

Subject: Re: Nickse/Daniel
Date: Tuesday, October 27, 2015 4:12 pm
From: Kenneth Lindauer <ken@lindauerlaw.com>
To: John Moorman <jmoorman@metaxasbrown.com>
Cc: Jane Daniels <0404@comcast.net>

John:

19

I thought your email of yesterday indicated you wanted a reply by tomorrow afternoon.

That being said, I'll get back to you by then.

Ms Daniel has no intention to violate the Judge's Order.

Ken

Sent from my iPhone

On Oct 27, 2015, at 4:06 PM, John Moorman <jmoorman@metaxasbrown.com> wrote:

Hey Ken – Sent you a letter yesterday, per Judge Bisenius order we were actually supposed to agree on a realtor by today, but figured I'd wait until the end of the day tomorrow. I fully don't expect Ms. Daniel to cooperate, as this has apparently been her M.O. in the past. If I don't hear from you by close of business tomorrow – 5 p.m. – I will have no choice but to proceed accordingly. I will file an emergency motion seeking relief, asking the court to appoint a realtor and/or special master – at Ms. Daniel's expense – allowing them immediate access to the property, allowing them to change the locks, issuing an order for Ms. Daniel to immediately vacate the property and/or be incarcerated, etc. And also seeks attorney's fees and costs. Don't think Judge Bisenius will be too pleased, so I hope it's not necessary.

If I have to do this, I will do my best to get the pleading(s) to you by Thursday, and at this point will plan to present the motion Friday morning in case you want to be there. Please get back to me as soon as possible. Thanks

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