Electronically Filed
Docket: 24-CCB-0031
Filing Date: 02/20/2025 05:13:37 PM EST

LEWIS
EXHIBIT D

From:	Seamus Kelly
To:	Lesser, Jacqueline
Cc:	Bailey, Jill; Bacon, Barbara; Aranda, Cassidy
Subject:	Re: Bell v Lewis Opening Written Statement
Date:	Wednesday, February 19, 2025 1:52:22 PM
Attachments:	image004.png image001.png

No I have not sought their permission. It's irrelevant to our claims or your defenses.

Seamus T. Kelly
Member
Music City Law, PLLC
seamus@musiccityfirm.com
(615) 200-0682
1033 Demonbreun Street, Suite 300
Nashville, TN 37203

IMPORTANT: This communication from the law firm of Music City Law, PLLC is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521, and contains information that may be confidential and privileged. Be advised that if you are not the intended recipient(s), any dissemination, distribution or copying of this communication is prohibited. Please notify the undersigned immediately by telephone or return e-mail. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS and other taxing authorities, we inform you that any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed on any taxpayer or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein. This message is intended for the named recipients only. It may contain information protected by the attorney-client or work-product privilege. If you have received this email in error, please notify the sender immediately by replying to this email. Please do not disclose this message to anyone and delete the message and any attachments. Thank you.

On Wed, Feb 19, 2025 at 1:49 PM Jacqueline.Lesser@icemiller.com <Jacqueline.Lesser@icemiller.com> wrote:

> Hi Seamus – the agreements are confidential so that they cannot even be put into evidence without approval of the other signatory to the agreement. Please confirm today that you have received approval from the parties to the agreement whose names you have redacted.
>
> **Jacqueline Lesser** | Partner
> P 215-982-5165
> 1735 Market Street Suite 3900 Philadelphia, PA 19103
> Jacqueline.Lesser@icemiller.com | icemiller.com

From: Seamus Kelly <seamus@musiccityfirm.com>

Sent: Monday, January 13, 2025 1:48 PM
To: Lesser, Jacqueline <Jacqueline.Lesser@icemiller.com>
Cc: Lantz, Robin <Robin.Lantz@icemiller.com>; Bacon, Barbara <Barbara.Bacon@icemiller.com>
Subject: Re: Bell v Lewis Opening Written Statement

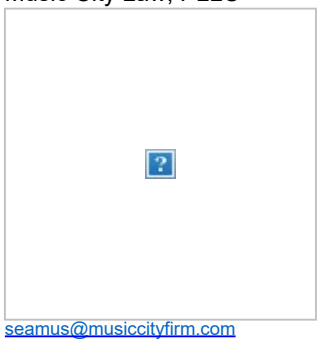
Hi Jacqueline,

The agreements were confidential. They serve no relevance here, other than their existence, so I see no point in revealing further confidential information in publicly filed documents. Can you tell me how the redacted information is in any way relevant to your client's defenses?

Best,

Seamus

Seamus T. Kelly
Member
Music City Law, PLLC



seamus@musiccityfirm.com
(615) 200-0682
1033 Demonbreun Street, Suite 300
Nashville, TN 37203

IMPORTANT: This communication from the law firm of Music City Law, PLLC is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521, and contains information that may be confidential and privileged. Be advised that if you are not the intended recipient(s), any dissemination, distribution or copying of this communication is prohibited. Please notify the undersigned immediately by telephone or return e-mail. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS and other taxing authorities, we inform you that any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed on any taxpayer or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein. This message is intended for the named recipients only. It may contain information protected by the attorney-client or work-product privilege. If you have received this email in error, please notify the sender immediately by replying to this email. Please do not disclose this message to anyone and delete the message and any attachments. Thank you.

On Sat, Jan 11, 2025 at 9:53 AM Jacqueline.Lesser@icemiller.com <Jacqueline.Lesser@icemiller.com> wrote:

> Hi Seamus,
>
> Although I did not object to the production of the contracts you produced with redactions – there is no reason for these redactions in the production. I can accedpt them as the filing – so they do not need to be under seal. Please provide me with the unredacted versions of the agreements.
>
> Thank you.
>
> **Jacqueline Lesser** | Partner
>
> P 215-982-5165
> 1735 Market Street Suite 3900 Philadelphia, PA 19103
> Jacqueline.Lesser@icemiller.com | icemiller.com
>
> ---
>
> **From:** Seamus Kelly <seamus@musiccityfirm.com>
> **Sent:** Monday, January 6, 2025 11:45 PM
> **To:** Lesser, Jacqueline <Jacqueline.Lesser@icemiller.com>
> **Subject:** Bell v Lewis Opening Written Statement
>
> Hi Jacqueline,
>
> Please see the attached, which I just filed.
>
> Best,

Seamus

Bell Lewis Witness Statement.pdf

Seamus T. Kelly
Member
Music City Law, PLLC

seamus@musiccityfirm.com
(615) 200-0682
1033 Demonbreun Street, Suite 300
Nashville, TN 37203

IMPORTANT: This communication from the law firm of Music City Law, PLLC is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521, and contains information that may be confidential and privileged. Be advised that if you are not the intended recipient(s), any dissemination, distribution or copying of this communication is prohibited. Please notify the undersigned immediately by telephone or return e-mail. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS and other taxing authorities, we inform you that any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed on any taxpayer or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein. This message is intended for the named recipients only. It may contain information protected by the attorney-client or work-product privilege. If you have received this email in error, please notify the sender immediately by replying to this email. Please do not disclose this message to anyone and delete the message and any attachments. Thank you.

****
****

CONFIDENTIALITY NOTICE: This E-mail and any attachments are confidential and may be protected by legal privilege. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of this E-mail or any attachment is prohibited. If you have received this E-mail in error, please notify us immediately by returning it to the sender and delete this copy from your system.
Thank you.
ICE MILLER LLP

****
****

Proof of Delivery

I hereby certify that on Thursday, February 20, 2025, I provided a true and correct copy of the Lewis Exhibit D to the following:

Keith F. Bell, represented by Keith F. Bell, served via ESERVICE at drkeithbell@gmail.com

Signed: /s/ Jacqueline M. Lesser