

From Article at [GetOutOfDebt.org](http://GetOutOfDebt.org)

# EXHIBIT B

**From:** [Richard Labarthe](#)  
**To:** [EBorges@GGTrialLaw.com](mailto:EBorges@GGTrialLaw.com)  
**Cc:** [Vincent Howard](#); [Jeffrey.Katz@mdrxservices.com](mailto:Jeffrey.Katz@mdrxservices.com)  
**Subject:** Urgent - Concerns regarding Morgan Drexen-related clients Fwd: Urgent -- Immediate action required  
**Date:** Thursday, June 18, 2015 3:09:14 PM

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Mr. Borges,

Earlier this afternoon attempted to reach you by phone. I identified myself to your receptionist as an attorney in Oklahoma City and that my call to you concerned Morgan Drexen. Thereupon, after placing me on hold your receptionist returned to say that you were unavailable.

I then left you a voice mail expressing some grave concerns that I have regarding potential breaches of attorney-client confidentiality, privacy rights, possible identity theft and unauthorized accessing of certain of my bank accounts, including client trust accounts.

I sincerely hope that this is not so but I have received news along these lines that is extremely disturbing and I hereby request that you provide answers immediately.

First off, please understand that I have many clients that are serviced by MD.

Also, please understand that any interference with my client contracts and relationships with your clients will not be tolerated.

Lastly, I strongly encourage you to consult with me first before canceling the services that MD provides for my clients at my direction so that we can arrange for alternative support services.

Please read the emails which I have just sent to administrators at Morgan Drexen and take heed of the demands conveyed in those emails.

I request that you reply by the end of business tomorrow providing confirmation that you understand and will comply with my demands.

Thank you. I await your prompt reply.

Richard C. Labarthe

LAW OFFICES OF RICHARD C. LABARTHE, P.C.

820 NE 63rd Street

OKLAHOMA CITY, OK 73105

405.843.5616; fax: 405.843.9685

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

From: **Richard Labarthe** <[labarthelaw@gmail.com](mailto:labarthelaw@gmail.com)>

Date: Thu, Jun 18, 2015 at 5:00 PM

Subject: Re: Urgent -- Immediate action required

To: [david.walker2@mdrxservices.com](mailto:david.walker2@mdrxservices.com), [dketsdever@mdrxservices.com](mailto:dketsdever@mdrxservices.com)

Cc: [Jeffrey.Katz@mdrxservices.com](mailto:Jeffrey.Katz@mdrxservices.com)

Morgan Drexen --

In case the preceding email was not sufficiently clear, let me succinctly state the following:

1. Morgan Drexen's authority and access to my client trust accounts is hereby revoked.
2. You are instructed to invoice us, Richard C. Labarthe, P.C., and we will decide what bills to pay. We are not about to pay any trustee for services they are not providing.
3. We hereby expressly demand an accounting so that we may know if MD or the trustee purporting to act for MD has even performed any services billed; and
4. We hereby demand that MD immediately send us an electronic copy of all of our clients' information.

I would like a prompt reply from yourselves and from the trustee confirming that this is understood and when we may expect to receive the requested information. Accordingly, please forward this email to the MD bankruptcy trustee immediately and provide confirmation that you have done so.

Thank you,

Richard Labarthe

Richard C. Labarthe

LAW OFFICES OF RICHARD C. LABARTHE, P.C.

820 NE 63rd Street

OKLAHOMA CITY, OK 73105

405.843.5616; fax: 405.843.9685

-----  
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On Thu, Jun 18, 2015 at 4:49 PM, Richard Labarthe <[labarthelaw@gmail.com](mailto:labarthelaw@gmail.com)> wrote:  
To Morgan Drexen, c/o David Walker and Deborah Ketsdever:

We have not received the requested items to process our accounts receivables. Neither have we received any statements of items that need to be processed nor invoices to be paid. We cannot represent our clients in this atmosphere.

I emphasize again that Morgan Drexen does **not** have authority to make any transactions to my accounts.

You are urged to confirm the following immediately:

1. That no transfers or withdrawals to my accounts have taken place since June 12, 2105;  
and
2. That you have not utilized my signature stamp after June 12, 2015.

Further, **if any unauthorized transactions have taken place, you must return the funds immediately. Otherwise all such transactions and any such transactions hereafter will be considered theft.**

I request that you provide written confirmation regarding these questions promptly and that you furnish a tracking number for the package containing the requested information.

Thank you.

Richard C. Labarthe

LAW OFFICES OF RICHARD C. LABARTHE, P.C.

820 NE 63rd Street

OKLAHOMA CITY, OK 73105

405.843.5616; fax: 405.843.9685

-----  
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**From:** [George Demos](#)  
**To:** "[Evan C. Borges](#)"; [Brad Smith](#)  
**Cc:** [John Hueston](#)  
**Subject:** FW: Sample Email to MD  
**Date:** Thursday, June 18, 2015 12:55:37 PM  
**Attachments:** [image001.png](#)

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Communication received from Vince Howard and one of the other law firms in the network follows below...

George J. Demos  
GlassRatner Advisory & Capital Group, LLC

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**From:** Richard Labarthe [mailto:[labarthelaw@gmail.com](mailto:labarthelaw@gmail.com)]  
**Sent:** Thursday, June 18, 2015 12:52 PM  
**To:** Vincent Howard  
**Cc:** [Jeffrey.Katz@mdrxservices.com](mailto:Jeffrey.Katz@mdrxservices.com); [david.walker2@mdrxservices.com](mailto:david.walker2@mdrxservices.com); [a.aiono@thewilliamsonfirm.com](mailto:a.aiono@thewilliamsonfirm.com); [dketsdever@mdrxservices.com](mailto:dketsdever@mdrxservices.com); Judy McCollum  
**Subject:** Re: Sample Email to MD

what is the email address to direct such an email to?

Richard C. Labarthe  
LAW OFFICES OF RICHARD C. LABARTHE, P.C.  
820 NE 63rd Street  
OKLAHOMA CITY, OK 73105  
405.843.5616; fax: 405.843.9685

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Confidential: This communication may contain information that is protected by the attorney-client privilege. If you do not expect such a communication from attorney Richard Labarthe, please delete this message without reading it or any attachment and notify us at [LABARTHELAW@GMAIL.COM](mailto:LABARTHELAW@GMAIL.COM) of this inadvertent delivery. Thank you.

On Thu, Jun 18, 2015 at 2:33 PM, Vincent Howard <[vhoward@howardlawpc.com](mailto:vhoward@howardlawpc.com)> wrote:  
Below is one example of the email that MD needs to receive on your law firm's behalf.



Vincent Howard  
Attorney at Law  
**HOWARD LAW, PC**  
Pacific Arts Plaza  
675 Anton Boulevard, First Floor

Costa Mesa, CA 92626  
P. 800.872.5925 F. 888.533.7310  
[vhoward@howardlawpc.com](mailto:vhoward@howardlawpc.com)  
Official Website: [www.HowardLawPC.com](http://www.HowardLawPC.com)  
Debt Solution: [www.HowardLawPC.net](http://www.HowardLawPC.net)



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**From:** Williamson Law <[l.williamson@thewilliamsonfirm.com](mailto:l.williamson@thewilliamsonfirm.com)>  
**Date:** June 18, 2015 at 11:45:02 AM EDT  
**To:** Deborah Ketsdever <[dketsdever@mdrxservices.com](mailto:dketsdever@mdrxservices.com)>, David Walker <[david.walker2@mdrxservices.com](mailto:david.walker2@mdrxservices.com)>, Aissac Aiono <[a.aiono@thewilliamsonfirm.com](mailto:a.aiono@thewilliamsonfirm.com)>  
**Subject: Williamson Law Firm Accounting**

Morgan Drexen,

We did not receive the requested items to process our accounts receivables and have not received any statements of items that need to be processed or invoices to be paid. Again, Morgan Drexen does not have authority to make any transactions to my accounts. Please confirm 1. That no transfers or withdrawals to my accounts have taken place since June 12, 2105. 2. That you have not utilized my signature stamp after June 12, 2015. 3. If any unauthorized transactions have taken place, you must return the funds immediately. Otherwise such transactions and any hereafter will be considered theft. Please provide written confirmation regarding these questions and provide the tracking number for the package containing the requested information. Thank you.

LWW

**From:** [Deborah Ketsdever](#)  
**To:** "Evan C. Borges"  
**Subject:** FW: In re Howard Law and Williamson & Howard  
**Date:** Thursday, June 18, 2015 8:38:05 AM  
**Importance:** High

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Evan,

I also forwarded this to George and Brad. I have not responded at this time.

Deborah

DEBORAH KETSDEVER | DIRECTOR OF ACCOUNTING/CONTROLLER | [dketsdever@mdrxservices.com](mailto:dketsdever@mdrxservices.com)  
P: 800.868.1458 X260 | F: 877.533.7309 | 675 Anton Blvd, Costa Mesa, CA 92626 | [www.mdrxservices.com](http://www.mdrxservices.com)

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-----Original Message-----

From: Vincent Howard  
Sent: Thursday, June 18, 2015 8:23 AM  
To: Deborah Ketsdever  
Cc: David Walker; Sean O'Keefe  
Subject: In re Howard Law and Williamson & Howard

I am revoking Morgan Drexen's authority to pull anymore money from my bank accounts. I thought I made this clear already. To the extent that I have not made it clear, I'm doing so now!

You will invoice me and present me with the invoices. I will then decide what I want to pay in light of the fact you've changed or stopped several service lines.

If any more money is taken, I will sue MD and the trustee for conversion.

Sent from the iPhone of Mr. Vincent D. Howard, Attorney at Law HOWARD LAW, PC  
[Vhoward@HowardLawPC.com](mailto:Vhoward@HowardLawPC.com) [www.HowardLawPC.com](http://www.HowardLawPC.com)

**From:** [kim.pisinski](mailto:kim.pisinski)  
**To:** [EBorges@GGTrialLaw.com](mailto:EBorges@GGTrialLaw.com)  
**Subject:** URGENT  
**Date:** Thursday, June 18, 2015 1:12:16 PM

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Dear Attorney Borges,

This letter serves as notice that you have no authority to contact any clients of my law firm. I have clients serviced by Morgan Drexen and MDRX and any interference with my confidential attorney-client relationship and with my confidential attorney-client contacts and records will not be tolerated and will be met with swift legal action.

You must first contact me prior to canceling any services that Morgan Drexen and MDRX has and is providing to my law firm and you do not have authority to arrange for alternative services to be rendered to my clients.

I have previously revoked Morgan Drexen's authority to access any of my accounts and any of my client's trust accounts.

I entrusted Morgan Drexen and MDRX with these confidential files and effective immediately no one with or involved with Morgan Drexen or MDRX has authority to access any of my information or files without prior approval by me from this moment forward. Any violation of this, as well as any further withdrawal of funds from my accounts (with the exception of paying settlements) will at a minimum be considered tortious interference with my business, violations of the Computer Fraud and Abuse Act, Fraud, a Breach of Fiduciary Duty, embezzlement, conversion, and theft and I will be forced to take legal action.

Please confirm receipt of this notice that serves as actual notice to you and your client that he will also be liable for interference with my law practice.

Thank you,

Law Offices of Kimberly A. Pisinski

#118, 54 Hazard Avenue, Enfield, CT 06082

44 State Street, Northampton, MA 01060

860-324-7985

[www.kpzlaw.net](http://www.kpzlaw.net)

FAX 860-218-9938

“Go confidently in the direction of your dreams. Live the life you've imagined.”

— Henry David Thoreau

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**From:** [Tami Munsch](mailto:Tami.Munsch)  
**To:** [EBorges@GGTrialLaw.com](mailto:EBorges@GGTrialLaw.com)  
**Subject:** Morgan Drexen  
**Date:** Thursday, June 18, 2015 12:46:44 PM

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Dear Evan:

I am an attorney in Mississippi who contracts with Morgan Drexen for services.

It has come to my attention that there may be interference with my contracts and client relationships. This will not be tolerated.

From what I have gathered, some services have already been canceled and this may threaten my clients. I ask that you consult with me first before canceling the services MD provides for my clients so that I can arrange for alternative services.

With best regards,

Tami Munsch  
Attorney at Law  
P.O. Box 205  
Kiln, MS 39556

601.326.2605 phone

601.326.2633 fax

[Tami@MunschLaw.com](mailto:Tami@MunschLaw.com) email

[www.MunschLaw.com](http://www.MunschLaw.com)

Sent from iDevice

*This message is being sent by Tami Munsch, Attorney at Law and may contain information which is privileged or confidential. If you are not the intended recipient please notify the law firm immediately and delete.*

**From:** [Bob Beckett](mailto:Bob.Beckett@GGTrialLaw.com)  
**To:** [EBorges@GGTrialLaw.com](mailto:EBorges@GGTrialLaw.com)  
**Subject:** Morgan Drexen  
**Date:** Thursday, June 18, 2015 4:32:47 PM

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Hello,

I am writing due to disturbing information I have received. I am an Attorney practicing law in Nevada. I have clients that were and are serviced by Morgan Drexen. My concern is interference with my current/past contracts and relationships with my clients in Nevada and it will not be tolerated. I have contacted Morgan Drexen and hereby notifying you that I would like to be consulted first before canceling the services Morgan Drexen provides for my clients at my direction so that I can arrange for alternative services.

I can be reached at 702-334-4886 for any questions.

Respectfully,  
Bob

***Robert S. Beckett, Esq.***

7500 West Lake Mead Blvd., Suite 9-141

Las Vegas, NV 89128

(702) 334-4886

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**From:** [JD Haas](#)  
**To:** [EBorges@GGTrialLaw.com](mailto:EBorges@GGTrialLaw.com)  
**Subject:** Morgan Drexen  
**Date:** Thursday, June 18, 2015 12:30:54 PM

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My name is J D Haas and I have clients who have been serviced by Morgan Drexen. Mr. Howard recently informed me of the actions taken by Morgan Drexen in regards to my clients. I agree with Mr. Howard on this issue. I want Morgan Drexen to bill me for their actions and I will review these bills for payment.

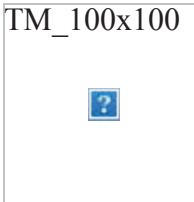
I do not want Morgan Drexen to attempt to transfer any of my clients to new firms.

J D Haas

--

Please acknowledge receipt of this email. No attorney/client relationship has been formed unless the client has a signed retainer with my law firm.

J D Haas & Associates, PLLC  
9801 Dupont Avenue South, Suite 430  
Bloomington, MN 55431  
952 345-1025  
[jdhaas@jdhaas.com](mailto:jdhaas@jdhaas.com)  
[www.jdhaas.com](http://www.jdhaas.com)



**From:** [Luis Figueredo](#)  
**To:** [EBorges@GGTrialLaw.com](mailto:EBorges@GGTrialLaw.com)  
**Subject:** Morgan Drexen  
**Date:** Thursday, June 18, 2015 5:07:39 PM  
**Attachments:** [Letter to Morgan Drexen Trustee.doc](#)

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Mr. Borges;

As engagement counsel I have clients that are serviced by Morgan Drexen. Attached please find a letter which raises my concerns. Thank you.

Luis Figueredo

**FIGUEREDO LAW, LLC.**

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**Attorneys & Counselors**

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## FIGUEREDO LAW LLC

ATTORNEYS & COUNSELORS

8455 SW 158<sup>th</sup> Street  
Miami, Florida 33157  
Telephone: (786) 393-8088  
lfigueredolaw@gmail.com

June 18, 2015

*Via e-mail* EBorges@GGTrialLaw.com

Mr. Evan Borges  
Counsel for the Trustee,  
Greenberg Gross  
650 Town Center Drive, Suite 1750,  
Costa Mesa, CA 92626

**Re: Morgan Drexen**

Dear Mr. Borges;

The purpose of this letter is to formally advise you that my firm retained Morgan Drexen several years ago to provide my office and our law firm's clients with legal support services. While I understand that Morgan Drexen filed for Chapter 11 Bankruptcy, Morgan Drexen has continued to provide legal support services.

However, I have been recently advised the Trustee would be terminating Morgan Drexen's provision of services. Section 3F of our contract with Morgan Drexen entitled "Changes in Methods and Procedures to Service Clients provides in pertinent part that: Morgan Drexen is contractually obligated to notify and inform my firm of any changes it makes in procedures, methods, or services.

My additional concerns are that my clients' information and my attorney work product be protected and kept confidential. My agreement with Morgan Drexen contains a precise provision governing Morgan Drexen's obligation to maintain confidentiality. Pursuant to the Agreement, Morgan Drexen has obligated itself and continues to obligate itself to maintain the confidentiality of the law firm's attorney-client communications and my clients' confidential information. As you are no doubt aware, my law firm – hired Morgan Drexen to perform specific services. The clients belong to the law firm – not Morgan Drexen. My law firm maintains an attorney-client relationship with these clients and my law firm provides them with legal services that I intend to keep providing. Moreover pursuant to Section 1 is entitled "Independent Judgment; Agency; Supervision

of MD Services.” I am ultimately responsible for overseeing the services provided to my firm and my firm’s clients.

Consequently, in the event Morgan Drexen decides to not offer my law firm certain lines of service, I will need to take those services on for myself and hire the necessary people to provide those services. In that regard, I would appreciate it, if you would consult with me first before canceling the services Morgan Drexen provides for my clients so that I can arrange for alternative services.

Sincerely,

**Figueredo Law LLC**

June 18, 2015

Luis Figueredo, Esq.

From Article at GetOutofDebt.org

**From:** Glenn Romano <[glenn@glennromano.com](mailto:glenn@glennromano.com)>  
**Date:** June 19, 2015 7:12:15 AM PDT  
**To:** <[EBorges@GGTrialLaw.com](mailto:EBorges@GGTrialLaw.com)>  
**Subject:** In re: Morgan Drexen Bankruptcy

Dear Mr. Borges:

My law firm utilizes the services of Morgan Drexen to assist in the servicing of my debt settlement clients. It is my professional responsibility to continue to serve my clients. Any interference with my contracts and relationships with my clients will not be tolerated, and I require that you must consult with me first before canceling the services Morgan Drexen provides for my clients at my direction so that I can arrange for alternative services.

Glenn C. Romano

GLENN C. ROMANO, P.C.

Philadelphia Office:  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Hatboro Office:  
3830 Lukens Lane  
Hatboro, PA 19040

[www.glennromano.com](http://www.glennromano.com)  
[glenn@glennromano.com](mailto:glenn@glennromano.com)

215 854 6337 Office  
215 323 4949 Direct Dial  
215 323 4950 Fax

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From Article at [www.FromOutOfDebt.org](http://www.FromOutOfDebt.org)



**From:** Rochelle Guznack <[rguznack@gmail.com](mailto:rguznack@gmail.com)>  
**Date:** June 19, 2015 7:27:42 AM PDT  
**To:** <[EBorges@GGTrialLaw.com](mailto:EBorges@GGTrialLaw.com)>  
**Subject: Wind-Down of Morgan Drexen and Michigan Clients**

Dear Mr. Borges:

I am deeply troubled by information I have received relating to the servicing of my Michigan clients after Morgan Drexen's dissolution. Especially bothersome is the belief that my clients are being "shopped" to a debt settlement company. Please be clear that Morgan Drexen only services MY clients and they have no right to provide my clients' information or sell my clients' accounts to another servicer pursuant to Section 1 of the contract under the subheading "Independent Judgment; Agency; Supervision of MD Services." If my clients are being "shopped, this activity must cease immediately and permanently. I intend to arrange for servicing of my clients' accounts myself.

Section 3F of my contract with Morgan Drexen, "Changes in Methods and Procedures to Service Clients" requires Morgan Drexen to notify and inform me of any changes it makes in procedures, methods, or services.. That would include consulting with me about changes in servicing or cessation of services by Morgan Drexen. Any interference with the attorney/client relationship is an actionable tort, and I will not hesitate to litigate these issues. It is also a violation of the Rules of Professional Conduct, I believe.

Please provide me, as soon as possible, with my clients' complete files. Under Michigan law, the file belongs to the client and as counsel, I step into the shoes of the client. I am also requesting an electronic copy of all of my clients' information in the possession of Morgan Drexen which may or may not be the same as my clients' complete files.

Also, prior to Morgan Drexen or anyone acting on its behalf sends out correspondence or any other communication to my clients about the servicing, I must approve same. I would prefer sending out notifications myself from my office. Any communication not previously approved by me will be considered a breach of my contract with Morgan Drexen.

--

Law Offices of Rochelle E. Guznack, PLLC is a debt relief agency. We help people file for bankruptcy relief under the Bankruptcy Code.

Proud graduate of Max Gardner's Bankruptcy Boot Camp

Rochelle E. Guznack  
Attorney at Law  
905 W. Ann Arbor Trail  
Plymouth, MI 48170  
(248) 679-1552 (office)  
(248) 282-5272 (fax)  
[rguznack@gmail.com](mailto:rguznack@gmail.com)

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**From:** Rochelle Guznack <[rguznack@gmail.com](mailto:rguznack@gmail.com)>  
**Date:** June 19, 2015 7:34:14 AM PDT  
**To:** David Walker <[david.walker@mdrexen.com](mailto:david.walker@mdrexen.com)>  
**Cc:** <[EBorges@ggtriallaw.com](mailto:EBorges@ggtriallaw.com)>, Deborah Ketsdever <[dketsdever@mdrexen.com](mailto:dketsdever@mdrexen.com)>  
**Subject:** Morgan Drexen and Michigan Clients

Morgan Drexen,

Please be advised that Morgan Drexen does not have authority to make any transactions to my Michigan clients' accounts. Any transactions, including charges to my clients' trust funds and payment to any vendor or third party must first be approved by me.

Please confirm that no transfers or withdrawals to my accounts have taken place since June 12, 2015 and that Morgan Drexen has not utilized my signature stamp after June 12, 2015. If any unauthorized transactions have taken place, you must return the funds immediately.

Thank you for your attention.

--

Law Offices of Rochelle E. Guznack, PLLC is a debt relief agency. We help people file for bankruptcy relief under the Bankruptcy Code.

Proud graduate of Max Gardner's Bankruptcy Boot Camp

Rochelle E. Guznack  
Attorney at Law  
905 W. Ann Arbor Trail  
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