MCNAMARA LEGAL SERVICES, P.A.

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SENT VIA USPS, AND EMAIL

April 25, 2023

Jeffrey H. Skatoff, Esq. 4440 PGA Blvd Suite 600 Palm Beach Gardens, FL 33410

RE: Estate of Lynn Edward Baker, 22-CP-3062, in and for Collier County.

This letter is being sent out to any interested party (if represented – their legal counsel) that filed a claim in the Estate of Lynn Edward Baker.

We are objecting to all claims as a matter of course, as is permitted under the Florida Probate Code. There are approximately 100 investors, whether individuals or entities. The investments made through Lynn Edward Baker's various entities have a commonality; that the funds were being invested either when a company offered a sales event, or when a company went public and its investors could cash out upon that occurrence.

The Estate is not in control of the underlying investments as they were directed to, and are under the management of, the respective companies. Investments come with risk. You may not receive all your initial investment if the company fails, or you may receive substantially more if the company succeeds. In either event, claims based on the actual amount of investment are not an accurate representation of the investor agreements.

Although we have filed our objections, we are willing to extend the statutory requirement to file a separate action, until further notice, as evidenced by the attached agreement.

I would discourage anyone from filing a suit within the statutory period if you are not willing to sign the attached agreement. Mr. Baker's personal assets in the estate are de minimis, with only about \$50,000 of this estate's current net worth being an asset of Mr. Baker's. So, even if you were to file a successful suit now, there would be little to no value/gain.

If the attached Agreement to Suspend Time for Filing Independent Action meets with your approval, please sign and scan, and email back the executed version via PDF. For counsel, you can e-file the same through the e-filing portal.

We have attempted to hire a Conservator. The job of a conservator is very similar to that of a Personal Representative in the estate. However, the Conservator is going to be responsible for the annual management of the LLC's until their payout event(s). In this matter, we are seeking an individual or

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entity that has experience with SEC reporting requirements, LLC management, and accounting. Due to the lack of available funds for this needed position, we have been unsuccessful in securing someone qualified, capable, and **willing** to do the work.

As we progress through this matter, I will send general updates to all interested parties. We are not communicating one-on-one with any individual investor. If I were to have calls and emails with each investor, we would not be able to progress the matter, and would waste limited resources in the process.

Mr. Baker had several password-protected databases, and no one knows how to access the data. We have spent a good amount of time trying to piece the information together into something usable and helpful. We have subpoenaed Google, Verizon, and Comcast in an effort to get access to the data as the legal representative to the estate. We have had some, albeit limited success in getting additional information from the respective data providers.

Although Mr. Baker's portion of the estate is de minimis, it is my belief that the estate will have to file an estate tax return. The reasoning: 1) some investors do not have written contracts for their investment; 2) by all accounts, there was in excess of the estate tax limit; 3) some of the LLC entities that you may have invested in have Mr. Baker as the sole member. If the assets are not accurately disclosed to the Internal Revenue Service, as funds belonging to others, his estate would appear to owe estate taxes, which ultimately would dilute each investor's return. Clearly that outcome would not be in any investor's interest and with limited resources, could force the untimely liquidation of shares causing further injury to the affected investors.

We are cognizant of the immense interest in this matter, as several million dollars are otherwise tied up and unavailable to the respective investors. We are doing everything in our power to progress this matter efficiently and as cost-effectively as possible.

Regards,

Brian McNamara

Attorney for the Estate of

Lynn Edward Baker

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR COLLIER COUNTY FLORIDA

Organization/Firm (If applicable:

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Email:		

FOR THE ESTATE:

/s/ Brian McNamara, Esq. /s/ BRIAN McNAMARA ESQ. Florida Bar No. 98022 5425 Park Central Ct. Naples, FL 34109

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