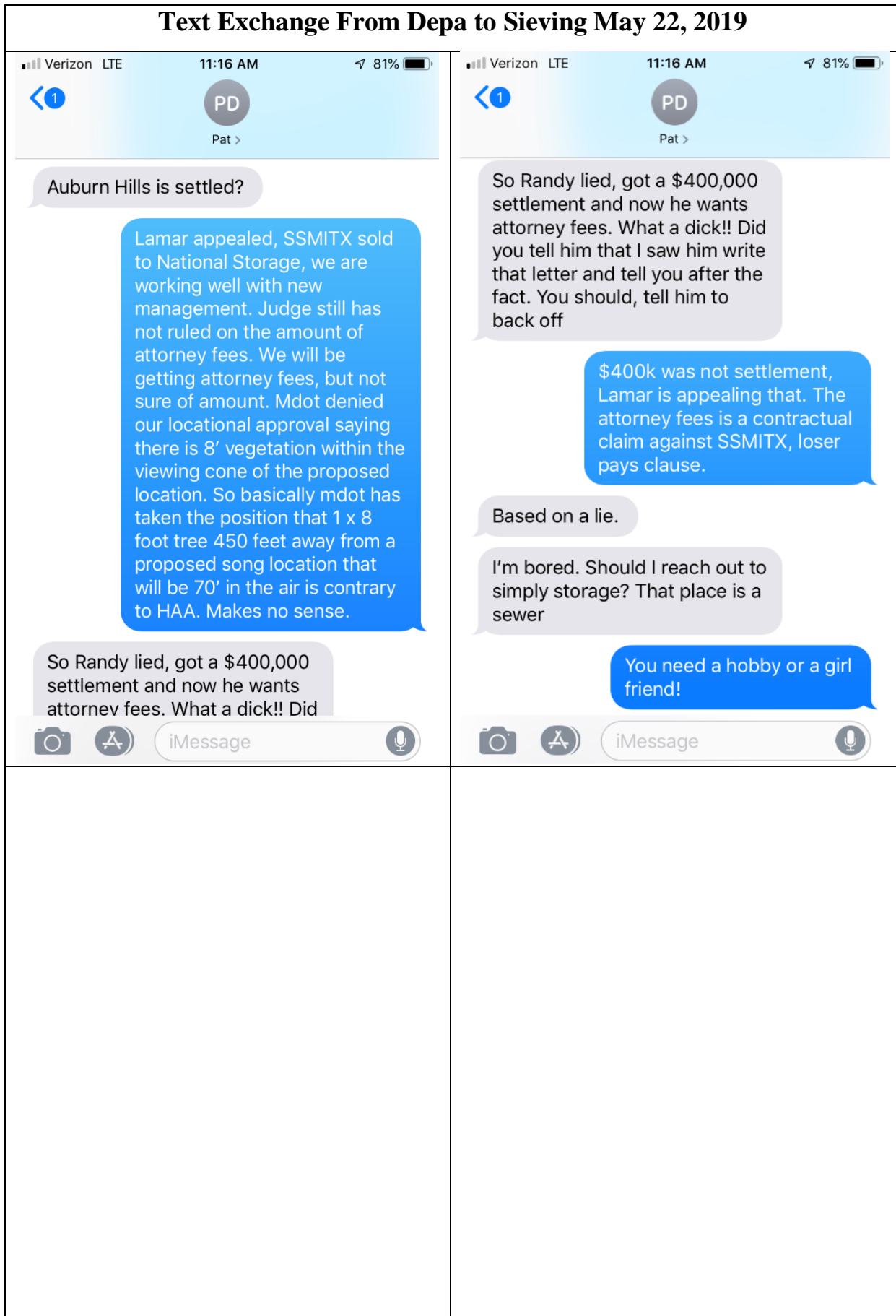


- a. In an attempt to elicit some type of incriminating admission from IO in-house attorney, Jeff Sieving, on May 22, 2019 Depa sent a random text to Sieving inquiring about the status of the Auburn Hills case, after a brief back and forth, Depa states, “should I reach out to simply storage? [International Outdoor] is a sewer”.
- i. Evidence: Text messages between Depa and Sieving
 - ii. Evidence: Emails between Depa and LeVasseur started at least by May 14, 2019, 8 days before the random inquiry from Depa to Sieving. Depa was already in communication with Defendant SSMITX’s attorney prior to May 22, 2019.
 - iii. Evidence: Depa Deposition & Evidentiary Hearing
 1. **Question:** “So what caused you to reach out a year later to Mr. LeVasseur? **[Answer]** Actually tried earlier, but - - with no response, but it was basically just weighing on my mind, what I saw, what was going on, and when I got a text from Jeff Sieving that the case was still, I guess, being appealed but they were going after legal fees, that’s when I decided to reach out.” *Dep., p 13, ln 9-16.* Depa’s text exchange with Sieving occurred on May 22, 2019, 8 days after Depa was already in email contact with LeVasseur. It is impossible for Sieving’s text to be the impetus that caused Depa to reach out to LeVasseur.
 2. **Question:** “Okay. And when did you get this text from Mr. Sieving that kind of sparked your efforts? **[Answer]** Before I reached out. **[Question]** Before the first letter? **[Answer]** No, earlier this year, maybe, April [2019]. *Dep., p 15, ln 17-21.*
 3. **Question:** “Why reach out to Mr. LeVasseur in May of 2019 with the information? **[Answer]** ...I just was in disbelief, disgusted the fact that [Mr. Oram] would do something to this extent with this amount of money involved, with this amount of personal injury to the Simply Self Storage lawyer, just from what I understand, through a text that Mr. Sieving sent me, that I just - - you know, just wanted - - wanted to get to the truth. Wanted the truth to be out there.” *Evd. Hrg., p 67-68, ln 12-5.* Depa’s text exchange with Sieving occurred on May 22, 2019, 8 days after Depa was already in email contact with LeVasseur. It is impossible for Sieving’s text to be the impetus that caused Depa to reach out to LeVasseur.
 - iv. Evidence: LeVasseur Invoices: Though not provided to International until after the re-trial, LeVasseur’s billing reports on February 27, 2019 he received and reviewed “correspondence from Brighton resident regarding International Outdoor fraud allegations.” This was a letter from Depa which he states that he sent a letter in September of 2018 and February of 2019. Levassuer NEVER acknowledged or provided such letters to us or the court. What exactly did these letters say. Levassuer never shared with anyone that letters existed. Were there other letters received by Levassuer? Where are the letters that Depa states that he sent to SSMITX? They never provided them as well. Note that the billing entries provided by Altior, post 2nd trial, show all redacted billing entries from the day after Levassuer received the letter from Depa and all Altior billings are redacted from 2.2819 thru and until 5.15.19 where there are billing entries for communications with Levassuer. So when Depa is testifying that what prompted

him to reachout to Levassuer was the text exchange on 5.22.19, both Levassuer and the attorneys for Lamar knew that was NOT TRUTHFUL but failed to clarify it to the courts or to us., since there is email communication on 5.13.19 between Levassuer and Depa, they knowingly allowed Depa to falsely testify because on 5.21.19, Depa had already had the conversation(s) with Levassuer and they had already provided an affidavit to him. Stark Regan and Altior had a joint litigation agreement so obviously all lawyers knew what was stated under oath was not truthful and did not clear it up with the courts. Based on manipulated, altered and incomplete billings, after receipt of the the letter by LeVasseur, he did no follow-up or did not bill for any follow-up. Yet, Altior's billing from 2.28.19 to 5.15.19 for that same time period is completely redacted. Yet, there was nothing going on to be invoiced since the matter was at the COA and completely briefed and filed. So from the time that Levassuer received the letter from Depa, he supposedly did NOTHING until Depa reached out again on 5.13.19 and there are no billing entries from Levassuer on the conversation with Depa until an email on 5.21.19 at 8:34 am where Levassuer states "I'm going to prepare a draft affidavit for you, I'll email it to you probably later today. If it's correct I'll have you sign it". No letter was ever produced, though requested on multiple occasions. In coordination/communication between Levassuer and with Altior billing entries from 5.15.19 and 5.16.19 (2x), Altior was aware of the communications and conversations with Depa. Knowing Depa, these conversations were recorded. By the time of the text exchange with Sieving on the evening of 5.22.19 at 9:05 pm., LeVasseur had numerous communications with Depa via email and also on the phone that do not appear on the billing records and by the time he states what prompted him to reach out to Levassuer, Levassuer had prepared one or possibly two drafts of an affidavit by 5.22.19 4:42 pm. (see billing records)

Text Exchange From Depa to Sieving May 22, 2019



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(248) 641-9955

OB Companies/Simply Self Storage

Kyle A. Schmutzler
7505 W. Sand Lake Rd
Orlando, FL 32819

Client Number 5858 WG
Invoice Number 59593
Invoice Date 04/12/2019
Activity Billed Through 03/31/2019

Regarding: **Lamar/International Outdoor**

00011

Services:

Note that the attorneys had gotten communications from Deza, in September as he stated in his deposition and also if you look at the Atto billings, they had been in communication with Deza for quite some time. The attorneys withheld important evidence and all the communications from plaintiffs.

02/15/2019	CEL	Receive and review Lamar reply brief on appeal.
02/18/2019	CEL	Prepare subpoena for billing records regarding International Outdoor.
02/27/2019	CEL	Receive and review correspondence from Brighton resident regarding International Outdoor fraud allegation.
02/28/2019	CEL	Review file and prepare for hearing on motion for attorney fees.
02/28/2019	SGR	Office conferences with Christopher LeVasseur regarding evidentiary hearing; legal research on matters.
03/01/2019	CEL	Telephone conference with attorney for Lamar regarding attorney fee motion; receive, review and reply to email from same.
03/01/2019	CEL	Continue preparation for evidentiary hearing on motion for attorney fees; research regarding standards for award of fees; review and assemble exhibits for hearing.
03/01/2019	SGR	Office conferences with Christopher LeVasseur regarding attorney fee hearing; review file; conduct legal research on rules of evidence and other matters; office conference with Christopher LeVasseur regarding same.
03/04/2019	CEL	Review file and prepare for hearing on attorney fees; attend hearing.
03/04/2019	SGR	Review files; attend attorney fee hearing with Christopher LeVasseur at OCCC.

no time and cost attached to any invoices

Total Services:

\$7,128.00

The one is a number and the other is a letter. Software does not use two different fonts on the same item, the rest of the numbers have been manually input in this invoice. The 2 does not look like the other fonts on this page.

Disbursements:

Document Submitted for Filing to MI Oakland County 6th Circuit Court.

OB Companies/Simply Self Stora

Invoice number 59593

03/31/2019 Postage expense

6.80

Total Disbursements: 6.80

Again, no total on the invoice. All software adds the two totals and gives a grand total. It is very obvious that this invoice has been intentionally manipulated

STARK REAGAN, P.C.

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OB Companies/Simply Self Storage

Kyle A. Schmutzler
7505 W. Sand Lake Rd
Orlando, FL 32819

Client Number 5858 WG
Invoice Number 59928
Invoice Date 06/07/2019
Activity Billed Through 05/31/2019

Regarding: **Lamar/International Outdoor** 00011

Services: Note: that when Depa was testifying and in cross examination, both Lawyers knew that Depa's story adn timelen was not true Yet, they not only allowed it but in cross examination, elaborated on it further, knowign that the testimony was not truthfu!

- 05/15/2019 CEL Telephone conference with former employee of International Outdoor; telephone conference with Lamar's attorney regarding same.
- 05/22/2019 CEL Draft affidavit regarding Patrick Depa and email to same.
- 05/23/2019 CEL Receive, review and reply to email from Patrick Depa; draft revisions to Depa affidavit.
- 05/24/2019 CEL Telephone conference with with Patrick Depa and draft revisions to affidavit.
- 05/29/2019 CEL Telephone conference with Lamar's attorney regarding Depa affidavit.

Total Services: \$1,224.00
the letter O and the number 0 are obviously different

Disbursements:

Total Disbursements: \$0.00
The two letters, one is a letter and the other a number which is impossible for software to do

There is no total here where there should be a total for the invoice of which obviously has been intentionally manipulated

document Submitted for Filing to MI Oakland County 6th Circuit Court.

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OB Companies/Simply Self Storage

Kyle A. Schmutzler
7505 W. Sand Lake Rd
Orlando, FL 32819

Client Number 5858 WG
Invoice Number 60171
Invoice Date 07/18/2019
Activity Billed Through 06/30/2019

Regarding: **Lamar/International Outdoor**

00011

Services:

06/03/2019	CEL	Telephone conference with Steve McKenney; receive and review correspondence from Patrick Depa; email to client regarding same; telephone conference with client.
06/05/2019	CEL	Receive, review and reply to email from Pat Depa.
06/06/2019	CEL	Receive, review and revise motion to set aside judgment; receive, review and reply to emails from client and Lamar's attorney regarding same; receive and review email from IO's attorney; email to Depa regarding motion filing.
06/06/2019	WG	Conference with Chris LeVasseur regarding motion to set aside judgment; review brief in support
06/07/2019	CEL	Receive, review and reply to email from Patrick Depa.
06/13/2019	CEL	Receive, review and reply to email from client; review rules regarding Seiving misconduct reporting; attention to contacting Alan White.
06/18/2019	CEL	Receive, review and reply to emails from Lamar's attorney; review response to motion to set aside judgment; attention to contacting Patrick Depa; prepare for motion hearing.
06/19/2019	CEL	Appear in court on motion to set aside verdict; telephone conference with client; telephone conference with Patrick Depa; receive and review emails form Depa; receive and review proposed order granting motion and approve same.
06/20/2019	CEL	Receive, review and reply to emails from Lamar's attorneys; receive and review correspondence from court regarding evidentiary hearing;

Again, no time
spent or rate on
the work performed

Document Submitted for Filing MI Oakland County 6th Circuit Court

OB Companies/Simply Self Store

Invoice number

60171

06/20/2019 CEL **advise Depa of same;** email to client regarding Depa conversation.
 Receive and review propose subpoena and document request to International Outdoor computer tech; draft revisions to same.

06/24/2019 CEL Receive, review and reply to emails from Lamar's attorney regarding draft discovery requests.

06/25/2019 CEL Receive, review and reply to email from Lamar's attorney and draft revisions to Sieving deposition subpoena.

06/27/2019 CEL Receive, review and reply to emails from Lamar's attorney; review email to IO's attorney; review and revise proposed protective order.

Note that there is not any time or totals for the work provided

Total Services: **\$3,921.00**

It is very obvious that this total has been manipulated and also the invoice has been modified with entries removed.

Disbursements:

06/30/2019 Photocopy expense

3.75

Total Disbursements:

\$3.75

Note that the numeral 3 is two different font sizes and also not in alignment with the other numbers

There is no total on any Invoice, it has been manipulated and modified. In all invoices it shows a total owed and is never separated and invoiced differently. The software always has the same font size and alignment is perfect on all software.

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OB Companies/Simply Self Storage

Kyle A. Schmutzler
7505 W. Sand Lake Rd
Orlando, FL 32819

Client Number 5858 WG
Invoice Number 60331
Invoice Date 08/23/2019
Activity Billed Through 07/31/2019

Regarding: **Lamar/International Outdoor**

00011

Services:

07/02/2019	CEL	Receive and review Lamar response to IO motion to quash subpoena.
07/02/2019	SGR	Draft and review communications to and from Christopher LeVasseur regarding hearing; review file, motion and response.
07/03/2019	SGR	Attend hearing at OCCC.
07/10/2019	CEL	Receive and review email from Steven McKenney regarding computer inspection.
07/17/2019	CEL	Receive, review and reply to numerous emails from Lamar and IO's attorneys regarding discovery and evidentiary hearing; telephone conference with Patrick Depa regarding possible deposition; attention to hiring private investigator.
07/18/2019	CEL	Receive, review and reply to emails from Lamar's attorneys regarding strategy; receive and review IO's motion to permit discovery and attention to preparing response to same.
07/19/2019	CEL	Attention to locating Alan White for possible interview.
07/22/2019	CEL	Receive, review and reply to emails from Lamar's attorney; receive and review email from Pat Depa; review IO motion to expand discovery and Lamar's response; draft reply to motion and attention to filing same.
07/22/2019	CEL	Telephone conferences with Patrick Depa; email to client regarding same; email to Lamar's attorney.
07/22/2019	WG	Review email from Chris LeVasseur regarding potential witness tampering; telephone conference with Chris LeVasseur regarding same.
07/23/2019	CEL	Review audio of Shea call; receive and review email from Lamar

Note, that there is no time or cost detail to work performed.

The attorneys knew that they had a hearing regarding discovery on the 24th and they needed to distract the courts attention away from the discovery motion and also it is another opportunity to shed a bad light on me personally and they continued to ride this "witness intimidation" theory at every level. The attorneys did not disclose that they had heard the voice conversations and did not inform the court or anyone as such.

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The Lawyers did not disclose to the court that there was no threat of any kind and also that they heard the voice mails, this would have been very important, see the hearing transcript and you will see that they played on this all along even at the COA. The recordings were never disclosed and are very important evidence that was intentionally withheld. The whole "WITNESS INTIMIDATION" argument and motion was staged by Depa and the attorneys. This strategy was preplanned since they got the motion on 07/18/2019. They knew if discovery was going to be allowed, they were in trouble.

OB Companies/Simply Self Stora Invoice number 60331

		attorney; prepare for hearing on IO motion to expand discovery.	Note, there is no time or cost attached to any invoice
07/24/2019	CEL	Appear in court for hearing on motion to expand discovery; telephone conference with client regarding same.	
07/24/2019	CEL	Telephone conference with Patrick Depa; receive and review emails and text messages regarding contacts with Sieving.	
07/25/2019	CEL	Receive, review and reply to emails from Lamar's attorneys; review and approve order regarding IO discovery motion; receive and review Potter motion to withdraw as counsel.	
07/25/2019	CEL	Receive and review IO emergency motion regarding computer inspection and Lamar response to same; attention to preparing concurrence in Lamar response and filing same; receive and review court of appeals decisions regarding same.	
07/25/2019	CEL	Receive and review deposition notices regarding Sieving and computer expert; receive, review and reply to emails from IO's and Lamar's attorneys regarding computer inspection issues.	
07/25/2019	WG	Review emails regarding relief from judgment; conference with Chris LeVasseur regarding same.	
07/26/2019	CEL	Receive, review and reply to emails from Lamar and IO counsel regarding computer inspection issues; telephone conference with Patrick Depa; telephone conference with Lamar's attorney; receive and review email from Judge Anderson's staff attorney; receive and review emergency motion regarding computer inspection and IO's response to same.	
07/26/2019	WG	Review emails regarding update on litigation; telephone conference with Kyle Schmutzler and Chris LeVasseur regarding same.	
07/30/2019	CEL	Receive and review Lamar response to motion to withdraw and motion for stay of proceedings.	
07/30/2019	CEL	Receive and review discovery requests from International Outdoor and draft response to same.	
07/30/2019	CEL	Receive, review and reply to emails from Lamar's attorney regarding computer inspection motion; receive and review expert affidavit regarding same.	
07/31/2019	CEL	Appear in court for hearing on various motions; email to client regarding same.	
07/31/2019	WG	Conference with Chris LeVasseur regarding results of hearing.	

Total Services: \$8,359.00

Disbursements:

07/31/2019	Photocopy expense	6.50
07/31/2019	Postage expense	1.30

Total Disbursements: \$7.80

Again, no total for the invoice, all software totals out the invoice total. This has been intentionally manipulated.

Altior Law P.C.

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Birmingham, MI 48009
Phone: (248) 594-5252
Fax: (248) 792-2938
www.altiorlaw.com

INVOICE

Invoice # 322
Date: 05/31/2019

Lamar Advertising Company
6405 N. Hix Road
Westland, Michigan 48185

L125.0002
Lamar Appeal

Attorney	Date	Notes	Quantity	Rate	Total
SM	02/01/2019	[REDACTED]			
LD	02/04/2019	[REDACTED]			
SM	02/04/2019	[REDACTED]			
SM	02/05/2019	[REDACTED]			
SM	02/06/2019	[REDACTED]			
SM	02/07/2019	[REDACTED]			
LD	02/08/2019	[REDACTED]			
SM	02/08/2019	[REDACTED]			
LD	02/09/2019	[REDACTED]			
SM	02/09/2019	[REDACTED]			
SM	02/10/2019	[REDACTED]			
SM	02/11/2019	[REDACTED]			
SM	02/12/2019	[REDACTED]			
LD	02/13/2019	[REDACTED]			

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SM	02/13/2019	[REDACTED]			
LD	02/14/2019	[REDACTED]			
SM	02/14/2019	[REDACTED]			
LD	02/26/2019	[REDACTED]			
SM	02/26/2019	[REDACTED]			
LD	03/20/2019	[REDACTED]			
LD	03/21/2019	[REDACTED]			
LD	03/22/2019	[REDACTED]			
SM	03/26/2019	[REDACTED]			
LD	03/26/2019	[REDACTED]			
LD	03/26/2019	[REDACTED]			
LD	04/11/2019	[REDACTED]			
LD	04/16/2019	[REDACTED]			
SM	04/16/2019	[REDACTED]			
LD	04/29/2019	[REDACTED]			
LD	04/30/2019	[REDACTED]			
SM	04/30/2019	[REDACTED]			
LD	05/02/2019	[REDACTED]			
LD	05/03/2019	[REDACTED]			
SM	05/15/2019	Communication with Levasseur re: [REDACTED] [REDACTED] review discovery and deposition transcripts re: same; confer with KFN re: [REDACTED]	0.50	\$375.00	\$187.50
SM	05/16/2019	Conference call with Joe and Rich re: [REDACTED] [REDACTED] legal research re: [REDACTED] [REDACTED]	0.50	\$375.00	\$187.50

LD		[REDACTED]			
SM	05/28/2019	Phone conference with client re: [REDACTED] [REDACTED] phone call to LeVasseur re: [REDACTED]	0.20	\$375.00	\$75.00
SM	05/29/2019	Communication with LeVasseur re: [REDACTED] review same; phone conference with client re: [REDACTED] confer with KFN and MDS re: [REDACTED]	0.80	\$375.00	\$300.00
MS	05/29/2019	Conference with KFN and STM re: [REDACTED] [REDACTED] Research re: [REDACTED] [REDACTED]	3.80	\$295.00	\$1,121.00
SM	05/30/2019	Phone call with LeVasseur re: [REDACTED] discuss [REDACTED] with MDS.	0.40	\$375.00	\$150.00
MS	05/30/2019	Research re: [REDACTED] Prepare memo re: [REDACTED] same. Conference with STM re: same.	4.80	\$295.00	\$1,416.00
MS	05/31/2019	Research re: [REDACTED] Prepare memo re: [REDACTED] Conference with STM re: [REDACTED]	3.20	\$295.00	\$944.00
				Subtotal	\$20,836.00
				Total	\$20,836.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
322	05/31/2019	\$20,836.00	\$0.00	\$20,836.00
			Outstanding Balance	\$20,836.00
			Amount in Trust	\$0.00
			Total Amount Outstanding	\$20,836.00

Operating Account