

**Defendants' Exhibit U -
Emails from Adam White, dated March 29, 2023
[pp. 1175 - 1176]**

steve vaccaroandwhite.com

From: adam white <adamlaw50@gmail.com>
Sent: Wednesday, March 29, 2023 9:34 PM
To: steve vaccaroandwhite.com
Subject: Fwd: law practice and Andrew meeting today

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

From: adam vaccaroandwhite.com <adam@vaccaroandwhite.com>
Date: Wed, Mar 29, 2023, 6:04 PM
Subject: law practice and Andrew meeting today
To: steve vaccaroandwhite.com <steve@vaccaroandwhite.com>
Cc: adamlaw50@gmail.com <adamlaw50@gmail.com>

Steve,

I appreciate your contributions to the meeting we had today. It was difficult for me and I'm assuming very difficult for both you and Andrew.

Given our email and other communications including most recently, it is clear to me that we need to dissolve our firm and separate our practices entirely.

Also, I can no longer see our sharing office space while running our own separate law practices which I tried imagining but can no longer imagine after you suggested it could be just like sharing space with Mark Bierman. I don't know whether you were joking or not, but the idea of that situation again horrifies me, and after Andrew, who would have been my sole paralegal, has stated his requirement that he work remotely which may work for the short term but not the long term.

I agree that we will need to work with a skilled mediator we both trust to dissolve our firm as expeditiously and reasonably as possible.

In the interim, you and I need to address and/or consider the following ASAP –

1. Do you plan on keeping our current office? I do not. If you don't, then I recommend that we give our 90 day notice by Friday per our Good Guy Guarantee which our Sub Lease requires. Please advise.
2. What proposal you and I want to offer Andrew for him to continue to work on firm cases (Peter's and mine since you made clear you were not comfortable with his working on yours); I suggest a Pro Rata salary for him to work from home 3 or 4 days a week. Please advise
3. What is your short term proposal for our current staff (Julie, Liam, etc.)?
4. I can't agree to your hiring a new employee or opening and/or running your own law practice from our current address until such time as we have an agreement on dissolution of our firm in place. I agree to work on that with you as quickly as possible but I'm assuming it will take some time given each of our demands towards our clients, etc.

I will do my best to pull together my proposal for dissolution of the practice and ask that you do the same and send me your proposal when you have one.

Best,

Adam

Please Note New Office Address

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