

From: Nithin Jayadeva <njayadeva@jdsdevelopment.com>
Subject: Fwd: BNP Development LLC v. JDS Principal 9DKB LLC and JDS Principal Parent - AAA Case 01-24-0008-2505
Date: May 7, 2025 at 9:43:28 PM EDT
To: Jonathan Minsker <jminsker@minskerlaw.com>, Michael Stern <mstern@jdsdevelopment.com>, Serena Rakhlin <srakhlin@jdsdevelopment.com>

----- Forwarded message -----

From: **Nithin Jayadeva** <njayadeva@jdsdevelopment.com>
Date: Wed, May 7, 2025 at 9:41 PM
Subject: Fwd: BNP Development LLC v. JDS Principal 9DKB LLC and JDS Principal Parent - AAA Case 01-24-0008-2505
To: James Reiman <jreiman@reimanadr.com>
Cc: Kaufman, Andrew <andrew.kaufman@blankrome.com>, Flanders, Craig <craig.flanders@blankrome.com>, <ahambelton@blankrome.com>, Treiber, Matthew <matthew.treiber@blankrome.com>

Dear Arbitrator Reiman,

Please see the below email I sent to Claimant's counsel today.

Given Kasowitz's withdrawal as our counsel yesterday, we respectfully request an extension of the deadline in your Partial Final Order relating to the production of documents until one week from next Tuesday's status conference. We expect to have retained replacement counsel by that time.

Thank you for your consideration of this matter.

----- Forwarded message -----

From: **Nithin Jayadeva** <njayadeva@jdsdevelopment.com>
Date: Wed, May 7, 2025 at 9:36 PM
Subject: BNP Development LLC v. JDS Principal 9DKB LLC and JDS Principal Parent - AAA Case 01-24-0008-2505
To: Kaufman, Andrew <andrew.kaufman@blankrome.com>
Cc: Flanders, Craig <craig.flanders@blankrome.com>, <ahambelton@blankrome.com>, Treiber, Matthew <matthew.treiber@blankrome.com>

Andrew,

As you know, our counsel withdrew from this matter yesterday, May 6. We are working to retain replacement counsel as soon as possible, so that he or she can advise us with respect to, among other things, the production to be made in response to the Partial Final Order. To that end, we expect to make a substantial production once we have retained replacement counsel. As Arbitrator Reiman requested during today's call, we will be prepared to discuss these issues in detail at Tuesday's status conference.

With respect to yesterday's production of the Assignment in Lieu term sheet, that term sheet and the actual Assignment-in-Lieu are the only documents comprising the Assignment-in-Lieu. Accordingly, we have fulfilled our obligations pursuant to Paragraph E of the Partial Final Order, which requires production of "all documents comprising the Assignment-in-Lieu".

Best,

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