



**Stacey L. Johnson**

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October 17, 2024

*Sent via e-delivery only*

Stephen Brower, Esq.  
Brentwood Law Group, PLLC  
1222 E. Baseline Drive, 2<sup>nd</sup> Floor  
Tempe, AZ 85283

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

Dear Stephen:

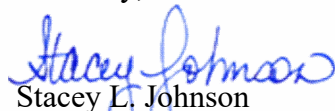
Thank you for taking my call on Monday October 15, 2024 regarding arbitration of the dispute in the above-reference Trust. As you are aware, I represent Joyce Anderson, Greg Leonhardt, Scott Leonhardt, and Ruth Leonhardt, the surviving stepchildren of Alice L. “Louise” Leonhardt and beneficiaries of a specific devise under the Trust.

In *In Re: Kipnis*, the “[Court of Appeals] adopt[ed] the fiduciary exception to the attorney-client privilege and [held] 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 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 are limited to communications and documentation associated with my clients’, their beneficial interest, and arbitration of the dispute regarding their specific bequest.

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