

- Aaron A Pelley

Aaron A Pelley | Cultiva Law PLLC

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On Mar 14, 2018, at 1:44 PM, Anne van Leynseele <anne@nwmjlaw.com> wrote:

Dear Aaron -

Thank you for your email, there are still several outstanding issues under our Settlement Agreement (SA).

1. All of the contents of the Oregon office is the property of **NWMJ Law** (^{NWMJ}). I will be at the Portland office on Sunday, March 18, 2018 around 11:00 am to remove everything. Because I am no longer on the lease, you must either be there yourself or have an agent there to allow me and my movers unfettered access. If your employee and contractor have personal possessions in the office, those should be removed for the weekend. If you can provide a receipt for any item not paid for by ^{NWMJ} you may also remove it. I will catalogue all items and any items not present and paid for by ^{NWMJ} will either need to be returned to the ^{NWMJ} Seattle Office by EOB Monday, March 19 or I will send a bill for reimbursement. There are several This also, includes the phone you removed and had programmed for an undisclosed location during the week of February 5, 2018. See SA Section 14.5.
2. The current website and use of ^{NWMJ}'s SEO for Cultiva is not compliant in numerous ways. Users searching for ^{NWMJ} are directed to Cultiva Law; your use of copyright protected images created for ^{NWMJ} locking KindTyme out of access, and the confusion created by the mishandling of the SEO must be repaired by EOB Monday, March 19, 2018. I have an expert who stated that the current situation is doing damage to both our companies. See SA Sections 6.1.3; 7.8.3; and

screenshots folder

3. Attached is a folder with the four social media sources belonging to NWMJ that you have altered. See SA Sections 6.1.3; 7.8.3; and screenshots folder

Google plus: You must detach the search result such that when a user searches NWMJ Cultiva does not appear in conjunction with NWMJ You must also remove all references to me, [REDACTED] [REDACTED] or any current employee of NWMJ

Twitter: You must remove all references to me, [REDACTED] [REDACTED] or any current employee of NWMJ as well as images taken by me or any current employee of NWMJ for the promotion of NWMJ

Instagram: You must remove all references to me, [REDACTED] [REDACTED] or any current employee of NWMJ as well as images taken by me or any current employee of NWMJ for the promotion of NWMJ

Facebook: You must remove all references to me, [REDACTED], or any current employee of NWMJ as well as images taken by me or any current employee of NWMJ for the promotion of NWMJ

All content posted under NWMJ s accounts is copyright protected and owned by NWMJ Once you have complied with these corrections, I will provide a waiver for the remaining content.

4. Included in your numerous downloads of the contents of the NWMJ server, you took firm property including: articles, PPT presentations , CLEs not written exclusively by Aaron Pelley, photos paid for by NWMJ (this includes all images from both photo shoots paid for by NWMJ thus the copyright is owned exclusively by NWMJ), NWMJ's Branding guide/Logos/Fonts, and the entire contents of the Partners folder, which includes personal items of mine. You must return all the following folders on a hard drive to the NWMJ Seattle office by EOB Monday, March 19, 2018. The folders that must be returned and all content removed from Cultiva's drives and your computer/s are:

ZZ NWMJ Law legacy

Rules and Regs Multi-State Guide

Publications

Projects

Power Point CLE Past

Office Financials

Maryland Business

Client Memos

Bar Communications

*Partners folder

5. Please provide email address for the six remaining Criminal cases so that NWMJ can send them disengagement notices. Once these are completed, we will begin working on the remaining clients. See SA Section 7.8.1
6. Please sign and return the paperwork removing you from the Seattle office lease. See SA Section 6.1.8
7. You brought the February parking permit, please return the March parking permit. See SA Section 6.1.5
8. On February 1, 2018, you deleted the client folder for [REDACTED] from the firm Google Drive, along with 104,684 other files. This client folder needs to be returned to the firm on a hard drive to the NWMJ Seattle office by EOB Monday, March 19, 2018.
9. When you returned the materials from Dick [REDACTED], there were no hard copy client files. I have personally seen Dick take notes during client meetings, I will expect that these files are in the Oregon office on Sunday, March 18, 2018 and files will be removed with the rest of the office contents. See SA Section 7.7
10. As for your request, you provided me general feedback on the proposed new copy for NWMJ. If you have any specific change requests, please send those to me. Once items 1-9 are resolved and I have reviewed the Cultiva website design for potential duplication of NWMJ's site design, I will instruct [REDACTED] to remove the NWMJ website written words and replace with the text you have reviewed. See SA Section 7.5

Please be aware that if these issues are not resolved by EOB Monday, March 19, 2018, I will seek a temporary order from JAMS and take any and all other measures necessary to enforce the terms agreed to. The Settlement Agreement states that the prevailing party is entitled to reimbursement for all expenses and legal costs incurred. This would include all expense incurred by a failed attempt to reclaim the Oregon office contents on Sunday, March 18, 2018, filings with social media entities, copyright lawyer for C&D, briefing for the temporary order, etc.

Please let me know that you intend to comply as requested herein with these agreed to terms of the Settlement Agreement.

Anne

<NWMJ:Cultiva Screenshots>

NWMJ Law has a new Washington phone number: **(206) 480-1700**. Please do us a favor and make this change in your contacts.

Anne van Leynseele | www.nwmj.com | (844) 873-6965

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[REDACTED]

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On Mar 13, 2018, at 3:41 PM, Aaron Pelley <aaron@culturalaw.com> wrote:

Pursuant to the settlement agreement, please remove the content from the **NWMJ Law** website.

- Aaron A Pelley

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