



Cole Moscatel <cole@tykomanagement.com>

Urgent - Settlement Proceeds

1 message

Cole Moscatel <cole@tykomanagement.com>
To: Kenneth Taylor III <KTaylor@rlattorneys.com>
Cc: PGoldEsq@gmail.com

Tue, Dec 9, 2025 at 9:03 AM

Ken,

At this point, I no longer care about your preferences regarding communication protocols or State Bar ethical boundaries. The level of stress, unnecessary delay, and financial impact caused by you and/or the insurance company's failure to issue the settlement proceeds is completely unacceptable. These delays have gone far beyond anything reasonable, and they are not going unnoticed.

You received the initial payment instructions and W-9 on October 29, 2025, followed by updated instructions on November 5 (both email threads are attached). Under our settlement agreement, you had 30 days from receipt of valid payment instructions and a W-9 to deliver the settlement funds. That contractual deadline has now passed by a significant margin. You know the Judge in this matter, and you know exactly how he responds to conduct that appears evasive, dilatory, or intentionally obstructive.

Given the circumstances, I expect a meaningful update today and a specific, confirmed date when the check will be received **immediately** -not a vague statement such as "I will let you know when it arrives in the mail." If you cannot or will not provide that, I will proceed accordingly. I have already consulted with local counsel. They are prepared to seek emergency relief in court, and I will not hesitate to pursue every available remedy, including complaints with the Department of Insurance and the State Bar of California, as well as any other action warranted by the situation.

Ken, I am done with the games. This situation is on the verge of escalating far beyond what is necessary. Provide the date the check will be received to my counsel without further delay, or be prepared to defend both your conduct and your client's actions.

Sincerely,

Cole Moscatel

CEO

O: (213) 999-5305
Assistant: (818) 661-9292
cole@tykomanagement.com | www.tykomanagement.com



INVESTMENT & MANAGEMENT COMPANY

23901 Calabasas Road
Suite 1068
Calabasas, CA 91302
(213) 999-5305
www.tykomanagement.com

----- Forwarded message -----

From: Cole Moscatel <cole@tykomanagement.com>
To: KTaylor@rlattorneys.com, "david@dorenfeldlaw.com" <david@dorenfeldlaw.com>, Nicole@dorenfeldlaw.com, "JSB@JeffreyBenice.com" <JSB@jeffreybenice.com>, "srosenkranz@rlattorneys.com" <srosenkranz@rlattorneys.com>, yvette@dorenfeldlaw.com, Maria@dorenfeldlaw.com
Cc: Scott Green <scott@thegreenlawgroup.com>, matthew@thegreenlawgroup.com, Leah Schoen <leah@thegreenlawgroup.com>, Jessica Dean <jessica@thegreenlawgroup.com>, salina@thegreenlawgroup.com
Bcc:
Date: Wed, 5 Nov 2025 14:33:38 -0800
Subject: Urgent — Formal Disbursement Instructions – Settlement Proceeds for Cole Moscatel
Hi Ken / All,

I am writing to formally direct that all settlement proceeds relating to my claim be issued and disbursed directly to me, Cole Moscatel, as the rightful payee. Here are my wire instructions:

Chase Bank

Name on acct: Cole B. Moscatel

Account number
759420477

Routing number
322271627

Please be advised that The Greene Law Group is no longer authorized to represent me or to act on my behalf in any capacity. Their representation has been terminated in writing, and they have been expressly instructed to cease all communications and involvement in this matter. Importantly, there is no lien, assignment, retainer clause, or other authorization granting that firm any right to receive, endorse, hold, or deposit my settlement funds into their trust account or any other account.

Any attempt by The Greene Law Group to direct, divert, or intercept the settlement proceeds is unauthorized and improper. Under California law, including Rule 1.15 of the California Rules of Professional Conduct, client funds must be disbursed directly to the client absent a valid written authorization or a lawfully adjudicated lien. Neither exists in this

case. Additionally, all legal fees claimed by that firm are formally disputed, and they possess no equitable or contractual interest in these proceeds.

To ensure proper handling and avoid unnecessary delay, I have attached my wire instructions for direct disbursement. Please confirm that the funds will be remitted accordingly and that The Greene Law Group's name has been removed from any payment instructions or payee lists associated with this settlement.

If you require a copy of the termination notice or any supporting documentation to confirm my exclusive right to receive payment, I will provide it immediately upon request. I respectfully ask that written confirmation of this update be provided no later than the close of business tomorrow to prevent any confusion or misdirection of funds.

Thank you for your prompt attention and cooperation in ensuring this matter is handled in accordance with California law and standard fiduciary protocols.

Thank you,
Cole

--
Cole Moscatel

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2 attachments

- Email from Leah (Oct. 29) with W-9.pdf**
532K
- Email to Ken on Nov. 5 - Updated Wire Instructions & W9.eml**
17K