

My dearest son, David:

I do not have the strength nor the heart yet, to answer your moving letter of sometime ago.

I will do so, but would probably prefer to defer doing so until the situation with your mother who is demanding a divorce, has cleared up. I will want to do so more likely than not with a conference call (or better your visit) between yourself and I with Denise included during all or some of the conversation. The topic is your future, the promises that were made on assumptions of reconciliation that your mother has callously disregarded, the possible litigation or settlement which may be forthcoming, and most importantly, what my position will be regarding your needs, including tuition, living etc... Please do not change your plans, give me some time. Litigation will begin as soon as next week, and if we settle we will know that as soon as this week.

Enclosed, you will find a document of minor interest to you to the extent that it outlines settlement proposals, but which I enclose for the highlighted text. It is part of my dream, and as you know, for the right or wrong, I have devoted my life to the creation of a "dynasty" which your mother has almost destroyed. Nevertheless one of my dreams is to see you live in the house that I built with my heart and soul, a house in which I had hoped to baby-sit my "numerous" grandchildren. A house that I will do all in my power to retain so that I might through you (and your lovely Denise) live that dream.

I am not the ogre you describe, wrongfully influenced by your mother. Your mother is seriously ill, diagnosed paranoia and masochism, I have never been angry with her for what she has done, and will not pardon only one thing: Her steadfast refusal at attempting two weeks of joint therapy in the hope of finding a common ground for reconciliation -- in sum at refusing to even try to save our marriage... I would have conceded anything to do so.

What is important is that you remember the words I uttered before you and Denise. "Whatever happens, you are and will always be my son...." Those are not idle words, but timing and results are affected by your mother's completely irrational behavior. I am trying desperately to minimize the damages, but even after we reach agreement she changes her mind, driving me, her attorneys and mine more crazy than you can imagine.

Much will happen in the future. Please do not take any of this personally no matter what the appearances or "captions". All recent law students feel they know a great deal, and you have a tendency to greatly underestimate my intellectual acumen and skills. I will explain everything I may have to do, but until I do, please do not take any of them personally or in any way which might negatively affect our relationship. Let the storm of litigation pass. Do not cut off communications, and most of all, stop advising your mother against my interest, and DO NOT take

over the active management of my KEOGH which is in her name. As it stand, your active take over of the Ryan account will put you in the caption of one lawsuit (I had warned you to stay away), if you touch anything in the KEOGH, I will consider that an affront to me and act accordingly. Moreover, your active assistance to your mother, which will come out at depositions, will make you an accessory of the waste of trust assets that will in part be alleged for her removal as trustee and could make you liable. To some extent for conversion.

Lastly, call Roden and have that account changed in my name or that of the GFT. There is no question that the funds came from me, and your steadfast refusal to comply with my repeated demands constitutes conversion.

And finally, I had written your mother that under no circumstances were you or she to sign a lease relating to 29 City Bld. I suggested alternatives, none of which would have affected you. Your mother ignored me. The rents you seem to be collecting without authority to do so, are conversion. Also, your mother has informed her attorney that you told her of the amounts of moneys invested by me in our partnership. Such disclosure constitutes a violation of your duties to me as your partner, moreover you know of course that under no circumstances may you withdraw partnership funds etc... This fiduciary breach may necessitate the termination of the partnership (at least for now) and the liquidation of all positions and remittance to me of my half after an accounting. I hope that just as with the Roden matter, you will not resist foolishly and cause senseless litigation to occur which because it will allege conversion, might prejudice or render difficult or delay your admission as a result of ethics committee inquiries.

All of this is not to suggest that I am attacking you. Whatever your mother's insane theories, I love you more than you will ever appreciate, but I must proceed to right the wrongs your mother has perpetuated, not the least of which are the hundreds of thousands she has wasted due to incompetence and mismanagement.

UNLESS THERE IS A SETTLEMENT, the battle will rage viciously and unfortunately as it is so unnecessary -- however please believe me when I tell you that no man has tried harder than I to avoid that consequence, repent for any wrong, and save a family and marriage.

We need to talk more... the when will eventually depend on you.

Love you
Dad