

AMON & SABATINI

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June 12, 1997

Theodore S. Steingut, Esq.
Dornbush, Mensch,
Mandelstam & Schaeffer, LLP
747 Third Avenue
New York, NY 10017

Re: Gouiran

Dear Ted:

As discussed, I would ask you again to strongly urge your client not to send any more communications to our clients in the various consolidated cases.

The "settlement" proposals set forth in the attached letter to David are utterly ridiculous: Having already taken over half the marital estate, Mr. Gouiran now seeks half of the remainder, with Donna inhibited as to disposition of the rest.

We did not feel it appropriate for you to have raised very preliminary feelers before Justice Ramos as "settlement discussions", and we do not believe that these fantastic proposals by Mr. Gouiran should be treated or referred to as such. His communications have presented extortionate threats, defamations, misstatements of fact and emotional duress. You should dissociate yourself from them rather than invoke them to the Court.

Quite simply, our client has not authorized any settlement with Mr. Gouiran, and if she were to do so, the opening condition would be payment of all fees and costs which she has incurred in connection with these vexatious lawsuits, reduced by the amount of the two bonds which we expect to liquidate as soon as Judge Ramos sets forth the parameters for our application.

Sincerely yours,



Thomas G. Amon

TGA:ly
bcc: Donna J. Gouiran

A:C2222

FAX
TRANSMISSION
Boite Postale 191 75263 PARIS Cedex 06, FRANCE E-Mail: 100551.705@Compuserve Portable: 336 0722 2313
331 4549 3069

De/From	GOUIRAN, Résidence PARIS Emile E. GOUIRAN ESQ.				
Fax:	331 4549 3926				
A/To :	DORBUSH Mensch et al, Attorneys Mr Theodore STEINGUT ESQ				
Date	17/06/97	Heure	: 09:31	N° page(s)	1

Message

Correspondence Settlement.
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cc. Thomas G. AMON

Since Mr Amon likes to use confidential communications removed from my appartement by his client's "burglary" on January 31, I am copying him with this to save myself another breaking and entering.

Amon's characterization of my letter to David only displays his ignorance. Let me state my point.

Firstly, unless Amon is prepared to face me down personally, no one is going to stop me from writing to my wife or my children for so long as there is a breath of life left in me. Moreover, I remind you, that it is on March 14 of this year that Donna called in tears, admitting that this separation is all wrong, that she wants to save her marriage, that she loves me, and simply doesn't know how to go about it. She left in the first place because of improper influence, and is being led astray by more of such influence, as witnessed by Amon's self-serving and self-enriching letter. It is easy to manipulate an emotionally charged client whose psychiatric state has been diagnosed as needing, and Amon is not one to miss the opportunity.

My letter to David was an invitation to dialogue. It presented four ideas that would be acceptable to me to assume the burden of Donna's creditors. There is nothing ridiculous in these proposals, unless considered under the disingenuous contention that Donna will realize more after litigating than as a result of settlement. The only person enriched is Amon, and his letter makes clear that he has succumbed to the temptation. Moreover, Amon ignores the stand-in-wait of a \$300,000 judgment against Donna by the French Fisc which I am appealing at my expense, and several other still unfiled claims.

It is always dangerous when an attorney loses his sense of distance and objectivity, and is ensnared in the rantings of his client. Amon is living proof: I have received no marital assets, Donna operated as a Strawman in a conduit. All funds have been returned to their owners.

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Fax:	331 4549 3926
A/To :	DORBUSH Mensch et al, Attorneys Mr Theodore STEINGUT ESQ

Date	20/07/97	Heure	11:28	N° page(s)	1
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Omnibus Settlement
Discussions and proposition
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Here is an idea that came up in response to Amon's "it can't be done" letter.

It seems that we have difficulties to surmount :

- One is Donna's desire for more That of course implicates my giving up something, since where else will it come from !
- The continuing risk of claims by other creditors.
- The untenable situation in which Amon's reflex response puts both Donna and

Here's my thought on the subject :

- Donna maintains in sworn affidavits, and would I assume do so again, that she has no creditors. If we settle, the obvious come back to this will never surface -- and the matter of her defenses will not be tested. As such, she cannot be transferring assets in fraud of creditors, nor maintaining a two small capital such as to render herself insolvent, and her transfer of all of our assets into an IRREVOCABLE trust would render those assets judgment proof. All the more so, that I will join with Donna for these purposes only, in that declaration, and in waiving my rights under the 1985 post nuptial, and in authorizing the transfer in respect to this trust. In-as-much as the "unknown" creditors have not at this date manifested their claims, I believe that such a joint transfer would be successful. Moreover, there would be little point in suing Donna if she had no assets left other than her Keogh account which is similarly protected.

- In order to make my Hold Harmless more meaningful, I will bond or escrow \$250,000 for six years, to cover any legal fees incurred by Donna in the defense of any action arising out of any transaction or occurrence having its origin prior to April 25, 1995.

- I will agree to all trust income going to Donna for life, then to me if I survive her, then to our children.

DEAL POINTS: Payment of the AFT, Division of the Keogh per my letter.

Worth talking ?

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De/From	GOUIRAN, Résidence PARIS Emile E. GOUIRAN ESQ.				
Fax:	331 4549 3926				
A/To :	AMON & Sabatini, Attorneys (TA) Mr Thomas G. AMON ESQ.				
Date	29/10/97	Heure :	19:16	N° page(s)	1

-Message

SETTLEMENT DISCUSSIONS:

I am confirming our telephone conversation.

I await your confirmation that you have authority to pursue discussions with me aimed at an omnibus settlement.

Immediately upon your confirmation, it is proposed that instructions go out to all lawyers, and that all pending litigation be stayed sine die, to continue for so long as you and I are pursuing settlement negotiations.

To supplement the terms originally outlined as those upon which I am certain to be able to deliver, I have agreed in concept, that all funds and properties delivered to myself and or any of the plaintiff, shall, upon a design that we will agree upon, remain within the United States, and shall be available to guaranty any judgment against my wife, in the event of any litigation subsequent to any settlement, arising out of a transactional sequence finding its origin in a period prior to April 25, 1995.

No "personal" issues shall be discussed nor any conditions of that nature imposed.

I await your confirmation to request instructions to counsel to stay all litigation.

Best regards.

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AMON & SABATINI
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November 3, 1997

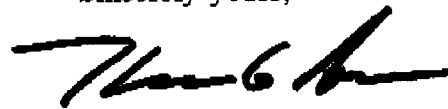
Via Fax

Emile E. Gouiran
Boite Postale 191
75263 Paris Cedex 06, France

Dear Emile:

I have your lengthy letter. As I said last week, I will get together with Mrs. Gouiran later in the week to formulate a proper response.

Sincerely yours,



Thomas G. Amon

TGA/jo

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Fax:	331 4549 3926
A/To :	AMON & Sabatini, Attorneys (TA) Mr Thomas G. AMON ESQ.
Date	03/11/97
Heure	19:06
N° page(s)	1



-Message

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SETTLEMENT DISCUSSIONS
Inception of stay of all proceedings
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Good Afternoon.

Just to let you know that I am awaiting confirmation from you as to the concensual stay outlined in my letter to you before releasing instructions in my possession to all counsel to discontinue all offensive measures.

I am concerned about getting this done for two immediate reasons: (1) I am sick as "h..." and coughing to no end, and (2) the consent I have obtained to allow two matters to expire under the S&L on November 7, is conditioned on my obtaining the confirmation from you. Quite simply, I do not think it will serve our efforts, to have two new matters served precipititiously at this time.

I know you are doing as much as you can, and I appreciate that. Nevertheless, I do have a lot of heat on me, and I have to give them something to let things go long enough for us to conclude some kind of settlement (see I am a proverbial optimist !)

Best regards.

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