

Founded in 1852
by Sidney Davy Miller

Sidney T. Miller (1864-1940)
George L. Canfield (1866-1928)
Lewis H. Paddock (1866-1935)
Ferris D. Stone (1882-1945)

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AFFILIATED OFFICE:
Pensacola, FL

August 9, 1999

VIA FACSIMILE AND MAIL (248) 203-7801

Paul J. Nicoletti, Esq.
Nicoletti & Associates, P.C.
1820 North Woodward
Suite 104
Bloomfield Hills, MI 48304

Re: Apollo Financial Services

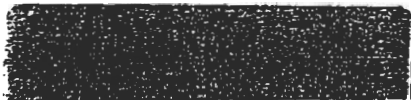
Dear Mr. Nicoletti:

This firm has been retained to represent Apollo Financial Services ("Apollo") with regard to claims arising from your misappropriation and disclosure of confidential information and trade secrets that belong to Apollo. As you know, Apollo was a client of Fabrizio & Nicoletti, P.C., a firm in which you were formally employed as an attorney. We have learned that you have disclosed trade secrets of Apollo on at least three occasions to at least eleven different people affiliated with at least two different companies in various states throughout the United States.

* This course of conduct is in violation of the law, including but not limited to the Michigan Uniform Trade Secrets Act, M.C.L. § 445.1901 et seq., and also gives rise to several common law torts, including but not limited to misappropriation of trade secrets, conversion, malpractice and breach of fiduciary duty. We also suggest that you review the Code of Professional Conduct Rule 1.6 and the Economic Espionage Act of 1996, 18 U.S.C. § 1832.

On behalf of Apollo, we demand that you immediately cease disclosing trade secrets and confidential business information of Apollo, and that you return any and all such information to my office immediately. This includes any and all copies of business plans, financial reports, and any other client information.

Please contact us regarding this matter no later than August 16, 1999. If we do not hear from you, we will have no alternative but to se



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**STIPULATED ORDER FOR
PERMANENT INJUNCTION AND DISMISSAL WITH PREJUDICE**

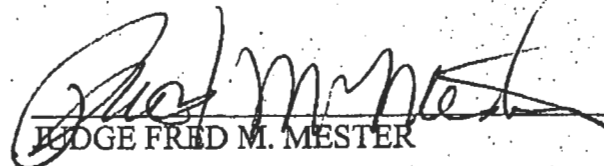
At a session of said Court, held in the City of Pontiac,
Oakland County, Michigan, this 6th day of December, 1999

PRESENT: HON. FRED M. MESTER
Circuit Court Judge

This matter having come before the Court on the stipulation of all parties, and the Court being advised in the premises;

IT IS HEREBY ORDERED that Defendants, Counter-Plaintiffs and Third Party Plaintiffs, Nicoletti and Associates, P.C. and Paul J. Nicoletti are hereby permanently restrained from dissemination of any information pertaining to Apollo Financial Services Inc. except upon further order of the Court.

IT IS FURTHER ORDERED that all claims, made in this lawsuit are dismissed in their entirety with prejudice and without costs or attorney fees, including counter claims and third party claims.


JUDGE FRED M. MESTER

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