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BY EMAIL ATTACHMENT

October 9, 2018

Richard Haddad
Otterbourg P.C.
230 Park Avenue
New York, NY 10169

Re: Index # 159222/2018
Request for Resolution Prior to Sanctions Under Local Rule V.(A)

Attorney Haddad,

Local rule V.(A) of the Courtroom of Hon. Justice Carmen Victoria St. George requires that the moving party first attempt to resolve a matter of impropriety before sanctions can be applied.


Accordingly, I hereby request that you either:

- 1) **Withdraw the Complaint entirely; or**
- 2) **Amend the Complaint as follows:**

Remove all extraneous and irrelevant personal material;
Clearly state the grounds for personal jurisdiction in New York;
State with particularity my supposedly defamatory statements and fraud;
Explain how I breached a contract to which I was not a party; and
Provide a bill of particulars as to how damages equal \$23 million.

If you do this, I will withdraw my request for sanctions.

If you do not agree to this, please inform me as soon as possible, as I plan to ask for an expedited briefing schedule.


Doug Litowitz