



October 30, 2022

Via Email and Hand Delivery (10/31/22)

[REDACTED]
[REDACTED]

Re: Reminder of Your Termination on Wednesday, October 26, 2022, 4:47 PM

Mr(s). Fairfax and Martin:

As the attorney of fact and legal representative for the Estate of Donovan Lynch and Wayne Lynch ("Estate), and Wayne Lynch (in his personal capacity and as administrator of the Estate), I am writing to remind you that your services and the retainer outlined in your October 6, 2022 (attached) retainer agreement were terminated by email from Wayne Lynch on Wednesday, October 26, 2022, at 4:47pm (attached). I also sent an email at 2:21pm that same day directing you to cease all representation of the Estate and to send me all the files Mr. Lynch and the Estate are entitled to (attached). You have not responded to either email and have not sent any files.

Since then, Wayne and I have both sent emails reminding you that you no longer represent the Estate. Yet, you continue to mislead the court. You have not responded to any of the necessary requests I have made for the details of the case or even the files. Therefore, the Estate is not able to secure new trial counsel as a result. Your actions since you became trial counsel for the Estate have been reckless, fraudulent, intentional and have caused the Estate and the Lynch family great financial and emotional stress.

You have interfered with the progression of this case for both sides by your actions. You both have known from the outset of my legal role in this case, yet you represented the opposite on behalf of the Estate. The October 26, 2022, letter from opposing counsel (attached) quotes you as representing "that they do not speak for you or otherwise have an affiliation with you." As you know, Wayne and I could provide you with numerous texts and emails that show the contrary to be true. The most obvious example is your October 6 retainer signed by Wayne Lynch as administrator of the Estate, and me as the legal representative of the Estate. That is certainly an "affiliation".

[REDACTED]



Furthermore, you planned depositions in secret- not notifying me or Mr. Lynch of anything related to them, not to mention attend them.

This morning you texted Wayne Lynch and misrepresented the purpose of the hearing and inferring that Judge Krask wants you to stay on the case. That is not true. I am the legal representative of the Estate. I have been since its inception. I am baffled as to why you still feel the need to misrepresent yourself. I am also in contact with the attorneys for the opposing party. You are currently the attorney of record in this case because there has not been substitution of counsel filed. Your actions since last Wednesday (including not giving us the file) have made it tremendously difficult to find new counsel. It is almost as if you hijacked or kidnapped this case for your own personal intentions.

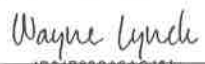
I am writing you to advise you to *cease all contact with my client* going forward. Mr. Lynch and the Lynch family have been through enough. They need their lawyers to work for them and not against them. I have been doing just that for them for a long time at great personal sacrifice to me and my family as well, to get them the justice they deserve. I do not understand why you felt the need to proceed with the case in this manner, but it certainly was not in the name of justice or the Estate.

Govern yourselves accordingly,

DocuSigned by:

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Jeff Reichert
Attorney for the
Estate of Donovan Wayne Lynch and Wayne Lynch

DocuSigned by:

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Wayne Lynch
Administrator of the Estate of Donovan Wayne Lynch

[REDACTED]