



Palisair

5 messages

Marc Rohatiner <mrohatiner@wrslawyers.com>
To: Gregory Aldisert <galdisert@kwikalaw.com>

Wed, May 20, 2015 at 4:32 PM

Greg:

I believe we have agreement among the parties regarding the documents to be exchanged. As we discussed, I wanted to address the mechanics of making the plans available to you, your client and whatever consultant you choose to use. The Association has in its possession the plans that were preliminarily approved. It also has the plans approved by the city. Faryan is asking the Association to give final approval to those plans.

Faryan has consented to have your side review the plans that the association has. Alternatively or in addition, to the extent you want all or portions of those plans copied so that they can be reviewed "offsite" you can pay for copies. After the mediation, you will be required, however, to return what you copied. In what I hope will be the unlikely event of litigation, you will of course not be waiving you right to get copies through normal discovery.

I am going to check on the mediators' availability and I will coordinate the dates with you and Faryan. I have also been instructed to notify the carrier of the pending mediation and invite/encourage a representative to attend.

I will be in court tomorrow morning. Call me after 10 if you have any questions.

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Francine Kirkpatrick <DrFKirk@verizon.net>
To: Diana Ungerleider <dianaunger3@gmail.com>

Wed, May 20, 2015 at 4:41 PM

Diana,
Did this email get to you too? The "To" only lists Geg Aldisert and the "cc" isn't listed. Possibly Marc sent it to all of the board as "bcc". I pass it on as you will be the one to hand over the records and possibly copy the plans, etc.
Francine

From: Marc Rohatiner <mrohatiner@wrslawyers.com>
Date: Wednesday, May 20, 2015 at 4:32 PM
To: Gregory Aldisert <galdisert@kwikalaw.com>
Subject: Palisair

[Quoted text hidden]

Diana Ungerleider <dianaunger3@gmail.com>
To: Francine Kirkpatrick <DrFKirk@verizon.net>

Thu, May 21, 2015 at 8:18 AM

No , I didn't get this one. I've been getting Marc Rohatiner's emails and will save them for our records. Should they go on the admin website?

Diana
[Quoted text hidden]

Francine Kirkpatrick <DrFKirk@verizon.net>
To: Diana Ungerleider <dianaunger3@gmail.com>

Thu, May 21, 2015 at 9:14 AM

NO. AS IT'S ATTORNEY CLIENT PRIVILEGE MATERIAL I'D RATHER A SAFER PLACE.

I think we talked about just for now setting up some files on your computer for all this kind of stuff. I wouldn't feel comfortable in putting it on the Admin website for all board members to access – it's too delicate for such wide distribution over the years with changing board members. I'd rather a password safe file somewhere that only the president and secretary have access to. Had you ever talked to Chuck if a password safe file can be created within the Admin website? That would be a perfect

arrangement.
Francine

From: Diana Ungerleider <dianaunger3@gmail.com>

Date: Thursday, May 21, 2015 at 8:18 AM

To: ">" <drfkirk@verizon.net>

Subject: Re: FW: Palisair

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Diana Ungerleider <dianaunger3@gmail.com>

Thu, May 21, 2015 at 1:37 PM

To: Francine Kirkpatrick <DrFKirk@verizon.net>

I haven't asked Chuck about creating a password-protected file within the website but I will.
For now, I'll keep these kinds of emails in a file on my computer.

Diana

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