

# **EXHIBIT E-1**

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**From:** Paul Soberon <paul@claimpay.net>  
**Sent:** Monday, July 10, 2023 4:28 PM  
**To:** Curtis Phillips <curtis@consultpcg.com>  
**Cc:** jesse@claimpay.net; Scott Jamison <scott@consultpcg.com>; Justin Willits <justin@consultpcg.com>; Jake Holt <jake@consultpcg.com>; Carlos Pastor <carlos@claimpay.net>; Wilfredo Navarro <wilfredo@claimpay.net>  
**Subject:** Re: Proposed next steps to collect MMA estimates - PCG Claims

Hi Curtis,

Let me know when you have couple mins to go through this.

Thanks,

Paul

On Fri, Jul 7, 2023 at 4:59 PM Paul Soberon <[paul@claimpay.net](mailto:paul@claimpay.net)> wrote:

Hi Curtis,

Thanks for your time.

Yes those covered the main points -

1. You were going to speak to your partners to get sign off to send letters to the insured
2. No payments received to date from strategy of requiring payments before releasing estimates to other attorneys that inquire
3. PCG to provide updated listing of claims with attorney designations

Please let us know good time(s) to speak. We can generally accommodate your schedule.

Best,

Paul

On Fri, Jul 7, 2023 at 4:28 PM Curtis Phillips <[curtis@consultpcg.com](mailto:curtis@consultpcg.com)> wrote:

Hi Jesse and Paul,

Thanks for the call today. To recap- we're going to get on a conference call next week to discuss sending the proposed letters without our estimates and update you on any conversations we've had with other attorneys. We'll also discuss our updated list of claims ya'll were funding. Did I miss anything? Let me know y'all's availability for a call so we can get something on the books.

*Curtis Phillips, Esq.*

*General Counsel / Partner*

**PCG Consulting**

Cell: 251.504.6907 | Email: [Curtis@consultpcg.com](mailto:Curtis@consultpcg.com) | Fax: 205.409.2592

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**From:** [jesse@claimpay.net](mailto:jesse@claimpay.net) <[jesse@claimpay.net](mailto:jesse@claimpay.net)>

**Sent:** Friday, June 23, 2023 12:12 PM

**To:** Scott Jamison <[scott@consultpcg.com](mailto:scott@consultpcg.com)>; Curtis Phillips <[curtis@consultpcg.com](mailto:curtis@consultpcg.com)>

**Cc:** 'jfbahier' <[jfbahier@hestiacapital.net](mailto:jfbahier@hestiacapital.net)>; 'Carlos Pastor' <[carlos@claimpay.net](mailto:carlos@claimpay.net)>; 'Paul Soberon' <[paul@claimpay.net](mailto:paul@claimpay.net)>; 'Wilfredo Navarro' <[wilfredo@claimpay.net](mailto:wilfredo@claimpay.net)>

**Subject:** Proposed next steps to collect MMA estimates - PCG Claims

Scott and Curtis

I know that you have spoken to Paul recently about moving forward to jointly find avenues to collect the estimates prepared for MMA. To summarize the next steps please see

below:

1. Attached is the list of claims we funded and the relevant information for each claim. Could you please add a column to the list identifying the new attorney on the file so we can update our files on our end and make the proper contacts? Additionally, please let us know if you have collected any payments for these claims or have a status update. As the deadline to file Ida claims is quickly approaching, we would appreciate that you provide the information as soon as possible.
2. As discussed with Paul, attached are the proposed letters to the insureds and carriers related to the claims that you prepared services for. Please review and let us know as soon as possible if you have any questions or proposed revisions.
3. Please keep us posted to developments you are seeing on the ground with respect to the claims.

Thank you,

**Jesse T. Schwartz**

General Counsel



954-254-9199

539 W. Commerce St #5925

Dallas, Texas 75208

# EXHIBIT E-2

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**From:** Curtis Phillips <curtis@consultpcg.com>  
**Sent:** Monday, June 26, 2023 1:48 PM  
**To:** jesse@claimpay.net; Scott Jamison <scott@consultpcg.com>; Jake Holt <jake@consultpcg.com>; Justin Willits <justin@consultpcg.com>  
**Cc:** 'jfbahier hestiacapital.net' <jfbahier@hestiacapital.net>; 'Carlos Pastor' <carlos@claimpay.net>; 'Paul Soberon' <paul@claimpay.net>; 'Wilfredo Navarro' <wilfredo@claimpay.net>  
**Subject:** RE: Proposed next steps to collect MMA estimates - PCG Claims

Hi Jesse,

We will work on reconciling the list to make sure it's up to date. Regarding the letters you proposed, we don't think sending those is the best course of action. Based on our conversations with our attorney, we should not be providing our estimates to insurance companies or property owners unless they pay for our work product. Because our contract was with MMA, our attorney advised that our right to payment only exists in conjunction with MMA's collections. So, if MMA does not collect on a claim, then our only way of getting paid would be to get the new attorney to pay us for our estimate. If we send the proposed letters along with our estimates, the receiving party has no obligation to pay for our work product since our contract was with MMA. Please feel free to give Scott or I a call if you would like to discuss further

*Curtis Phillips, Esq.*

*General Counsel / Partner*

**PCG Consulting**

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**Sent:** Friday, June 23, 2023 12:12 PM  
**To:** Scott Jamison <[scott@consultpcg.com](mailto:scott@consultpcg.com)>; Curtis Phillips <[curtis@consultpcg.com](mailto:curtis@consultpcg.com)>  
**Cc:** 'jfbahier hestiacapital.net' <[jfbahier@hestiacapital.net](mailto:jfbahier@hestiacapital.net)>; 'Carlos Pastor' <[carlos@claimpay.net](mailto:carlos@claimpay.net)>; 'Paul Soberon' <[paul@claimpay.net](mailto:paul@claimpay.net)>; 'Wilfredo Navarro' <[wilfredo@claimpay.net](mailto:wilfredo@claimpay.net)>  
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