

LAW OFFICES  
**McCURDY & CANDLER, LLC**  
SUITE 550  
160 CLAIREMONT AVENUE  
DECATUR, GEORGIA 30030

JULIUS A. McCURDY (1903 - 1993)  
SCOTT CANDLER, JR. (1926 - 1994)  
J. ROBIN HARRIS (1925 - 1989)

JOHN WALTER DRAKE  
SCOTT CANDLER, III  
DONALD C. SUESSMITH, JR.  
SCOTT CANDLER, IV  
BENJAMIN H. PIERMAN

BRIAN DEUTSCH  
STEPHANIE JONES

TELEPHONE: 404 678-1824  
WEBSITE: WWW.MCCURDYCANDLER.COM

E-Mail Address:  
bpierman@mccurdycandler.com

September 17, 2021

Via U.S. Mail and Email

John J. Park, Jr., Esq.  
Law Office of Jack Park  
616-B Green Street  
Gainesville, GA 30501

RE: *Charles Logan Lynch and David Noel Lynch v. The Estate of Charles J. Lynch, III, et al.*  
Fulton County Superior Court, Civil Action No. 2020CV334996  
USCR 6.4(b) Effort to Resolve Discovery Dispute

Dear Mr. Park,

We are in receipt of your prior letter dated September 14, 2020 regarding the above matter.

Our client has consistently maintained to you that she **may** have responsive documents in her storage facilities in and around Myrtle Beach, South Carolina. As you know, she moved from Atlanta to Myrtle Beach earlier this year and had to put much of possessions in storage. Also, as we stated in our discovery responses, you and your clients are free to review these storage facilities to ascertain if there are any documents responsive to your requests. We will do everything we can to accommodate your reasonable plans to do so.

However, it is unreasonable to demand that our client, who is a senior citizen, has a long history of back injuries, including surgery on her spine, and who suffers from chronic spinal pain, to physically move dozens and dozens of boxes, furniture, and other personal possessions around her storage units. As she stated in her deposition, she will have to hire people to assist her with the arduous physical labor.

She should not, and the discovery rules do not demand that she, solely bear that cost. Again, we ask, and have asked, for you and your clients to formulate a reasonable plan to accomplish these tasks. You have not provided us with such a plan to date.

We have never refused you or your clients access to these documents and are not refusing

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access now. I do not mean to be repetitive, but we simply ask for a plan to accomplish the search and review of these storage facilities. Since your clients live in the Atlanta area, we felt that it was best for them to tell us when they wish to access the storage facilities.

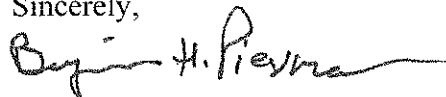
However, instead of a plan for action, we receive your unreasonable demand to produce these documents by today, after three (3) days notice. This is simply an insufficient amount of time.

Your demand is made even more unreasonable because the documents you seek, if our client even possesses any that are responsive to your requests, can charitably be called "ancient". Your clients are basing this litigation, which is at least their third attempt at suing our client, on allegations that are forty (40) plus years old. Thus, it is entirely logical that our client has no idea about documents from a company that her late husband ceased working with and for at some point in the 1980's or early 1990's.

We look forward to your reply with at least a tentative plan for accessing and reviewing these documents in the near future. We truly wish to collaborate and cooperate with your discovery requests, but we do ask for reciprocal collaboration and cooperation.

Please feel free to contact me if you have further questions or concerns regarding discovery or this matter in general. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Benjamin H. Pierman", with a long, sweeping horizontal line extending to the right.

Benjamin H. Pierman