

EXHIBIT B

From: <arick@thebloomfirm.com>

Subject: RE: Weber

Date: December 13, 2018 at 5:04:06 PM EST

To: "Jayne Weintraub" <jweintraub@saleweintraub.com>, "Anna Levine-Gronningsater" <anna@thebloomfirm.com>, "Lisa Bloom" <Lisa@TheBloomFirm.com>

Cc: "Daniel Brown" <dlbrown@sheppardmullin.com>, "Jonathan Etra" <jonathan.etra@nelsonmullins.com>

Jayne,

Thank you your email. We are in agreement that professional courtesy is preferred and a two-way street, and I sincerely hope that we can move forward with these matters amicably and professionally.

To respond directly to your email:

First, in regard to the subpoenas for deposition. We provided your team with the names and information of alleged victims during confidential settlement negotiations in anticipation of a mediation for which we believed your client agreed to in good faith. Now, your team has unilaterally cancelled that deposition and attempted to depose those individuals revealed to you during the negotiation process. I find this to be in bad faith.

Further, your team is well-aware that we intend to file lawsuits on behalf of those individuals, so I find it surprising that you would attempt to depose them now, prior to them being actual plaintiffs, when we have not provided any information that would suggest they have any relevant knowledge concerning Mr. Boyce's case outside of their own experiences with Mr. Weber. We would of course, not be agreeing to allow your team to depose these victims more than once, so is it your position that you would prefer to depose them all now as witnesses as opposed to wait until they are plaintiffs?

Second, in regard to the interrogatories. Your team is well-aware that we intend to move to amend the complaint in Mr. Boyce's case in the immediate future, adding a federal claim, which will in all likelihood, render these written discovery issues moot for the time being, as well as any forthcoming depositions. Since this will likely take place prior to any status conference or hearing in this case, there does not appear to be any need for urgency when this case will likely be re-set in the very near future.

We will be more than happy to discuss the schedule for depositions and resolve any discovery issues once we have filed our Motion and the Court has rendered an opinion, giving us all a better idea of where and how this case will be litigated.

Please let me know if you have any further questions or concerns.

Thank you,

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