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October 15, 2024

Sent via e-delivery only
Stephen Brower, Esq.
Brentwood Law Group, PLLC
1222 E. Baseline Drive, 2nd Floor
Tempe, AZ 85283

RE: THE ALICE L. LEONHARDT REVOCABLE TRUST uad 2/26/2017 (the “Trust”)

Dear Stephen:

Thank you for taking my call today regarding the potential arbitration of the dispute in the above-reference Trust. As you are aware, I represent Joyce Anderson, Greg Leonhardt, Scott Leonhardt, and Ruth Leonhardt, the surviving stepchildren of Alice L. “Louise” Leonhardt and beneficiaries of a specific devise under the Trust.

I understand from our call that your client, the trustee of the Trust, refuses to initiate arbitration of the dispute regarding my clients’ specific bequest, and that she insists on utilizing the American Arbitration Association (“AAA”) to administer the arbitration, even though they do not offer a Wills and Trusts panel. You also referred to a desire to avoid disclosure of privileged communications while sharing with me your client’s position.

Pursuant to *In Re: Kipnis*, the “[Court of Appeals] adopt[s] the fiduciary exception to the attorney-client privilege and hold[s] that disclosure to the beneficiary and successor trustee of otherwise privileged communications is required insofar as the trustee seeks legal advice in its fiduciary capacity on matters of trust administration.”

I hereby demand for all communication you have had with your client, including but not limited to handwritten, electronic, typed, and audio recordings, regarding the administration of the Trust for the period November 9, 2023 to date. The disclosures demanded relate only to communications and documentation associated with my clients’, their beneficial interest, and arbitration.

Please coordinate with my office for the electronic delivery of the records no later than **November 1, 2024.**

Sincerely,

Stacey L. Johnson
Stacey L. Johnson, PLLC

C: Clients