

From: [Berg, Geoffrey](#)
To: [Melissa Moore](#); [Chanler A. Langham](#)
Subject: Atlas/Torres/Sinn settlement agreement violation
Date: Monday, December 23, 2013 9:26:56 PM
Attachments: [IMG_0354.jpg](#)

Melissa and Chanler,

As you know, the settlement agreement between our clients contains confidentiality and non-disparagement clauses. I can't say I've ever seen a violation of those provisions quite like this one, but Mr. Sinn texted the attached picture to Craig Taylor this past weekend. As you can see, the photo features Mr. Sinn and Mr. Torres. Also making an appearance is Chanler's co-counsel, not exactly living up to the highest standards of professionalism by upholding his middle finger instead of the dignity of the profession, as the rules require.

Whether they thought they were being funny or trying to accomplish something else isn't clear. I'm going to guess, though, that this picture was not taken right after your clients and co-counsel either refused to discuss Atlas, Taylor, Marshall or the settlement or used "words to the effect that all disputes among [the Parties] have been fully settled and resolved" and nothing else, as the agreement requires.

It looks to me like they were just drunk. Whatever the case, Mr. Taylor isn't amused, and I don't blame him.

This case took a lot of effort from all of us to get settled and I don't want to undo it over this. Without waiving Atlas' right to act in response to any future violation(s), and without asking that either of your clients admit to having violated it, request is made that Mr. Sinn, Mr. Torres and Chanler's co-counsel (whose name escapes me at the moment) each apologize to Mr. Taylor before Christmas and then leave him alone.

If you would like to discuss, please let me know.

Geoff

