From: Kenia Bravo
To: "Rene Murai"

Cc: <u>"avelinogonzalez@bellsouth.net"</u>
Subject: Corbacho Daudinot v. Puig et al.
Date: Friday, April 10, 2015 1:46:00 PM

Dear Mr. Murai,

Thank you for your continuing efforts to secure a settlement agreement between the parties in the case of Corbacho Daudinot v. Yasiel Puig, et al.

This email shall serve to memorialize our conversation, wherein you advised me to propose an agreed motion to extend the expert witness deadline (currently set for April 15) to permit the parties to enter into an agreement without the expense of further litigation, and to send you the motion in order for you to provide it to Sean Santini—who is vacationing at the moment—in order to procure his agreement.

On a separate matter, which I did not mention during our conversation, Mr. Santini has sent the Plaintiff Requests for Production, to which I have not yet sent a response. To avoid unnecessary costs and time of litigation if our goal is to enter into a settlement, I would like to have a stay in the discovery for the moment while we negotiate.

When Sean returns, I would like to set up a meeting next week with you and him—without the presence of our clients--in order to further negotiate and iron out the numbers. Based on the time constraints of the case, I believe face-to-face negotiation is preferable to telephone and email communication. Additionally, we shall present Mr. Santini with new documentation from Cuba that has just recently been brought to our attention—specifically, a Cuban court sentence from a separate trial of two other individuals that Puig sent to prison. The sentence demonstrates that Puig—along with several other baseball players—accussed two (2) other individuals of Human Trafficking and testified against them, sending them to prison. We additionally have the affidavit of another man, who Puig sent to prison by accusing him of Human Trafficking and then testifying against him as well.

Sincerely,

Avelino J. Gonzalez, Esq.

AJG/kb

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