

5. I recall the June 29 conference call very well because Mr. Wistow became very animated and belligerent. He repeatedly interrupted Ms. Vitale and me when we tried to respond to his statements.

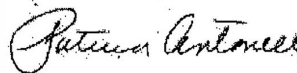
6. Ms. Vitale did **not** state in that conference that the self-insured retentions applicable to the Open Claims were all annual and not cumulative.

7. The next day I spoke with Mr. Hemmendinger. He apologized for how Mr. Wistow acted during that call and asked me to tell Ms. Vitale that he apologized for how the call went and how Mr. Wistow acted.

8. On June 30, the DLT informed the Liquidating Receiver that it would assume liability for both the administration and payment of the remaining workers' compensation claims.

9. On July 8, Mr. Wistow asked me to call him at his home. I did so. In that call, after repeatedly apologizing to me for his prior behavior, Mr. Wistow demanded that I draft the Settlement Agreement with DLT within three business days. I met that deadline and Beacon's counsel forwarded the draft to Special Counsel on July 13. Although pressuring me to draft the agreement on short notice, to date, Mr. Wistow has not acted to finalize the settlement agreement.


IN WITNESS WHEREOF, the undersigned has executed this document this 18th day of October 2021.



Patricia Antonelli, Esq.

STATE OF Rhode Island
COUNTY OF Providence

On this 18th day of October 2021, before me, the undersigned notary public, personally appeared Patricia Antonelli, Esq., [] personally known to the notary – OR- [] proved to the notary through satisfactory evidence of identification which was _____, to be the person whose name is signed on the preceding or attached document, and acknowledged to the notary that he signed it voluntarily.


Notary Public: _____
My Commission Expires: _____
ID: _____

AMANDA CARLOW
Notary Public, State of Rhode Island
My Commission Expires Dec. 16, 2023