

EXHIBIT B

Natoli, Christine (New York)

From: Natoli, Christine (New York) <NatoliC@ballardspahr.com> on behalf of Friedman, Julian W. (New York) <FriedmanJ@ballardspahr.com>
Sent: Wednesday, September 1, 2021 9:18 AM
To: alessandro nomellini
Subject: Legacy Litigation
Attachments: 9-1-21 NOMELLINI DMEAST_45905598(1).DOCX

Hi Alessandro:

Please see attached letter.

Julian W. Friedman

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September 1, 2021

Via E-mail

Alessandro Nomellini
Via Amelia Sud 241
Via Reggio
Lucca, Italy 55049

Re: Legacy Organization, Inc. v. Nomellini, Index No. 650785/2021
Smet & WWRS Belgium, N.V. v. Nomellini and Fato, Index No. 653245/2020

Dear Alessandro:

As we have discussed numerous times, my firm and I are filing a motion to withdraw as your counsel in the two above-captioned cases based on your failure to pay all of our outstanding invoices by August 31 despite your assurances that you would do so.

The purpose of this letter is to inform you of the current status of each case so that you, and any new counsel you engage to represent you and Ms.Fato, will be up-to-date. Here are the essential points to keep in mind regarding each case.

Legacy Action

- As you know, the Court previously granted a preliminary injunction against you. That injunction remains in effect.
- We have moved for reargument of the preliminary injunction motion. Our motion for reargument has been fully briefed and is pending before the Court.
- We have also filed a Notice of Appeal from the preliminary injunction. That appeal must be perfected by October 8, 2021.
- Plaintiff has served document requests to which your response is due.
- Plaintiff has served interrogatories to which your response is due.

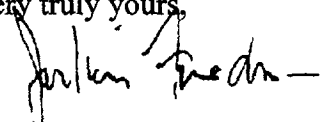
Alessandro Nomellini
September 1, 2021
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- Yesterday, Plaintiff filed a motion to have you held in contempt of court and sanctioned based upon various allegations in connection with the document requests and your conduct since the preliminary injunction was granted. No hearing date for that motion has been set, but I anticipate this happening soon.

Smet WWRS Action

- We have moved to dismiss this case. The motion is fully briefed and is awaiting decision by the Court.
- Plaintiffs have moved for the entry of a default judgment against you and Ms. Fato. The motion is fully briefed and is awaiting decision by the Court.

Very truly yours,



Julian W. Friedman

JWF/cn