

# EXHIBIT 1

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**From:** Monica M. Littman <mlittman@kdvlaw.com>  
**Sent:** Thursday, May 20, 2021 1:42 PM  
**To:** NJDdb\_ORDERS\_Bongiovanni  
**Cc:** Richard J. Perr; ari@marcuszelman.com  
**Subject:** Piccinetti v. Clayton, Myrick, McClanahan & Coulter, PLLC, et al. - Case No. 3:16-cv-04032-TJB  
**Attachments:** Letter from ICS.pdf

**CAUTION - EXTERNAL:**

Dear Judge Bongiovanni:

This firm represents Respondent, Theodore Lachman ("Respondent"), in this case. Please allow this email to serve as a response to Your Honor's Order dated May 13, 2021. This firm does not represent Defendant, Internal Credit Systems, Inc. ("ICS"). It is my understanding that ICS does not have representation for this case.

Respondent, in his capacity as President of ICS, has provided me with the attached letter, which states that ICS objects to the disclosure of the letter dated May 7, 2019 from Christopher Dalton.

Respondent, in his individual capacity, cannot take a position as to whether the letter dated May 7, 2019 can be disclosed to counsel for Plaintiff. Respondent, in his individual capacity, never had an attorney-client relationship with Mr. Dalton. Respondent, in his individual capacity, never signed an engagement letter with Mr. Dalton to represent him personally. Any conversations that Respondent had in his individual capacity with Mr. Dalton are not privileged.

Respectfully,

Monica M. Littman

**Monica M. Littman**  
*Attorney at Law*



**KAUFMAN DOLOWICH VOLUCK**

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# EXHIBIT 2

**Internal Credit Systems, Inc.**

PO BOX 52088  
Durham, NC 27717

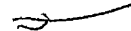
Toll Free: 1-877-405-1900

NC Dept. of Insurance Permit #101394

Dear Magistrate Judge Bongiovanni,

I am President of Internal Credit Systems. Internal Credit Systems, is not waiving the Attorney Client Privilege and Internal Credit Systems objects to providing the letter dated May 7<sup>th</sup>, 2019 from Christopher Dalton to the Court along with all his exhibits.

Sincerely,



Ted Lachman  
President  
**INTERNAL CREDIT SYSTEMS, INC**

# EXHIBIT 3

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**From:** Ari Marcus <ari@marcuszelman.com>  
**Sent:** Thursday, May 20, 2021 2:03 PM  
**To:** Monica M. Littman  
**Cc:** NJDdb\_ORDERS\_Bongiovanni; Richard J. Perr  
**Subject:** Re: Piccinetti v. Clayton, Myrick, McClanahan & Coulter, PLLC, et al. - Case No. 3:16-cv-04032-TJB

**CAUTION - EXTERNAL:**

Your Honor:

Based on Mr. Lachman's assertions, I do not see any rational, legal or logical, that should preclude Plaintiff from seeing Mr. Dalton's May 07, 2019 disclosure. In Your Honor's May 02, 2019 Order, Mr. Dalton was Ordered to provide Your Honor with all communications with **Lachman** (not ICS), regarding the scope of his representations with Mr. Lachman. These communications clearly cannot be considered privileged communications that would justify an objection from ICS.

Furthermore, as a corporate entity, ICS cannot represent themselves. As such, any correspondences from ICS should be disregarded.

Very truly yours,

*Ari H. Marcus, Esq.*  
Marcus & Zelman, LLC

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