

EXHIBIT B

From: Dagostino, Alida <alida.dagostino@dlapiper.com>
Sent: Monday, January 27, 2020 9:44 AM
To: Walt Tollison
Cc: Lauren Price; Stacy Nixon (snixon@receiverfip.com); Elizabeth Clark (eclark@receiverfip.com); Peterson, Joseph
Subject: RE: Scott A. Kohn, Future Income Payments

Mr. Tollison,

I appreciate your follow up and patience while we've been evaluating the Receiver's request. The receivership order granted the Receiver authority over the "Defendants" defined to include Messrs. Kohn, Hipp, Keneally and Future Income Payments LLC. The Receiver does not stand in the shoes of other entities related to one or more of these Defendants, or, by extension, appear to have authority on the basis of this order to receive their client file documents.

This poses a complication. Most of the matters we handled for Future Income Payments involved other, third-parties as clients (i.e., clients who are not among the Defendants). Accordingly, these other clients do not fall within the scope of the Receiver's authority. There is only one matter we have identified that we believe involved the representation of only Mr. Kohn and Future Income Payments. We are confirming that with the relationship attorney, and if that is accurate, we will transfer documents related to that one matter as quickly as possible.

In the meantime, per your request, I have confirmed with our finance department that there are no funds related to Future Income Payments in our client trust account.

Thank you, and I'm copying my colleague, Joe Peterson, as he will assist as we proceed.

Alida Dagostino
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