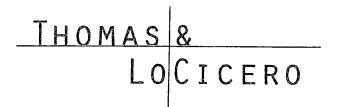
KEN BURKE CLERK OF CIRCUIT COURT

2016 NOV 16 PM 3: 36

Exhibit 8.PDF



EXHIBIT "8"



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## **VIA EMAIL**

August 9, 2016

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I write on behalf of A.J. Daulerio to ask that you withdraw Plaintiff's Renewed Motion for Sanctions and that you withdraw or modify the Writ of Garnishment since the amount is well within Mr. Daulerio's constitutional and statutory exemptions.

First, Plaintiff's Motion for Sanctions is premised on the allegation that Mr. Daulerio "concealed indemnity rights." However, Mr. Daulerio's employment agreement, which contains an indemnification provision, was produced to you in Defendants' very first document production in this case, in July 2013. In other words, nothing has been concealed, and Plaintiff's Renewed Motion seeks relief based on a premise that is not accurate. Accordingly, we request that you immediately withdraw Plaintiff's Renewed Motion.

All Counsel August 9, 2016 Page 2

Second, Plaintiff's Ex Parte Motion for a Writ of Garnishment has resulted in a freeze on Mr. Daulerio's Chase bank account, which has a balance of roughly \$1,500. Setting aside whether the garnishment was proper, the amount in the account is well under the constitutional and statutory exemptions. See Fla. Const. art. X, § 4; Fla. Stat. § 222.25(4). We request you immediately withdraw the writ, and, if Plaintiff continues his effort to garnish this account, submit a revised order that accounts for the exemptions and take all necessary steps to ensure that Chase unfreezes amounts that are exempted.

We trust that you will take corrective action as described above and will confirm to us by the close of business tomorrow that you have done so. We reserve all of Mr. Daulerio's rights with respect to both Motions and the Garnishment.

Very truly yours,

THOMAS & LOCICERO PL

Gregg D. Thomas

cc: Seth Berlin, Esq. Mike Berry, Esq. Paul Safier, Esq.