

From: Chase Garrett <chase.garrett@solidcounsel.com>
To: Robert Newton <rnewton@rnnlaw.com>
Date: Wednesday, June 29, 2022 at 15:54
Subject: Mishkoff

Robert,

Hope all is well. I received the attached letter from Mr. Mishkoff today. It was also addressed to John Scheef as the firm's managing partner and to my client. By my calculation, he spent some \$26.85 on postage to transmit these three letters via "Priority Mail" in response to a pleading that was filed more than a month ago. Since I cannot correspond directly with Mr. Mishkoff, I write to you instead.

Mr. Mishkoff complains about my statement in Paragraph 9 of the Counterclaim where I wrote, "*He simply seems to enjoy exposing himself to her security cameras.*" Below that statement is a photograph taken from video footage of a security camera installed under Ms. Bryant's carport. You'll note in the picture that Mr. Mishkoff (obviously clothed) is staring directly into the camera and smiling. The allegation is that he not only trespasses on her property, but does so while evincing conspicuousness.

By including the photograph directly below the statement in Paragraph 9, where Mr. Mishkoff is appropriately clothed for the month of November, it should be clear to the reader that I was not suggesting that he was exposing his pudendum or that he enjoys the act of exhibitionism on his neighbor's property. Rather, by smiling and staring into her camera, he appears to be letting Mr. Bryant know that he knows he is being recorded on her property. Therefore, when I said that he seemed to enjoy exposing himself, that is all that was meant. This is not a statement that he exposed his bare sex organs or anything like that. I hope you can help him understand.

The statement in Paragraph 9, to the extent that it is anything more than my opinion on what Mr. Mishkoff enjoys, is therefore true.

Would you also tell him not to correspond directly with my client?

Respectfully,

T. Chase Garrett

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