

LIST OF DOCUMENTS TRANSMITTED TO DISCIPLINARY COUNSEL & RELATED COMMUNICATIONS

HIRAMOTO

6/19/19 – Kennedy ltr re: April 2017 disciplinary complaint

7/29/19 – WLF to Katz letter & accompanying documents:

- Exhibit 1: 7/19/19 Kennedy ltr;
- Exhibit 2: SJM opposition memo;
- Exhibit 3: Opinion & Order granting SJM;
- Exhibit 4: WLF billing totals for JH, 2014 – 2017 – **see 1**

11/11/19 – Spero to WLF requesting 1) complete billing records; 2) all SJM filings; 3) cost estimates to JH; 4) emails or memoranda estimating damages/evaluation of case.

11/22/19 – NW & MR email discussion re: Spero's 11/11 letter

12/20/19 – MR emails Spero all documents (including emails & bills) to 4 categories over a series of emails (*No response or acknowledgement from Spero.* – **see 2**):

- Complete billing file, including monthly itemized statements;
- All filings related to SJM (Memo in Opposition to SJM; Statement of Facts; COS: Exhibits 1 – 60; Docket Sheet);
- All emails (8) between WLF & JH re: estimates for damages & likelihood of success.

7/14/20 – Spero to WLF ltr requesting complete bill for 2/5/15 & all intake documents

7/15/20 – MR & NW emails re: 7/14/20 ltr

7/24/20 – WLF ltr responds w/ complete 2/5/15 bill as requested & a note that there are no intake docs (MR emailed this to Spero) – **see 3**

7/24/20 – MR emails Spero a follow-up letter from NW w/ appellate brief – **see 4**

6/3/21 – Affidavit of Garth Dunkel w/ supporting memo from 9/13/16

***Notably, Judy Hiramoto had access to WLF's Cloud file throughout the lawsuit – i.e. her complete file with the firm.**

ALIBOZEK

1/17/20 – Spero ltr to WLF re: disciplinary complaint & requesting 8 categories of documents

2/27/20 – Spero & NW scheduling emails re: response to the complaint

3/17/20 – Spero & NW scheduling emails re: response to the complaint

3/20/20 – MR emails Spero two documents:

- All WLF emails with client regarding billing, from October 2017 to February 2019;
- Client's complete billing file – **see 5**

6/30/20 – Spero emails NW re: interview same day & requesting SJM filings

6/30/20 – MR emails Spero w/ all SJM filings + a copy of WLF's Pleading Index, "so that if there are additional documents you are seeking, you can easily identify them and I can provide them to you":

- Alibozek Pleading Index;
- GE's Motion for Judgment on the Pleadings on Count Two
- GE's Motion for Partial SJ;
- GE's Statement of Facts;
- WLF's SJM Opposition Memo;
- WLF's Statement of Facts; and
- Exhibits 1 – 11 of Statement of Facts – **see 6**

6/30/20 – MR emails Spero spreadsheet of complete billing file (repeat of what was provided on 3/20/20) – **see 7**

7/14/20 – Spero to WLF ltr requesting 1) bank record for retainer; 2) records of last communication w/ client re: retainer & account; 3) full bill for Oct. 2018; 4) all intake docs & other non-document requests

7/15/20 – MR & NW emails re: Spero's 7/14/20 ltr

7/24/20 – MR & NW emails re: response to Spero's ltr

7/24/20 – MR emails Spero w/ ltr from NW & all requested documents, including bills, emails, notes:

- Alibozek Retainer Fee Payments;
- Emails w/ client re: retainer & outstanding expenses;
- Emails with client in Oct/Nov 2018;
- 2015 & 2017 WLF notes on intakes. – **see 8**

8/6/20 – Spero to WLF ltr requesting 1) record of retainer remittance; 2) phone records; 3) bank record of transfer of retainer funds; 4) current engagement ltr + other non-document requests

8/13/20 – NW & MR emails re: Spero's 8/6/20 ltr

8/7 – 8/18/20 – NW, MR & client emails re: return of retainer

8/24 – 8/26/20 – NW & Sharyn Alibozek emails re: return of retainer

9/4/20 – S.A. confirms receipt of check

3/23/21 – S.A. requests complete file

3/23/21 & 3/24/21 – MR & NW emails re: Alibozeks' request for file

4/1/21 – MR & NW emails re: Alibozezs' delinquency in billing chronology; MR creates a chronology of client's complete billing history

4/2/21 -- **at the Alibozezs' request, Margaux gave them both access to a Google Drive with all files:** affidavits, documents from the AG's office, documents client separately provided to WLF, a complete billing file, a complete correspondence file, deposition transcripts, discovery productions from both parties, and all pleadings.

7/19/21 & 7/20/21 – MR & NW emails re: file provided to Alibozezs

10/18/21 – NW & MR emails re: emails and other documents provided to Spero for Alibozek & Hiramoto