolve this short of filing.

Would you please forward a copy of the motion to Ed and Cedric? I understand that you do not represent them in their individual capacities and likely will not be able to due to the conflict of interest with the Recorder’s Office. But you do have a relationship with them and can explain the conflict process. Please ask them to contact me or have their counsel contact me so that we can begin the meet and confer process as required by Judge Schenkier. If you would prefer that I send the motion to Ed and Cedric directly, please let me know.

Best regards,

Brian

Brian I. Hays
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