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28 January 2020

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Sent by: Email only
Our Client: Global Marketing Associates LLC

Dear Madam,

Re: GC 196 of 2019

We acknowledge receipt of your letter dated 18 December 2019 and affidavit of Alan Hall served on behalf of your client on 10th January 2020.

Subject to consent to the proposed course of action below we will make application to fix an appointment for trial date in due course.

Request for Financial Records

Our client agrees that it is unfortunate that this matter has ended in litigation. We believe the correspondence sent on behalf of our client amply demonstrates that the fault for this occurring is at the door of the ExCo incumbents at the time the requests were made.

The concessions in your letter with respect to inspection and review of the books of account are welcomed and we suggest the following procedure for the provision of same:

1. The parties agree on terms of the financial request between members of the ExCo and the plaintiff without the involvement of Attorneys within 40 days of the date of this letter;
2. To facilitate this the parties will agree a stay of proceedings to allow this meeting to take place and an agreement reached on the terms of the request;
3. Upon an agreement being reached on the terms of the disclosure and the documents handed over the matter should be concluded.
4. If no agreement is reached on the scope of the disclosure the litigation can move forward;

It is clearly not acceptable that our client discontinues his litigation prior to knowing what documents your client is prepared to allow inspection and/or production of and could well simply end in further litigation.

Minutes of Meetings

You have confirmed that minutes exist in your letter and Mr. Hall's affidavit clarifies that in fact for some meetings brief minutes record the decisions

made and at other times minutes are generated by an exchange of email correspondence.

You have asked for particularity on the issues for which our client seeks minutes and we clarify as follows:

- Minutes relating to the establishment, membership of and operation of the Pappagallo Beach Villas website
- Minutes regarding the installation of security cameras in the Strata parking lots
- Minutes relating to the selection, cost, and procurement of any Strata pool furniture in 2018 and 2019.

Please take instructions on whether the minutes relating to these matters will be released.

Yours faithfully,

A handwritten signature in black ink, consisting of the letters 'KSG' in a stylized, cursive font.

KSG Attorneys at Law