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EMAILED
DATE: 10/3
TIME: 10:26 am

October 3, 2017

VIA EMAIL & U.S. MAIL

Mr. Michael Elbery
elbery@roadrunner.com

RE: June Elbery Estate

Michael:

In response to your Motion to Compel Document discovery, the November to December, 2016 bank statements for accounts ending in #176 and 869 have been ordered from Santander. A review of bank statement for Acct #176 shows that there is only a difference of \$28.02 from ending balance on November 2, 2016 and the beginning balance of December 3, 2016 which most likely represents an interest payment.

I spoke to Santander Bank and there have been only 21 checks written on Acct. #5869. Checks #102, 103, 104, 105, 106, 107, 108, 109, 114, 115, 117, 119 were not written or presented for payment. This could have been easily verified by a review of the bank statements provided to you.

A copy of all checks written on Acct. #5869 both front and back have been requested from Santander.

Copies of Santander Acct. #179 for July 3 through September 3, 2017 are produced herewith.

Copies of Santander Acct. #869 for July 3 to September 3, 2017 are produced herewith.

In response to your question concerning Schedule B, Line Items 8, 9, 10, 11, 12 do not have checks associated with those line items. Those line items reflect charges against the shares of the individuals. Kathleen was charged \$2,000 for trains which you are aware of and Line Items 9—11 are charges to the shares of Kathleen, David, and Joyce as their pro rata contribution to the payment of the MA Estate Tax for their receipt of non-probate assets. Line Item #12 is a payment due to me for legal fees accrued after December, 2016 to June, 2016 but not yet paid.

Please be advised that I will be filing a Motion to have my legal fees in responding to the Motion to Compel assessed against you at the hearing on October 16, 2017.

A handwritten signature in blue ink, appearing to read 'J. McLaughlin', written in a cursive style.

James A. McLaughlin

hm

enc.

elberym-email100317