

EXHIBIT 3

*Ramón A. Abadin*

305.671.2124

ramon.abadin@sedgwicklaw.com

September 28, 2017

Via Email

Lori Holcomb, Division Director
Ethics and Consumer Protection
The Florida Bar
651 East Jefferson Street
Tallahassee, Florida 32399-2300
E-mail: lholtcomb@floridabar.org

Re: Unlicensed Practice of Law Investigation of Christopher Riley/TIKD.com
The Florida Bar Case No. 20174035(11B) & 20144045(11B)

Dear Ms. Holcomb:

Along with Gregory Coleman from the law firm of Critton Luttier Coleman, LLP, we represent Christopher Riley and Tikd Services LLC (“Tikd”) in connection with the above-referenced UPL complaints. Please direct all future communications regarding this matter solely to the attention of Mr. Coleman and me.

Thank you very much for reaching out to me on Tuesday, September 26, 2017, along with Elizabeth Tarbert and Will Spiliias, to discuss the problems Mr. Riley and Tikd are facing due to The Florida Bar’s (the “Bar”) ongoing investigation of complaints lodged by The Ticket Clinic and its lawyers.

As I explained, lawyers who are associated with The Ticket Clinic, and others who see Tikd as unwelcome competition, are threatening ethics complaints against any lawyer who provides legal services to Tikd’s customers. Worse, these lawyers are claiming that the Bar has issued “opinions” or “letters” concluding that Tikd is engaged in the unlicensed practice of law and illegal fee-splitting, and that any lawyer performing services for Tikd’s customers is committing ethical breaches. As discussed above, you confirmed the Bar has not issued any such opinions or made any such findings. Rather, a UPL complaint brought by attorney Ted Hollander from The Ticket Clinic is being investigated by the Bar’s UPL committee system, and has been forwarded from a local circuit committee to the UPL Standing Committee for consideration in October. We all agree that only The Florida Supreme Court has the authority to decide if Tikd’s business model is the practice of law.

Unfortunately, the combination of The Ticket Clinic’s highly-publicized complaints, the Bar’s investigation, and public and inaccurate claims from lawyers at The Ticket Clinic that the Bar has prejudged Tikd’s case is causing Mr. Riley and Tikd immediate harm. Lawyers are declining to represent Tikd’s customers out of fear of Bar grievance actions from Mr. Hollander. Tikd faces the real

Lori Holcomb, Esq.

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possibility of being driven out of business before The Florida Supreme Court can decide whether The Ticket Clinic's complaints have merit.

Thank you for discussing possible solutions to minimize the threat posed to Tikd while the Bar investigates The Ticket Clinic's complaints. Given the misinformation that is being spread and misattributed to the Bar, we would ask that the Bar make a public, written statement along the following lines to clarify and preserve the status quo pending a resolution of the Bar's consideration of these complaints, or a ruling by The Florida Supreme Court:

- Neither The Florida Bar nor the Standing Committee on the Unlicensed Practice of Law has reached the conclusion or made the finding that Tikd is engaged in the unlicensed practice of law or illegal fee-splitting.
- The Standing Committee will consider Mr. Hollander and The Ticket Clinic's allegations against Tikd at its meeting on October 13, 2017.
- The Bar's UPL Standing Committee is not a court and does not make findings or conclusions regarding whether a party is engaged in the unlicensed practice of law.
- After its meeting, the Standing Committee will make a decision to either close the investigation or recommend further proceedings.
- Only The Florida Supreme Court can decide whether Tikd is engaged in the unlicensed practice of law.
- The Bar will not proceed with grievances against attorneys representing Tikd's customers until the Bar concludes its investigation on Tikd or, alternatively, The Florida Supreme Court rules on whether Tikd is engaged in the unlicensed practice of law or illegal fee-sharing.

None of these statements should be controversial for the Bar to make; in fact, they would help clarify that the Bar is not engaged in actions that could expose it to liability under *North Carolina State Bd. of Dental Examiners v. Federal Trade Commission*, 135 S. Ct. 1101 (2015). I am happy to work with you as to specific wording, but this public message is essential to mitigating the anticompetitive harm that is being caused by the misuse and inaccurate descriptions of the Bar's current investigation into Tikd.

Very truly yours,

/s/ *Ramón A. Abadin*

Ramón A. Abadin
Sedgwick LLP

Gregory W. Coleman
Critton Luttier Coleman, LLP
303 Banyan Boulevard
Suite 400
West Palm Beach, FL 33401
GColeman@lawclc.com

Lori Holcomb, Esq.

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RAA/imc

cc: John F. Harkness, Jr., Executive Director, The Florida Bar
Joshua E. Doyle, Executive Director Designee, The Florida Bar
Jacquelyn P. Needelman, Branch UPL Counsel, The Florida Bar