

BO FREEMAN

From: BO FREEMAN <bscpgroupholdingsllc@gmail.com>
Sent: Wednesday, February 09, 2022 8:59 PM
To: 'WILLIAM BEHR'; thomas.manisero@wilsonelser.com; stephen.barrett@wilsonelser.com; sean.wagner@wilsonelser.com; roger.gottilla@wilsonelser.com; daniel.flores@wilsonelser.com; curt.schlom@wilsonelser.com; craig.hunter@wilsonelser.com; craig.brinker@wilsonelser.com; amy.hanrahan@wilsonelser.com; ALAN.RUBIN@WILSONELSER.COM; ashley.humphries@wilsonelser.com; andrea.shiffman@wilsonelser.com; angel.vitiello@wilsonelser.com; angelique.sabia-candero@wilsonelser.com; aviva.stein@wilsonelser.com; carole.nimaroff@wilsonelser.com; corrine.shea@wilsonelser.com; debra.tama@wilsonelser.com; elizabeth.scoditti@wilsonelser.com; ellyn.wilder@wilsonelser.com; erin.zecca@wilsonelser.com; grace.song@wilsonelser.com; jennifer.provost@wilsonelser.com; jennifer.sciales@wilsonelser.com; judy.selmeci@wilsonelser.com; kathleen.mullins@wilsonelser.com; lauren.zink@wilsonelser.com; lois.ottombrino@wilsonelser.com; lori.semlies@wilsonelser.com; megan.rigney@wilsonelser.com; patricia.wik@wilsonelser.com; RICKI.ROER@WILSONELSER.COM; stacey.seltzer@wilsonelser.com; Suzanne.Swanson@wilsonelser.com; urvashi.sinha@wilsonelser.com; yana.siegel@wilsonelser.com
Cc: RICKI.ROER@WILSONELSER.COM; LEXUS DIAMOND; LEXUS DIAMOND; william.1leras2@nypd.org; Victor.Mazzotti@1800LAW1010.com; tracie.shagiuriguen@nypd.org; thomas.meaney@nypd.org; tejinder.singh@nypd.org; tara.tizzio@nypd.org; taimoor.ahmad@nypd.org; 'serge.jean@nypd.org'; serge.jean@nypd.org; sean.hogan@nypd.org; sean.aman@nypd.org; ronald.perillo@nypd.org; robert.yturraspe@nypd.org; robert.passero@nypd.org; richard.narciso@nypd.org; RICHARD.LEE3@nypd.org; Raul.Rodriguez3@nypd.org; paul.clark@nypd.org; patrick.doyle@nypd.org; nicholas.mitchell@nypd.org; nibel.pena@nypd.org; nibal.pena@nypd.org; narine.ramlochan@nypd.org; michelle.murray@nypd.org; michael.reilly2@nypd.org; michael.rachwalski@nypd.org; michael.corrado@nypd.org; max.solomon@nypd.org; matthew.whiting@nypd.org; mark.pagano@nypd.org; mark.hunter@nypd.org; Marilyn.Noa@nypd.org; marian.bencea@nypd.org; lm2892@cumc.columbia.edu; liam.moyles3@nypd.org; lamarr.barnes@nypd.org; Kenneth.Feeley@nypd.org; joseph.soldano@nypd.org; Joseph.Leonard@nypd.org; JOSEPH.ALGERIO@nypd.org; johnny.liquori@nypd.org; john.tourloukis@nypd.org; John.Lamneck@nypd.org; jarett.dilorenzo@nypd.org; JAREE.JONES@NYPD.ORG; 'JAREE JONES (JAREE.JONES@NYPD.ORG)'; gregory.conlon@nypd.org; george.kalogeropoulos@nypd.org; FRANK.ALIPERTI@nypd.org; francisco.martireyes@nypd.org; eric.chau@nypd.org; erdem.ozen@nypd.org; daniel.sendrowski@nypd.org; daniel.bavuso@nypd.org; dajon.panton@nypd.org; christopher.freda@nypd.org; christophe.snagg@nypd.org; christophe.leap@nypd.org; CHRISTINA.ORTIZ@NYPD.COM; charles.novak@nypd.org; brian.nelsen@nypd.org; brian.crooks@nypd.org; anthony.sclafani@nypd.org; alyssa.vogel@nypd.org; aloysius.sosic@nypd.org; ALEXANDER.AVDIC@nypd.org; adam.riddick@nypd.org; 90pctyco@nypd.org; 90pctdvo@nypd.org; 1pctyco@nypd.org; 1pctdvo@nypd.org; 18pctyco@nypd.org; 17pctyco@nypd.org; 14pctyco@nypd.org; 10pctyco@nypd.org; 10pctdvo@nypd.org
Subject: *** THANK YOU FOR KINDLY ALERTING YOUR MANAGERS: ACCEPT THIS AS A REASONABLE REQUEST.
Attachments: EX31 --- 2020-10-05 -- REQUEST TO MEET AND QUASH [IPHONE] [ELSERS] [YUZERS].pdf; EX30 --- 2020-07-03 -- REQUEST TO REMOVE CAMERA.pdf; EX29 --- 2020-04-06 -- QUALIFIED [ASHLEY HUMPHRIES] IN THE COUNTY OF NEW YORK.pdf; EX28 --- 2020-02-19 -- ROSALIA CHANN [MOV] CONVERSION AND DISTRIBUTION.pdf; 153974_2020_Sullivan_Properties_L_P_v_Baris_Dincer_EXHIBIT_S__397.pdf; 153974_2020_Sullivan_Properties_L_P_v_Baris_Dincer_EXHIBIT_S__398.pdf; 153974_2020_Sullivan_Properties_L_P_v_Baris_Dincer_EXHIBIT_S__385.pdf; 153974_2020_Sullivan_Properties_L_P_v_Baris_Dincer_EXHIBIT_S__294.pdf; 153974_2020_Sullivan_Properties_L_P_v_Baris_Dincer_EXHIBIT_S__293.pdf; 153974_2020_Sullivan_Properties_L_P_v_Baris_Dincer_EXHIBIT_S__292.pdf; 153974_2020_Sullivan_Properties_L_P_v_Baris_Dincer_EXHIBIT_S__291.pdf; 153974_2020_Sullivan_Properties_L_P_v_Baris_Dincer_EXHIBIT_S__289.pdf; 153974_2020_Sullivan_Properties_L_P_v_Baris_Dincer_EXHIBIT_S__285.pdf; 153974_2020_Sullivan_Properties_L_P_v_Baris_Dincer_EXHIBIT_S__285.pdf; 2. ELSER - New York NY - Office - Wilson Elser [roer].pdf; 3. ELSER - New York NY - Office - RICKI E. ROAR.pdf
Importance: High
Sensitivity: Private

MRS. ROER & CO.

WAS NOT AWARE, THE DISTRIBUTION CHAIN OF THESE UNCONSENTED VIDEOS BEGAN ON THE 19TH OF FEBRUARY IN 2020.
- I ASKED KINDLY MRS. ROER, PREVIOUSLY – AND ONCE AGAIN.

WHERE IS THIS COLLECTION OF [*.MOV FILES]... AND WHY HAVE I NOT HEARD BACK FROM YOU, AS THE REGIONAL MANAGER AT 150 EAST 42ND STREET.

I TOLD THE ZUCKER FAMILY AS ENTERED IN THE PUBLIC RECORD, AND FILED WITH THE COURT THAT
I WANTED ABSOLUTELY NOTHING TO DO WITH THEM, OR THEIR BUSINESS AFFAIRS.
- YOUR COUNSELOR CONTINUED TO DISTRIBUTE THE VIDEOS???

WHAT PART OF NON-CONSENT DO YOU NOT UNDERSTAND?
- **SHE USED HER CORPORATE EMAIL ADDRESS**
- **–FETCH THOSE FILES IMMEDIATELY FROM THE SERVERS, AND ADVISE YOUR CLIENT TO DESIST FROM ANY FURTHER VIDEO-TAPING OF ANYONE**

ARE YOU SICK OR SOMETHING?
>> DOCKET 285....
- I DID NOT CONSENT TO BEING VIDEO-TAPED IN MY APARTMENT. NOW FETCH THEM AND DO YOUR JOB.
- UNLESS YOU’RE A SUPPORTER OF THIS TYPE OF BEHAVIOR – WHICH I AM NOT... AND NEVER WAS.
- ALSO. NEVER CONSENTED TO BEING MENACED BY A HOUSE OF KEEBLER ELVES.

I WILL PROVIDE YOU WITH A GRACE PERIOD PRIOR TO FILING ANY COMMENCENT DOCUMENTS AS TO AVOID A CERTAIN DELUGE ONTO ALL THESE OTHER MEMBERS THAT YOU SUPERVISE – AS PROMULGATED IN YOUR WEBSITE.

I WOULD ADVISE AS FOLLOWS _____ –

STEP 1. WALK TO THE POLICE DEPT. IN THE CORRECT ZIPCODE
STEP 2. WHEN IT’S CONVENIENT WITH THE RESPECTIVE POLICE DEPARTMENT AND IN THE JURISDICTION FOR:
MANHATTAN SKYLINE
101 WEST 55TH STREET, NEW YORK, NY 10019

STEP 3. RING THE BUZZER.

STEP 4. IF THEY DON’T OPEN THE DOOR, ASK THE POLICE ...
OR THE NYFD, OR WHATEVER ENTITY HAS THE JURISDISCTION AND RIGHTS TO KICK IN THEIR DOOR.

- TAKE ALL OF THEIR COMPUTERS;
- LAPTOPS;
- CELL PHONES; AND
- ANY OTHER DEVICE WHICH MAY POTENTIALLY HOLD OTHER VIDEOS, LIKE VIDEOS OF CHILDREN FOR INSTANCE.

THEN
STEP 5. CONTACT ME USING MY PERSONAL EMAIL ADDRESS TO MAKE ARRANGEMENT TO RETURN ALL VIDEOS OF MYSELF WHICH WERE NEVER CONSENTED FOR FILM OR DISTRIBUTION...
THEN DESTROY ANY AND ALL COPIES THAT YOU MAY OR MAY NOT HAVE TAMPERED WITH. AFTER I REVIEW THEM FOR PERSONAL REASONS WHICH ARE NONE OF YOUR BUSINESS.

THANK YOU.

/s/ BO DINCER.
iPhone.: 646-256-3609
Panasonic.: 917-378-3467

FILED: NEW YORK COUNTY CLERK 08/04/2020 02:32 PM

INDEX NO. 153974/2020

NYSCEF DOC. NO. 285

RECEIVED NYSCEF: 08/04/2020

Humphries, Ashley V.

From: Super - Sullivan <Super@sullivanmews.com>
Sent: Monday, July 20, 2020 8:50 AM
To: Daniel Rispoli; Laskowitz, Shari
Cc: Humphries, Ashley V.
Subject: RE: Update

[EXTERNAL EMAIL]

Just checked the cameras, they didn't do anything, just came by on the sidewalk and left!!!

YAHOO! MAIL

Subject RE: Sullivan Properties v Baris Dincer
From Humphries, Ashley V. <Ashley.Humphries@wilsonelser.com>
To: Bo Dincer <bd2561@columbia.edu>, Laskowitz, Shari <slaskowitz@ingramllp.com>
Cc: BARIS DINCER <b-dincer66@outlook.com>, Bo Dincer <bo.dincer@yahoo.com>
Date Mon, Oct 5, 2020 at 2:19 PM

Dear Mr. Dincer,

As you are aware, I have agreed to voluntarily produce my client, Daniel Rispoli for a non-party witness deposition in the above referenced matter on October 8, 2020 at 11:00 am. In furtherance of Ms. Laskowitz' October 2, 2020 email correspondence, please be advised that you are permitted to attend and participate in the deposition, which will be held in person at Ms. Laskowitz' office. Should you choose not to attend, your appearance will be waived, and I will move to quash any future attempts to obtain Mr. Rispoli's deposition.

Please do not hesitate to contact the undersigned if you have any questions.

Best,

Ashley V. Humphries
Attorney at Law
Wilson Elser Moskowitz Edelman & Dicker LLP
150 E 42nd Street
New York, NY 10017
212.915.5546 (Direct)
908.433-7463 (Cell)
212.490.3000 (Main)
212.490.3038 (Fax)
ashley.humphries@wilsonelser.com