From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 1, 2017 at 12:42 PM
To: laura comerford laura.comerford@aon.com
Cc: Maria Clark maria.clark@aon.com, Todd W. Musburger todd@musburger.com

ok.

i want to add that it appears ms. franklin has taken ill and i would like to make all best efforts (as per the email) with full coverage to engage her while she is still able.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

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> Hi Alan
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> Maria will pass on to Hiscox but per her e-mail yesterday, they advised it is with coverage counsel and will probably be a couple of weeks before we hear back.
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> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Thursday, June 01, 2017 1:57 PM
> **To:** Laura Comerford; Maria Clark
> **Cc:** Todd W. Musburger
> **Subject:** amazing grace; 27700815 - E&O - Aretha Franklin Claim
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> hi laura and maria
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> i want you, as my insurance brokers, to have the following. (see below.)
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> this case is now becoming EXTREMELY time sensitive as scheduling to make certain deadlines for the fall are now coming on.
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> if there???s any way to get an answer asap from hiscox, that is very much appreciated.

thank you.

-alan

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phone: 323 988 9692

peace and love.

Begin forwarded message:

From: Steven Zansberg <SZansberg@lskslaw.com>
Subject: Franlkin v. Elliott
To: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>

Alan:

Attached for your review:

> The DRAFT of the letter I propose to send to Reid Neureiter, after your and Larry???s review and edits, and after I give Reid a ???heads up??? courtesy call that it is coming his way.
>
> Please let me know if you???d like to schedule a call, tomorrow afternoon or Thursday, to discuss these.
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> Best regards,
> Steve
>
> Steven D. Zansberg

<image001.jpg>

1888 Sherman Street
Suite 370
Denver, CO 80203
(303) 376-2409 | Phone
(303) 376-2401 | Fax
www.lskslaw.com

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 16, 2017 at 10:11 AM
To: Laura Comerford laura.comerford@aon.com
Cc: Maria Clark maria.clark@aon.com

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

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Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 16, 2017 at 9:01 AM
To: Laura Comerford laura.comerford@aon.com
Cc: Maria Clark maria.clark@aon.com, Todd W. Musburger todd@musburger.com

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<image001.jpg>

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From: **Maria Clark** maria.clark@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 23, 2017 at 2:26 PM
To: Laura Comerford laura.comerford@aon.com, alan elliott (ucla) alanelliott@g.ucla.edu

MC

I have not heard back. I will follow up with them.

Sincerely,
Maria Clark | Claims Manager

AON/Albert G. Ruben Company (New York) Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Tel: 212-463-5583 | Main Tel: 212-627-7400
Direct Fax: 847-953-0892
Email: maria.clark@aon.com

****

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

Before you print, think about the ENVIRONMENT

From: Laura Comerford
Sent: Tuesday, May 23, 2017 4:51 PM
To: alan elliott (ucla)
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Maria have you heard anything from Hiscox?

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two fully negotiated contracts that were approved and generated by and with her counsel. Both offers were OVER and above what Ms. Franklin and her counsel asked for. Ms. Franklin has since fired her counsel and I have no hope that she will accept any offer. Because Ms. Franklin refuses to negotiate any further, this leaves me no other option but to reopen the case in Denver.
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In 2011, Ms. Franklin filed a very public lawsuit against me, preventing the film from being exhibited.
In 2013, Warner Films discovered Ms. Franklin's personal service contract, which plainly allowed me to distribute the film.
The 2011 lawsuit was settled out of court, I suffered no loss. This 2011 claim was not something that would be covered by this insurance as we now had a signed contract from Ms. Franklin, one that had been used to make and distribute the film.
Importantly, all communications were done with knowledge by Hiscox/AON that the personal service contract and specifically the "indemnification letter" on page 2 of Ms. Franklin's personal service contract (which states: "We do hereby undertake and agree to hold and save you harmless of, from and against any loss, cost, damage or expense which may arise or result from said agreement, and we further agree that we will, upon demand, reimburse you for any cost, liability, or expense which you may incur or any payment which you make in accordance with, or as a result of, such agreement.") would serve as the "insurance for the insurance."
The muddiness of these events (Ms. Franklin suing me and hoping I would never find- or enforce her personal service contract) led my counsel and AON/Hiscox to dutifully consider the question, and it is disingenuous for Hiscox to claim otherwise.
Thank you.
Alan

---

phone: 323 988 9692

peace and love.

> On May 9, 2017, at 12:40 PM, Laura Comerford <laura.comerford@aon.com> wrote:
>
> Hi Alan
>
> Per our conversation, you would like to go

back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015. Please confirm via this e-mail and provide any new details and reason behind your disagreement with carrier, specifically that the claim presented was not related to the 2011 claim and why. Maria will then get in contact with Hiscox and see what they say.

Thanks,

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **Maria Clark** maria.clark@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 19, 2017 at 1:38 PM
To: Laura Comerford laura.comerford@aon.com, alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Todd W. Musburger todd@musburger.com

MC

Hi Alan,

I sent a follow up note to the Hiscox adjuster requesting an update of coverage counsel's review.

I will advise once I hear back from her.

Thank you.

Sincerely,
Maria Clark | Claims Manager

AON/Albert G. Ruben Company (New York) Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Tel: 212-463-5583 | Main Tel: 212-627-7400
Direct Fax: 847-953-0892
Email: maria.clark@aon.com

****

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

Before you print, think about the ENVIRONMENT

From: Laura Comerford
Sent: Monday, June 19, 2017 10:29 AM
To: alan elliott (ucla)
Cc: Maria Clark; Todd W. Musburger
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim

Maria is back from vacation today and she will be checking her e-mails and will advise of any response.

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016

New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Friday, June 16, 2017 12:02 PM
To: Laura Comerford
Cc: Maria Clark; Todd W. Musburger
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura

i am checking in to see if there is any response. please let me know.

thank you.

-alan

---
phone: 323 988 9692

peace and love.

On Jun 1, 2017, at 12:41 PM, Laura Comerford <laura.comerford@aon.com> wrote:

> Hi Alan
>
> Maria will pass on to Hiscox but per her e-mail yesterday, they advised it is with coverage counsel and will probably be a couple of weeks before we hear back.
>
> Laura
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Thursday, June 01, 2017 1:57 PM
> **To:** Laura Comerford; Maria Clark
> **Cc:** Todd W. Musburger
> **Subject:** amazing grace; 27700815 - E&O - Aretha Franklin Claim
>
> hi laura and maria

i want you, as my insurance brokers, to have the following. (see below.)

this case is now becoming EXTREMELY time sensitive as scheduling to make certain deadlines for the fall are now coming on.

if there???s any way to get an answer asap from hiscox, that is very much appreciated.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: Steven Zansberg <SZansberg@lskslaw.com>
Subject: Franlkin v. Elliott
To: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>

Alan:

Attached for your review:

> The DRAFT of the letter I propose to send to Reid Neureiter, after your and Larry???s review and edits, and after I give Reid a ???heads up??? courtesy call that it is coming his way.
>
> Please let me know if you???d like to schedule a call, tomorrow afternoon or Thursday, to discuss these.
>
> Best regards,
> Steve
>
> Steven D. Zansberg

<image001.jpg>

1888 Sherman Street
Suite 370
Denver, CO 80203
(303) 376-2409 | Phone
(303) 376-2401 | Fax
www.lskslaw.com

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 23, 2017 at 2:50 PM
To: Maria Clark maria.clark@aon.com
Cc: Laura Comerford laura.comerford@aon.com

thank you.

-alan

---
phone: 323 988 9692

peace and love.

On May 23, 2017, at 2:26 PM, Maria Clark <maria.clark@aon.com> wrote:

> I have not heard back. I will follow up with them.
>
> Sincerely,
> Maria Clark | Claims Manager
>
> _____
> AON/Albert G. Ruben Company (New York) Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Tel: 212-463-5583 | Main Tel: 212-627-7400
> Direct Fax: 847-953-0892
> Email: maria.clark@aon.com
>
> **********
> The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.
>
> Before you print, think about the ENVIRONMENT
>
> **From:** Laura Comerford
> **Sent:** Tuesday, May 23, 2017 4:51 PM
> **To:** alan elliott (ucla)
> **Cc:** Maria Clark
> **Subject:** RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
>
> Maria have you heard anything from Hiscox?
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 23, 2017 1:53 PM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i am checking up in this. please let me know.

thank you.

-alan

---
phone: 323 988 9692

peace and love.

On May 16, 2017, at 10:31 AM, Laura Comerford <laura.comerford@aon.com> wrote:

> Maria is sending to Hiscox and I spoke with the underwriter to let her know that you want them to reconsider the claim. We will make sure you are copied in their response.
>
> Laura
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
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> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Tuesday, May 16, 2017 1:11 PM
> **To:** Laura Comerford
> **Cc:** Maria Clark
> **Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
>
> hi laura and maria
>
> i wanted to check in and see where we are on this.
>
> thank you

thank you.

-alan

---

phone: 323 988 9692

peace and love.

> On May 12, 2017, at 11:37 AM, Laura Comerford <laura.comerford@aon.com> wrote:
>
> Thanks Alan.
>
> Maria call me when you have a chance.
>
> Laura
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, May 12, 2017 1:24 PM
> **To:** Laura Comerford
> **Cc:** Maria Clark
> **Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
>
> Dear Laura,
> I request that AON go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015.
> When Hiscox declined coverage, it was because Hiscox claimed I had, after intensive vetted phone calls, emails and discussions with both Hiscox and with AON, failed to disclose previous issues with Ms. Franklin and that I answered the following question incorrectly:
> "Have you suffered any loss or has any claim, whether successful or not, ever been made against you that would be covered by this insurance."
> Hiscox and AON specifically directed me to answer the question "no." In discussions I had with both Hiscox's counsel Ted Gerdes, as well as AON's Stephen Carroll, we specifically reviewed the 2011 lawsuit and the personal service contract obtained in 2013 when considering how to answer the question. Thus, the answer was discussed and deliberated with both the carrier and the

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Because of the 2013 discovery of the personal service contract, AON/Hiscox vetted the contract and when the question came up, everyone was aware of the prior issues and they were satisfied with the enforceability of the personal service contract, which was evinced in the answer.
Coinciding with the time of Hiscox's exclusion of Aretha Franklin in 2015, I made a deal with Ms. Franklin's counsel that would nullify any issues. Because of this deal, I did not fight Hiscox.
However, after more than 15 months of negotiations, Ms. Franklin has declined two fully negotiated contracts that were approved and generated by and with her counsel. Both offers were OVER and above what Ms. Franklin and her counsel asked for. Ms. Franklin has since fired her counsel and I have no hope that she will accept any offer. Because Ms. Franklin refuses to negotiate any further, this leaves me no other option but to reopen the case in Denver.
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As this film deals with one of the more well known personalities in the world in Ms. Franklin, a woman who is known for her controversial and public disposition and litigious behavior, it is not credible that Hiscox can say, after the intensive application process that we went through, that they had no knowledge.
To remind from where the confusion/untangling emanated:
In 2011, Ms. Franklin filed a very public lawsuit against me, preventing the film from being exhibited.
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Importantly, all communications were done with knowledge by Hiscox/AON that the personal service contract and specifically the "indemnification letter" on page 2 of Ms. Franklin's personal service contract (which states: "We do hereby undertake and agree to hold and save you harmless of, from and against any loss, cost, damage or expense which may arise or result from said agreement, and we further agree that we will, upon demand, reimburse you for any cost, liability, or expense which you may incur or any payment which you make in accordance with, or as a result of, such agreement.") would serve as the "insurance for the insurance."
The muddiness of these events (Ms. Franklin suing me and hoping I would never find- or enforce her personal service contract) led my counsel and AON/Hiscox to dutifully consider the question, and it is disingenuous for Hiscox to claim otherwise.
Thank you.
Alan
---

phone: 323 988 9692

peace and love.

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Hi Alan

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Thanks,

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 25, 2017 at 8:55 AM
To: laura comerford laura.comerford@aon.com
Cc: Maria Clark maria.clark@aon.com

any response?

thank you.

-alan

---
phone: 323 988 9692

peace and love.

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> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Tuesday, May 23, 2017 1:53 PM
> **To:** Laura Comerford
> **Cc:** Maria Clark
> **Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
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Laura

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Cc: Maria Clark
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171 Madison Avenue, Suite 401
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Thank you.
Alan

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phone: 323 988 9692

peace and love.

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Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

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phone: 323 988 9692

peace and love.

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with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **Maria Clark** maria.clark@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 25, 2017 at 11:25 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Laura Comerford laura.comerford@aon.com

MC

Hi Alan,

The adjuster, Tara Bodden, who was assigned to the handling of this claim is in a mediation today. I forwarded her an e-mail following up for a response.

Thank you.

Sincerely,
Maria Clark | Claims Manager

AON/Albert G. Ruben Company (New York) Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Tel: 212-463-5583 | Main Tel: 212-627-7400
Direct Fax: 847-953-0892
Email: maria.clark@aon.com

****

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Before you print, think about the ENVIRONMENT

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
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phone: **323 988 9692**

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Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
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Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i wanted to check in and see where we are on this.

thank you.

-alan

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phone: 323 988 9692

peace and love.

> On May 12, 2017, at 11:37 AM, Laura Comerford <laura.comerford@aon.com> wrote:
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> Thanks Alan.
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> Maria call me when you have a chance.
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> Laura
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> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, May 12, 2017 1:24 PM

To: Laura Comerford
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Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

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Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

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From: alan elliott (ucla)
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Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT

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To: Stephen Carroll
<stephen.carroll@aon.com>

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 31, 2017 at 7:57 AM
To: Laura Comerford laura.comerford@aon.com
Cc: Maria Clark maria.clark@aon.com

hello laura and maria

can we get a timeline on an answer if not... maybe an actual answer please?

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i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

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phone: 323 988 9692

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From: **Maria Clark** maria.clark@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 31, 2017 at 9:28 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Laura Comerford laura.comerford@aon.com

MC

Hi Alan,

Please be advised that Hiscox sent your request out to coverage counsel and expects to get a response back in the next couple of weeks.

As soon as we hear back from them, we will advise you of their determination.

Thank you.

Sincerely,
Maria Clark | Claims Manager

AON/Albert G. Ruben Company (New York) Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Tel: 212-463-5583 | Main Tel: 212-627-7400
Direct Fax: 847-953-0892
Email: maria.clark@aon.com

****

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

Before you print, think about the ENVIRONMENT

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, May 31, 2017 10:57 AM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

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Subject: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 1, 2017 at 10:57 AM
To: laura comerford laura.comerford@aon.com, Maria Clark maria.clark@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi laura and maria

i want you, as my insurance brokers, to have the following. (see below.)

this case is now becoming EXTREMELY time sensitive as scheduling to make certain deadlines for the fall are now coming on.

if there's any way to get an answer asap from hiscox, that is very much appreciated.

thank you.

-alan

---

phone: 323 988 9692

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> Begin forwarded message:
>
> **From:** Steven Zansberg <SZansberg@lskslaw.com>
> **Subject:** **Franlkin v. Elliott**
> **To:** "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>
>
> Alan:
>
> Attached for your review:
>
> The DRAFT of the letter I propose to send to Reid Neureiter, after your and Larry's review and edits, and after I give Reid a "heads up" courtesy call that it is coming his way.
>
> Please let me know if you'd like to schedule a call, tomorrow afternoon or Thursday, to discuss these.
>
> Best regards,
> Steve
>
> Steven D. Zansberg
>
> LSKS LEVINE SULLIVAN KOCH & SCHULZ, LLP
>
> 1888 Sherman Street
> Suite 370
> Denver, CO 80203
> (303) 376-2409 | Phone
> (303) 376-2401 | Fax
> www.lskslaw.com

Elliott-Franklin - ltr to N...).docx

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In 2013, Warner Films discovered Ms. Franklin’s personal service contract, which plainly allowed me to distribute the film.
The 2011 lawsuit was settled out of court, I suffered no loss. This 2011 claim was not something that would be covered by this insurance as we now had a signed contract from Ms. Franklin, one that had been used to make and distribute the film.
Importantly, all communications were done with knowledge by Hiscox/AON that the personal service contract and specifically the “indemnification letter” on page 2 of Ms. Franklin's personal service contract (which states: “We do hereby undertake and agree to hold and save you harmless of, from and against any loss, cost, damage or expense which may arise or result from said agreement, and we further agree that we will, upon demand, reimburse you for any cost, liability, or expense which you may incur or any payment which you make in accordance with, or as a result of, such agreement.”) would serve as the “insurance for the insurance."
The muddiness of these events (Ms. Franklin suing me and hoping I would never find- or enforce her personal service contract) led my counsel and AON/Hiscox to dutifully consider the question, and it is disingenuous for Hiscox to claim otherwise.
Thank you.
Alan
---

phone: **323 988 9692**

peace and love.

> On May 9, 2017, at 12:40 PM, Laura Comerford <laura.comerford@aon.com> wrote:
>
> Hi Alan
>
> Per our conversation, you would like to go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015. Please confirm via this e-mail and provide any new details and reason behind your disagreement with carrier, specifically that the claim presented was not related to the 2011 claim and why. Maria will then get in contact with Hiscox and see what they say.
>
> Thanks,
>
> Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **Laura Comerford** laura.comerford@aon.com
Subject: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 9, 2017 at 12:40 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Maria Clark maria.clark@aon.com, Laura Comerford laura.comerford@aon.com

LC

Hi Alan

Per our conversation, you would like to go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015. Please confirm via this e-mail and provide any new details and reason behind your disagreement with carrier, specifically that the claim presented was not related to the 2011 claim and why. Maria will then get in contact with Hiscox and see what they say.

Thanks,

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: amazing grace; 27700815
Date: May 9, 2017 at 9:47 AM
To: laura.comerford@aon.com

thank you.

-alan

---

phone: 323 988 9692

peace and love.

> Begin forwarded message:
>
> **From:** alan elliott (ucla) <alanelliott@g.ucla.edu>
> **Subject:** **amazing grace; 27700815**
> **Date:** May 8, 2017 at 1:56:22 PM PDT
> **To:** Stephen Carroll <stephen.carroll@aon.com>
>
> hi stephen
>
> i hope this finds you well.
>
> i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.
>
> please let me know.
>
> thank you.
>
> -alan
>
> ---
>
> **phone: 323 988 9692**
>
> **peace and love.**

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: insurance PRIOR to hiscox...
Date: June 26, 2017 at 1:13 PM
To: Maria Clark maria.clark@aon.com, laura comerford laura.comerford@aon.com

was with chubb.

hiscox is kicking me there.

thank you.

-alan

---
phone: 323 988 9692

peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: 2700815 Amazing Grace
Date: March 14, 2016 at 2:41 PM
To: Stephen Carroll stephen.carroll@aon.com

hey stephen

has hiscox taken a position re point #2 (below)?

thank you.

-alan

---
phone: 323 988 9692
peace and love.

Begin forwarded message:

> **From:** "alan elliott (ucla)" <alanelliott@g.ucla.edu>
> **Date:** March 2, 2016 at 1:08:14 PM PST
> **To:** Stephen Carroll <stephen.carroll@aon.com>
> **Subject: Re: 2700815 Amazing Grace**
>
> hi stephen:
>
> i have a couple items i could use your help with please:
>
> 1) i will send you a note about previous coverage re: the chubb group. (it'll be the next email i send to you).
>
> 2) something i'd like to go back to hiscox on:
>
> the warner seven arts contract which we asked hiscox to vet (see below).
>
> the contract has an indemnification page (page two: http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20(Atlantic%20and%20Warner%20Bros.%20Seven%20Arts).pdf).
>
> i would like, as was discussed, ask the insurer to go to atlantic records for reimbursement. the contract reads (page 2 of the aretha/warner seven arts personal service agreement):
>
> "To Warner Bros.- Seven Arts, Inc…" (from whom i have quitclaim)
>
> "…in consideration thereof and as an inducement for you so to do, we do hereby undertake and agree to hold and save you harmless of, from and against any loss, cost, damage or expense which may arise or result from said agreement, and we further agree that we will, upon demand, reimburse you for any cost, liability, or expense which you may incur or any payment which you make in accordance with, or as a result of, such agreement.
>
> - ATLANTIC RECORDING CORPORATION"
>
> because the indemnification and contract are vetted and not excluded, i want hiscox to be put on notice and to start with the process of doing good on the claim.
>
> thank you.
>
> -alan
>
> **---**
> **phone: 323 988 9692**
> **peace and love.**
>
> **http://songsoundrecord.tumblr.com**
>
> > Begin forwarded message:
> >
> > **From:** Stephen Carroll <stephen.carroll@aon.com>
> > **Date:** July 13, 2015 at 8:12:25 AM PDT
> > **To:** "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>
> > **Cc:** Annette Shavuo <annette.shavuo@aon.com>
> > **Subject: FW: 2700815 Amazing Grace**

See comments from underwriter at Hiscox. Let me know if you have any questions.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: Richardson Joanne [mailto:Joanne.Richardson@Hiscox.com]
Sent: Monday, July 13, 2015 11:02 AM
To: Stephen Carroll
Cc: Annette Shavuo
Subject: 2700815 Amazing Grace

Per the insured's request, I want to confirm that we aware of the contract attached and that the insured is relying on this contract/document to make this film. We have vetted it's validity and are satisfied it is acceptable and therefore have not placed any special exclusions on the policy that would prohibit coverage under the policy . Of course, there are standard insurance policy terms, conditions and exclusion that apply regardless and we could never confirm or deny any coverage in advance as each and every claims sencerio is unique and must be evaluated on the specific facts and circumstances of the case. But again, the quote does not contain a chain of tile exclusion or any other specific exclusion involving this project and we recognize the Atlantic records indemnification letter in the Warner contract to be valid. Please note we have not yet cleared the title, as a title report and legal opinion has not been received to date.

Please let me know if you have any further questions.

Best,
Joann

Joanne Richardson, CPCU
Media & Entertainment Practice Leader
Hiscox Partner
Hiscox USA
T 646.452.2355
M 646.823.8092
joanne.richardson@hiscox.com
Connect with Hiscox online
Web www.hiscoxbroker.com
Twitter @Hiscox_USA

<image003.png>

From: Stephen Carroll [mailto:stephen.carroll@aon.com]
Sent: Thursday, July 09, 2015 3:11 PM

Sent: Thursday, July 09, 2015 3:11 PM
To: Richardson Joanne
Cc: Annette Shavuo
Subject: FW: Favorites

Attached is the contract Alan Elliott at Amazing Grace wanted you to acknowledge. I will be sending a bind order to you shortly.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Thursday, July 09, 2015 2:37 PM
To: Stephen Carroll
Subject: Favorites

http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20(Atlantic%20and%20Warner%20Bros.%20Seven%20Arts).pdf

---

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Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

<4-1-1968 Aretha Franklin Recording Agreement (Atlantic and Warner Bros. Seven Arts).pdf>

thank you.

---
phone: 323 988 9692

Sent from a iPhone

This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 29, 2015 at 1:37 PM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com, Todd W. Musburger todd@musburger.com

hello annette

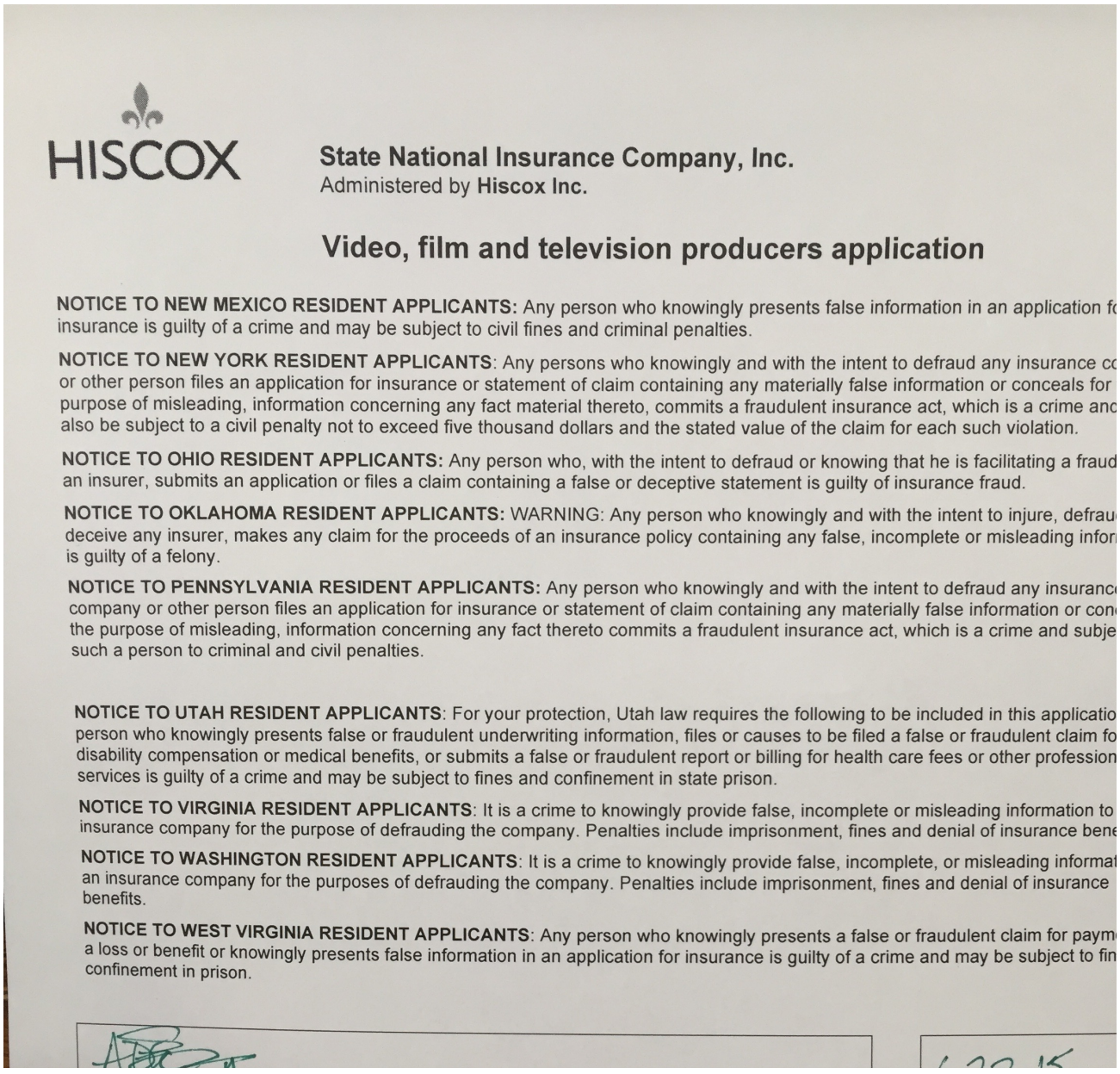
attached is the signed copy and application. still outstanding is:

- the corbis stock shot
- publishing rights (i should have in next two weeks)

thank you.

-alan

amazing grace App- R...03.doc



HISCOX

State National Insurance Company, Inc.
Administered by **Hiscox Inc.**

Video, film and television producers application

NOTICE TO NEW MEXICO RESIDENT APPLICANTS: Any person who knowingly presents false information in an application fo insurance is guilty of a crime and may be subject to civil fines and criminal penalties.

NOTICE TO NEW YORK RESIDENT APPLICANTS: Any persons who knowingly and with the intent to defraud any insurance co or other person files an application for insurance or statement of claim containing any materially false information or conceals for purpose of misleading, information concerning any fact material thereto, commits a fraudulent insurance act, which is a crime and also be subject to a civil penalty not to exceed five thousand dollars and the stated value of the claim for each such violation.

NOTICE TO OHIO RESIDENT APPLICANTS: Any person who, with the intent to defraud or knowing that he is facilitating a fraud an insurer, submits an application or files a claim containing a false or deceptive statement is guilty of insurance fraud.

NOTICE TO OKLAHOMA RESIDENT APPLICANTS: WARNING: Any person who knowingly and with the intent to injure, defrau deceive any insurer, makes any claim for the proceeds of an insurance policy containing any false, incomplete or misleading infor is guilty of a felony.

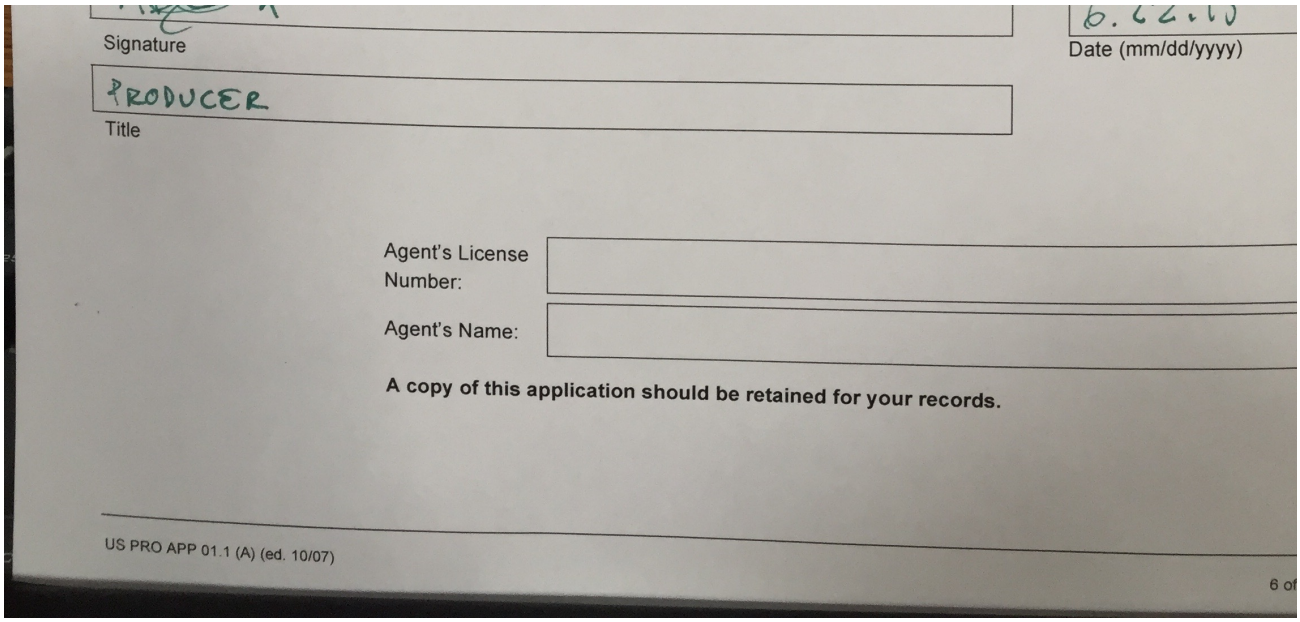
NOTICE TO PENNSYLVANIA RESIDENT APPLICANTS: Any person who knowingly and with the intent to defraud any insurance company or other person files an application for insurance or statement of claim containing any materially false information or con the purpose of misleading, information concerning any fact thereto commits a fraudulent insurance act, which is a crime and subje such a person to criminal and civil penalties.

NOTICE TO UTAH RESIDENT APPLICANTS: For your protection, Utah law requires the following to be included in this applicatio person who knowingly presents false or fraudulent underwriting information, files or causes to be filed a false or fraudulent claim fo disability compensation or medical benefits, or submits a false or fraudulent report or billing for health care fees or other profession services is guilty of a crime and may be subject to fines and confinement in state prison.

NOTICE TO VIRGINIA RESIDENT APPLICANTS: It is a crime to knowingly provide false, incomplete or misleading information to insurance company for the purpose of defrauding the company. Penalties include imprisonment, fines and denial of insurance bene

NOTICE TO WASHINGTON RESIDENT APPLICANTS: It is a crime to knowingly provide false, incomplete, or misleading informat an insurance company for the purposes of defrauding the company. Penalties include imprisonment, fines and denial of insurance benefits.

NOTICE TO WEST VIRGINIA RESIDENT APPLICANTS: Any person who knowingly presents a false or fraudulent claim for paym a loss or benefit or knowingly presents false information in an application for insurance is guilty of a crime and may be subject to fin confinement in prison.


Signature

Date (mm/dd/yyyy)

PRODUCER

Title

Agent's License Number:

Agent's Name:

A copy of this application should be retained for your records.

US PRO APP 01.1 (A) (ed. 10/07)

6 of

---

phone: 323 988 9692

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> On Jul 22, 2015, at 12:32 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:
>
> Alan,
>
> The Errors & Omissions' for **"Amazing Grace"** is bound for the period of 7/21/2015 to 7/21/2018. Here's a copy of the signed binder for your files.
>
> Once the following subjectivities have been satisfactorily met, the underwriter will issue the policy:
>
> 1. Currently signed and dated application, by July 29, 2015 – attached application was not signed.
>
> 2. Per Q# 22 on the application, confirmation that:
>
> 1) the stock shot" of Los Angeles which comes from Corbis has been finalized and all rights obtained
> 2) the publishing of some songs you mention have yet to be negotiated have all been finalized and all music rights have been obtained.
>
> Upon receipt and review of this we can consider removing the exclusion.
>
> Thank you

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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<Binder - EO - 15-18 Amazing Grace.pdf><App- REVISED Q#22 -E&O Video Film and Television Producers Application Admitted_Word1203.doc>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 29, 2015 at 1:37 PM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com, Todd W. Musburger todd@musburger.com

hello annette

attached is the signed copy and application. still outstanding is:

- the corbis stock shot
- publishing rights (i should have in next two weeks- still

thank you.

-alan

amazing grace App- R...03.doc
Downloading...

IMG_8348 (2).jpg
Downloading...

---

phone: 323 988 9692

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> On Jul 22, 2015, at 12:32 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:
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>
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>
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Thank you

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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<Binder - EO - 15-18 Amazing Grace.pdf><App- REVISED Q#22 -E&O Video Film and Television Producers Application Admitted_Word1203.doc>

From: **Larry Blake** larry.blake@concordmusicgroup.com
Subject: Amazing Grace / E&O Policy
Date: July 11, 2016 at 3:34 PM
To: stephen.carroll@aon.com
Cc: alan elliott (ucla) alanelliott@g.ucla.edu

LB

Hi Stephen:

Alan Elliott asked me to call you. I got your voicemail when I called about 50 minutes ago.

Please advise as to your available times for you and I to talk.

Thanks,

Larry

Larry Blake
Chief Legal & Business Affairs Officer
Concord Bicycle Music
100 N. Crescent Dr., Garden Level
Beverly Hills, CA 90210
Larry.Blake@concordmusicgroup.com
(O)310.385.4205

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Amazing Grace
Date: March 4, 2015 at 12:23 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Ramona V. Horne ramona.horne@aon.com, George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk, Todd W. Musburger todd@musburger.com

hey stephen

we are checking in re policy.

please let us know.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Feb 27, 2015, at 1:42 PM, Stephen Carroll <stephen.carroll@aon.com> wrote:

> Thank you…I have forwarded info to underwriters
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> Cell: 914-589-2474
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, February 27, 2015 3:50 PM
> **To:** Stephen Carroll
> **Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
> **Subject:** Re: Amazing Grace
>
> hi stephen
>
> please see answers below.
>
> > On Feb 27, 2015, at 11:22 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
> >
> > So after all this time my underwriter finally responded to the submission and had the following questions. I apologize but would appreciate any clarification you can provide:
> >
> > 1. Is this a documentary, music video or something else?

documentary

2. What is the anticipated distribution/dissemination? theatrical release, TV special, etc…?

theatrical, vod, dvd, television

3. Was it previously produced and released and now they're re-releasing it?

it was (technically) produced by warners.

elements of the project have been released at least twice that we know of:

1) the atlantic 25th anniversary film, made with braverman productions <image001.png>
2) aretha franklin; the queen of soul (august 22, 1988)
(http://www.imdb.com/title/tt0210537/)

4. If not previously released please advise who produced it and who currently owns the copyright and what agreements are in place with this applicant.

the current iteration of the footage is owned by me with quitclaim from warner bors. films.

5. Did they obtain rights from Warner Brothers?

yes.

6. Did they obtain rights from Atlantic Records?

none needed, as per atlantic/warner music group.

7. Did Aretha Franklin participate in this production?

yes

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
Cell: 914-589-2474
Fax: 847-953-2692

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 31, 2017 at 7:57 AM
To: Laura Comerford laura.comerford@aon.com
Cc: Maria Clark maria.clark@aon.com

hello laura and maria

can we get a timeline on an answer if not... maybe an actual answer please?

thank you.

-alan

---
phone: 323 988 9692

peace and love.

On May 23, 2017, at 1:51 PM, Laura Comerford <laura.comerford@aon.com> wrote:

> Maria have you heard anything from Hiscox?
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Tuesday, May 23, 2017 1:53 PM
> **To:** Laura Comerford
> **Cc:** Maria Clark
> **Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
>
> hi laura and maria
>
> i am checking up in this. please let me know.
>
> thank you.
>
> -alan
>
> ---
> phone: 323 988 9692
>
> peace and love.
>
> On May 16, 2017, at 10:31 AM, Laura Comerford <laura.comerford@aon.com> wrote:
>
> > Maria is sending to Hiscox and I spoke with the underwriter to let her know that you want them to reconsider the claim. We will make sure you are copied in their response.

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 16, 2017 1:11 PM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i wanted to check in and see where we are on this.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

> On May 12, 2017, at 11:37 AM, Laura Comerford <laura.comerford@aon.com> wrote:
>
> Thanks Alan.
>
> Maria call me when you have a chance.
>
> Laura
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401

171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Friday, May 12, 2017 1:24 PM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

Dear Laura,
I request that AON go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015.
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Thank you.
Alan
---

phone: 323 988 9692

peace and love.

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Direct Phone: 212-337-4354

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Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

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phone: 323 988 9692

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Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>

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i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

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phone: 323 988 9692

peace and love.

From: **Maria Clark** maria.clark@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 31, 2017 at 9:28 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Laura Comerford laura.comerford@aon.com

MC

Hi Alan,

Please be advised that Hiscox sent your request out to coverage counsel and expects to get a response back in the next couple of weeks.

As soon as we hear back from them, we will advise you of their determination.

Thank you.

Sincerely,
Maria Clark | Claims Manager

AON/Albert G. Ruben Company (New York) Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Tel: 212-463-5583 | Main Tel: 212-627-7400
Direct Fax: 847-953-0892
Email: maria.clark@aon.com

****

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

Before you print, think about the ENVIRONMENT

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, May 31, 2017 10:57 AM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hello laura and maria

can we get a timeline on an answer if not... maybe an actual answer please?

thank you.

-alan

---

phone: 323 988 9692

peace and love.

On May 23, 2017, at 1:51 PM, Laura Comerford <laura.comerford@aon.com> wrote:

> Maria have you heard anything from Hiscox?
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Tuesday, May 23, 2017 1:53 PM
> **To:** Laura Comerford
> **Cc:** Maria Clark
> **Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
>
> hi laura and maria
>
> i am checking up in this. please let me know.
>
> thank you.
>
> -alan
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Laura

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171 Madison Avenue, Suite 401
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please let me know.

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phone: 323 988 9692

peace and love.

From: **laura comerford** laura.comerford@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 1, 2017 at 12:41 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Maria Clark maria.clark@aon.com
Cc: Todd W. Musburger todd@musburger.com

LC

Hi Alan

Maria will pass on to Hiscox but per her e-mail yesterday, they advised it is with coverage counsel and will probably be a couple of weeks before we hear back.

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Thursday, June 01, 2017 1:57 PM
To: Laura Comerford; Maria Clark
Cc: Todd W. Musburger
Subject: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i want you, as my insurance brokers, to have the following. (see below.)

this case is now becoming EXTREMELY time sensitive as scheduling to make certain deadlines for the fall are now coming on.

if there???s any way to get an answer asap from hiscox, that is very much appreciated.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: Steven Zansberg <SZansberg@lskslaw.com>
Subject: Franlkin v. Elliott
To: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>

Alan:

Attached for your review:

> The DRAFT of the letter I propose to send to Reid Neureiter, after your and Larry???s review and edits, and after I give Reid a ???heads up??? courtesy call that it is coming his way.
>
> Please let me know if you???d like to schedule a call, tomorrow afternoon or Thursday, to discuss these.
>
> Best regards,
> Steve

Steven D. Zansberg

LSKS LEVINE SULLIVAN KOCH & SCHULZ, LLP

1888 Sherman Street
Suite 370
Denver, CO 80203
(303) 376-2409 | Phone
(303) 376-2401 | Fax
www.lskslaw.com

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Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 16, 2017 1:11 PM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i wanted to check in and see where we are on this.

thank you.

-alan

---

phone: **323 988 9692**

peace and love.

> On May 12, 2017, at 11:37 AM, Laura Comerford <laura.comerford@aon.com> wrote:
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> Thanks Alan.
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> Maria call me when you have a chance.

Laura

Laura R. Comerford
Vice President
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171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
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To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

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Subject: amazing grace; 27700815
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To: Stephen Carroll <stephen.carroll@aon.com>

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i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 1, 2017 at 12:42 PM
To: laura comerford laura.comerford@aon.com
Cc: Maria Clark maria.clark@aon.com, Todd W. Musburger todd@musburger.com

ok.

i want to add that it appears ms. franklin has taken ill and i would like to make all best efforts (as per the email) with full coverage to engage her while she is still able.

thank you.

-alan

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> **Sent:** Thursday, June 01, 2017 1:57 PM
> **To:** Laura Comerford; Maria Clark
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Attached for your review:

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> Please let me know if you???d like to schedule a call, tomorrow afternoon or Thursday, to discuss these.
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<image001.jpg>

1888 Sherman Street
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(303) 376-2409 | Phone
(303) 376-2401 | Fax
www.lskslaw.com

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 23, 2017 at 10:53 AM
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Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 16, 2017 at 9:01 AM
To: Laura Comerford laura.comerford@aon.com
Cc: Maria Clark maria.clark@aon.com, Todd W. Musburger todd@musburger.com

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From: **Laura Comerford** laura.comerford@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 23, 2017 at 1:51 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Maria Clark maria.clark@aon.com

LC

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From: **Laura Comerford** laura.comerford@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 19, 2017 at 7:28 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Maria Clark maria.clark@aon.com, Todd W. Musburger todd@musburger.com

LC

Maria is back from vacation today and she will be checking her e-mails and will advise of any response.

Laura

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Subject: Franlkin v. Elliott
To: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>

Alan:

Attached for your review:

> The DRAFT of the letter I propose to send to Reid Neureiter, after your and Larry???s review and edits, and after I give Reid a ???heads up??? courtesy call that it is coming his way.

Please let me know if you???d like to schedule a call, tomorrow afternoon or Thursday, to discuss these.

Best regards,
Steve

Steven D. Zansberg

1888 Sherman Street
Suite 370
Denver, CO 80203
(303) 376-2409 | Phone
(303) 376-2401 | Fax
www.lskslaw.com

From: **Maria Clark** maria.clark@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 23, 2017 at 2:26 PM
To: Laura Comerford laura.comerford@aon.com, alan elliott (ucla) alanelliott@g.ucla.edu

MC

I have not heard back. I will follow up with them.

Sincerely,
Maria Clark | Claims Manager

AON/Albert G. Ruben Company (New York) Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Tel: 212-463-5583 | Main Tel: 212-627-7400
Direct Fax: 847-953-0892
Email: maria.clark@aon.com

****

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

Before you print, think about the ENVIRONMENT

From: Laura Comerford
Sent: Tuesday, May 23, 2017 4:51 PM
To: alan elliott (ucla)
Cc: Maria Clark
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim

Maria have you heard anything from Hiscox?

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 23, 2017 1:53 PM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i am checking up in this. please let me know.

thank you.

-alan

---
phone: 323 988 9692

peace and love.

On May 16, 2017, at 10:31 AM, Laura Comerford <laura.comerford@aon.com> wrote:

> Maria is sending to Hiscox and I spoke with the underwriter to let her know that you want them to reconsider the claim. We will make sure you are copied in their response.
>
> Laura
>
> Laura R. Comerford
> Vice President
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> i wanted to check in and see where we are on this.
>
> thank you.
>
> -alan
>
> ---
> **phone: 323 988 9692**

peace and love.

On May 12, 2017, at 11:37 AM, Laura Comerford <laura.comerford@aon.com> wrote:

Thanks Alan.

Maria call me when you have a chance.

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
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When Hiscox declined coverage, it was because Hiscox claimed I had, after intensive vetted phone calls, emails and discussions with both Hiscox and with AON, failed to disclose previous issues with Ms. Franklin and that I answered the following question incorrectly:
"Have you suffered any loss or has any claim, whether successful or not, ever been made against you that would be covered by this insurance."
Hiscox and AON specifically directed me to answer the question "no." In discussions I had with both Hiscox's counsel Ted Gerdes, as well as AON's Stephen Carroll, we specifically reviewed the 2011 lawsuit and the personal service contract obtained in 2013 when considering how to answer the question. Thus, the answer was discussed and deliberated with both the carrier and the broker.
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Coinciding with the time of Hiscox's exclusion of Aretha Franklin in 2015, I made a deal with Ms. Franklin's counsel that would nullify any issues. Because of this deal, I did not fight Hiscox.
However, after more than 15 months of negotiations, Ms. Franklin has declined two fully negotiated contracts that were approved and generated by and with her

two fully negotiated contracts that were approved and generated by and with her counsel. Both offers were OVER and above what Ms. Franklin and her counsel asked for. Ms. Franklin has since fired her counsel and I have no hope that she will accept any offer. Because Ms. Franklin refuses to negotiate any further, this leaves me no other option but to reopen the case in Denver.
The fundamental and virtually singular reason for my Hiscox insurance was because of Ms. Franklin's volatility. Insurance would allow me to defend and enforce Ms. Franklin's contract, which was recently discovered (in 2013) by Warner Films. Hiscox directed me to discuss these matters with Ted Gerdes, I specifically told Mr. Gerdes about the 2011 lawsuit, providing him with links in emails to the "cease and desist" settlement which resulted from the lawsuit.
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To remind from where the confusion/untangling emanated:
In 2011, Ms. Franklin filed a very public lawsuit against me, preventing the film from being exhibited.
In 2013, Warner Films discovered Ms. Franklin's personal service contract, which plainly allowed me to distribute the film.
The 2011 lawsuit was settled out of court, I suffered no loss. This 2011 claim was not something that would be covered by this insurance as we now had a signed contract from Ms. Franklin, one that had been used to make and distribute the film.
Importantly, all communications were done with knowledge by Hiscox/AON that the personal service contract and specifically the "indemnification letter" on page 2 of Ms. Franklin's personal service contract (which states: "We do hereby undertake and agree to hold and save you harmless of, from and against any loss, cost, damage or expense which may arise or result from said agreement, and we further agree that we will, upon demand, reimburse you for any cost, liability, or expense which you may incur or any payment which you make in accordance with, or as a result of, such agreement.") would serve as the "insurance for the insurance."
The muddiness of these events (Ms. Franklin suing me and hoping I would never find- or enforce her personal service contract) led my counsel and AON/Hiscox to dutifully consider the question, and it is disingenuous for Hiscox to claim otherwise.
Thank you.
Alan

---

phone: 323 988 9692

peace and love.

> On May 9, 2017, at 12:40 PM, Laura Comerford <laura.comerford@aon.com> wrote:
>
> Hi Alan
>
> Per our conversation, you would like to go

back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015. Please confirm via this e-mail and provide any new details and reason behind your disagreement with carrier, specifically that the claim presented was not related to the 2011 claim and why. Maria will then get in contact with Hiscox and see what they say.

Thanks,

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **Maria Clark** maria.clark@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 19, 2017 at 1:38 PM
To: Laura Comerford laura.comerford@aon.com, alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Todd W. Musburger todd@musburger.com

MC

Hi Alan,

I sent a follow up note to the Hiscox adjuster requesting an update of coverage counsel's review.

I will advise once I hear back from her.

Thank you.

Sincerely,
Maria Clark | Claims Manager

AON/Albert G. Ruben Company (New York) Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Tel: 212-463-5583 | Main Tel: 212-627-7400
Direct Fax: 847-953-0892
Email: maria.clark@aon.com

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Before you print, think about the ENVIRONMENT

From: Laura Comerford
Sent: Monday, June 19, 2017 10:29 AM
To: alan elliott (ucla)
Cc: Maria Clark; Todd W. Musburger
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim

Maria is back from vacation today and she will be checking her e-mails and will advise of any response.

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016

New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Friday, June 16, 2017 12:02 PM
To: Laura Comerford
Cc: Maria Clark; Todd W. Musburger
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura

i am checking in to see if there is any response. please let me know.

thank you.

-alan

---
phone: 323 988 9692

peace and love.

On Jun 1, 2017, at 12:41 PM, Laura Comerford <laura.comerford@aon.com> wrote:

> Hi Alan
>
> Maria will pass on to Hiscox but per her e-mail yesterday, they advised it is with coverage counsel and will probably be a couple of weeks before we hear back.
>
> Laura
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Thursday, June 01, 2017 1:57 PM
> **To:** Laura Comerford; Maria Clark
> **Cc:** Todd W. Musburger
> **Subject:** amazing grace; 27700815 - E&O - Aretha Franklin Claim
>
> hi laura and maria

i want you, as my insurance brokers, to have the following. (see below.)

this case is now becoming EXTREMELY time sensitive as scheduling to make certain deadlines for the fall are now coming on.

if there???s any way to get an answer asap from hiscox, that is very much appreciated.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: Steven Zansberg <SZansberg@lskslaw.com>
Subject: Franlkin v. Elliott
To: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>

Alan:

Attached for your review:

> The DRAFT of the letter I propose to send to Reid Neureiter, after your and Larry???s review and edits, and after I give Reid a ???heads up??? courtesy call that it is coming his way.
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> Please let me know if you???d like to schedule a call, tomorrow afternoon or Thursday, to discuss these.
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> Best regards,
> Steve
>
> Steven D. Zansberg

<image001.jpg>

1888 Sherman Street
Suite 370
Denver, CO 80203
(303) 376-2409 | Phone
(303) 376-2401 | Fax
www.lskslaw.com

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 23, 2017 at 2:50 PM
To: Maria Clark maria.clark@aon.com
Cc: Laura Comerford laura.comerford@aon.com

thank you.

-alan

---
phone: 323 988 9692

peace and love.

On May 23, 2017, at 2:26 PM, Maria Clark <maria.clark@aon.com> wrote:

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>
> Sincerely,
> Maria Clark | Claims Manager
>
> _____
> AON/Albert G. Ruben Company (New York) Inc.
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> Direct Fax: 847-953-0892
> Email: maria.clark@aon.com
>
> **********
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>
> Before you print, think about the ENVIRONMENT
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> **From:** Laura Comerford
> **Sent:** Tuesday, May 23, 2017 4:51 PM
> **To:** alan elliott (ucla)
> **Cc:** Maria Clark
> **Subject:** RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
>
> Maria have you heard anything from Hiscox?
>
> Laura R. Comerford
> Vice President
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> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 23, 2017 1:53 PM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i am checking up in this. please let me know.

thank you.

-alan

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phone: 323 988 9692

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> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
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> ---
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> **Sent:** Tuesday, May 16, 2017 1:11 PM
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-alan

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phone: 323 988 9692

peace and love.

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> 171 Madison Avenue, Suite 401
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> Direct Phone: 212-337-4354
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> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, May 12, 2017 1:24 PM
> **To:** Laura Comerford
> **Cc:** Maria Clark
> **Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
>
> Dear Laura,
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In 2011, Ms. Franklin filed a very public lawsuit against me, preventing the film from being exhibited.
In 2013, Warner Films discovered Ms. Franklin's personal service contract, which plainly allowed me to distribute the film.
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Importantly, all communications were done with knowledge by Hiscox/AON that the personal service contract and specifically the "indemnification letter" on page 2 of Ms. Franklin's personal service contract (which states: "We do hereby undertake and agree to hold and save you harmless of, from and against any loss, cost, damage or expense which may arise or result from said agreement, and we further agree that we will, upon demand, reimburse you for any cost, liability, or expense which you may incur or any payment which you make in accordance with, or as a result of, such agreement.") would serve as the "insurance for the insurance."
The muddiness of these events (Ms. Franklin suing me and hoping I would never find- or enforce her personal service contract) led my counsel and AON/Hiscox to dutifully consider the question, and it is disingenuous for Hiscox to claim otherwise.
Thank you.
Alan
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phone: 323 988 9692

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Thanks,

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

---

phone: 323 988 9692

peace and love.

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From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 25, 2017 at 8:55 AM
To: laura comerford laura.comerford@aon.com
Cc: Maria Clark maria.clark@aon.com

any response?

thank you.

-alan

---

phone: 323 988 9692

peace and love.

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The muddiness of these events (Ms. Franklin suing me and hoping I would never find- or enforce her personal service contract) led my counsel and AON/Hiscox to dutifully consider the question, and it is disingenuous for Hiscox to claim otherwise.
Thank you.
Alan

---

phone: 323 988 9692

peace and love.

> On May 9, 2017, at 12:40 PM, Laura Comerford <laura.comerford@aon.com> wrote:
>
> Hi Alan
>
> Per our conversation, you would like to go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015. Please confirm via this e-mail and provide any new details and reason behind your disagreement with carrier, specifically that the claim presented was not related to the 2011 claim and why. Maria will then get in contact with Hiscox and see what they say.
>
> Thanks,

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection

with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **Maria Clark** maria.clark@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 25, 2017 at 11:25 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Laura Comerford laura.comerford@aon.com

MC

Hi Alan,

The adjuster, Tara Bodden, who was assigned to the handling of this claim is in a mediation today. I forwarded her an e-mail following up for a response.

Thank you.

Sincerely,
Maria Clark | Claims Manager

AON/Albert G. Ruben Company (New York) Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Tel: 212-463-5583 | Main Tel: 212-627-7400
Direct Fax: 847-953-0892
Email: maria.clark@aon.com

****

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

Before you print, think about the ENVIRONMENT

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Thursday, May 25, 2017 11:56 AM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

any response?

thank you.

-alan

---

phone: **323 988 9692**

peace and love.

On May 23, 2017, at 1:51 PM, Laura Comerford <laura.comerford@aon.com> wrote:

Maria have you heard anything from Hiscox?

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 23, 2017 1:53 PM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i am checking up in this. please let me know.

thank you.

-alan

---
phone: 323 988 9692

peace and love.

On May 16, 2017, at 10:31 AM, Laura Comerford <laura.comerford@aon.com> wrote:

> Maria is sending to Hiscox and I spoke with the underwriter to let her know that you want them to reconsider the claim. We will make sure you are copied in their response.
>
> Laura
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401

171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 16, 2017 1:11 PM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i wanted to check in and see where we are on this.

thank you.

-alan

---
phone: 323 988 9692

peace and love.

> On May 12, 2017, at 11:37 AM, Laura Comerford <laura.comerford@aon.com> wrote:
>
> Thanks Alan.
>
> Maria call me when you have a chance.
>
> Laura
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, May 12, 2017 1:24 PM

To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

Dear Laura,
I request that AON go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015.
When Hiscox declined coverage, it was because Hiscox claimed I had, after intensive vetted phone calls, emails and discussions with both Hiscox and with AON, failed to disclose previous issues with Ms. Franklin and that I answered the following question incorrectly: "Have you suffered any loss or has any claim, whether successful or not, ever been made against you that would be covered by this insurance."
Hiscox and AON specifically directed me to answer the question "no." In discussions I had with both Hiscox's counsel Ted Gerdes, as well as AON's Stephen Carroll, we specifically reviewed the 2011 lawsuit and the personal service contract obtained in 2013 when considering how to answer the question. Thus, the answer was discussed and deliberated with both the carrier and the broker.
Because of the 2013 discovery of the personal service contract, AON/Hiscox vetted the contract and when the question came up, everyone was aware of the prior issues and they were satisfied with the enforceability of the personal service contract, which was evinced in the answer.
Coinciding with the time of Hiscox's exclusion of Aretha Franklin in 2015, I made a deal with Ms. Franklin's counsel that would nullify any issues. Because of this deal, I did not fight Hiscox.
However, after more than 15 months of negotiations, Ms. Franklin has declined two fully negotiated contracts that were approved and generated by and with her counsel. Both offers were OVER and above what Ms. Franklin and her counsel asked for. Ms. Franklin has since fired her counsel and I have no hope that she will accept any offer. Because Ms. Franklin refuses to negotiate any further, this leaves me no other option but to reopen the case in Denver.
The fundamental and virtually singular reason for my Hiscox insurance was because of Ms. Franklin's volatility. Insurance would allow me to defend and enforce Ms. Franklin's contract, which was recently discovered (in 2013) by Warner Films. Hiscox directed me to discuss these matters with Ted Gerdes, I specifically told Mr. Gerdes about the 2011 lawsuit, providing him with links in emails to the "cease and desist" settlement which resulted from the lawsuit.
As this film deals with one of the more well known personalities in the world in Ms. Franklin, a woman who is known for her controversial and public disposition and litigious behavior, it is not credible that Hiscox can say, after the intensive application process that we went through, that they had no knowledge.
To remind from where the confusion/untangling emanated:
In 2011, Ms. Franklin filed a very public lawsuit against me, preventing the film from being exhibited.
In 2013, Warner Films discovered Ms. Franklin's personal service

contract, which plainly allowed me to distribute the film.
The 2011 lawsuit was settled out of court, I suffered no loss. This 2011 claim was not something that would be covered by this insurance as we now had a signed contract from Ms. Franklin, one that had been used to make and distribute the film.
Importantly, all communications were done with knowledge by Hiscox/AON that the personal service contract and specifically the "indemnification letter" on page 2 of Ms. Franklin's personal service contract (which states: "We do hereby undertake and agree to hold and save you harmless of, from and against any loss, cost, damage or expense which may arise or result from said agreement, and we further agree that we will, upon demand, reimburse you for any cost, liability, or expense which you may incur or any payment which you make in accordance with, or as a result of, such agreement.") would serve as the "insurance for the insurance."
The muddiness of these events (Ms. Franklin suing me and hoping I would never find- or enforce her personal service contract) led my counsel and AON/Hiscox to dutifully consider the question, and it is disingenuous for Hiscox to claim otherwise.
Thank you.
Alan

---

phone: 323 988 9692

peace and love.

> On May 9, 2017, at 12:40 PM, Laura Comerford <laura.comerford@aon.com> wrote:
>
> Hi Alan
>
> Per our conversation, you would like to go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015. Please confirm via this e-mail and provide any new details and reason behind your disagreement with carrier, specifically that the claim presented was not related to the 2011 claim and why. Maria will then get in contact with Hiscox and see what they say

and see what they say.

Thanks,

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla)
[mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla)
<alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT

Date: May 8, 2017 at 1:36:22 PM PDT
To: Stephen Carroll
<stephen.carroll@aon.com>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 1, 2017 at 10:57 AM
To: laura comerford laura.comerford@aon.com, Maria Clark maria.clark@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi laura and maria

i want you, as my insurance brokers, to have the following. (see below.)

this case is now becoming EXTREMELY time sensitive as scheduling to make certain deadlines for the fall are now coming on.

if there's any way to get an answer asap from hiscox, that is very much appreciated.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

> Begin forwarded message:
>
> **From:** Steven Zansberg <SZansberg@lskslaw.com>
> **Subject:** **Franlkin v. Elliott**
> **To:** "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>
>
> Alan:
>
> Attached for your review:
>
> The DRAFT of the letter I propose to send to Reid Neureiter, after your and Larry's review and edits, and after I give Reid a "heads up" courtesy call that it is coming his way.
>
> Please let me know if you'd like to schedule a call, tomorrow afternoon or Thursday, to discuss these.
>
> Best regards,
> Steve
>
> Steven D. Zansberg
>
> LSKS LEVINE SULLIVAN KOCH & SCHULZ, LLP
>
> 1888 Sherman Street
> Suite 370
> Denver, CO 80203
> (303) 376-2409 | Phone
> (303) 376-2401 | Fax
> www.lskslaw.com

Elliott-Franklin - ltr to N...).docx

From: **Laura Comerford** laura.comerford@aon.com
Subject: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 12, 2017 at 11:37 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Maria Clark maria.clark@aon.com, Laura Comerford laura.comerford@aon.com

LC

Thanks Alan.

Maria call me when you have a chance.

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Friday, May 12, 2017 1:24 PM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

Dear Laura,
I request that AON go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015.
When Hiscox declined coverage, it was because Hiscox claimed I had, after intensive vetted phone calls, emails and discussions with both Hiscox and with AON, failed to disclose previous issues with Ms. Franklin and that I answered the following question incorrectly:
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Hiscox and AON specifically directed me to answer the question "no." In discussions I had with both Hiscox's counsel Ted Gerdes, as well as AON's Stephen Carroll, we specifically reviewed the 2011 lawsuit and the personal service contract obtained in 2013 when considering how to answer the question. Thus, the answer was discussed and deliberated with both the carrier and the broker.
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2015) by Warner Films. Hiscox directed me to discuss these matters with Ted Gerdes, I specifically told Mr. Gerdes about the 2011 lawsuit, providing him with links in emails to the “cease and desist” settlement which resulted from the lawsuit.
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In 2013, Warner Films discovered Ms. Franklin’s personal service contract, which plainly allowed me to distribute the film.
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Thank you.
Alan
---

phone: **323 988 9692**

peace and love.

> On May 9, 2017, at 12:40 PM, Laura Comerford <laura.comerford@aon.com> wrote:
>
> Hi Alan
>
> Per our conversation, you would like to go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015. Please confirm via this e-mail and provide any new details and reason behind your disagreement with carrier, specifically that the claim presented was not related to the 2011 claim and why. Maria will then get in contact with Hiscox and see what they say.
>
> Thanks,
>
> Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **Laura Comerford** laura.comerford@aon.com
Subject: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 9, 2017 at 12:40 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Maria Clark maria.clark@aon.com, Laura Comerford laura.comerford@aon.com

LC

Hi Alan

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Thanks,

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

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Sent: Tuesday, May 09, 2017 12:48 PM
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Subject: Fwd: amazing grace; 27700815

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
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To: Stephen Carroll <stephen.carroll@aon.com>

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please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: amazing grace; 27700815
Date: May 9, 2017 at 9:47 AM
To: laura.comerford@aon.com

thank you.

-alan

---

phone: 323 988 9692

peace and love.

> Begin forwarded message:
>
> **From:** alan elliott (ucla) <alanelliott@g.ucla.edu>
> **Subject:** **amazing grace; 27700815**
> **Date:** May 8, 2017 at 1:56:22 PM PDT
> **To:** Stephen Carroll <stephen.carroll@aon.com>
>
> hi stephen
>
> i hope this finds you well.
>
> i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.
>
> please let me know.
>
> thank you.
>
> -alan
>
> ---
>
> **phone: 323 988 9692**
>
> **peace and love.**

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56 PM
To: Stephen Carroll stephen.carroll@aon.com

hi stephen

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i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace; 27700815
Date: May 4, 2017 at 2:37 PM
To: Stephen Carroll stephen.carroll@aon.com

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: RE: Amazing Grace
Date: March 4, 2015 at 12:25 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Ramona V. Horne ramona.horne@aon.com, George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk, Todd W. Musburger todd@musburger.com

SC

Here is the quote from Hiscox. I am waiting on Axis.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
Cell: 914-589-2474
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, March 04, 2015 3:24 PM
To: Stephen Carroll
Cc: Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
Subject: Re: Amazing Grace

hey stephen

we are checking in re policy.

please let us know.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <stephen.carroll@aon.com> wrote:

> Thank you…I have forwarded info to underwriters
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401

New York, NY 10016
Phone: 212-337-4353
Cell: 914-589-2474
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Friday, February 27, 2015 3:50 PM
To: Stephen Carroll
Cc: Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
Subject: Re: Amazing Grace

hi stephen

please see answers below.

> On Feb 27, 2015, at 11:22 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
>
> So after all this time my underwriter finally responded to the submission and had the following questions. I apologize but would appreciate any clarification you can provide:
>
> 1. Is this a documentary, music video or something else?

documentary

2. What is the anticipated distribution/dissemination? theatrical release, TV special, etc…?

theatrical, vod, dvd, television

3. Was it previously produced and released and now they're re-releasing it?

it was (technically) produced by warners.

elements of the project have been released at least twice that we know of:

1) the atlantic 25th anniversary film, made with braverman productions <image001.png>
2) aretha franklin; the queen of soul (august 22, 1988) (http://www.imdb.com/title/tt0210537/)

4. If not previously released please advise who produced it and who currently owns the copyright and what agreements are in place with this applicant.

the current iteration of the footage is owned by me with quitclaim from warner bors. films.

5. Did they obtain rights from Warner Brothers?

yes.

6. Did they obtain rights from Atlantic Records?

none needed, as per atlantic/warner music group.

7. Did Aretha Franklin participate in this production?

yes

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
Cell: 914-589-2474
Fax: 847-953-2692

Amazing Grace
Hiscox...te.PDF

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: RE: Amazing Grace
Date: March 11, 2015 at 8:13 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Ramona V. Horne ramona.horne@aon.com, George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk, Todd W. Musburger todd@musburger.com

SC

Alan: I got the following indication from Axis:

Full/Wide theatrical release:
$1m/$3m $25k SIR $15,539 3 year policy with TOIE

Limited theatrical release:
$1m/$3m $25k SIR $7,063 3 year term with TOIE

All forms of non-theatrical release:
$1m/$3m $25k SIR $4,528 3 year term with TOIE.

Unfortunately on this type of risk we cannot offer music coverage as the artist should have own coverage.

Clearly Hiscox is the way to go. Give me a call to discuss.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
Cell: 914-589-2474
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, March 09, 2015 8:02 PM
To: Stephen Carroll
Cc: Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
Subject: Re: Amazing Grace

hey stephen

checking to see if you had an axis quote.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Mar 4, 2015, at 12:25 PM, Stephen Carroll <stephen.carroll@aon.com> wrote:

> Here is the quote from Hiscox. I am waiting on Axis.
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> Cell: 914-589-2474
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Wednesday, March 04, 2015 3:24 PM
> **To:** Stephen Carroll
> **Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
> **Subject:** Re: Amazing Grace
>
> hey stephen
>
> we are checking in re policy.
>
> please let us know.
>
> thank you.
>
> ---
> phone: 323 988 9692
>
> Sent from a iPhone
>
> This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.
>
> On Feb 27, 2015, at 1:42 PM, Stephen Carroll <stephen.carroll@aon.com> wrote:
>
> > Thank you. I have forwarded info to underwriters

Thank you…I have forwarded info to underwriters

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
Cell: 914-589-2474
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Friday, February 27, 2015 3:50 PM
To: Stephen Carroll
Cc: Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
Subject: Re: Amazing Grace

hi stephen

please see answers below.

> On Feb 27, 2015, at 11:22 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
>
> So after all this time my underwriter finally responded to the submission and had the following questions. I apologize but would appreciate any clarification you can provide:
>
> 1. Is this a documentary, music video or something else?

documentary

2. What is the anticipated distribution/dissemination? theatrical release, TV special, etc…?

theatrical, vod, dvd, television

3. Was it previously produced and released and now they're re-releasing it?

it was (technically) produced by warners.

elements of the project have been released at least twice that we know of:

1) the atlantic 25th anniversary film, made with braverman productions <image001.png>
2) aretha franklin; the queen of soul (august 22, 1988) (http://www.imdb.com/title/tt0210537/)

4. If not previously released please advise who produced it and who currently owns the copyright and what agreements are in place with this applicant.

the current iteration of the footage is owned by me with quitclaim from warner bors. films.

5. Did they obtain rights from Warner Brothers?

yes.

6. Did they obtain rights from Atlantic Records?

none needed, as per atlantic/warner music group.

7. Did Aretha Franklin participate in this production?

yes

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212 337 4353

Phone: 212-337-4353
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Amazing Grace
Date: May 18, 2015 at 9:34 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi stephen

can i get a 60 day extension on this quote please?

thank you.

-alan

---

phone: 323 988 9692

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> **Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
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> please let us know.
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> Cell: 914-589-2474
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, February 27, 2015 3:50 PM
> **To:** Stephen Carroll
> **Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
> **Subject:** Re: Amazing Grace
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7. Did Aretha Franklin participate in this production?

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Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: February 26, 2016 at 12:59 PM
To: Stephen Carroll stephen.carroll@aon.com

thank you.

-alan

---
phone: 323 988 9692
peace and love.

On Feb 26, 2016, at 12:56 PM, Stephen Carroll <stephen.carroll@aon.com> wrote:

> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> **New Cell: 914-588-4290**
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott [mailto:alanelliott@g.ucla.edu]
> **Sent:** Thursday, February 25, 2016 1:58 PM
> **To:** Stephen Carroll
> **Subject:** Re: amazing grace confirmation
>
> hi stephen
>
> can you please send me a copy of the full policy for “amazing grace.” (i can’t find the full policy.)
>
> thank you.
>
> -alan
>
> ---
> **phone: 323 988 9692**
> **peace and love.**
>
> **http://songsoundrecord.tumblr.com**
>
> > On Jul 21, 2015, at 8:37 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:
> >
> > Alan,

We did not receive it yet. Mail is delivered in the afternoon,

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, July 21, 2015 11:34 AM
To: Annette Shavuo
Subject: Re: amazing grace confirmation

hi Annette

any sign of the check yet? please let me know.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Jul 20, 2015, at 2:10 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:

OK great

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, July 20, 2015 5:00 PM
To: Annette Shavuo
Subject: Fwd: amazing grace confirmation

hi annette- as per below… it should be there tomorrow (we hope).

thank you.

-alan

---

phone: 323 988 9692

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Begin forwarded message:

From: Julie Huntsinger <juliehuntsinger@me.com>
Subject: Re: amazing grace confirmation
Date: July 20, 2015 at 1:55:48 PM PDT

To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

Hi Alan,

It is en route.

Forgive us- for some reason it was held Thursday- when i expected it to go out- and it went out Friday instead.

Really embarrassed.

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com
www.telluridefilmfestival.org
42nd TELLURIDE FILM FESTIVAL
September 4-7, 2015

On Jul 20, 2015, at 1:51 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hey Julie

Can you pls see if this is en route?

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

> **From:** Annette Shavuo <annette.shavuo@aon.com>
> **Date:** July 20, 2015 at 1:27:21 PM PDT
> **To:** "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
> **Subject: FW: amazing grace confirmation**

Alan,

We did not receive the check. Maybe by tomorrow.

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: juliehuntsinger@mac.com
Cc: Annette Shavuo
Subject: FW: amazing grace confirmation

Hi Julie,
Attached is the E&O policy invoice.
Please remit payment. Thank you.

Best Regards,
Amanda Roytbak
Assisting Laura Comerford
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
212.337.4357

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of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, July 14, 2015 2:16 PM
To: Amanda Roytbak
Cc: Annette Shavuo; Stephen Carroll; Todd W. Musburger; Julie Huntsinger
Subject: Re: amazing grace confirmation

hi

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

---

phone: 323 988 9692

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> On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <amanda.roytbak@aon.com> wrote:
>
> # please bill directly to:
>
> # Julie Huntsinger

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

<2700815_9.pdf>

From: **Annette Shavuo** annette.shavuo@aon.com
Subject: RE: amazing grace confirmation
Date: July 14, 2015 at 6:30 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com

AS

Thank you Alan.

Once we receive the check for $ 5,700 ($ 5,400 + $ 300 administration fee), we will request to bind coverage.

Please make check payable to Aon/Albert G. Ruben.

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, July 13, 2015 5:02 PM
To: Stephen Carroll; Annette Shavuo
Cc: Todd W. Musburger
Subject: amazing grace confirmation

hi stephen and annette and thank you again for your patience and diligence.

attached is my signature for option “b”.

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

EXECUTIVE SUMMARY

You have asked us to provide you with a new proposal. Our goal is to obtain the appropriate insurance coverage, at the most competitive price. We approached Hiscox who specializes in this type of insurance coverage. Please refer to the Quote Disclosure Report attached, which outlines our commission for the quoted coverage. If you wish to bind coverage as outlined in this proposal, please check the lines of coverage you are accepting and sign the Acknowledgment and Approval of Insured below.

Acknowledgment and Approval of Insured

We hereby acknowledge receipt and review of the information presented in the New Proposal ("Proposal") dated 7/8/2015 for Errors & Omissions and provided in the attached Quote Disclosure Report dated 7/8/2015. We hereby instruct Aon/Albert G. Ruben Insurance Services, Inc. (AGR) to bind the insurance program(s) selected by us and understand that our instruction to bind constitutes an acceptance of the terms and conditions and payments described in this Proposal, including ARS U.S. Business Terms. We consent to the procedure whereby Aon will place or renew additional policies we are likely to need in the twelve months following this program inception with the insurer we have selected. We understand that Aon will advise us of any variances in premium rates, coverages, terms or conditions applicable to additional placed policies prior to binding them for our approval.

Coverage	Accept	Decline
Errors & Omissions "Amazing Grace"	X	

Date: 7.13.15 By: _____

Signature On behalf of Amazing Grace, LLC.

	Email	Mail	Both
Policy Delivery Via:			

This insurance document is furnished to you as a matter of information for your convenience. It only summarizes the listed proposed policy(ies) and is not intended to reflect all the terms and conditions or exclusions of such proposed policy(ies). Moreover, the information contained in this document reflects proposed coverage as of the effective date(s) of the proposed policy(ies) and does not include subsequent changes. This document is not an insurance policy and does not amend, alter or extend the coverage afforded by the listed proposed policy(ies). The insurance afforded by the listed proposed policy(ies) is subject to all the terms, exclusions and conditions of such policy(ies).
The services and placements outlined in this proposal will be provided in accordance with the terms of the notices and policies set forth in the ARS US Business Terms.

thank you.

-alan

---

phone: **323 988 9692**

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From: **Amanda Roytbak** amanda.roytbak@aon.com
Subject: RE: amazing grace confirmation
Date: July 14, 2015 at 11:13 AM
To: Annette Shavuo annette.shavuo@aon.com, alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Stephen Carroll stephen.carroll@aon.com, Todd W. Musburger todd@musburger.com

AR

Hi Alan,
Please see the attached invoice for the E&O policy.
Please remit payment. Thank you.

Best Regards,
Amanda Roytbak
Assisting Laura Comerford
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
212.337.4357

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From: Annette Shavuo
Sent: Tuesday, July 14, 2015 12:26 PM
To: alan elliott (ucla)
Cc: Stephen Carroll; Todd W. Musburger; Amanda Roytbak
Subject: RE: amazing grace confirmation

Alan,

Amanda will send an invoice shortly.

Thanks,

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, July 14, 2015 10:19 AM
To: Annette Shavuo
Cc: Stephen Carroll; Todd W. Musburger
Subject: Re: amazing grace confirmation

hi Annette

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

they will get you paid today!

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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>
> Please make check payable to Aon/Albert G. Ruben.

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Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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To: Stephen Carroll; Annette Shavuo
Cc: Todd W. Musburger
Subject: amazing grace confirmation

hi stephen and annette and thank you again for your patience and diligence.

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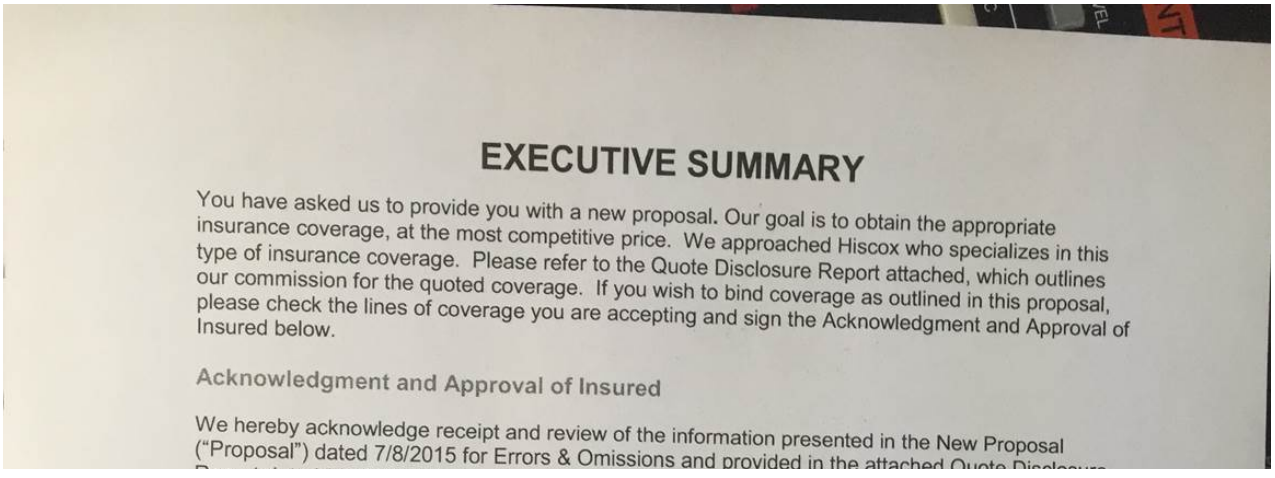
please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com



EXECUTIVE SUMMARY

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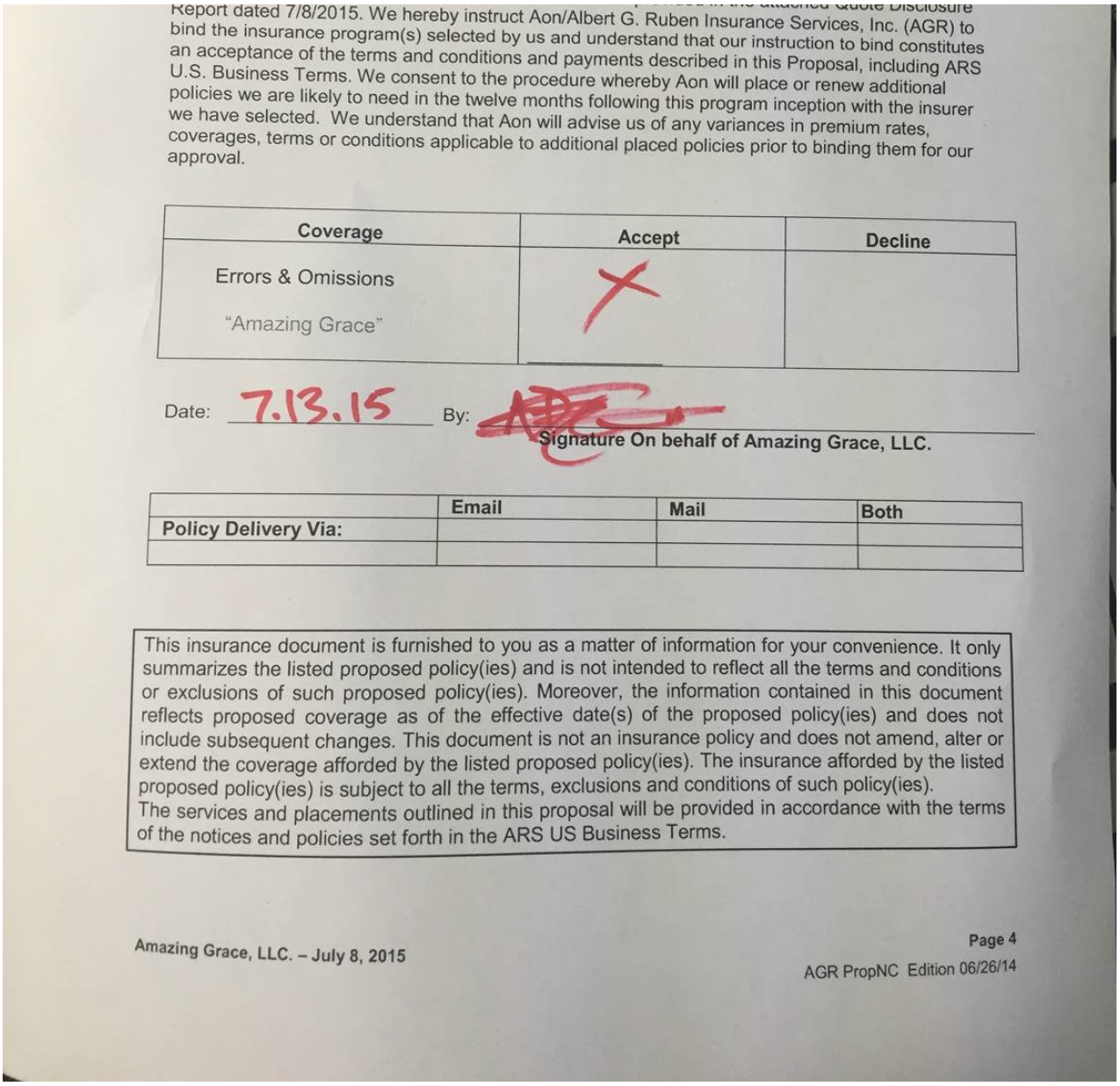
We hereby acknowledge receipt and review of the information presented in the New Proposal (“Proposal”) dated 7/8/2015 for Errors & Omissions and provided in the attached Quote Disclosure



Report dated 7/8/2015. We hereby instruct Aon/Albert G. Ruben Insurance Services, Inc. (AGR) to bind the insurance program(s) selected by us and understand that our instruction to bind constitutes an acceptance of the terms and conditions and payments described in this Proposal, including ARS U.S. Business Terms. We consent to the procedure whereby Aon will place or renew additional policies we are likely to need in the twelve months following this program inception with the insurer we have selected. We understand that Aon will advise us of any variances in premium rates, coverages, terms or conditions applicable to additional placed policies prior to binding them for our approval.

Coverage	Accept	Decline
Errors & Omissions "Amazing Grace"	X	

Date: 7.13.15 By: _____
Signature On behalf of Amazing Grace, LLC.

	Email	Mail	Both
Policy Delivery Via:			

This insurance document is furnished to you as a matter of information for your convenience. It only summarizes the listed proposed policy(ies) and is not intended to reflect all the terms and conditions or exclusions of such proposed policy(ies). Moreover, the information contained in this document reflects proposed coverage as of the effective date(s) of the proposed policy(ies) and does not include subsequent changes. This document is not an insurance policy and does not amend, alter or extend the coverage afforded by the listed proposed policy(ies). The insurance afforded by the listed proposed policy(ies) is subject to all the terms, exclusions and conditions of such policy(ies).
The services and placements outlined in this proposal will be provided in accordance with the terms of the notices and policies set forth in the ARS US Business Terms.

Amazing Grace, LLC. – July 8, 2015

Page 4
AGR PropNC Edition 06/26/14

thank you.

-alan

---

phone: 323 988 9692

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INVOICE

Agency:

Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016

212-627-7400
847-953-0872
rubenny@aon.com

Insured:

Amazing Grace LLC
1633 N Stanley Ave

Los Angeles CA 90046-2712

Invoice Date:	07/14/2015

Invoice No.:	1228
Account No.:	TBD
Policy No.:	TBD
Policy Type.:	Errors & Omissions
Company:	Hiscox
Effective Date:	TBD
Expiration Date:	TBD

Policy Description / Endorsements and Payments	Amount
Policy	$ 5400
Erros & Omissions Policy (3 year term) - "Amazing Grace"	0.00
Administrative Fee	300
	0.00
	0.00
	0.00
	0.00
	0.00
	0.00
	0.00
	0.00
	0.00
	0.00
Mortgagee:	Balance: $5,700.00

Comments

Please remit payment. Thank you.

cut below on dotted line and return

Insured Copy

Insured:

Policy Number
TBD

Policy Period		
TBD	-	TBD

Amazing Grace LLC
1633 N Stanley Ave

Los Angeles CA 90046-2712

Account:	TBD
Invoice:	1228
Date:	07/14/2015
Balance:	$5,700.00

Agency:

Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016

$

Indicate Amount Paid

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: July 14, 2015 at 11:15 AM
To: Amanda Roytbak amanda.roytbak@aon.com
Cc: Annette Shavuo annette.shavuo@aon.com, Stephen Carroll stephen.carroll@aon.com, Todd W. Musburger todd@musburger.com , Julie Huntsinger juliehuntsinger@me.com

hi

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

---

phone: 323 988 9692

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> On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <amanda.roytbak@aon.com> wrote:
>
> # please bill directly to:
>
> # Julie Huntsinger
> # Executive Director
> # Telluride Film Festival
> # (510) 665-9494
> # juliehuntsinger@mac.com

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: July 15, 2015 at 10:16 AM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com, Todd W. Musburger todd@musburger.com, Amanda Roytbak amanda.roytbak@aon.com

good morning

checking to see that this is on it's path to being bound. please let me know.

thank you.

-alan

---

phone: 323 988 9692

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> On Jul 14, 2015, at 9:26 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:
>
> Alan,
>
> Amanda will send an invoice shortly.
>
> Thanks,
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
> Fax: (212) 633-1457 / Direct: (847) 953-0849
>
> Before you print, think about the ENVIRONMENT
>
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>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Tuesday, July 14, 2015 10:19 AM
> **To:** Annette Shavuo
> **Cc:** Stephen Carroll; Todd W. Musburger
> **Subject:** Re: amazing grace confirmation
>
> hi Annette

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

they will get you paid today!

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Jul 14, 2015, at 6:30 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:

> Thank you Alan.
>
> Once we receive the check for $ 5,700 ($ 5,400 + $ 300 administration fee), we will request to bind coverage.
>
> Please make check payable to Aon/Albert G. Ruben.
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
> Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, July 13, 2015 5:02 PM
To: Stephen Carroll; Annette Shavuo
Cc: Todd W. Musburger
Subject: amazing grace confirmation

hi stephen and annette and thank you again for your patience and diligence.

attached is my signature for option “b”.

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<image001.jpg>

thank you.

-alan

---

phone: 323 988 9692

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: amazing grace confirmation
Date: July 20, 2015 at 2:00 PM
To: Annette Shavuo annette.shavuo@aon.com

hi annette- as per below… it should be there tomorrow (we hope).

thank you.

-alan

---

phone: 323 988 9692

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> Begin forwarded message:
>
> **From:** Julie Huntsinger <juliehuntsinger@me.com>
> **Subject:** **Re: amazing grace confirmation**
> **Date:** July 20, 2015 at 1:55:48 PM PDT
> **To:** "alan elliott (ucla)" <alanelliott@g.ucla.edu>
>
> Hi Alan,
>
> It is en route.
>
> Forgive us- for some reason it was held Thursday- when i expected it to go out- and it went out Friday instead.
>
> Really embarrassed.
>
> Julie Huntsinger
> Executive Director
> Telluride Film Festival
> (510) 665-9494
> juliehuntsinger@mac.com
> www.telluridefilmfestival.org
> 42nd TELLURIDE FILM FESTIVAL
> September 4-7, 2015
>
> On Jul 20, 2015, at 1:51 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:
>
> > hey Julie
> >
> > Can you pls see if this is en route?
> >
> > thank you.
> >
> > ---
> > phone: 323 988 9692
> >
> > Sent from a iPhone
> > This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.
> >
> > Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Subject: FW: amazing grace confirmation

Alan,

We did not receive the check. Maybe by tomorrow.

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: juliehuntsinger@mac.com
Cc: Annette Shavuo
Subject: FW: amazing grace confirmation

Hi Julie,
Attached is the E&O policy invoice.
Please remit payment. Thank you.

Best Regards,
Amanda Roytbak
Assisting Laura Comerford
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
212.337.4357

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, July 14, 2015 2:16 PM
To: Amanda Roytbak
Cc: Annette Shavuo; Stephen Carroll; Todd W. Musburger; Julie Huntsinger
Subject: Re: amazing grace confirmation

hi

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

---

phone: 323 988 9692

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> On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <amanda.roytbak@aon.com> wrote:
>
> please bill directly to:
>
> Julie Huntsinger
> Executive Director
> Telluride Film Festival
> (510) 665-9494

juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: July 21, 2015 at 8:34 AM
To: Annette Shavuo annette.shavuo@aon.com

hi Annette

any sign of the check yet? please let me know.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Jul 20, 2015, at 2:10 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:

> OK great
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
> Fax: (212) 633-1457 / Direct: (847) 953-0849
>
> Before you print, think about the ENVIRONMENT
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>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Monday, July 20, 2015 5:00 PM
> **To:** Annette Shavuo
> **Subject:** Fwd: amazing grace confirmation
>
> hi annette- as per below… it should be there tomorrow (we hope).
>
> thank you.
>
> -alan
>
> ---
>
> **phone: 323 988 9692**

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Begin forwarded message:

From: Julie Huntsinger <juliehuntsinger@me.com>
Subject: Re: amazing grace confirmation
Date: July 20, 2015 at 1:55:48 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

Hi Alan,

It is en route.

Forgive us- for some reason it was held Thursday- when i expected it to go out- and it went out Friday instead.

Really embarrassed.

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com
www.telluridefilmfestival.org
42nd TELLURIDE FILM FESTIVAL
September 4-7, 2015

On Jul 20, 2015, at 1:51 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hey Julie

Can you pls see if this is en route?

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Subject: FW: amazing grace confirmation

Alan,

We did not receive the check. Maybe by tomorrow.

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: juliehuntsinger@mac.com
Cc: Annette Shavuo
Subject: FW: amazing grace confirmation

Hi Julie,
Attached is the E&O policy invoice.
Please remit payment. Thank you.

Best Regards,
Amanda Roytbak
Assisting Laura Comerford
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401

New York, NY 10016
212.337.4357

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, July 14, 2015 2:16 PM
To: Amanda Roytbak
Cc: Annette Shavuo; Stephen Carroll; Todd W. Musburger; Julie Huntsinger
Subject: Re: amazing grace confirmation

hi

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

---

phone: 323 988 9692

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> On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <amanda.roytbak@aon.com> wrote:
>
> # please bill directly to:
>
> # Julie Huntsinger

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: February 24, 2016 at 10:05 PM
To: Annette Shavuo annette.shavuo@aon.com

hi annette

can you please send me a copy of the full policy for “amazing grace."

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

> On Jul 21, 2015, at 8:37 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:
>
> Alan,
>
> We did not receive it yet. Mail is delivered in the afternoon,
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
> Fax: (212) 633-1457 / Direct: (847) 953-0849
>
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>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Tuesday, July 21, 2015 11:34 AM
> **To:** Annette Shavuo
> **Subject:** Re: amazing grace confirmation
>
> hi Annette
>
> any sign of the check yet? please let me know.
>
> thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Jul 20, 2015, at 2:10 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:

> OK great
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
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>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Monday, July 20, 2015 5:00 PM
> **To:** Annette Shavuo
> **Subject:** Fwd: amazing grace confirmation
>
> hi annette- as per below… it should be there tomorrow (we hope).
>
> thank you.
>
> -alan
>
> ---
>
> **phone: 323 988 9692**

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Begin forwarded message:

From: Julie Huntsinger <juliehuntsinger@me.com>
Subject: Re: amazing grace confirmation
Date: July 20, 2015 at 1:55:48 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

Hi Alan,

It is en route.

Forgive us- for some reason it was held Thursday- when i expected it to go out- and it went out Friday instead.

Really embarrassed.

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com
www.telluridefilmfestival.org
42nd TELLURIDE FILM FESTIVAL
September 4-7, 2015

On Jul 20, 2015, at 1:51 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hey Julie

Can you pls see if this is en route?

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Subject: FW: amazing grace confirmation

Alan,

We did not receive the check. Maybe by tomorrow.

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: juliehuntsinger@mac.com
Cc: Annette Shavuo
Subject: FW: amazing grace confirmation

Hi Julie,
Attached is the E&O policy invoice.
Please remit payment. Thank you.

Best Regards,
Amanda Roytbak
Assisting Laura Comerford
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
212.337.4357

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, July 14, 2015 2:16 PM
To: Amanda Roytbak
Cc: Annette Shavuo; Stephen Carroll; Todd W. Musburger; Julie Huntsinger
Subject: Re: amazing grace confirmation

hi

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

---

phone: 323 988 9692

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info@alanelliott.net.

On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <amanda.roytbak@aon.com> wrote:

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: February 25, 2016 at 10:57 AM
To: Stephen Carroll stephen.carroll@aon.com

hi stephen

can you please send me a copy of the full policy for “amazing grace.” (i can’t find the full policy.)

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

> On Jul 21, 2015, at 8:37 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:
>
> Alan,
>
> We did not receive it yet. Mail is delivered in the afternoon,
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
> Fax: (212) 633-1457 / Direct: (847) 953-0849
>
> Before you print, think about the ENVIRONMENT
>
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>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Tuesday, July 21, 2015 11:34 AM
> **To:** Annette Shavuo
> **Subject:** Re: amazing grace confirmation
>
> hi Annette
>
> any sign of the check yet? please let me know.
>
> thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Jul 20, 2015, at 2:10 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:

> OK great
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
> Fax: (212) 633-1457 / Direct: (847) 953-0849
>
> Before you print, think about the ENVIRONMENT
>
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>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Monday, July 20, 2015 5:00 PM
> **To:** Annette Shavuo
> **Subject:** Fwd: amazing grace confirmation
>
> hi annette- as per below… it should be there tomorrow (we hope).
>
> thank you.
>
> -alan
>
> ---
>
> **phone: 323 988 9692**

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Begin forwarded message:

From: Julie Huntsinger <juliehuntsinger@me.com>
Subject: Re: amazing grace confirmation
Date: July 20, 2015 at 1:55:48 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

Hi Alan,

It is en route.

Forgive us- for some reason it was held Thursday- when i expected it to go out- and it went out Friday instead.

Really embarrassed.

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com
www.telluridefilmfestival.org
42nd TELLURIDE FILM FESTIVAL
September 4-7, 2015

On Jul 20, 2015, at 1:51 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hey Julie

Can you pls see if this is en route?

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Subject: FW: amazing grace confirmation

Alan,

We did not receive the check. Maybe by tomorrow.

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: juliehuntsinger@mac.com
Cc: Annette Shavuo
Subject: FW: amazing grace confirmation

Hi Julie,
Attached is the E&O policy invoice.
Please remit payment. Thank you.

Best Regards,
Amanda Roytbak
Assisting Laura Comerford
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
212.337.4357

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, July 14, 2015 2:16 PM
To: Amanda Roytbak
Cc: Annette Shavuo; Stephen Carroll; Todd W. Musburger; Julie Huntsinger
Subject: Re: amazing grace confirmation

hi

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

---

phone: 323 988 9692

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info@alanelliott.net.

On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <amanda.roytbak@aon.com> wrote:

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace confirmation
Date: July 13, 2015 at 2:01 PM
To: Stephen Carroll Stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi stephen and annette and thank you again for your patience and diligence.

attached is my signature for option “b”.

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

EXECUTIVE SUMMARY

You have asked us to provide you with a new proposal. Our goal is to obtain the appropriate insurance coverage, at the most competitive price. We approached Hiscox who specializes in this type of insurance coverage. Please refer to the Quote Disclosure Report attached, which outlines our commission for the quoted coverage. If you wish to bind coverage as outlined in this proposal, please check the lines of coverage you are accepting and sign the Acknowledgment and Approval of Insured below.

Acknowledgment and Approval of Insured

We hereby acknowledge receipt and review of the information presented in the New Proposal (“Proposal”) dated 7/8/2015 for Errors & Omissions and provided in the attached Quote Disclosure Report dated 7/8/2015. We hereby instruct Aon/Albert G. Ruben Insurance Services, Inc. (AGR) to bind the insurance program(s) selected by us and understand that our instruction to bind constitutes an acceptance of the terms and conditions and payments described in this Proposal, including ARS U.S. Business Terms. We consent to the procedure whereby Aon will place or renew additional policies we are likely to need in the twelve months following this program inception with the insurer we have selected. We understand that Aon will advise us of any variances in premium rates, coverages, terms or conditions applicable to additional placed policies prior to binding them for our approval.

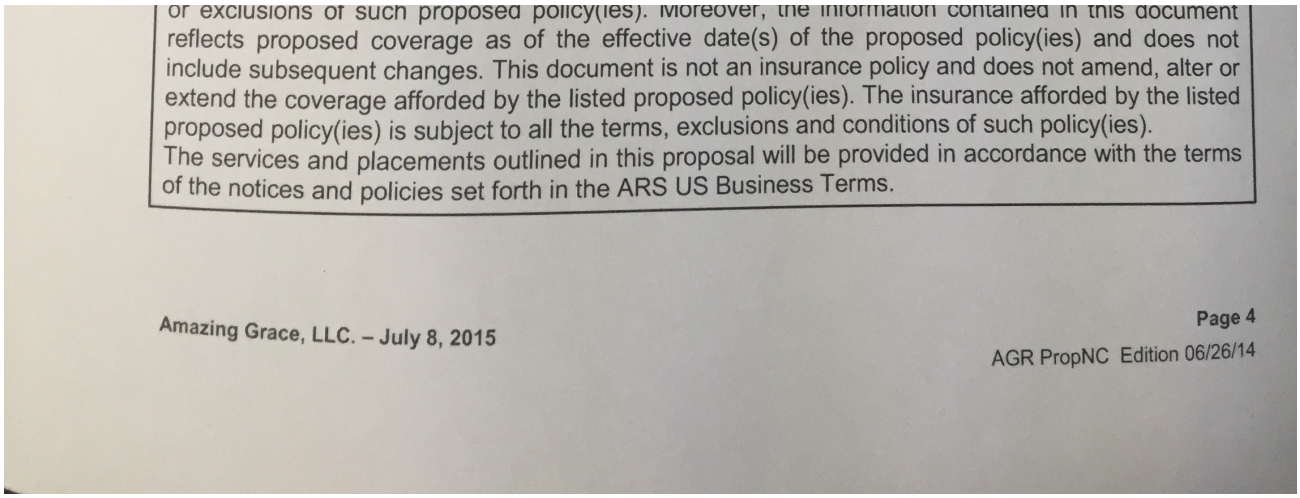
Coverage	Accept	Decline
Errors & Omissions “Amazing Grace”	X	

Date: 7.13.15 By: _____

Signature On behalf of Amazing Grace, LLC.

	Email	Mail	Both
Policy Delivery Via:			

This insurance document is furnished to you as a matter of information for your convenience. It only summarizes the listed proposed policy(ies) and is not intended to reflect all the terms and conditions


or exclusions of such proposed policy(ies). Moreover, the information contained in this document reflects proposed coverage as of the effective date(s) of the proposed policy(ies) and does not include subsequent changes. This document is not an insurance policy and does not amend, alter or extend the coverage afforded by the listed proposed policy(ies). The insurance afforded by the listed proposed policy(ies) is subject to all the terms, exclusions and conditions of such policy(ies).
The services and placements outlined in this proposal will be provided in accordance with the terms of the notices and policies set forth in the ARS US Business Terms.

thank you.

-alan

---

phone: 323 988 9692

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace coverage
Date: July 20, 2015 at 7:25 AM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com

I will ask.

is there another way to pay directly?

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Jul 20, 2015, at 7:15 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:

> Alan,
>
> Check was not received. Maybe later when we receive the mail.
>
> What address did you send it to?
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
> Fax: (212) 633-1457 / Direct: (847) 953-0849
>
> Before you print, think about the ENVIRONMENT
>
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>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Monday, July 20, 2015 9:54 AM
> **To:** Stephen Carroll; Annette Shavuo
> **Subject:** amazing grace coverage
>
> good morning stephen and Annette
>
> I am checking in to see if the telluride money has come in and if so if you might please forward over asap the new bound coverage (without the exclusion for the corrected #22

forward over asap the new bound coverage (without the exclusion for the corrected #22 question).

please let me know.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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From: **Annette Shavuo** annette.shavuo@aon.com
Subject: RE: amazing grace coverage
Date: July 21, 2015 at 12:51 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Stephen Carroll stephen.carroll@aon.com

AS

Alan,

We received check # 9953 in the amount of $ 5,700. I will request to bind coverage. Once I receive confirmation from our underwriter, I will send to you.

Thank you,

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: **Annette Shavuo** annette.shavuo@aon.com
Subject: RE: amazing grace coverage
Date: July 17, 2015 at 7:05 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Stephen Carroll stephen.carroll@aon.com

AS

Alan,

We have not received payment. When did you send the check?

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Friday, July 17, 2015 1:40 AM
To: Stephen Carroll; Annette Shavuo
Subject: amazing grace coverage

good morning stephen and Annette

I am checking in to see if the telluride money has come in and if so if you might please forward over asap the new bound coverage (without the exclusion for the corrected #22 question).

please let me know.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace coverage
Date: July 20, 2015 at 6:53 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com

good morning stephen and Annette

I am checking in to see if the telluride money has come in and if so if you might please forward over asap the new bound coverage (without the exclusion for the corrected #22 question).

please let me know.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace coverage
Date: March 23, 2015 at 6:34 AM
To: Stephen Carroll stephen.carroll@aon.com

hey stephen

I need to get coverage on the "consents" for all that are on screen- from Aretha Franklin to the choir to the band.

I have separate releases for each- including Aretha's personal service contract with warner brothers.

can we get on the phone today with the insurance company so we can get that going please?

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: amazing grace follow up
Date: February 2, 2016 at 7:09 PM
To: Annette Shavuo annette.shavuo@aon.com

hello annette

i sent the below to stephen and got a response that he is on vacation. can you please let me know where this stands.

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

> Begin forwarded message:
>
> **From:** "alan elliott (ucla)" <alanelliott@g.ucla.edu>
> **Subject:** **amazing grace follow up**
> **Date:** February 2, 2016 at 4:00:15 PM PST
> **To:** Stephen Carroll <stephen.carroll@aon.com>
> **Cc:** "Todd W. Musburger" <todd@musburger.com>
>
> hi stephen
>
> where are we at re: reinstating insurance?
>
> thank you.
>
> -alan
>
> ---
> phone: 323 988 9692
> peace and love.

From: **Todd Musburger** todd@musburger.com
Subject: Re: amazing grace follow up
Date: February 18, 2016 at 8:57 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: alan elliott (ucla) alanelliott@g.ucla.edu

TM

Hello Stephen: I am one of the attorneys working with Alan Elliott regarding the Aretha Franklin concert footage project. I have been asked to provide some answers to coverage questions that have arisen and I would like to set a call with you today or tomorrow...Please let me know what would work for you...Thanks, Todd

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Wed, Feb 3, 2016 at 11:44 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:

> The answer re Aretha was a firm no. I don't know what we can do. I will call u when I return next week
>
> ---
>
> **From:** alan elliott (ucla)
> **Sent:** Tuesday, February 02, 2016 7:00:15 PM
> **To:** Stephen Carroll
> **Cc:** Todd W. Musburger
> **Subject:** amazing grace follow up
>
> hi stephen
>
> where are we at re: reinstating insurance?
>
> thank you.
>
> -alan
>
> ---
> phone: 323 988 9692
> peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace follow up
Date: February 2, 2016 at 4:00 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi stephen

where are we at re: reinstating insurance?

thank you.

-alan

---
phone: 323 988 9692
peace and love.

From: **Alan Elliott** alanelliott@ucla.edu
Subject: amazing grace insurance form
Date: February 4, 2015 at 10:22 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Todd W. Musburger todd@musburger.com

hello

attached is the insurance application. please let me know if any adjustments are needed (i left what i didn't know blank).

amazing 02021...03.doc

thank you.

-alan

---

phone: 323 988 9692

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> On Feb 2, 2015, at 9:57 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> Cell: 914-589-2474
> Fax: 847-953-2692
>
> ---
>
> **From:** ALAN ELLIOTT [mailto:alanelliott@g.ucla.edu] **On Behalf Of** Alan Elliott
> **Sent:** Monday, February 02, 2015 12:37 PM
> **To:** Stephen Carroll; Ramona V. Horne
> **Cc:** George Chignell; john battsek; Joe Boyd
> **Subject:** insurance needed!
>
> hello
>
> i need to start the process of getting insurance for my film and john battsek and george chignell suggested we start.
>
> how do we start?
>
> thank you.
>
> -alan

-alan

---

phone: 323 988 9692

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<Video Film and Television Producers Application Admitted_Word1203.doc>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace insurance form
Date: February 9, 2015 at 1:48 PM
To: Stephen Carroll Stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk

please let me know if there's anything missing/askew/wrong/right…

amazing 02091...3.docx

thank you.

-alan

---

phone: 323 988 9692

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Amazing Grace, LLC. - E&O QUOTE
Date: July 8, 2015 at 1:31 PM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com

hi

question 22 has been approved according to the lawyer ted gerdes who works for joanne richardson.

thank you.

-alan

---

phone: 323 988 9692

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> On Jul 8, 2015, at 12:55 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:
>
> Alan,
>
> Attached please find the Errors & Omissions' quotes for **"Amazing Grace"** provided by Hiscox. Please review along with our Transparency paperwork and advise if you wish to bind.
>
> **Prior to binding,** we need the following:
>
> **1. "Acknowledgment and Approval of Insured"** form signed, dated and returned **(1st attachment, page 4)**
>
> 2. **Full premium** made payable to Aon/Albert G. Ruben.
>
> **SUBJECTIVITIES:**
>
> **To remove endorsement 2542 - Failure to Obtain License Exclusion**
> Need update on Question # 22 that all final selections have been made and all rights and releases obtained.
>
> **Title Search Report and Opinion**
> To consider removal of the title exclusion, please forward a Title Search Report and an opinion.
>
> Aon Choice Limitation of Liability Program please be advised we are limiting our Liability to $1,000,000. See page 11, Your Limitation of Our Liability of our Insurance Proposal (attached).
>
> Should you have any questions, please contact our office,

Thank you,

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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<T&D Insurance Proposal -Amazing Grace - E&O.pdf><Amazing Grace Hiscox Quote.PDF><QDR AGR Premiums - Amazing Grace 2014 0731 v2.xls>

From: **alan elliott** Alan@AlanElliott.net
Subject: Re: Amazing Grace, LLC E&O #USUUA2700815.15
Date: June 12, 2018 at 12:19 PM
To: Ramona Horne ramona.horne@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi ramona

yes, we will be renewing this. can you please give me the price to reup for 1 yr./3yr/ 5yr or whatever the options may be please.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

On May 14, 2018, at 9:22 AM, Ramona Horne <ramona.horne@aon.com> wrote:

Good afternoon,

The above mentioned E&O is scheduled to expired on 7/21/2018. In order for us to obtain a renewal quote we need an updated application. Please see attached. I have also attached the expiring application as a reference. If coverage is no longer needed please advise. Thanks.

Regards,

Ramona Horne

_____

AON/Albert G. Ruben Company (New York) Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Tel: 212-337-4358
Direct Fax: 847-953-2367
Email: ramona.horne@aon.com

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the

> ***individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.***
>
> <Video_Film_and_Television_Producers_Application.pdf><amazing grace App- REVISED Q#22 -E&O Video Film and Television Producers....doc>

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **alan elliott** Alan@AlanElliott.net
Subject: Re: Amazing Grace, LLC E&O #USUUA2700815.15
Date: June 14, 2018 at 10:45 AM
To: Ramona Horne ramona.horne@aon.com

hi ramona

i am following up on this since i havent heard back since our call the other day.

yes, we will be renewing this. can you please give me the price to reup for 1 yr./3yr/ 5yr or whatever the options may be please.

thank you.

-alan

---

phone: 323 988 9692

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>
> Ramona Horne
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> AON/Albert G. Ruben Company (New York) Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Tel: 212-337-4358
> Direct Fax: 847-953-2367
> Email: ramona.horne@aon.com

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<Video_Film_and_Television_Producers_Application.pdf><amazing grace App- REVISED Q#22 -E&O Video Film and Television Producers....doc>

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **alan elliott** Alan@AlanElliott.net
Subject: Fwd: Amazing Grace, LLC E&O #USUUA2700815.15
Date: June 12, 2018 at 12:18 PM
To: Ramona Horne ramona.horne@aon.com

thank you.

-alan

---

phone: 323 988 9692

peace and love.

> Begin forwarded message:
>
> **From:** "alan elliott (ucla)" <alanelliott@g.ucla.edu>
> **Subject:** **Re: Amazing Grace, LLC E&O #USUUA2700815.15**
> **Date:** June 11, 2018 at 10:52:29 AM PDT
> **To:** Ramona Horne <ramona.horne@aon.com>
> **Cc:** "Todd W. Musburger" <todd@musburger.com>
>
> hi ramona
>
> yes, we will be renewing this. can you please give me the price to reup for 1 yr./3yr/ 5yr or whatever the options may be please.
>
> thank you.
>
> -alan
>
> ---
>
> **phone: 323 988 9692**
>
> **peace and love.**
>
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<Video_Film_and_Television_Producers_Application.pdf><amazing grace App- REVISED Q#22 -E&O Video Film and Television Producers....doc>

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **Cope, Victoria** Victoria.Cope@clydeco.us
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 1:03 PM
To: alanelliott@g.ucla.edu
Cc: Bertschi, Scott Scott.Bertschi@clydeco.us, maria.clark@aon.com, Bodden Tara Tara.Bodden@HISCOX.com

VC

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | **Mobile:** +1 404 374 5461

CLYDE&CO | 271 17th Street | Suite 1720 | Atlanta | GA 30363 | USA
Main +1 404 410 3150 | **Fax** +1 404 410 3151 | **www.clydeco.us**

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PDF Adobe
Hiscox_Amazing Grace…7).PDF

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS
Date: July 10, 2015 at 9:33 AM
To: Stephen Carroll Stephen.carroll@aon.com

thank you.

-alan

---

phone: 323 988 9692

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> Begin forwarded message:
>
> **From:** Annette Shavuo <annette.shavuo@aon.com>
> **Subject:** **RE: Amazing Grace- PLEASE CHECK THIS**
> **Date:** July 9, 2015 at 7:56:00 AM PDT
> **To:** alan elliott <alanelliott@g.ucla.edu>, Stephen Carroll <stephen.carroll@aon.com>
>
> Hi Alan,
>
> Thank you for answering Q#22. I will send the revised application to Hiscox. We still need the following in order to bind coverage.
>
> 1. **"Acknowledgment and Approval of Insured"** form signed, dated and returned **(1st attachment, page 4)**
>
> 2. **Full premium** made payable to Aon/Albert G. Ruben.
>
> Thanks,
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
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> Fax: (212) 633-1457 / Direct: (847) 953-0849
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From: alan elliott [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, July 08, 2015 4:38 PM
To: Stephen Carroll; Annette Shavuo
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS

hi stephen

per my conversation with joanne, i would like to bind coverage asap.

i would like, in the coverage, as also discussed with joanne, is for the following to be specifically delineated in the coverage:

- a statement from the hiscox that they are insuring the project, and those involved with the project, from all claims regarding the chain of title to the film.

- that there are no exclusions to the coverage and the term/cost of an extended policy, since the coverage needs to extend for the full length of all agreements.

(of course there are always exclusions for fraud, withholding pertinent information, etc.)

- that the Atlantic records indemnification letter in the warner contract is in effect.

thank you.

-alan

---

phone: **323 988 9692**

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> On Mar 4, 2015, at 12:25 PM, Stephen Carroll <stephen.carroll@aon.com> wrote:
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> Here is the quote from Hiscox. I am waiting on Axis.
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> Cell: 914-589-2474

Cell: [redacted]
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, March 04, 2015 3:24 PM
To: Stephen Carroll
Cc: Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
Subject: Re: Amazing Grace

hey stephen

we are checking in re policy.

please let us know.

thank you.

---
phone: 323 988 9692

Sent from a iPhone
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On Feb 27, 2015, at 1:42 PM, Stephen Carroll <stephen.carroll@aon.com> wrote:

> Thank you…I have forwarded info to underwriters
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> Cell: 914-589-2474
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, February 27, 2015 3:50 PM

Sent: Friday, February 27, 2015 3:30 PM
To: Stephen Carroll
Cc: Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
Subject: Re: Amazing Grace

hi stephen

please see answers below.

> On Feb 27, 2015, at 11:22 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
>
> So after all this time my underwriter finally responded to the submission and had the following questions. I apologize but would appreciate any clarification you can provide:
>
> 1. Is this a documentary, music video or something else?

documentary

> 2. What is the anticipated distribution/dissemination? theatrical release, TV special, etc…?

theatrical, vod, dvd, television

> 3. Was it previously produced and released and now they're re-releasing it?

it was (technically) produced by warners.

elements of the project have been released at least twice that we know of:

1) the atlantic 25th anniversary film, made with braverman productions <image001.png>
2) aretha franklin; the queen of soul (august 22, 1988) (http://www.imdb.com/title/tt0210537/)

4. If not previously released please advise who produced it and who currently owns the copyright and what agreements are in place with this applicant.

the current iteration of the footage is owned by me with quitclaim from warner bors. films.

5. Did they obtain rights from Warner Brothers?

yes.

6. Did they obtain rights from Atlantic Records?

none needed, as per atlantic/warner music group.

7. Did Aretha Franklin participate in this production?

yes

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
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Phone: 212-337-4353
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

T&D Insurance
Propos...O.PDF

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: RE: Amazing Grace- PLEASE CHECK THIS
Date: July 10, 2015 at 11:54 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Annette Shavuo annette.shavuo@aon.com

SC

Alan: you didn't sign page 4 or indicate your option selection.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
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Sent: Friday, July 10, 2015 12:34 PM
To: Stephen Carroll
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS

thank you.

-alan

---

phone: 323 988 9692

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> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Wednesday, March 04, 2015 3:24 PM
> **To:** Stephen Carroll
> **Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
> **Subject:** Re: Amazing Grace
>
> hey stephen
>
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>
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production?

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Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

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phone: 323 988 9692

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phone: 323 988 9692

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> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> Cell: 914-589-2474
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, February 27, 2015 3:50 PM
> **To:** Stephen Carroll
> **Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
> **Subject:** Re: Amazing Grace
>
> hi stephen
>
> please see answers below.
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<Amazing Grace Hiscox Quote.PDF>

From: **Annette Shavuo** annette.shavuo@aon.com
Subject: RE: Amazing Grace- PLEASE CHECK THIS
Date: July 9, 2015 at 7:56 AM
To: alan elliott alanelliott@g.ucla.edu, Stephen Carroll stephen.carroll@aon.com

AS

Hi Alan,

Thank you for answering Q#22. I will send the revised application to Hiscox. We still need the following in order to bind coverage.

1. **"Acknowledgment and Approval of Insured"** form signed, dated and returned **(1st attachment, page 4)**

2. **Full premium** made payable to Aon/Albert G. Ruben.

Thanks,

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: alan elliott [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, July 08, 2015 4:38 PM
To: Stephen Carroll; Annette Shavuo
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS

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thank you.

-alan

---

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>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Wednesday, March 04, 2015 3:24 PM
> **To:** Stephen Carroll
> **Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
> **Subject:** Re: Amazing Grace
>
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>
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>
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Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

T&D Insurance Propos...O.PDF

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Amazing Grace- PLEASE CHECK THIS
Date: July 9, 2015 at 2:04 PM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com

hi annette and stephen

i was about to sign this and noticed it is not the correct version.

can i please get the revised quote with this taken out of the doc. now that question #22 has been answered:

SUBJECTIVITIES:

To remove endorsement 2542 - Failure to Obtain License Exclusion

Need update on Question # 22 that all final selections have been made and all rights and releases obtained.

thank you.

-alan

---

phone: 323 988 9692

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From: alan elliott [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, July 08, 2015 4:38 PM
To: Stephen Carroll; Annette Shavuo
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS

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Subject: Re: Amazing Grace

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Date: July 9, 2015 at 2:05 PM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com

and… one thing more:

how much is a title report?

thank you.

-alan

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<Amazing Grace Hiscox Quote.PDF>

<T&D Insurance Proposal -Amazing Grace - E&O.PDF>

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: RE: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 9:26 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Annette Shavuo annette.shavuo@aon.com
Cc: Liesl Copland LCopland@wmeentertainment.com, Todd Musburger todd@musburger.com

SC

Alan:

This takes care of stock footage. I need confirmation all music has been cleared to remove exclusion.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, August 31, 2015 12:06 PM
To: Annette Shavuo; Stephen Carroll
Cc: Liesl Copland; Todd Musburger
Subject: amazing grace policy 2700815 NEED ASAP

hi annette and stephen

we need to get the exclusions for song clearances and stock shots lifted asap so we can get funds today.

thank you.

-alan

---

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Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: clearance invoice... to rid policy of exclusion...
Date: August 28, 2015 at 12:25:17 PM PDT
To: Annette Shavuo <annette.shavuo@aon.com>, "Todd W. Musburger" <todd@musburger.com>
Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger"

Cc: Liesl Copland <LCopland@wheelentertainment.com>, "Todd W. Musburger <todd@musburger.com>

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 9:36 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Annette Shavuo annette.shavuo@aon.com, Liesl Copland LCopland@wmeentertainment.com, Todd W. Musburger todd@musburger.com

here you go:

The Rights Workshop, Inc.
1800 Bryant Street, Suite 104
San Francisco, CA 94110

(415)561-3333
billing@rightsworkshop.com
http://www.rightsworkshop.com

Invoice

Date	Invoice #
08/18/2015	1444
Terms	**Due Date**
Net 10	08/28/2015

Bill To

Julie Huntsinger
Telluride Film Festival
800 Jones Street
Berkeley, CA 94710

Amount Due	Enclosed
$5,250.00	

Please detach top portion and return with your payment.

Project: Amazing Grace

Service	Description	Quantity	Rate	Amount
Music Clearance (Part B)	• Contract procurement, review & admin	7	250.00	1,750.00
License Fee	• Music license fees • Holy Holy, How I Got Over, Precious Lord Take My Hand, You've Got a Friend, My Sweet Lord, • Old Landmark, Mary Don't You Weep	7	500.00	3,500.00
			Total	$5,250.00

Thank you for your business. Please note Federal ID#: 42-1655690.

thank you.

-alan

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> Alan:
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> This takes care of stock footage. I need confirmation all music has been cleared to remove exclusion.
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> **Cc:** Liesl Copland; Todd Musburger
> **Subject:** amazing grace policy 2700815 NEED ASAP
>
> hi annette and stephen
>
> we need to get the exclusions for song clearances and stock shots lifted asap so we can get funds today.
>
> thank you.
>
> -alan
>
> ---
>
> **phone: 323 988 9692**
>
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Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: clearance invoice... to rid policy of exclusion...
Date: August 28, 2015 at 12:25:17 PM PDT
To: Annette Shavuo <annette.shavuo@aon.com>, "Todd W. Musburger" <todd@musburger.com>
Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <todd@musburger.com>

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 10:08 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Annette Shavuo annette.shavuo@aon.com, Liesl Copland LCopland@wmeentertainment.com, Todd W. Musburger todd@musburger.com

thank you.

-alan

---

phone: 323 988 9692

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> On Aug 31, 2015, at 9:26 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
>
> Alan:
>
> This takes care of stock footage. I need confirmation all music has been cleared to remove exclusion.
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> **New Cell: 914-588-4290**
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Monday, August 31, 2015 12:06 PM
> **To:** Annette Shavuo; Stephen Carroll
> **Cc:** Liesl Copland; Todd Musburger
> **Subject:** amazing grace policy 2700815 NEED ASAP
>
> hi annette and stephen
>
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Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <todd@musburger.com>

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace policy 2700815 NEED ASAP
Date: January 27, 2016 at 9:49 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Annette Shavuo annette.shavuo@aon.com, Todd W. Musburger todd@musburger.com

hello stephen

i have been in touch with some attorneys about hiscox's declining of my coverage and, long story short, they find hiscox's position suspect.

i currently have an offer from a film company that would pay $2.3m- and over the lifetime of the contract (27 years) i believe the value should be at least 5x's that, which is what i may have to walk away from because of hiscox's position currently.

i would like to get your thoughts on how to best challenge hiscox to reinstate the policy asap and/or some referrals to litigators.

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

> On Aug 31, 2015, at 10:07 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
>
> See below. Exclusion will be removed. Endorsement to follow.
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> **New Cell: 914-588-4290**
> Fax: 847-953-2692
>
> ---
>
> **From:** Richardson Joanne [mailto:Joanne.Richardson@Hiscox.com]
> **Sent:** Monday, August 31, 2015 1:04 PM
> **To:** Stephen Carroll
> **Cc:** Annette Shavuo
> **Subject:** FW: amazing grace policy 2700815 NEED ASAP
>
> Thanks, I'll remove the exclusion.
>
> ---
>
> **From:** Stephen Carroll [mailto:stephen.carroll@aon.com]
> **Sent:** Monday, August 31, 2015 12:45
> **To:** Richardson Joanne
> **Cc:** Annette Shavuo
> **Subject:** FW: amazing grace policy 2700815 NEED ASAP
>
> Music clearance attached.
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York

Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, August 31, 2015 12:37 PM
To: Stephen Carroll
Cc: Annette Shavuo; Liesl Copland; Todd W. Musburger
Subject: Re: amazing grace policy 2700815 NEED ASAP

here you go:

thank you.

-alan

---

phone: 323 988 9692

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> Alan:
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> This takes care of stock footage. I need confirmation all music has been cleared to remove exclusion.
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> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> **New Cell: 914-588-4290**
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Monday, August 31, 2015 12:06 PM
> **To:** Annette Shavuo; Stephen Carroll
> **Cc:** Liesl Copland; Todd Musburger
> **Subject:** amazing grace policy 2700815 NEED ASAP

hi annette and stephen

we need to get the exclusions for song clearances and stock shots lifted asap so we can get funds today.

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phone: 323 988 9692

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Date: August 28, 2015 at 12:25:17 PM PDT
To: Annette Shavuo <annette.shavuo@aon.com>, "Todd W. Musburger" <todd@musburger.com>
Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <todd@musburger.com>

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

---

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<Invoice #1444.pdf>

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: RE: amazing grace policy 2700815 NEED ASAP
Date: January 27, 2016 at 1:08 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Annette Shavuo annette.shavuo@aon.com, Todd W. Musburger todd@musburger.com

SC

This is all I have to date. Let me know how you wish to proceed.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, January 27, 2016 12:50 PM
To: Stephen Carroll
Cc: Annette Shavuo; Todd W. Musburger
Subject: Re: amazing grace policy 2700815 NEED ASAP

hello stephen

i have been in touch with some attorneys about hiscox's declining of my coverage and, long story short, they find hiscox's position suspect.

i currently have an offer from a film company that would pay $2.3m- and over the lifetime of the contract (27 years) i believe the value should be at least 5x's that, which is what i may have to walk away from because of hiscox's position currently.

i would like to get your thoughts on how to best challenge hiscox to reinstate the policy asap and/or some referrals to litigators.

thank you.

-alan

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phone: 323 988 9692
peace and love.

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Music clearance attached.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
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Sent: Monday, August 31, 2015 12:37 PM
To: Stephen Carroll
Cc: Annette Shavuo; Liesl Copland; Todd W. Musburger
Subject: Re: amazing grace policy 2700815 NEED ASAP

here you go:

thank you.

-alan

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phone: 323 988 9692

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Stephen Carroll, V.P.
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171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
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Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, August 31, 2015 12:06 PM
To: Annette Shavuo; Stephen Carroll
Cc: Liesl Copland; Todd Musburger
Subject: amazing grace policy 2700815 NEED ASAP

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phone: 323 988 9692

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Subject: clearance invoice... to rid policy of exclusion...
Date: August 28, 2015 at 12:25:17 PM PDT
To: Annette Shavuo <annette.shavuo@aon.com>, "Todd W. Musburger" <todd@musburger.com>
Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <todd@musburger.com>

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

---

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<Invoice #1444.pdf>

Amazing Grace - Frank...C.PDF

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: RE: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 9:11 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Annette Shavuo annette.shavuo@aon.com
Cc: Liesl Copland LCopland@wmeentertainment.com, Todd Musburger todd@musburger.com

SC

I have sent into underwriter…waiting for response.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, August 31, 2015 12:06 PM
To: Annette Shavuo; Stephen Carroll
Cc: Liesl Copland; Todd Musburger
Subject: amazing grace policy 2700815 NEED ASAP

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---

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Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <todd@musburger.com>

hi again, we need to make sure the exclusions for ALL song clearances is removed

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

From: **Todd Musburger** todd@musburger.com
Subject: "Amazing Grace"
Date: March 17, 2016 at 1:08 PM
To: Stephen Carroll stephen.carroll@aon.com, ALAN ELLIOTT alanelliott@g.ucla.edu

TM

Hi Stephen: Lionsgate has asked us to add the following as additional insureds on the existing policy:

1. "Summit Entertainment, LLC, each partner therein and division thereof, and its respective parents, subsidiaries, and related entities, its distributors, licensees and assigns, and the respective officers, directors, shareholders, employees and agents of the foregoing, 2700 Colorado Avenue, Suite 200, Santa Monica, CA 90404"

2. "Entertainment One UK Ltd., its parent, subsidiaries and all associated, affiliated and related entities, its successors, assigns, licensees, sub-distributors, sub-licensees, exhibitors, broadcasters and advertisers, and the officers, directors, shareholders, attorneys, agents and employees of each of the foregoing, 120 New Cavendish Street, London W1W 6XX"

3. "JP Morgan Chase Bank, 1 Chase Manhattan Plaza, New York, NY 10005"

Please let me know if you have any additional questions...Thanks, Todd

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace
Date: June 15, 2016 at 2:43 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi stephen

is there a time we can please get on the phone to discuss the policy today?

please let me know.

thank you.

-alan

---
phone: 323 988 9692
peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Amazing Grace
Date: February 27, 2015 at 12:50 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Ramona.horne@aon.com, George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk, Todd W. Musburger todd@musburger.com

hi stephen

please see answers below.

> On Feb 27, 2015, at 11:22 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
>
> So after all this time my underwriter finally responded to the submission and had the following questions. I apologize but would appreciate any clarification you can provide:
>
> 1. Is this a documentary, music video or something else?

documentary

> 2. What is the anticipated distribution/dissemination? theatrical release, TV special, etc…?

theatrical, vod, dvd, television

> 3. Was it previously produced and released and now they're re-releasing it?

it was (technically) produced by warners.

elements of the project have been released at least twice that we know of:

1) the atlantic 25th anniversary film, made with braverman productions

2) aretha franklin; the queen of soul (august 22, 1988) (http://www.imdb.com/title/tt0210537/)

> 4. If not previously released please advise who produced it and who currently owns the copyright and what agreements are in place with this applicant.

the current iteration of the footage is owned by me with quitclaim from warner bors. films.

> 5. Did they obtain rights from Warner Brothers?

yes.

> 6. Did they obtain rights from Atlantic Records?

none needed, as per atlantic/warner music group.

> 7. Did Aretha Franklin participate in this production?

yes

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016

Phone: 212-337-4353
Cell: 914-589-2474
Fax: 847-953-2692

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace/concord music group
Date: July 11, 2016 at 3:28 PM
To: Larry Blake Larry.Blake@concordmusicgroup.com, Stephen Carroll stephen.carroll@aon.com
Cc: Scott Pascucci scottpascucci@concordbicycle.com

yes.

stephen and i talked at 8:45pst this morning. stephen said he left you a vm.

perhaps you guys can set a time to talk?

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

> On Jul 11, 2016, at 3:15 PM, Larry Blake <Larry.Blake@concordmusicgroup.com> wrote:
>
> Alan,
>
> I never heard back from Stephen Carroll on this. I tried him again about a half hour ago, but got his voicemail again.
>
> Did he respond to you?
>
> Larry
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, July 08, 2016 2:09 PM
> **To:** Larry Blake <Larry.Blake@concordmusicgroup.com>; Scott Pascucci <scottpascucci@concordbicycle.com>
> **Subject:** Fwd: amazing grace/concord music group
>
> thank you.
>
> -alan
>
> ---
>
> **phone: 323 988 9692**
> **peace and love.**
>
> **http://songsoundrecord.tumblr.com**
>
> Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: amazing grace/concord music group
Date: July 8, 2016 at 2:01:51 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>
Cc: "Todd W. Musburger" <todd@musburger.com>

hi stephen

you have on your voice mail a call from larry blake, svp/general counsel from concord music group.

PLEASE call him asap- he needs to hear from you that the policy does not exclude sydney pollack.

Larry Blake <Larry.Blake@concordmusicgroup.com> 310 385 4205

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace/Delivery Schedule
Date: November 6, 2015 at 4:42 PM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com
Cc: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, Lincoln Bandlow lbandlow@foxrothschild.com

hey stephen

can you please ask the carrier re: “amazing grace” if, as suggested by hiscox’s referral (lincoln bandlow), that in fact, if there is a settlement with aretha frankln and amazing grace llc, that producers errors and omissions coverage is in place that provides for a $25,000 deductible and coverage of $5m/$5m for three years? Plus we need a quote because this policy has to be paid for 3 years as part of Delivery.

thank you.

-alan

---

phone: 323 988 9692
peace and love.

> Tom McGuire | WME
> TMcGuire@wmeentertainment.com
> 310.248.3022
>
> ---
>
> **From:** Bandlow, Lincoln [mailto:lbandlow@foxrothschild.com]
> **Sent:** Friday, November 06, 2015 3:38 PM
> **To:** alan elliott (ucla); Tom McGuire
> **Cc:** Todd W. Musburger
> **Subject:** RE: Amazing Grace/Delivery Schedule
>
> The carrier has said that there is no coverage for this dispute because information about prior disputes with Aretha were purportedly not disclosed to the carrier during the application process. I don’t believe that the carrier is taking the position that all coverage is now null and void or if just coverage relating to any claim by Aretha is out. So that would have to be clarified with the carrier. I would lean to thinking they are just excluding Aretha claims.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace/Delivery Schedule
Date: November 6, 2015 at 3:44 PM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com
Cc: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, Lincoln Bandlow lbandlow@foxrothschild.com

hey stephen

can you ask the carrier re: “amazing grace” if, as suggested by hiscox’s referral (lincoln bandlow), that in fact, if there is a settlement with aretha frankln and amazing grace llc, that coverage is in place?

thank you.

-alan

---

phone: 323 988 9692
peace and love.

> Tom McGuire | WME
> TMcGuire@wmeentertainment.com
> 310.248.3022
>
> ---
>
> **From:** Bandlow, Lincoln [mailto:lbandlow@foxrothschild.com]
> **Sent:** Friday, November 06, 2015 3:38 PM
> **To:** alan elliott (ucla); Tom McGuire
> **Cc:** Todd W. Musburger
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From: **Bodden Tara** Tara.Bodden@HISCOX.com
Subject: Amazing Grace/Franklin
Date: September 16, 2015 at 2:28 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Richardson Joanne Joanne.Richardson@Hiscox.com, stephen.carroll@aon.com

BT

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

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Amazing Grace - Frank...OC.pdf

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace/sydney pollack
Date: June 9, 2016 at 11:54 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com, Tom McGuire tmcguire@wmeentertainment.com

hello stephen:

as we are obliged to update you and because sydney pollack is covered under the “amazing grace" e&o policy, as an update:

i had a presumed deal with lionsgate films. the deal was for $2.3m and has fallen through because the sydney pollack estate has refused to further indemnify the film company.

lionsgate, down the stretch of the 8 month + negotiation asked us to “make peace” with barry tyerman- the attorney for the late sydney pollack (pollack died before the film was edited). lionsgate asked for a signed indemnification letter from the estate.

we had sold the film to lionsgate with full disclosure that mr. tyerman had asked me to remove mr. pollack’s name as director of the film prior to the film festival in telluride last year. i did as mr. tyerman asked, removed mr. pollack’s name from the film, and thought that would be the end (the film does NOT have the pollack name on it, nor did we ever warrant that we were selling a sydney pollack film).

to try to satisfy lionsgate, we prepared two separate letters (see below) in addition to the memo from warner films showing that pollack had been paid.

steve spira, the president of business affairs, has told me that mr. tyerman came to warner brothers looking for further payment. mr. spira told me that warners told mr. tyerman that according to mr. pollack’s contract, warners felt there was no further compensation due to the estate.

also, bryan unger, the dga’s associate national executive director, took the following position on behalf of the director’s guild:

> **From:** "Bryan Unger" <Bryan@dga.org>
> **Subject: Re: amazing grace/sydney pollack**
> **Date:** August 24, 2015 at 1:59:30 PM PDT
> **To:** <alanelliott@g.ucla.edu>
>
> Alan, I don't see a DGA issue here. This should be handled directly with the estate. Glad to hear you are moving the project along! - Bryan
>
> G. Bryan Unger
> Associate National Executive Director/Western Executive Director
> Directors Guild of America
> bryan@dga.org
> 310-289-5330
>
> > > > "alan elliott (ucla)" <alanelliott@g.ucla.edu> 8/17/2015 8:09 PM >>>
> hey bryan
>
> I know we have gone over this before but... my "amazing grace" film is now opening both telluride (confidential) and Toronto.
>
> sydney pollack has a contract which wb paid him...
>
> and so I was wondering if the dga wanted to weigh in on this in any way... as the estate may want to pull Sydney's name off the project.

all of this is to inform you of the situation.

we have other offers which are being negotiated. i have no plans to negotiate any further with mr. tyerman.

INTER-OFFICE MEMO

WARNER BROS. INC.

TO: KEN MANCEBO FROM: JACK E. FREEDMAN

SUBJECT: ARETHA FRANKLIN PROJECT - Sanford Productions

DATE: March 14, 1972 COPIES TO: F. Wells B. Wallace
P. Knecht
C. Greenlaw D. Brown
E. Morey S. Kiwitt

We have agreed to pay to Sanford Productions the sum of $1,500 for Sidney Pollack's services in producing and directing this project. We will be billed later for DGA contributions.

Please prepare the check and send it to me for transmittal with an appropriate letter.

JEF:jf

J.E.F.

Tyerman 2016-0...1.docx

Chain of Title Ltr (Am...inal.pdf

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

From: **Linda Lichter** llichter@lgna.com
Subject: Re: Aretha Franklin Cease and Desist Demand
Date: September 4, 2015 at 8:07 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Annette Shavuo annette.shavuo@aon.com, Stephen Carroll stephen.carroll@aon.com, Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, Tom Luddy tom.luddy@gmail.com, Julie Huntsinger juliehuntsinger@me.com

LL

Alan, please also add tom and Julie to the policy. Linda LICHTER.

Sent from my iPad

On Sep 4, 2015, at 8:56 AM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

> dear insurers
>
> please add the telluride film festival to the policy for:
>
> 2700815 Amazing Grace LLC
>
> tom, Julie: if there are any specifics you would like, please contact stephen or Annette.
>
> stephen is at:
>
> (212) 337-4353 w
> (914) 589-2474 c
>
> Annette is at:
>
> (212) 463-5586 w
> (847) 953-0849 c
>
> thank you.
>
> ---
> phone: 323 988 9692
>
> Sent from a iPhone
>
> This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.
>
> On Sep 4, 2015, at 8:17 AM, Julie Huntsinger <juliehuntsinger@me.com> wrote:
>
> > You have?
> >
> > We need to somehow be indemnified. Can your legal help with that?
> >
> > Sent from my iPhone
> >
> > Begin forwarded message:
> >
> > **From:** Linda Lichter <llichter@lgna.com>
> > **Date:** September 4, 2015 at 8:11:39 AM MDT
> > **To:** Julie Huntsinger <juliehuntsinger@me.com>
> > **Cc:** Tom Luddy <tom.luddy@gmail.com>
> > **Subject: Re: Aretha Franklin Cease and Desist Demand**
> >
> > Alan should show you whatever documentation he has concerning the name and likeness rights. Does he claim to have that?
> >
> > Notwithstanding, there is no injunction yet, and not sure they'd get one against a non profit showing.
> >
> > Ask Alan about giving telluride an indemnity.
> >
> > Talk later.
> >
> > Sent from my iPad
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> > On Sep 4, 2015, at 12:26 AM, Julie Huntsinger <juliehuntsinger@me.com> wrote:
> >
> > > Alan tells me it ended today but this would indicate otherwise.
> > >
> > > Thoughts?
> > >
> > > Sent from my iPad
> > >
> > > Begin forwarded message:
> > >
> > > **From:** TFF Mail <mail@telluridefilmfestival.org>
> > > **Date:** September 3, 2015 at 10:07:30 PM MDT
> > > **To:** Julie Huntsinger <juliehuntsinger@me.com>
> > > **Subject: Fwd: Aretha Franklin Cease and Desist Demand**
> > >
> > > What?! How can I help here?
> > >
> > > > Begin forwarded message:
> > > >
> > > > **From:** "Fresard, Fred" <FFresard@dykema.com>
> > > > **Subject: Aretha Franklin Cease and Desist Demand**
> > > > **Date:** September 3, 2015 at 9:33:52 PM MDT

To: "mail@telluridefilmfestival.org" <mail@telluridefilmfestival.org>
Cc: "Neureiter, Reid" <Neureiter@wtotrial.com>

Please see attached correspondence regarding Aretha Franklin's demand that the National Film Preserve, Ltd., a/k/a Telluride Film Festival refrain from showing the film "Amazing Grace."

Regards,

Fred Fresard

DYKEMA

Fred J. Fresard
Member
FFresard@dykema.com
Licensed in Michigan and Ontario, Canada

248-203-0593 Direct
248-203-0700 Main
855-233-1801 Fax
248-840-6314 Mobile

39577 Woodward Avenue, Suite 300
Bloomfield Hills, Michigan 48304
www.dykema.com

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<Aretha Franklin Cease and Desist Demand.pdf>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Aretha Franklin Cease and Desist Demand
Date: September 4, 2015 at 8:17 AM
To: Linda Lichter llichter@lgna.com, Annette Shavuo annette.shavuo@aon.com, Stephen Carroll stephen.carroll@aon.com
Cc: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, Tom Luddy tom.luddy@gmail.com, Julie Huntsinger juliehuntsinger@me.com

yes please add tom luddy and Julie Huntsinger to the insurance policy.

thank you.

---
phone: 323 988 9692

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> Sent from my iPad
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> >
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> >
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> >
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> > (914) 589-2474 c
> >
> > Annette is at:
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> > (847) 953-0849 c
> >
> > thank you.
> >
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> > phone: 323 988 9692
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Begin forwarded message:

From: TFF Mail <mail@telluridefilmfestival.org>
Date: September 3, 2015 at 10:07:30 PM MDT
To: Julie Huntsinger <juliehuntsinger@me.com>
Subject: Fwd: Aretha Franklin Cease and Desist Demand

What?! How can I help here?

Begin forwarded message:

From: "Fresard, Fred" <FFresard@dykema.com>
Subject: Aretha Franklin Cease and Desist Demand
Date: September 3, 2015 at 9:33:52 PM MDT
To: "mail@telluridefilmfestival.org" <mail@telluridefilmfestival.org>
Cc: "Neureiter, Reid" <Neureiter@wtotrial.com>

Please see attached correspondence regarding Aretha Franklin's demand that the National Film Preserve, Ltd., a/k/a Telluride Film Festival refrain from showing the film "Amazing Grace."

Regards,

Fred Fresard

DYKEMA

Fred J. Fresard
Member
FFresard@dykema.com
Licensed in Michigan and Ontario, Canada

248-203-0593 Direct
248-203-0700 Main
855-233-1801 Fax
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<Aretha Franklin Cease and Desist Demand.pdf>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Aretha Franklin Cease and Desist Demand
Date: September 4, 2015 at 7:30 AM
To: Annette Shavuo annette.shavuo@aon.com, Stephen Carroll stephen.carroll@aon.com
Cc: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, llichter@lgna.com, Tom Luddy tom.luddy@gmail.com, Julie Huntsinger juliehuntsinger@me.com

dear insurers

please add the telluride film festival to the policy for:

2700815 Amazing Grace LLC

tom, Julie: if there are any specifics you would like, please contact stephen or Annette.

stephen is at:

(212) 337-4353 w
(914) 589-2474 c

Annette is at:

(212) 463-5586 w
(847) 953-0849 c

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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>
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> > > > > **From:** "Fresard, Fred" <FFresard@dykema.com>
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> > > > > **Date:** September 3, 2015 at 9:33:52 PM MDT
> > > > > **To:** "mail@telluridefilmfestival.org" <mail@telluridefilmfestival.org>
> > > > > **Cc:** "Neureiter, Reid" <Neureiter@wtotrial.com>
> > > > >
> > > > > Please see attached correspondence regarding Aretha Franklin's demand that the National Film Preserve, Ltd., a/k/a Telluride Film Festival refrain from showing the film "Amazing Grace."

Regards,

Fred Fresard

DYKEMA

Fred J. Fresard
Member
FFresard@dykema.com
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248-203-0593 Direct
248-203-0700 Main
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<Aretha Franklin Cease and Desist Demand.pdf>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Aretha Franklin/Injunction/"Amazing Grace"
Date: September 4, 2015 at 11:26 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

> **From:** Tom McGuire <TMcGuire@wmeentertainment.com>
> **Date:** September 4, 2015 at 12:20:47 PM MDT
> **To:** "srodgers@fwlaw.com" <srodgers@fwlaw.com>, "jtanner@fwlaw.com" <jtanner@fwlaw.com>
> **Cc:** "Todd Musburger (todd@musburger.com)" <todd@musburger.com>, "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>
> **Subject: Aretha Franklin/Injunction/"Amazing Grace"**
>
> Gentlemen:
>
> I have spoken to our client and his lawyer on this matter, and Alan will take on the obligation of paying your fees.
>
> Let me know if you have any question on this matter. I look forward to working with you on this.
>
> Tom McGuire
>
> Tom McGuire | WME
> TMcGuire@wmeentertainment.com
> 310.248.3022

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Call with Aretha's counsel
Date: September 4, 2015 at 11:25 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

> **From:** Linda Lichter <llichter@lgna.com>
> **Date:** September 4, 2015 at 12:23:08 PM MDT
> **To:** Tom McGuire <TMcGuire@wmeentertainment.com>
> **Cc:** "Todd Musburger (todd@musburger.com)" <todd@musburger.com>, "Matt Farmer (mifarmer0@gmail.com)" <mifarmer0@gmail.com>, "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>, Liesl Copland <LCopland@wmeentertainment.com>
> **Subject: Re: Call with Aretha's counsel**
>
> If there is a hearing when will it be?
>
> Linda Lichter
>
> On Sep 4, 2015, at 12:15 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:
>
> > Linda:
> >
> > Alan's lawyer Todd Musburger and I had a call with Aretha's Detroit, Denver and LA counsel this morning to fully and fairly discuss matters.
> >
> > Todd promised to get them the documents which form the basis for our chain of title, and he has now done so.
> >
> > They are reviewing, and there will be another call to discuss whether there will be litigation or deal discussions. I believe they heard us when Todd very calmly walked them through our arguments.
> >
> > IMPORTANT: Alan is not a defendant here. The festival is. Does the festival have litigation counsel that will be present if there is a hearing today? if so, we should know who that is so we can speak to them and get them up to speed.
> >
> > Thanks, Linda.
> >
> > Tom
> >
> > Tom McGuire | WME
> > TMcGuire@wmeentertainment.com
> > 310.248.3022

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: clearance invoice... to rid policy of exclusion...
Date: August 28, 2015 at 12:25 PM
To: Annette Shavuo annette.shavuo@aon.com, Todd W. Musburger todd@musburger.com
Cc: Liesl Copland LCopland@wmeentertainment.com, Todd W. Musburger todd@musburger.com

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

The Rights Workshop, Inc.
1800 Bryant Street, Suite 104
San Francisco, CA 94110

(415)561-3333
billing@rightsworkshop.com
http://www.rightsworkshop.com

Invoice

Date	Invoice #
08/18/2015	1444
Terms	**Due Date**
Net 10	08/28/2015

Bill To

Julie Huntsinger
Telluride Film Festival
800 Jones Street
Berkeley, CA 94710

Amount Due	Enclosed
$5,250.00	

Please detach top portion and return with your payment.

Project: Amazing Grace

Service	Description	Quantity	Rate	Amount
Music Clearance (Part B)	• Contract procurement, review & admin	7	250.00	1,750.00
License Fee	• Music license fees • Holy Holy, How I Got Over, Precious Lord Take My Hand, You've Got a Friend, My Sweet Lord, • Old Landmark, Mary Don't You Weep	7	500.00	3,500.00
			Total	$5,250.00

Thank you for your business. Please note Federal ID#: 42-1655690.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7
Date: September 4, 2015 at 8:54 AM
To: Annette Shavuo annette.shavuo@aon.com, Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com, Tom McGuire tmcguire@wmeentertainment.com, llichter@lgna.com

for insurers

thank you.

---
phone: 323 988 9692

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Begin forwarded message:

> **From:** Todd Musburger <todd@musburger.com>
> **Date:** September 4, 2015 at 9:27:31 AM MDT
> **To:** ALAN ELLIOTT <alanelliott@g.ucla.edu>, Tom McGuire <tmcguire@wmeentertainment.com>, Matt Farmer <mifarmer0@gmail.com>
> **Subject: Fwd: FW: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7**
>
> This just arrived. Todd is still on the plane.
> -Rebecca
> **Todd W. Musburger**
> **Todd W. Musburger, Ltd.**
> **142 E. Ontario**
> **Suite 500**
> **Chicago, Illinois 60611**
> **312 664 2600**
>
> ---------- Forwarded message ----------
> From: **Neureiter, Reid** <Neureiter@wtotrial.com>
> Date: Fri, Sep 4, 2015 at 8:59 AM
> Subject: FW: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7
> To: Todd Musburger <todd@musburger.com>
> Cc: "Cantor, Jon D." <JDCantor@dykema.com>, "Fresard, Fred" <FFresard@dykema.com>
>
> Mr. Musburger,
>
> This Complaint was filed early this morning in Denver Federal Court, District of Colorado.
>
> Regards
> Reid Neureiter
> 303-244-1993
>
> -----Original Message-----
> From: Neureiter, Reid
> Sent: Friday, September 4, 2015 1:48 AM
> To: 'shannon@telluridefilmfestival.org'
> Subject: FW: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7
> Importance: High
>
> To whom it may concern at the Telluride Film Festival, including co-Director Julie Huntsinger (as registered agent),
>
> Attached find a federal lawsuit filed early this morning on behalf of Aretha Franklin seeking an injunction to stop the public showing or release of the Film "Amazing Grace," which, based on public reports, is to be shown at 7:30 p.m in Telluride. We will be seeking an immediate audience with the Federal Court in Denver to protect Ms. Franklin's rights to her name and likeness. As the exhibits hereto show, the Producer of the film, Mr. Elliot, was never granted permission by Ms. Franklin to publicly show the film and publicly displaying any footage of Ms. Franklin's 1972 concert would be a significant violation of her rights as well as a violation of the federal anti-bootlegging statute.
>
> Please have an authorized representative of the Festival (preferably your legal counsel) contact me immediately in the event

the Festival wants to be heard by the Court.

I can be reached at my office line 303-244-1993 or my cell phone 303-917-3871.

Thank you for your prompt attention to this request.

Wheeler Trigg O'Donnell LLP
N. Reid Neureiter
Of Counsel
303.244.1993
neureiter@wtotrial.com

370 Seventeenth Street, Suite 4500
Denver, Colorado 80202-5647
P 303.244.1800 F 303.244.1879
wtotrial.com

Exhibit 1.pdf

Exhibit 2.pdf

Declaration

I, Aretha Franklin, do hereby swear and affirm that if called upon to testify, I would testify to the following including but not limited to:

a. That in 1972, I did a live recording of my album Amazing Grace at the New Missionary Baptist Church in Los Angeles, California.
b. That the recording of this album was videotaped.
c. That Mr. Alan Elliott, owner of Al's Tapes and Records claims to have purchased the rights to the film or footage of my 1972 performance at the New Missionary Baptist Church in Los Angeles, California.
d. That I have never given permission or entered into any agreement, verbal, written or otherwise with Alan Elliott, Al's Tapes & Records or any entity to exploit my name and or likeness for commercial purposes with regards to the "Amazing Grace" movie, or any film or footage of my 1972 performance at the New Missionary Baptist Church in Los Angeles, California.
e. That in spite of not having prior authorization, as referenced above, Mr. Alan Elliott has plans to release a movie based on my 1972 performance as mentioned above which exploits my name and likeness solely for commercial purposes

above which exploits my name and likeness solely for commercial purposes.

Further affiant sayeth not

ARETHA FRANKLIN

EXHIBIT 3

Declaration

I, Rhonda Jacobs-Sturges do hereby swear and affirm that if called upon to testify, I would testify to the following including but not limited to:

1. That I have watched a live video recorded performance of Aretha Franklin singing at the New Missionary Baptist Church in Los Angeles, California.
2. That the video is more than 128 minutes long with more than 80% directly focused on Aretha Franklin performing her songs.

Further affiant sayeth not.

RHONDA JACOBS

8/24/11

JUANITA R. COE
NOTARY PUBLIC, STATE OF MI
COUNTY OF WAYNE
MY COMMISSION EXPIRES May 27, 2012
ACTING IN COUNTY OF

EXHIBIT 4

Exhibit 5.pdf

Exhibit 6.pdf

Exhibit 7.pdf

ECF Transaction Receip...ted.pdf

Complaint for Emerg...ted.pdf

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7
Date: September 4, 2015 at 7:50 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com

more for insurers

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

> **From:** "alan elliott (ucla)" <alanelliott@g.ucla.edu>
> **Date:** September 4, 2015 at 8:22:23 AM MDT
> **To:** Julie Huntsinger <juliehuntsinger@me.com>
> **Cc:** Tom Luddy <tom.luddy@gmail.com>, "Todd W. Musburger" <todd@musburger.com>, Tom McGuire <tmcguire@wmeentertainment.com>
> **Subject: Re: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7**
>
> thank you.
>
> ---
> phone: 323 988 9692
>
> Sent from a iPhone
>
> This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.
>
> On Sep 4, 2015, at 7:33 AM, Julie Huntsinger <juliehuntsinger@me.com> wrote:
>
> > Loading…

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: E&O Policy
Date: April 22, 2016 at 10:30 AM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Todd Musburger todd@musburger.com, Everett Hendler ehendler@lionsgate.com

hi Annette

can you please make the correction asked for below.

thank you.

-alan

---
phone: 323 988 9692
peace and love.

On Apr 22, 2016, at 10:23 AM, Todd Musburger <todd@musburger.com> wrote:

> Alan: Write to her requesting the change that Everett cites - he is correct - and we will need that with anyone we deal with >Thx
> **Todd W. Musburger**
> **Todd W. Musburger, Ltd.**
> **142 E. Ontario**
> **Suite 500**
> **Chicago, Illinois 60611**
> **312 664 2600**
>
> ---------- Forwarded message ----------
> From: **Everett Hendler** <ehendler@lionsgate.com>
> Date: Fri, Apr 22, 2016 at 12:15 PM
> Subject: RE: E&O Policy
> To: Todd Musburger <todd@musburger.com>
>
> Understood.
>
> One slight mistake that needs to be corrected on this new endorsement. Endorsement 8 is actually numbered “E2542.1” not “E2582” as indicated on Endorsement 10. Please have the carrier update this so it properly identifies the deletion.
>
> Endorsement 10 should read as “…it is agreed that Endorsement **E2542.1** Failure to Obtain License Exclusion is/are deleted…”
>
> Thank you for working through the rest, Todd.
>
> Best,
>
> Everett

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Favorites
Date: July 9, 2015 at 11:36 AM
To: Stephen Carroll stephen.carroll@aon.com

http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20(Atlantic%20and%20Warner%20Bros.%20Seven%20Arts).pdf

4-1-1968
Aretha...ts).pdf

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: FOR IMMEDIATE RELEASE: ARETHA FRANKLIN FILES INJUNCTION AGAINST 'AMAZING GRACE' FILM
Date: September 3, 2015 at 11:02 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi insurers:

so you know...

we just got this. I have not been served. But we wanted to make you aware as soon as possible.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

> **From:** "McCollum, Brian" <bmccollum@freepress.com>
> **Date:** September 3, 2015 at 9:17:37 AM PDT
> **To:** "alanelliott@ucla.edu" <alanelliott@ucla.edu>
> **Subject: FW: FOR IMMEDIATE RELEASE: ARETHA FRANKLIN FILES INJUNCTION AGAINST 'AMAZING GRACE' FILM**
>
> **From:** waldc@aol.com [mailto:waldc@aol.com]
> **Sent:** Thursday, September 03, 2015 12:00 PM
> **To:** McCollum, Brian <bmccollum@freepress.com>
> **Subject:** Fwd: FOR IMMEDIATE RELEASE: ARETHA FRANKLIN FILES INJUNCTION AGAINST 'AMAZING GRACE' FILM
>
> ---
>
> ---
>
> ---
>
> **FOR IMMEDIATE RELEASE: ARETHA FRANKLIN FILES AN INJUNCTION AGAINST 'AMAZING GRACE' FILM**
>
> **ARETHA FRANKLIN FILES AN INJUNCTION AGAINST RELEASE OF 'AMAZING GRACE' FILM**
>
> Detroit--Aretha Franklin has proceeded to file an injunction

against the release and showing of the film, "Amazing Grace."

Ms. Franklin says she is taking legal action "because the film holders refuse to compensate me for my name and likeness in the film."
The internationally-acclaimed singer has hired the Detroit law firm, Dykema Gossett.

The film shows the making of Ms. Franklin's landmark gospel album, 'Amazing Grace," that she recorded in 1972. It remains the biggest selling gospel album of all time.

###

Media Contact: Clarence Waldron
CW Media
cwmedia24@gmail.com
773 859-0308

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: FW: 2700815 Amazing Grace
Date: July 13, 2015 at 8:12 AM
To: alan elliott (ucla) (alanelliott@g.ucla.edu) alanelliott@g.ucla.edu
Cc: Annette Shavuo annette.shavuo@aon.com

SC

See comments from underwriter at Hiscox. Let me know if you have any questions.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: Richardson Joanne [mailto:Joanne.Richardson@Hiscox.com]
Sent: Monday, July 13, 2015 11:02 AM
To: Stephen Carroll
Cc: Annette Shavuo
Subject: 2700815 Amazing Grace

Per the insured's request, I want to confirm that we aware of the contract attached and that the insured is relying on this contract/document to make this film. We have vetted it's validity and are satisfied it is acceptable and therefore have not placed any special exclusions on the policy that would prohibit coverage under the policy . Of course, there are standard insurance policy terms, conditions and exclusion that apply regardless and we could never confirm or deny any coverage in advance as each and every claims sencerio is unique and must be evaluated on the specific facts and circumstances of the case. But again, the quote does not contain a chain of tile exclusion or any other specific exclusion involving this project and we recognize the Atlantic records indemnification letter in the Warner contract to be valid. Please note we have not yet cleared the title, as a title report and legal opinion has not been received to date.

Please let me know if you have any further questions.

Best,
Joann

Joanne Richardson, CPCU
Media & Entertainment Practice Leader
Hiscox Partner
Hiscox USA
T 646.452.2355
M 646.823.8092
joanne.richardson@hiscox.com
Connect with Hiscox online
Web www.hiscoxbroker.com
Twitter @Hiscox_USA

HISCOX | encourage courage

From: Stephen Carroll [mailto:stephen.carroll@aon.com]
Sent: Thursday, July 09, 2015 3:11 PM
To: Richardson Joanne
Cc: Annette Shavuo
Subject: FW: Favorites

Attached is the contract Alan Elliott at Amazing Grace wanted you to acknowledge. I will be sending a bind order to you shortly.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Thursday, July 09, 2015 2:37 PM
To: Stephen Carroll
Subject: Favorites

http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20(Atlantic%20and%20Warner%20Bros.%20Seven%20Arts).pdf

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4-1-1968
Aretha...ts).pdf

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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From: **Annette Shavuo** annette.shavuo@aon.com
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32 PM
To: alanelliott@g.ucla.edu
Cc: Stephen Carroll stephen.carroll@aon.com

AS

Alan,

The Errors & Omissions' for **"Amazing Grace"** is bound for the period of 7/21/2015 to 7/21/2018. Here's a copy of the signed binder for your files.

Once the following subjectivities have been satisfactorily met, the underwriter will issue the policy:

1. Currently signed and dated application, by July 29, 2015 – attached application was not signed.

2. Per Q# 22 on the application, confirmation that:

1) the stock shot" of Los Angeles which comes from Corbis has been finalized and all rights obtained
2) the publishing of some songs you mention have yet to be negotiated have all been finalized and all music rights have been obtained.

Upon receipt and review of this we can consider removing the exclusion.

Thank you

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

Before you print, think about the ENVIRONMENT

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Binder - EO - 15-18...ce.pdf

App- REVISED Q#22 -...03.doc

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: FW: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 10:07 AM
To: alan elliott (ucla) (alanelliott@g.ucla.edu) alanelliott@g.ucla.edu
Cc: Annette Shavuo annette.shavuo@aon.com

SC

See below. Exclusion will be removed. Endorsement to follow.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: Richardson Joanne [mailto:Joanne.Richardson@Hiscox.com]
Sent: Monday, August 31, 2015 1:04 PM
To: Stephen Carroll
Cc: Annette Shavuo
Subject: FW: amazing grace policy 2700815 NEED ASAP

Thanks, I'll remove the exclusion.

From: Stephen Carroll [mailto:stephen.carroll@aon.com]
Sent: Monday, August 31, 2015 12:45
To: Richardson Joanne
Cc: Annette Shavuo
Subject: FW: amazing grace policy 2700815 NEED ASAP

Music clearance attached.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, August 31, 2015 12:37 PM
To: Stephen Carroll
Cc: Annette Shavuo; Liesl Copland; Todd W. Musburger
Subject: Re: amazing grace policy 2700815 NEED ASAP

here you go:

thank you

thank you.

-alan

---

phone: 323 988 9692

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> On Aug 31, 2015, at 9:26 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
>
> Alan:
>
> This takes care of stock footage. I need confirmation all music has been cleared to remove exclusion.
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> **New Cell: 914-588-4290**
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Monday, August 31, 2015 12:06 PM
> **To:** Annette Shavuo; Stephen Carroll
> **Cc:** Liesl Copland; Todd Musburger
> **Subject:** amazing grace policy 2700815 NEED ASAP
>
> hi annette and stephen
>
> we need to get the exclusions for song clearances and stock shots lifted asap so we can get funds today.
>
> thank you.
>
> -alan
>
> ---
>
> **phone: 323 988 9692**
>
> This email transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or

please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: clearance invoice... to rid policy of exclusion...
Date: August 28, 2015 at 12:25:17 PM PDT
To: Annette Shavuo <annette.shavuo@aon.com>, "Todd W. Musburger" <todd@musburger.com>
Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <todd@musburger.com>

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

---

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The Rights Workshop, Inc.
1800 Bryant Street, Suite 104
San Francisco, CA 94110

(415)561-3333
billing@rightsworkshop.com
http://www.rightsworkshop.com

Invoice

Date	Invoice #
08/18/2015	1444
Terms	**Due Date**
Net 10	08/28/2015

Bill To
Julie Huntsinger Telluride Film Festival 800 Jones Street Berkeley, CA 94710

Amount Due	Enclosed
$5,250.00	

Please detach top portion and return with your payment.

Project
Amazing Grace

Service	Description	Quantity	Rate	Amount
Music Clearance (Part B)	• Contract procurement, review & admin	7	250.00	1,750.00
License Fee	• Music license fees • Holy Holy, How I Got Over, Precious Lord Take My Hand, You've Got a Friend, My Sweet Lord, • Old Landmark, Mary Don't You Weep	7	500.00	3,500.00
			Total	$5,250.00

Thank you for your business. Please note Federal ID#: 42-1655690.

From: **Alan Elliott** alanelliott@ucla.edu
Subject: insurance needed!
Date: February 2, 2015 at 9:37 AM
To: Stephen.carroll@aon.com, Ramona.horne@aon.com
Cc: George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk

hello

i need to start the process of getting insurance for my film and john battsek and george chignell suggested we start.

how do we start?

thank you.

-alan

---

phone: 323 988 9692

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From: **Alan Elliott** alanelliott@ucla.edu
Subject: insurance needed!
Date: February 2, 2015 at 9:36 AM
To: Stephen.carroll@aon.com, Ramona.horne@aon.com
Cc: George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk

hello

i need to start the process of getting insurance for my film and john battsek and george chignell suggested we start.

how do we start?

thank you.

-alan

---

phone: 323 988 9692

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: insurance on all sides needs to be informed.
Date: September 4, 2015 at 12:13 PM
To: Linda Lichter llichter@lgna.com, Todd W. Musburger todd@musburger.com
Cc: Tom Luddy tom.luddy@gmail.com, Julie Huntsinger juliehuntsinger@me.com, Matt Farmer mifarmer0@gmail.com, Stephen Carroll stephen.carroll@aon.com

my insurance company… And my friend Matt Farmer, litigator,… Want to make sure that all sides have reported everything to our respective insurance companies.

hiscox, who is my insurance through stephen carroll (ccd here) knows everything. But they have pointed out… That I am not named on the suit. And that the telluride insurance company needs to be aware.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: insurance PRIOR to hiscox...
Date: June 26, 2017 at 1:13 PM
To: Maria Clark maria.clark@aon.com, laura comerford laura.comerford@aon.com

was with chubb.

hiscox is kicking me there.

thank you.

-alan

---
phone: 323 988 9692

peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: larry blake info:
Date: July 8, 2016 at 2:03 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Larry Blake Larry.Blake@concordmusicgroup.com

Larry Blake <Larry.Blake@concordmusicgroup.com>

310 385 4205

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: stock shots exclusion removal for amazing grace...
Date: August 28, 2015 at 12:22 PM
To: Annette Shavuo annette.shavuo@aon.com, Stephen Carroll Stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com, Liesl Copland LCopland@wmeentertainment.com

hi guys

Re: 2700815 Amazing Grace LLC

we need to get rid of the exclusions for:

stock shots.

attached is the invoice and we have the clips now.

thank you.

-alan

---

gettyimages

Thanks for your order If you have any questions, call us toll free at 800-IMAGERY (800-462-4379).

Sales order number: 14938832

Not yet available

Reference information

Sales order number:
14938832

Sales order date:
August 27, 2015

Payment method:
Credit card

Job or project title:
AMAZING GRACE FILM

Ordered by:
ALAN ELLIOT

End client:
ALAN ELLIOT

Licensed to:
ALAN ELLIOT

Bill to
J W BOYD
amazing grace film
217 THOMPSON ST

NEW YORK, NY 10012
United States
alanelliott@ucla.edu

License agreements

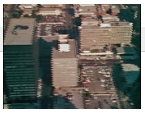
Contact us

1970 AERIAL High-rise apartment buildings, Los Angeles, California, USA, AUDIO

Clip #:	86296671	Price
License type:	Rights-ready	$ 750.00 USD
Filmmaker:	L.A. County	
Collection:	Archive Films: Creative	
Delivery method:	Download by customer	
Release info:	No model or property rel... for this clip; however, rel... for commercial use. Click ... for more information.	
Resolution:	SD 720x486 @ 29.97 fps NTSC	

PAN city traffic, Los Angeles

		Price
		$ 750.00 USD



1970 AERIAL MONTAGE Office buildings, Los Angeles, California, USA, AUDIO

Clip #:	978-64	Price
License type:	Rights-ready	$ 750.00 USD
Filmmaker:	Universal Studios	
Collection:	Universal Studios	
Delivery method:	Download by customer	
Release info:	No model or property rel... for this clip; however, rel... for commercial use. Click ... for more information.	
Resolution:	HD 1920x1080 @ 24p Pro... (HQ)	

Clip #:	86296672	
License type:	Rights-ready	
Filmmaker:	L.A. County	
Collection:	Archive Films: Creative	
Delivery method:	Download by customer	
Release info:	No model or property releases have been obtained for this clip; however, releases may not be required for commercial use. Click here for more information.	
Use:	Media uses: Documentary, news, editorial and educational	
Use definition:	Use in one production or program. Not intended for commercial or promotional purposes. This license includes the right to distribute the production in its final form in all media now known or hereafter devised throughout the world in perpetuity. For documentary film trailers and promotions, please refer to "Media, editorial & entertainment uses: Feature film trailer."	
Resolution:	SD 720x486 @ 29.97 fps NTSC	

Subtotal:	$ 2,250.00 USD
Shipping:	$ 0.00 USD
Tax:	$ 0.00 USD

Total:	$ 2,250.00 USD

A separate invoice will be mailed to you at the address above.

This order is subject to the licensing and purchasing terms that you agreed to when you originally placed your order. You can view our refund and return policy at any time.

*Sales, VAT or other similar transactional taxes may be applied to an order depending on the product licensed and the State, Province and/or Country in which the delivery address is located. If you are paying with terms, you will receive an invoice in the mail detailing the actual tax applied. If you are paying by credit card, the actual tax applied will be included in the transaction amount that appears on your credit card statement. The total amount of the transaction appearing on your invoice or statement may vary slightly from the amount shown on your online purchase order and the initial order confirmation you receive via email. If you have any questions about our tax policy, please feel free to contact us.

Questions? Please call toll free at 800-IMAGERY (800-462-4379).

Thank you.

Have questions? Contact us

Contact us
Call us toll-free at 800 IMAGERY (800 462 4379)

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phone: 323 988 9692

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> On Aug 27, 2015, at 6:07 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:
>
> I just got a call, did they email you Todd? They say the insurance stuff didn't pass their legal and they also need evidence of music clearance. I told them we were effectively partners with WB but that payments for festival were being made now but I wasn't sure what else they needed on the insurance thing. They need a legal opinion letter I think they said? Please advise
>
> Liesl Copland | WME
> LCopland@wmeentertainment.com
> 310.246.3383

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Sydney Pollack; "Amazing Grace"
Date: June 28, 2016 at 9:47 AM
To: Stephen Carroll stephen.carroll@aon.com

thank you.

-alan

---
phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

> Begin forwarded message:
>
> **From:** ALAN ELLIOTT <alanelliott@g.ucla.edu>
> **Subject:** **Fwd: Sydney Pollack; "Amazing Grace"**
> **Date:** April 26, 2016 at 1:36:18 PM PDT
> **To:** Stephen Carroll <Stephen.carroll@aon.com>
> **Cc:** "Todd W. Musburger" <todd@musburger.com>
>
> hi stephen
>
> as i am obliged to report all possible claims… here's a continuation.
>
> thank you.
>
> -alan
>
> ---
> **phone: 323 988 9692**
> **peace and love.**
>
> **http://songsoundrecord.tumblr.com**
>
> > Begin forwarded message:
> >
> > **From:** "Tyerman, Barry" <BTyerman@jtwamm.com>
> > **Subject:** **Sydney Pollack; "Amazing Grace"**
> > **Date:** April 26, 2016 at 1:29:06 PM PDT
> > **To:** Tom McGuire <TMcGuire@wmeentertainment.com>
> > **Cc:** "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>, linda burrow <burrow@caldwell-leslie.com>, Liesl Copland <LCopland@wmeentertainment.com>, "Todd Musburger (todd@musburger.com)" <todd@musburger.com>
> >
> > Tom,
> >
> > I do not want you to be left with some false sense that our clients are any less committed to pursuing any and all claims and all legal, equitable and administrative remedies to protect the rig
> > use of his name, likeness or the results and proceeds of his services.
> >
> > Understandably we are not interested in litigating the legal foundation for those claims in correspondence and it is not the duty of the Pollack parties to correct Ms. Burrow's flawed analysi
> > serious violations of Directors Guild of America creative, economic and other provisions applicable to this project; infringement of Mr. Pollack's droit moral and intellectual property rights
> >
> > It is indisputable that Mr. Elliott, without any authorization from our clients whatsoever, has FOR YEARS been trading openly and brazenly on the Sydney Pollack name, iconic body of fil
> >
> > Mr. Elliott and his representatives have been repeatedly admonished to discontinue misrepresenting to any party that he has any authorization whatsoever from or on behalf of Sydney Polla
> > all available remedies to protect his economic, personal and creative rights and interests, including against any and all parties in the chain of infringement of our clients' rights.
> >
> > On a personal note, although I know you are seriously conflicted about your role in this matter, I am disappointed that you without explanation reversed your position, as it was clear to me
> >
> > In any event, please be advised that the Sydney Pollack rights and claims will not simply go away and our clients are fully committed to whatever litigation or other course of action may be
> >
> > Very truly yours,
> >
> > Barry Tyerman
> >
> > Barry W. Tyerman, Esq.
> > Jackoway Tyerman Wertheimer
> > Austen Mandelbaum Morris & Klein
> > 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> > Phone: (310) 553-0305
> > Firm Fax: (310) 553-5036
> > Direct Fax: (310)551-4448
> > Email: BTyerman@jtwamm.com
> >
> > ---
> > **From:** Tom McGuire [mailto:TMcGuire@wmeentertainment.com]
> > **Sent:** Friday, April 08, 2016 11:59 AM
> > **To:** Tyerman, Barry
> > **Cc:** alan elliott (ucla) (alanelliott@g.ucla.edu); linda burrow; Liesl Copland; Todd Musburger (todd@musburger.com)
> > **Subject:** RE: Sydney Pollack; "Amazing Grace"
> >
> > Barry,
> >
> > In response to your email below, at this time I am not authorized to give you the financial details of this project. We urge you to respond to Linda Burrow's letter to you from a few weeks back. We ar
> >
> > Thank you.
> >
> > Tom
> >
> > Tom McGuire | WME
> > TMcGuire@wmeentertainment.com
> > 310.248.3022
> >
> > ---
> > **From:** Tyerman, Barry [mailto:BTyerman@jtwamm.com]
> > **Sent:** Wednesday, March 30, 2016 12:57 PM
> > **To:** Tom McGuire
> > **Subject:** RE: Sydney Pollack; "Amazing Grace"
> >
> > Tom,
> >
> > Further to our call last week I was expecting by Friday (or at the latest Monday) to receive from you the promised detailed financial information concerning t
> >
> > Barry W. Tyerman, Esq.
> > Jackoway Tyerman Wertheimer
> > Austen Mandelbaum Morris & Klein

1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, March 07, 2016 1:01 PM
To: 'Tom McGuire'
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

When you and I recently met you indicated that your client may not yet have advised the distributor or the errors and omissions insurance carrier of the various client has expressly acknowledged in writing that he has no rights to exploit the foregoing without the prior written consent of our esteemed client's successors

I just did not want there to be any potential misunderstanding and, of course, the foregoing and previous discussions and correspondence are without prejudice

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 24, 2015 12:37 PM
To: 'Tom McGuire'
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Just as a reminder, this is the status quo.

No rights have been granted to use the name, likeness, performance or biography of Sydney Pollack in connection with this project and Mr. Elliott specifically

And clearly despite your encouragement and what I thought was our understanding, Mr. Elliott continues to pester friends, family and professional colleagues

Thank you. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 17, 2015 5:32 PM
To: Tom McGuire
Subject: FW: Sydney Pollack; "Amazing Grace"

Tom,

I know that we have been missing each other. On the chance that it may take some time to connect, please advise your client that, without prejudice, the successors to the rights of Sydney Pollack accept his sug

I understand that quite provocatively Mr. Elliott has flagrantly breached a "standstill" agreement entered into with or on behalf of Aretha Franklin. Clearly not a positive move or one likely to encourage cooperatic

Nothing contained herein or our previous correspondence shall be construed as a waiver of any of our clients' rights, positions or remedies, all of which are expressly reserved.

Barry

PS. Please remind your client that it is unethical for him to be contacting Rachel Pollack or any other member of the family directly. Thank you.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, August 11, 2015 11:45 AM
To: Tyerman, Barry
Cc: Rachel Pollack; Todd W. Musburger
Subject: Re: Sydney Pollack; "Amazing Grace"

and good morning to you to barry!

look… and rachel is on this email too (along with todd, my lawyer and pal)… so mind your manners, please, bar…

again… according to the records we have, sydney was paid for directing and producing. if you have ANYTHING else… please send it so we can sort it through fairly.

look… i was the one who worked with sydney on this. i have his shot notes. he and i had the conversations. and sydney suggested- without prompting- that i finish this because "alan, you k

i can't change the facts of how the movie came to where it is!

and if this is about money… i am still soliciting investors. if the family wants to buy in… now's the time! (me personally… i have re-mortgaged- "jeremiah johnson"-style- my own house.

in sum, i have nothing but love for sydney and the work we did on the film. i am and was honored to work with him on this but i defer to the family as to what to do on the credits. i am putt

thank you.

-alan

---

phone: 323 988 9692

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On Aug 11, 2015, at 9:58 AM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

Your blatant and continuing disregard of the interests of our clients, as well as your self-promotion on the backs of the talents and cont
Presumably you have and will advise the representatives of the Toronto International Film Festival of the serious claims of various int

Not only would exhibition of the film violate various statutory and common law rights of our clients, but also constitute a serious and

The foregoing obviously is not a complete exposition of the claims against you and any and all other parties participating in the unlaw

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, July 14, 2015 12:18 PM
To: 'alan elliott'
Subject: RE: Sydney Pollack; "Amazing Grace"

Alan,

What you have sent me purports to be an internal Warner Bros. memorandum, not anything like a contract. Neither Sydney nor any re

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [mailto:alanelliott@g.ucla.edu]
Sent: Monday, July 13, 2015 8:54 PM
To: Tyerman, Barry
Cc: rpollack@mac.com
Subject: Re: Sydney Pollack; "Amazing Grace"

<image002.png>

phone: 323 988 9692

Sent from a iPhone
This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, conta

On Jul 13, 2015, at 5:40 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

> Nothing is attached.
>
> Barry W. Tyerman, Esq.
> Jackoway Tyerman Wertheimer
> Austen Mandelbaum Morris & Klein
> 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> Phone: (310) 553-0305
> Firm Fax: (310) 553-5036
> Direct Fax: (310) 551-4448
> Email: BTyerman@jtwamm.com
>
> -----Original Message-----
> **From:** alan elliott (ucla) [alanelliott@g.ucla.edu]
> **Received:** Monday, 13 Jul 2015, 5:10PM
> **To:** Tyerman, Barry [BTyerman@jtwamm.com]
> **CC:** Rachel Pollack [rpollack@mac.com]
> **Subject:** Re: Sydney Pollack; "Amazing Grace"
>
> here is Sydney's from wb(see attached).
>
> as I wrote before, Aretha's contract is not available for public (or private) broadcast.

what I can write as assurance re ms franklins contract is:

1) it is insured and vetted
2) it has been used twice by wb films

thank you.

---
phone: 323 988 9692

Sent from a iPhone
<image003.png>
This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messag

On Jul 13, 2015, at 5:01 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

You indicate that there is a "signed contract from Sydney" but religiously have avoide

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, July 13, 2015 4:14 PM
To: Tyerman, Barry
Cc: Rachel Pollack
Subject: Re: Sydney Pollack; "Amazing Grace"

hi barry

as you know, i do have a signed contract from sydney, sydney never asked for anything from me, and

i don't want their to be any bad feelings… and i feel the movie is awesome and a testament to sydney.

and if there's anything else, please let me know if there's something anybody wants specifically.

thank you.

-alan

---
phone: 323 988 9692

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On Jul 13, 2015, at 3:54 PM, Tyerman, Barry <BTyerman@jtwamm.com

Alan,

Simply ignoring this situation will not make it go away. If you
Sydney's involvement, but it is a misrepresentation to say the

All rights, positions and remedies reserved. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 9
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, June 16, 2015 3:28 PM
To: 'alan elliott'
Subject: RE: amazing grace links...

Your deflection is unacceptable, Alan, and clearly we will nee
further use of his name on or in connection with this project.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 9
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, June 16, 2015 3:06 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hi barry

i have ms. franklin's signature on her "personal service contract," it was

as to sydney's credit, he accepted a payment and he never approached me
feel… his best film!!)

ps- i am screening the film tomorrow at wme at 11am if either of the girls

thank you.

-alan

---

phone: **323 988 9692**

This email transmission, including any previous messages or attachments to it, contains informat

On Jun 16, 20

I am not inte
rights neede

To be clear,

All of this is

Barry W. Tye
Jackoway Tye
Austen Mande
1925 Century
Phone: (310
Firm Fax: (3
Direct Fax:
Email: BTyer

From: alan elliott (ucla) [mailto:
Sent: Tuesday, June 16, 2015 2:
To: Tyerman, Barry
Subject: Re: amazing grace link

hi barry

i have one document about sy

the film is now set for telluric

because this journey has been

to this, and i hope you will ur

i hope you'll understand and

i hope this finds you well.

thank you.

-alan

---

phone: **323 988 9692**

This email transmission, including any

On May 6, 2015, at 12:32 PM,

thank you.

-alan

---

phone: **323 988 9692**

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Sydney Pollack; "Amazing Grace"
Date: March 7, 2016 at 5:44 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com

thank you.

-alan

---
phone: 323 988 9692
peace and love.

Begin forwarded message:

> **From:** Tom McGuire <TMcGuire@wmeentertainment.com>
> **Date:** March 7, 2016 at 1:32:40 PM PST
> **To:** Todd Musburger <todd@musburger.com>, "alan elliott (ucla)" <alanelliott@g.ucla.edu>
> **Subject: Fwd: Sydney Pollack; "Amazing Grace"**
>
> Sent from my iPad
>
> Tom McGuire | WME
> TMcGuire@wmeentertainment.com
> 310.248.3022
>
> Begin forwarded message:
>
> > **From:** "Tyerman, Barry" <BTyerman@jtwamm.com>
> > **Date:** March 7, 2016 at 1:00:43 PM PST
> > **To:** 'Tom McGuire' <TMcGuire@wmeentertainment.com>
> > **Subject: RE: Sydney Pollack; "Amazing Grace"**
> >
> > Tom,
> >
> > When you and I recently met you indicated that your client may not yet have advised the distributor or the errors and omissions insurance carrier of the various concerning the rampant unauthorized use of his name and likeness for commercial exploitation which has continued for years, the rights to the results and pro in detail in previous discussions and correspondence. Moreover your client has expressly acknowledged in writing that he has no rights to exploit the foregoing
> >
> > I just did not want there to be any potential misunderstanding and, of course, the foregoing and previous discussions and correspondence are without prejudice
> >
> > Very truly yours,
> >
> > Barry Tyerman
> > Barry W. Tyerman, Esq.
> > Jackoway Tyerman Wertheimer
> > Austen Mandelbaum Morris & Klein
> > 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> > Phone: (310) 553-0305
> > Firm Fax: (310) 553-5036
> > Direct Fax: (310)551-4448
> > Email: BTyerman@jtwamm.com
> >
> > ---
> >
> > **From:** Tyerman, Barry
> > **Sent:** Monday, August 24, 2015 12:37 PM
> > **To:** 'Tom McGuire'
> > **Subject:** RE: Sydney Pollack; "Amazing Grace"
> >
> > Tom,
> >
> > Just as a reminder, this is the status quo.
> >
> > No rights have been granted to use the name, likeness, performance or biography of Sydney Pollack in connection with this project and Mr. Elliott specifically Anyone acting inconsistently with this will be held accountable.
> >
> > And clearly despite your encouragement and what I thought was our understanding, Mr. Elliott continues to pester friends, family and professional colleagues
> >
> > Thank you. Barry
> > Barry W. Tyerman, Esq.
> > Jackoway Tyerman Wertheimer
> > Austen Mandelbaum Morris & Klein
> > 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> > Phone: (310) 553-0305
> > Firm Fax: (310) 553-5036
> > Direct Fax: (310)551-4448
> > Email: BTyerman@jtwamm.com
> >
> > ---
> >
> > **From:** Tyerman, Barry
> > **Sent:** Monday, August 17, 2015 5:32 PM
> > **To:** Tom McGuire
> > **Subject:** FW: Sydney Pollack; "Amazing Grace"
> >
> > Tom,
> >
> > I know that we have been missing each other. On the chance that it may take some time to connect, please advise your client that, without prejudice, the successors to the rights of Sydney Pollack accept his su performance or image and, without limiting the generality of the foregoing, delete any and all visual or other references to Mr. Pollack in and in connection with the film.
> >
> > I understand that quite provocatively Mr. Elliott has flagrantly breached a "standstill" agreement entered into with or on behalf of Aretha Franklin. Clearly not a positive move or one likely to encourage cooperatic
> >
> > Nothing contained herein or our previous correspondence shall be construed as a waiver of any of our clients' rights, positions or remedies, all of which are expressly reserved.
> >
> > Barry
> >
> > PS. Please remind your client that it is unethical for him to be contacting Rachel Pollack or any other member of the family directly. Thank you.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, August 11, 2015 11:45 AM
To: Tyerman, Barry
Cc: Rachel Pollack; Todd W. Musburger
Subject: Re: Sydney Pollack; "Amazing Grace"

and good morning to you to barry!

look… and rachel is on this email too (along with todd, my lawyer and pal)… so mind your manners, please, bar…

again… according to the records we have, sydney was paid for directing and producing. if you have ANYTHING else… please send it so we can sort it through fairly.

look… i was the one who worked with sydney on this. i have his shot notes. he and i had the conversations. and sydney suggested- without prompting- that i finish this because "alan, you k
"director" i will...

i can't change the facts of how the movie came to where it is!

and if this is about money… i am still soliciting investors. if the family wants to buy in… now's the time! (me personally… i have re-mortgaged- "jeremiah johnson"-style- my own house.
mortgaged the house on any of thsee four occasion.)

in sum, i have nothing but love for sydney and the work we did on the film. i am and was honored to work with him on this but i defer to the family as to what to do on the credits. i am putt

thank you.

-alan

---
phone: 323 988 9692

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> On Aug 11, 2015, at 9:58 AM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:
>
> Alan,
>
> Your blatant and continuing disregard of the interests of our clients, as well as your self-promotion on the backs of the talents and contractual and c
> unprofessional and disgusting. Since you have ignored our efforts to address this situation amicably we have no recourse but to engage with Warne
> underlying musical and other materials to shut down your rogue activities. Presumably you have and will advise the representatives of the Toronto
> Festival and all other parties in the chain of any unlawful exploitation of these rights. Please confirm that the Festival has been so advised.
>
> Not only would exhibition of the film violate various statutory and common law rights of our clients, but also constitute a serious and direct violati
> creative rights and credits and formal grievances are being initiated.
>
> The foregoing obviously is not a complete exposition of the claims against you and any and all other parties participating in the unlawful exploitati
>
> Very truly yours,
>
> Barry Tyerman
> Barry W. Tyerman, Esq.
> Jackoway Tyerman Wertheimer
> Austen Mandelbaum Morris & Klein
> 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> Phone: (310) 553-0305
> Firm Fax: (310) 553-5036
> Direct Fax: (310)551-4448
> Email: BTyerman@jtwamm.com
>
> ---
>
> **From:** Tyerman, Barry
> **Sent:** Tuesday, July 14, 2015 12:18 PM
> **To:** 'alan elliott'
> **Subject:** RE: Sydney Pollack; "Amazing Grace"
>
> Alan,
>
> What you have sent me purports to be an internal Warner Bros. memorandum, not anything like a contract. Neither Sydney nor any representative i
> All rights, positions and remedies reserved. Barry
>
> Barry W. Tyerman, Esq.
> Jackoway Tyerman Wertheimer
> Austen Mandelbaum Morris & Klein
> 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> Phone: (310) 553-0305
> Firm Fax: (310) 553-5036
> Direct Fax: (310)551-4448
> Email: BTyerman@jtwamm.com
>
> ---
>
> **From:** alan elliott [mailto:alanelliott@g.ucla.edu]
> **Sent:** Monday, July 13, 2015 8:54 PM
> **To:** Tyerman, Barry
> **Cc:** rpollack@mac.com
> **Subject:** Re: Sydney Pollack; "Amazing Grace"

<image002.png>

phone: 323 988 9692

Sent from a iPhone
This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contains informatior
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On Jul 13, 2015, at 5:40 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

> Nothing is attached.
>
> Barry W. Tyerman, Esq.
> Jackoway Tyerman Wertheimer
> Austen Mandelbaum Morris & Klein
> 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> Phone: (310) 553-0305
> Firm Fax: (310) 553-5036
> Direct Fax: (310) 551-4448
> Email: BTyerman@jtwamm.com
>
> -----Original Message-----
> **From:** alan elliott (ucla) [alanelliott@g.ucla.edu]
> **Received:** Monday, 13 Jul 2015, 5:10PM
> **To:** Tyerman, Barry [BTyerman@jtwamm.com]
> **CC:** Rachel Pollack [rpollack@mac.com]
> **Subject:** Re: Sydney Pollack; "Amazing Grace"
>
> here is Sydney's from wb(see attached).
>
> as I wrote before, Aretha's contract is not available for public (or private) broadcast.
>
> what I can write as assurance re ms franklins contract is:
>
> 1) it is insured and vetted
> 2) it has been used twice by wb films
>
> thank you.
>
> ---
> phone: 323 988 9692
>
> Sent from a iPhone
> <image003.png>
> This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contai
> please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly pro
>
> On Jul 13, 2015, at 5:01 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:
>
> > You indicate that there is a "signed contract from Sydney" but religiously have avoided providing this. And we're led to beli
> > she is being shown, which certainly would not have pleased Sydney. Perhaps you could begin by providing the contracts wh
> >
> > Barry W. Tyerman, Esq.
> > Jackoway Tyerman Wertheimer
> > Austen Mandelbaum Morris & Klein
> > 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> > Phone: (310) 553-0305
> > Firm Fax: (310) 553-5036
> > Direct Fax: (310) 551-4448
> > Email: BTyerman@jtwamm.com
> >
> > ---
> >
> > **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> > **Sent:** Monday, July 13, 2015 4:14 PM
> > **To:** Tyerman, Barry
> > **Cc:** Rachel Pollack
> > **Subject:** Re: Sydney Pollack; "Amazing Grace"
> >
> > hi barry
> >
> > as you know, i do have a signed contract from sydney, sydney never asked for anything from me, and i am not sure what you- or the family want…
> >
> > i don't want their to be any bad feelings… and i feel the movie is awesome and a testament to sydney… and if rachel or rebecca want me to take sy
> >
> > and if there's anything else, please let me know if there's something anybody wants specifically.
> >
> > thank you.
> >
> > -alan
> >
> > ---
> > **phone: 323 988 9692**
> >
> > This email transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission i
> > of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.
> >
> > > On Jul 13, 2015, at 3:54 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:
> > >
> > > Alan,
> > >
> > > Simply ignoring this situation will not make it go away. If you will not voluntarily withdraw any exhibition of th
> > > measures. We are specifically instructed to protect the Sydney Pollack name and not permit its use without authc

measures. We are specifically instructed to protect the Sydney Pollack name and not permit its use without authc
how good you may believe the film is (not surprising given Sydney's involvement, but it is a misrepresentation t
gloss over these serious legal issues.

All rights, positions and remedies reserved. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, June 16, 2015 3:28 PM
To: 'alan elliott'
Subject: RE: amazing grace links...

Your deflection is unacceptable, Alan, and clearly we will need to escalate matters in order properly to address c
of the underlying documentation which you allege exists. With due respect Sydney Pollack has ultimate rights tc
hereby instruct you to cease and desist immediately from any further use of his name on or in connection with th
fully accountable. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, June 16, 2015 3:06 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hi barry

i have ms. franklin's signature on her "personal service contract," it was provided to me by wb. (fyi: ms. franklin signed a "personal s
to the late john calley and by joe boyd- who served as music director at wb films in 1972. both calley and sydney often alluded to suc

as to sydney's credit, he accepted a payment and he never approached me about anything re: further payment. according to the doc i h
according to the contract (a favorite jerry wexler expression…), sydney has no "rights" to the film. if the family wishes for me to rem
what they want, i can do so...but why would anybody want that, barry? (this is, i feel… his best film!!)

ps- i am screening the film tomorrow at wme at 11am if either of the girls wants to come!

thank you.

-alan

---

phone: 323 988 9692

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> On Jun 16, 2015, at 2:42 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:
>
> I am not interested in "opening any cans of worms". Only to protect the rights of Sydney
> sure that his work is not exploited without those issues being addressed and not over the
> would never have countenanced that and was very clear that her rights needed to be add
> manner. If you have contracts to establish that she has given that permission, it is impera
> documentation of any arrangements with Sydney Pollack).
>
> To be clear, you have no rights to utilize any of the rights of Sydney Pollack, including l
> "Directed by Pollack"), without further written agreement from his successors.
>
> All of this is not exhaustive and is without prejudice to the other rights, positions and re
>
> Barry W. Tyerman, Esq.
> Jackoway Tyerman Wertheimer
> Austen Mandelbaum Morris & Klein
> 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> Phone: (310) 553-0305
> Firm Fax: (310) 553-5036
> Direct Fax: (310)551-4448
> Email: BTyerman@jtwamm.com

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, June 16, 2015 2:24 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hi barry

i have one document about sydney's deal with wb. (i'm sure you have that though.) it is the only document that mentior
something specific that you are looking for, i will try to help suss it out.

the film is now set for telluride and i anticipate it will then go to toronto.

because this journey has been extremely lawyer intensive (sydney would have killed a few people by now…)… i am nc

to this, and i hope you will understand that this is written with complete respect… i feel i have put all the worms in the

i hope you'll understand and if there's something i can help you with that requires any non-can opening… especially fo
sydney's wish that i "go finish the film!". if the family wants to discuss ANYTHING having to do with this… please ha

i hope this finds you well.

thank you.

-alan

---

phone: 323 988 9692

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without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by r

On Jun 16, 2015, at 2:05 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

May I please have the courtesy of a response and copies of the relevant docu

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Wednesday, May 06, 2015 1:08 PM
To: 'alan elliott (ucla)'
Subject: RE: amazing grace links...

Sydney was equally clear with me that the Aretha rights had not been cleared. Please sen
can take a look. At some point (sooner rather than later) I should also see your agreement

Does this mean that you have not heard from anyone on behalf of Aretha recently?

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, May 06, 2015 1:06 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hey barry

as John Calley quite clearly yelled at me at a certain point… "Do you think I would send Sydney Pollack
wasn't a release?!"

the answer is:

there is.

Aretha signed a personal service contract with warner 7 arts (The film company) which wb and Sydney re

the man whose responsibility it was to secure all releases for filming, joe Boyd, (joe was director of film r
letter re-stating these facts.

as jerry wexler always implored me to do, "check what's in the contract!" (we did, and that's what we are

thank you.

---
phone: 323 988 9692

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please delete the original transmission without making copies, disclosing, distributing, saving or making u
which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.

On May 6, 2015, at 12:32 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

In your response you did not address the issue of the Aretha Fran
rights. Have you made an arrangement with her? And is there a c
with the record label? There is absolutely no way that the Sydney

with the record label? There is absolutely no way that the Sydney Pollack rights will be cleared, including any possibility of the film being attributed to him (the whole notion of "Directed by Sydney Pollack" is an issue), unless and until all of this has been worked through and fully documented.

Given the various items to be resolved, all rights, positions and remedies are expressly reserved.

Thanks. Barry

PS. None of these necessary "legalities" reflect on the quality of project or our collective desire hopefully to see Sydney's good w finally and respectfully made available to an audience.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 9006
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

To: Tyerman, Barry
Subject: Fwd: amazing grace links...

hey barry

I reached out to Sydney's girls through Donna (see Rachel's sweet email belo

as discussed I am taking the film to premiere at telluride.

as of now I am planning on:

directed by Sydney pollack

produced by Sydney pollack and alan Elliott

if the girls have any issues or concerns, please have them contact me. I will t do what they feel is appropriate re credits.

and if there's any documentation or... anything else that I should know about iteration of the project Sydney and I started on in 2007... or anything from th passed (I'd be very interested to see the 1997 file!) please send it over and let discuss.

hope this finds you well.

thank you.

---
phone: 323 988 9692

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Begin forwarded message:

From: Donna Ostroff <missdo@aol.com>
Date: April 22, 2015 at 3:44:03 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Subject: Fwd: amazing grace links...

> **From:** Rachel Pollack <rpollack@mac.com>
> **Date:** April 22, 2015 at 2:42:27 PM PDT
> **To:** MissDO@aol.com
> **Subject: Re: amazing grace links...**
>
> I just watched the trailer and will watch the rest when I get home. What a wonderful wonderful thing

he has done!!! How awful if that had just sat there. I am so thankful to him for doing it and I can't wait to see it!!!!

Thanks you so Donna. Much love to you.

thank you.

-alan

---

phone: **323 988 9692**

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reply info@alanelliott.net.

From: **ALAN ELLIOTT** alanelliott@g.ucla.edu
Subject: Fwd: Sydney Pollack; "Amazing Grace"
Date: April 26, 2016 at 1:36 PM
To: Stephen Carroll Stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi stephen

as i am obliged to report all possible claims… here's a continuation.

thank you.

-alan

---
phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

Begin forwarded message:

From: "Tyerman, Barry" <BTyerman@jtwamm.com>
Subject: **Sydney Pollack; "Amazing Grace"**
Date: April 26, 2016 at 1:29:06 PM PDT
To: Tom McGuire <TMcGuire@wmeentertainment.com>
Cc: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>, linda burrow <burrow@caldwell-leslie.com>, Liesl Copland <LCopland@wmeentertainment.com>, "Todd Musburger (todd@musburger.com)" <todd@musburger.com>

Tom,

I do not want you to be left with some false sense that our clients are any less committed to pursuing any and all claims and all legal, equitable and administrative remedies to protect the righ use of his name, likeness or the results and proceeds of his services.

Understandably we are not interested in litigating the legal foundation for those claims in correspondence and it is not the duty of the Pollack parties to correct Ms. Burrow's flawed analysis serious violations of Directors Guild of America creative, economic and other provisions applicable to this project; infringement of Mr. Pollack's droit moral and intellectual property rights h

It is indisputable that Mr. Elliott, without any authorization from our clients whatsoever, has FOR YEARS been trading openly and brazenly on the Sydney Pollack name, iconic body of film

Mr. Elliott and his representatives have been repeatedly admonished to discontinue misrepresenting to any party that he has any authorization whatsoever from or on behalf of Sydney Pollacl all available remedies to protect his economic, personal and creative rights and interests, including against any and all parties in the chain of infringement of our clients' rights.

On a personal note, although I know you are seriously conflicted about your role in this matter, I am disappointed that you without explanation reversed your position, as it was clear to me fr

In any event, please be advised that the Sydney Pollack rights and claims will not simply go away and our clients are fully committed to whatever litigation or other course of action may be r

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tom McGuire [mailto:TMcGuire@wmeentertainment.com]
Sent: Friday, April 08, 2016 11:59 AM
To: Tyerman, Barry
Cc: alan elliott (ucla) (alanelliott@g.ucla.edu); linda burrow; Liesl Copland; Todd Musburger (todd@musburger.com)
Subject: RE: Sydney Pollack; "Amazing Grace"

Barry,

In response to your email below, at this time I am not authorized to give you the financial details of this project. We urge you to respond to Linda Burrow's letter to you from a few weeks back. We are

Thank you.

Tom

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: Tyerman, Barry [mailto:BTyerman@jtwamm.com]
Sent: Wednesday, March 30, 2016 12:57 PM
To: Tom McGuire
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Further to our call last week I was expecting by Friday (or at the latest Monday) to receive from you the promised detailed financial information concerning th

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, March 07, 2016 1:01 PM
To: 'Tom McGuire'
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

When you and I recently met you indicated that your client may not yet have advised the distributor or the errors and omissions insurance carrier of the various client has expressly acknowledged in writing that he has no rights to exploit the foregoing without the prior written consent of our esteemed client's successors.

I just did not want there to be any potential misunderstanding and, of course, the foregoing and previous discussions and correspondence are without prejudice t

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 24, 2015 12:37 PM
To: 'Tom McGuire'
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Just as a reminder, this is the status quo.

No rights have been granted to use the name, likeness, performance or biography of Sydney Pollack in connection with this project and Mr. Elliott specifically a

And clearly despite your encouragement and what I thought was our understanding, Mr. Elliott continues to pester friends, family and professional colleagues o

Thank you. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 17, 2015 5:32 PM
To: Tom McGuire
Subject: FW: Sydney Pollack; "Amazing Grace"

Tom,

I know that we have been missing each other. On the chance that it may take some time to connect, please advise your client that, without prejudice, the successors to the rights of Sydney Pollack accept his sugg

I understand that quite provocatively Mr. Elliott has flagrantly breached a "standstill" agreement entered into with or on behalf of Aretha Franklin. Clearly not a positive move or one likely to encourage cooperation

Nothing contained herein or our previous correspondence shall be construed as a waiver of any of our clients' rights, positions or remedies, all of which are expressly reserved.

Barry

PS. Please remind your client that it is unethical for him to be contacting Rachel Pollack or any other member of the family directly. Thank you.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, August 11, 2015 11:45 AM
To: Tyerman, Barry
Cc: Rachel Pollack; Todd W. Musburger
Subject: Re: Sydney Pollack; "Amazing Grace"

and good morning to you to barry!

look… and rachel is on this email too (along with todd, my lawyer and pal)… so mind your manners, please, bar…

again… according to the records we have, sydney was paid for directing and producing. if you have ANYTHING else… please send it so we can sort it through fairly.

look… i was the one who worked with sydney on this. i have his shot notes. he and i had the conversations. and sydney suggested- without prompting- that i finish this because "alan, you kn

i can't change the facts of how the movie came to where it is!

and if this is about money… i am still soliciting investors. if the family wants to buy in… now's the time! (me personally… i have re-mortgaged- "jeremiah johnson"-style- my own house. fo

in sum, i have nothing but love for sydney and the work we did on the film. i am and was honored to work with him on this but i defer to the family as to what to do on the credits. i am puttir

thank you.

-alan

---
phone: 323 988 9692

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On Aug 11, 2015, at 9:58 AM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

Your blatant and continuing disregard of the interests of our clients, as well as your self-promotion on the backs of the talents and contr
Presumably you have and will advise the representatives of the Toronto International Film Festival of the serious claims of various inte

Not only would exhibition of the film violate various statutory and common law rights of our clients, but also constitute a serious and d

The foregoing obviously is not a complete exposition of the claims against you and any and all other parties participating in the unlawfu

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, July 14, 2015 12:18 PM
To: 'alan elliott'
Subject: RE: Sydney Pollack; "Amazing Grace"

Alan,

What you have sent me purports to be an internal Warner Bros. memorandum, not anything like a contract. Neither Sydney nor any repr

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
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Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [mailto:alanelliott@g.ucla.edu]
Sent: Monday, July 13, 2015 8:54 PM
To: Tyerman, Barry
Cc: rpollack@mac.com
Subject: Re: Sydney Pollack; "Amazing Grace"

<image002.png>

phone: 323 988 9692

Sent from a iPhone
This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contain

On Jul 13, 2015, at 5:40 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

> Nothing is attached.
>
> Barry W. Tyerman, Esq.
> Jackoway Tyerman Wertheimer
> Austen Mandelbaum Morris & Klein
> 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> Phone: (310) 553-0305
> Firm Fax: (310) 553-5036
> Direct Fax: (310) 551-4448
> Email: BTyerman@jtwamm.com
>
> -----Original Message-----
> **From:** alan elliott (ucla) [alanelliott@g.ucla.edu]
> **Received:** Monday, 13 Jul 2015, 5:10PM
> **To:** Tyerman, Barry [BTyerman@jtwamm.com]
> **CC:** Rachel Pollack [rpollack@mac.com]
> **Subject:** Re: Sydney Pollack; "Amazing Grace"
>
> here is Sydney's from wb(see attached).
>
> as I wrote before, Aretha's contract is not available for public (or private) broadcast.
>
> what I can write as assurance re ms franklins contract is:
>
> 1) it is insured and vetted
> 2) it has been used twice by wb films
>
> thank you.
>
> ---
> phone: 323 988 9692

phone: 323 988 9692

Sent from a iPhone
<image003.png>
This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous message

On Jul 13, 2015, at 5:01 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

You indicate that there is a "signed contract from Sydney" but religiously have avoided

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
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Email: BTyerman@jtwamm.com

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, July 13, 2015 4:14 PM
To: Tyerman, Barry
Cc: Rachel Pollack
Subject: Re: Sydney Pollack; "Amazing Grace"

hi barry

as you know, i do have a signed contract from sydney, sydney never asked for anything from me, and i

i don't want their to be any bad feelings… and i feel the movie is awesome and a testament to sydney…

and if there's anything else, please let me know if there's something anybody wants specifically.

thank you.

-alan

---
phone: 323 988 9692

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On Jul 13, 2015, at 3:54 PM, Tyerman, Barry <BTyerman@jtwamm.com>

Alan,

Simply ignoring this situation will not make it go away. If you
Sydney's involvement, but it is a misrepresentation to say the c

All rights, positions and remedies reserved. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, June 16, 2015 3:28 PM
To: 'alan elliott'
Subject: RE: amazing grace links...

Your deflection is unacceptable, Alan, and clearly we will need
further use of his name on or in connection with this project. Y

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, June 16, 2015 3:06 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hi barry

i have ms. franklin's signature on her "personal service contract," it was pr

as to sydney's credit, he accepted a payment and he never approached me a
feel… his best film!!)

ps- i am screening the film tomorrow at wme at 11am if either of the girls

thank you.

-alan

---
phone: 323 988 9692

This email transmission, including any previous messages or attachments to it, contains informatio

On Jun 16, 201

I am not inter
rights needed

To be clear, y

All of this is

Barry W. Tyer
Jackoway Tyer
Austen Mandel
1925 Century
Phone: (310)
Firm Fax: (31
Direct Fax: (
Email: BTyerm

From: alan elliott (ucla) [mailto:al
Sent: Tuesday, June 16, 2015 2:2
To: Tyerman, Barry
Subject: Re: amazing grace links.

hi barry

i have one document about syd

the film is now set for telluride

because this journey has been

to this, and i hope you will und

i hope you'll understand and if

i hope this finds you well.

thank you.

-alan

---

phone: 323 988 9692

This email transmission, including any pr

On May 6, 2015, at 12:32 PM, T

thank you.

-alan

---

phone: **323 988 9692**

This email transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please del

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: sydney pollack
Date: March 3, 2016 at 2:30 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com, Tom McGuire tmcguire@wmeentertainment.com

Steve-

As we discussed now on the phone, below are my email correspondences re: Sydney Pollack's attorney Barry Tyerman. i have searched my files in an effort to give a complete view. You should also speak with Tom McGuire about his meetings/conversations with Barry Tyerman.

Some context (and please ask any questions):

Barry Tyerman is the attorney for Sydney Pollack (Mr. Pollack passed away in May, 2008). Since I received quitclaim of the project from Warner Bros. in 2007, out of respect for the late Mr. Pollack, I have kept Mr. Tyerman updated on the film's progress. I have, as you can see below, asked Mr. Tyerman what he would consider for additional payment for Mr. Pollack's heirs. Mr. Tyerman has, in these eight years, not given me an answer.

Prior to the Telluride Film Festival in September, 2015, Mr. Tyerman asked me to remove Mr. Pollack's credit from the film, I did so.

Over the years, I have repeatedly provided Mr. Tyerman with the following as proof of Warners' payment:

http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20legal%20pollack%20payment.pdf

I have discussed the issue of Mr. Pollack and Mr. Tyerman's claim on behalf of Mr. Pollack with both Dan Furie, Warner Bros . Pictures, Business Affairs, and the President, Worldwide Business Affairs, Warner Bros. Pictures Steven S. Spira.

Warners has provided me all documents re: Sydney Pollack.

Mr. Tyerman has claimed that there may be a previous 1997 contract with Warners. Mr. Tyerman was asked by Tom McGuire a month or so ago about the contract. Mr. Tyerman has not provided the contract. Warners has no copy of the agreement Mr. Tyerman talked of.

Both Mr. Spira and Mr. Furie advised Mr. Tyerman that, according to all known documents, Mr. Pollack is not owed anything further.

Mr. Spira said to me privately, "Mr. Tyerman asked us for money on this. I told him he had no cause. He is on a fishing expedition."

Other docs. with Sydney Pollack can be found at the web site (http://alsrecordsandtapes.com/amazinglaw/wbdocs/), including a general release for Mr. Pollack's image/likeness (which Mr. Pollack and his crew wrote):

http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazing%20releases%20church%20choir.pdfa

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

these are from emails from you and tom and liesl and herb jordan.

before i call insurance carrier, let's discuss precisely what you want me to say.

> **From:** "Herb Jordan" <jordan@adagegroup.net>
> **Subject: Various**
> **Date:** February 6, 2008 at 11:03:01 AM PST
> **To:** "'Alan Elliott'" <Alan@AlanElliott.net>
>
> Alan, Here's the Latest:
>
> Aretha
> - Spoke with Ann Stockman at Warner Pictures. She checked Sydney's file and came up

blank. I suggested that he may have done business through a loan out company, and that it could conceivably be filed under the company name. She researched his company “Sanford Production” today and found nothing on Amazing Grace. I also suggested that the doc could be traced through the disbursement of his fee. But as with most things, records of that end of the transaction seem to be lost to history. This circles back to the matter of how we deal with Sydney. Alan Wertheimer says that Syd’s lawyer Barry Tyreman was around and remembers the transaction. Chances are he has the doc, if it exists. I haven’t told Alan that we acquired the film because we have our hands full with Aretha. Need to discuss.

From: Tyerman, Barry [mailto:BTyerman@jtwamm.com]
Sent: Wednesday, August 12, 2015 11:01 AM
To: Tom McGuire
Subject: FW: Sydney Pollack; "Amazing Grace"

Tom,

I understand from Warners that you are representing Mr. Elliott and this project, which frankly surprises me given the attitude and disregard for contractual and creative rights he has consistently and routinely exhibited. Contrary to Mr. Elliott’s assertion he has no rights to either the name, likeness, biography or results and proceeds of services of Sydney Pollack or Aretha Franklin (among other essential clearances) and he is about to step off the deepest darkest elevator shaft of his life.

Begin forwarded message:

From: Tom McGuire <TMcGuire@wmeentertainment.com>
Subject: RE: Tyerman question #1.
Date: August 12, 2015 at 3:54:05 PM PDT
To: Liesl Copland <LCopland@wmeentertainment.com>
Cc: Tom McGuire Assistant <tmcguire_asst@wmeentertainment.com>, "alan elliott (ucla)" <alanelliott@g.ucla.edu>, "Todd W. Musburger" <todd@musburger.com>, Liesl Copland Assistant <LCopland_Asst@wmeentertainment.com>

I have asked barry what he wants. ball is in his court

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: Liesl Copland
Sent: Wednesday, August 12, 2015 3:50 PM
To: Tom McGuire
Cc: Tom McGuire Assistant; alan elliott (ucla); Todd W. Musburger; Liesl Copland Assistant
Subject: Re: Tyerman question #1.

Are we formulating a response? How long do we have?

Sent from my iPhone

Liesl Copland | WME
LCopland@wmeentertainment.com
310.246.3383

On Aug 12, 2015, at 2:29 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:

> Alan: please send all emails to me (you can copy my assistant, but I don't want anything getting lost). You are now sending emails to my assistant and Liesl's assistant.
>
> I have asked Barry what he wants in order for the Estate to support the release. We have our arguments about what rights you have, and he has his arguments about what rights he has. I say put those arguments to the side and lets see what he wants. There isnt really any money. A share of the back end, I would say ok, depending on the amount. And the right to use his name and likeness in the film and in promo/advertising. He should have directing credit, but that will depend on the DGA. You can give his estate a consultation right, or even an approval right, over the use of his image in the film and advertising—as long as there is an agreement that they are supporting the release, they will not be obstructionist, I don't believe.
>
> Tom
>
> Tom McGuire | WME
> TMcGuire@wmeentertainment.com
> 310.248.3022

——

From: "Tyerman, Barry" <BTyerman@jtwamm.com>
Subject: RE: Sydney Pollack; "Amazing Grace"
Date: August 17, 2015 at 6:24:58 PM PDT
To: 'Tom McGuire' <TMcGuire@wmeentertainment.com>
Cc: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>, "Todd Musburger (todd@musburger.com)" <todd@musburger.com>, Liesl Copland <LCopland@wmeentertainment.com>

Thanks Tom. I realize that you may not have been made privy to all of the agreements and other commitments your client has made over the years with respect to this project and then "reconsidered". I believe you will ultimately be made aware that the "standstill" agreement with Ms. Franklin was in fact entered into, among others. It goes without saying that I have the utmost respect for you and WME and I'm sure that you and your agency would not want to be party to the violation of these arrangements.

And as to direct communications with our clients, without debating your ethical analysis, our clients have requested that there be no direct communication and that everything be routed through our offices.

As to the use of Mr. Pollack's name and image, Warners will confirm to you that they did not purport to grant any such rights and, whatever his legal position, Mr. Elliott has volunteered to remove Mr. Pollack's unauthorized and inappropriate credit. Perhaps this is another commitment which he is "reconsidering?

Thank you. Barry

From: Tom McGuire <TMcGuire@wmeentertainment.com>

Subject: RE: Sydney Pollack; "Amazing Grace"
Date: August 17, 2015 at 5:41:46 PM PDT
To: "Tyerman, Barry" <BTyerman@jtwamm.com>
Cc: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>, "Todd Musburger (todd@musburger.com)" <todd@musburger.com>, Liesl Copland <LCopland@wmeentertainment.com>

Barry,

I will pass this email on. However, two observations:

1. I am unaware of any "standstill" agreement or other similar agreement that Alan or his production has entered into with Ms. Franklin. I would be happy to be on a call with you and/or her representative(s) to confirm that.
2. I do not believe it is against any ethical laws for Alan to speak directly to anyone involved in this matter. I will advise him that you do not want him to speak to Rachel or any other member of the family.

In addition, I do not know myself that Alan offered to take Mr. Pollack's name off the film, either generally or in the manner in which you suggest. I am passing your email on to Alan.

Tom

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: Tyerman, Barry [mailto:BTyerman@jtwamm.com]

Sent: Monday, August 17, 2015 5:32 PM
To: Tom McGuire
Subject: FW: Sydney Pollack; "Amazing Grace"

Tom,

I know that we have been missing each other. On the chance that it may take some time to connect, please advise your client that, without prejudice, the successors to the rights of Sydney Pollack accept his suggestion to take Mr. Pollack's name off the film, including for the proposed screenings at Toronto. Please have him cease any further use of Mr. Pollack's name, performance or image and, without limiting the generality of the foregoing, delete any and all visual or other references to Mr. Pollack in and in connection with the film.

I understand that quite provocatively Mr. Elliott has flagrantly breached a "standstill" agreement entered into with or on behalf of Aretha Franklin. Clearly not a positive move or one likely to encourage cooperation from anyone. I have been put in contact with her representatives.

Nothing contained herein or our previous correspondence shall be construed as a waiver of any of our clients' rights, positions or remedies, all of which are expressly reserved.

Barry

On Aug 23, 2015, at 2:13 PM, alan elliott <Alan@AlanElliott.net> wrote:

Bill was Sydney's editor. He, Sydney and I worked on the film. (bill cut the original trailer before I engaged JEFF Buchanan- bill might have been the editor but... he got a job in Baton Rouge for a year and during that time I met Buchanan)...

anyway, Bill just called. Donna, Sydney's assistant, had called Bill because Donna is so upset about how barry is mischaracterizing Sydney's involvement in the movie… And Sydney's involvement with me… To the family.

bill's call to me came completely unsolicited. I have not talked to him in a while… Or to Donna… As Donna has a gag order with the family since sydney passed and I knew this so I have been respectful.

but Bill is the one key link who can actually speak as to how much Sydney wanted this to be a "film by Sydney Pollack."

And Bill was apoplectic… As Donna had heard through the grapevine through the girls that things have escalated through barry.

> Long story short… 10% is our limit. I wouldn't mind making it 5%.
>
> Bill, Through no pushing from me at all... seriously... no really, seriously... has told the girls how much Sydney enjoyed working with me…
>
> How much Sydney wanted "amazing grace" to be finished…
>
> And how he- Bill- is the only one who can validate all of this to the family...
>
> and to everyone else if there's any questions about it.
>
> and he isn't press shy having done this in 2010 when there was the variety piece (http://variety.com/2010/music/markets-festivals/grace-film-finally-near-1118013484/).
>
> thank you.

___

From: Tom McGuire
Sent: Monday, August 24, 2015 12:46 PM
To: 'Tyerman, Barry'
Subject: RE: Sydney Pollack; "Amazing Grace"

My understanding is that several people have reached out to Alan with no request or attempt to contact them by Alan. Having said that, I am passing your note on to all.

Where are we in terms of our discussion last week? This project is going to Telluride and Toronto.

Tom

From: Tyerman, Barry [mailto:BTyerman@jtwamm.com]
Sent: Monday, August 24, 2015 12:37 PM
To: Tom McGuire
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Just as a reminder, this is the status quo.

No rights have been granted to use the name, likeness, performance or biography of Sydney Pollack in

connection with this project and Mr. Elliott specifically agreed to take Mr. Pollack's name off the film, of course without prejudice to our other rights, positions and remedies. Anyone acting inconsistently with this will be held accountable.

And clearly despite your encouragement and what I thought was our understanding, Mr. Elliott continues to pester friends, family and professional colleagues of our late client. Please make sure that this is discontinued.

Thank you. Barry

———

From: Tyerman, Barry [mailto:BTyerman@jtwamm.com]
Sent: Monday, August 24, 2015 1:05 PM
To: Tom McGuire
Subject: RE: Sydney Pollack; "Amazing Grace"

I am not talking about people soliciting Alan, but rather the reverse including, for example, his contacting Mr. Pollack's longtime assistant asking her what credit she would like!

As to our discussions, my recollection is that you were talking to Arnold Reed attempting to make a deal for Ms. Franklin's rights, none of which to our knowledge have been granted to date. If you are able to make a mutually acceptable arrangement you were then going to come to us to attempt to make a deal for Mr. Pollack's rights, absolutely none of which have been granted.

In the interim, wherever the project may go, lawfully or unlawfully, it may not go with the use of any Mr. Pollack's rights and Mr. Elliott specifically committed to take his name off the film, which we have accepted. Please confirm that this has been implemented and that there shall not be any inference in any discussions with any third parties that this is anything but a project not authorized by or on behalf of Sydney Pollack.

Thank you. Barry

———

From: Tyerman, Barry [mailto:BTyerman@jtwamm.com]
Sent: Wednesday, August 26, 2015 11:07 AM

To: Tom McGuire
Subject: RE: Amazing Grace

No mention of Sydney Pollack ANYWHERE (Including publicity, promotion, etc.) and no use of his image. This is all of course without prejudice to our basic position that all of this is uncleared as required by the Warner Bros. clip license.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

From: Tom McGuire [mailto:TMcGuire@wmeentertainment.com]
Sent: Wednesday, August 26, 2015 11:04 AM
To: Tyerman, Barry
Subject: Amazing Grace

Hi Barry

Alan is pulling the directed by credit to Sydney off the film. He had planned to give him a producer credit as well ("produced by Alan Elliott, Sydney Pollack and Jerry Wexler"—order for illustrative purposes only, not final).

Do you also want Alan to remove the produced by credit?

Tom
——

> **From:** Tom McGuire <TMcGuire@wmeentertainment.com>
> **Subject: RE: i talked with spira...**
> **Date:** August 26, 2015 at 4:41:51 PM PDT
> **To:** "alan elliott (ucla)" <alanelliott@g.ucla.edu>
>
> Not being flip, even though it will sound flip: I finished with barry—don't know if we have. Really up to Barry—I do not believe he is taking any aggressive action towards us, he just wants sydney's name off as director and producer, and he wants his name out of publicity. We can only control what we control of the publicity. I assume you are not sending out that epk package—that would drive him crazy.
>
> Tom McGuire | WME
> TMcGuire@wmeentertainment.com
> 310.248.3022

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, August 26, 2015 4:38 PM
To: Tom McGuire
Cc: Todd Musburger; Liesl Copland
Subject: Re: i talked with spira...

ok! did we finish with barry?

thank you.

——

From: Tom McGuire <TMcGuire@wmeentertainment.com>
Subject: RE: i talked with spira...
Date: August 26, 2015 at 5:05:51 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

No director, producer or any other Sydney credits

Tom McGuire | WME

——

From: Tom McGuire <TMcGuire@wmeentertainment.com>
Subject: Re: Aretha Franklin Doc 'Amazing Grace' Hosts Secret Screening for Buyers | Variety
Date: September 12, 2015 at 3:53:53 PM PDT
To: Liesl Copland <LCopland@wmeentertainment.com>
Cc: alan elliott <Alan@AlanElliott.net>, Todd Musburger <todd@musburger.com>

There is no pending legal action. There is his new statement that there are unspecified claims

Sent from my iPhone

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

On Sep 12, 2015, at 4:50 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

> We got it. But what i am saying is, we were asked to tale his name off and we dis and now he is bullying With this other stuff. I need an opinion if the pending legal action is real.
>
> Sent from my iPhone
>
> Liesl Copland | WME
> LCopland@wmeentertainment.com

310.246.3383

On Sep 12, 2015, at 6:49 PM, alan elliott <Alan@AlanElliott.net> wrote:

> be clear:
>
> sydney's attorney asked for his name off. we took it off. we are not paying him.
>
> honestly, if there is even $5 less I have to take for putting it back on, I am a pass.
>
> period.
>
> thank you.
>
> ---
> phone: 323 988 9692
>
> Sent from me.
>
> On Sep 12, 2015, at 3:46 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:
>
> > Todd can we connect tomorrow. I am at a wedding until then. We have a clock so we need to act tomorrow.
> >
> > Sent from my iPhone
> >
> > Tom McGuire | WME
> > TMcGuire@wmeentertainment.com
> > 310.248.3022
> >
> > On Sep 12, 2015, at 4:40 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:
> >
> > > He has never mentioned any pending claims. We may have to clarify before i can close and I will need to close tomorrow to keep these levels. Amazon just put a clock on us of 48 hours.
> > >
> > > Sent from my iPhone
> > >
> > > Liesl Copland | WME
> > > LCopland@wmeentertainment.com
> > > 310.246.3383
> > >
> > > On Sep 12, 2015, at 5:42 PM, Todd Musburger <todd@musburger.com> wrote:
> > >
> > > > I will have a go at him on Tuesday...Thanks...

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Sat, Sep 12, 2015 at 4:40 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

> I am. I have said we cant credit him. What will he do, legally?
>
> Lionsgate interest for world expecting offer.
>
> Sent from my iPhone
>
> Liesl Copland | WME
> LCopland@wmeentertainment.com
> 310.246.3383
>
> On Sep 12, 2015, at 5:29 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:
>
> > FYI
> >
> > Sent from my iPhone
> >
> > Tom McGuire | WME
> > TMcGuire@wmeentertainment.com
> > 310.248.3022
> >
> > Begin forwarded message:
> >
> > **From:** "Tyerman, Barry" <BTyerman@jtwamm.com>
> > **Date:** September 12, 2015 at 1:13:21 PM MDT
> > **To:** "TMcGuire@wmeentertainment.com" <TMcGuire@wmeentertainment.com>
> > **Subject: Aretha Franklin Doc 'Amazing Grace' Hosts Secret Screening for Buyers | Variety**
> >
> > I trust you will be advising potential buyers that you have no Sydney Pollack rights and in fact that there are pending claims of which everyone should be placed on notice.
> >
> > http://variety.com/2015/film/festivals/toronto-aretha-franklin-doc-amazing-grace-holds-secret-screening-for-buyers-exclusive-1201591920/
> >
> > Sent from my Android phone using Symantec TouchDown (www.symantec.com)

——

From: **Todd Musburger** <todd@musburger.com>
Date: Sun, Sep 13, 2015 at 10:17 AM
Subject: Greetings...

To: Barry Tyerman <BTyerman@jtwamm.com>

Barry: I am one of the attorneys working with Alan Elliott on the Aretha Franklin concert film project. I have been asked by our group to discuss with you the claim that you are making in reference to your client, the Estate of Sidney Pollack. I know this is not an opportune day to engage you, and you might feel that you have fully explained your position several times before. However, I come to you seeking some guidance as to the nature and validity of your claim. I have reviewed the emails you have written to Tom McGuire and Alan Elliott. I know also that at your request the Pollack name has been removed from the movie. I have studied the Quit Claim Deed from Warner Bros., and the existing paperwork concerning Mr. Pollack's payment for the work he performed on this project. I want to accord you every respect, and I feel that there must be something in your possession that we have not seen. It would be of genuine assistance to all of us if you could provide the basis for your claim with the documentation you are relying on. I assure you I will give this matter the priority it deserves. As we all say on occasion, time is of the essence. Cordially, Todd

Todd W. Musburger

---

here are the highlights (and below more extended). this is ALL i have between barry and me. i will start looking to see if i have more from tom or jordan or you.

---

august 17, 2015:

As to the use of Mr. Pollack's name and image, Warners will confirm to you that they did not purport to grant any such rights and, whatever his legal position, Mr. Elliott has volunteered to remove Mr. Pollack's unauthorized and inappropriate credit. Perhaps this is another commitment which he is "reconsidering?

---

august 11, 2015

Since you have ignored our efforts to address this situation amicably we have no recourse but to engage with Warner Bros., the directors Guild of America and the representatives of Ms. Aretha Franklin and the owners of the underlying musical and other materials to shut down your rogue activities. Presumably you have and will advise the representatives of the Toronto

and will advise the representatives of the Toronto International Film Festival of the serious claims of various interested parties and the accountability of the Festival and all other parties in the chain of any unlawful exploitation of these rights. Please confirm that the Festival has been so advised.

Not only would exhibition of the film violate various statutory and common law rights of our clients, but also constitute a serious and direct violation of the provisions of the applicable agreements of the Directors Guild of America including relating to creative rights and credits and formal grievances are being initiated.

The foregoing obviously is not a complete exposition of the claims against you and any and all other parties participating in the unlawful exploitation of these rights and all rights, positions and remedies are expressly reserved.

———

july 14, 2015

What you have sent me purports to be an internal Warner Bros. memorandum, not anything like a contract. Neither Sydney nor any representative is even copied on this. If this is what you are relying on for rights, your reliance obviously is wildly unjustified. All rights, positions and remedies reserved. Barry

———

july 13, 2015

If you will not voluntarily withdraw any exhibition of the film, including in Toronto, we will be required to take our own legal will measures. We are specifically instructed to protect the Sydney Pollack name and not permit its use without authorization nor without the rights of Aretha Franklin being addressed. No matter how good you may believe the film is (not surprising given Sydney's involvement, but it is a misrepresentation to say the completed film was

misrepresentation to say the completed film was "Directed By" him), we will not permit you to gloss over these serious legal issues.

All rights, positions and remedies reserved. Barry

———

june 16, 2015

With due respect Sydney Pollack has ultimate rights to this film and, as his longtime attorney and Trustee for his beneficiaries, I hereby instruct you to cease and desist immediately from any further use of his name on or in connection with this project. You and any other person or entity violating his rights will be held fully accountable. Barry

———

june 16, 2015

I am not interested in "opening any cans of worms". Only to protect the rights of Sydney Pollack, both economic and creative. And to make sure that his work is not exploited without those issues being addressed and not over the legal or other objections of Aretha Franklin. He would never have countenanced that and was very clear that her rights needed to be addressed before this work could be exploited in any manner. If you have contracts to establish that she has given that permission, it is imperative that those be shared urgently (as well as any documentation of any arrangements with Sydney Pollack).

To be clear, you have no rights to utilize any of the rights of Sydney Pollack, including his name (and certainly not to credit this film as being "Directed by Pollack"), without further written agreement from his successors.

All of this is not exhaustive and is without prejudice to the other rights, positions and remedies of Mr. Pollack's successors.

successors.

---

may 6, 2015

Please send me that contract and your contract with warners or should I ask for the warners contract directly from them?

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

-----Original Message-----
From: alan elliott (ucla) [alanelliott@g.ucla.edu]
Received: Wednesday, 06 May 2015, 1:12PM
To: Tyerman, Barry [BTyerman@jtwamm.com]
Subject: Re: amazing grace links...

Sydney was not correct. there is a contract with Aretha and warner 7arts.

(ps Sydney also failed to mention that the reason the film never got made was because he couldn't sync up the visuals the audio! a small... but important detail.)

I am very hopeful… That Aretha will have a come to Jesus moment at some point… And we are in constant contact… But I am relying on the contract.

thank you.

---
phone: 323 988 9692

Sent from a iPhone
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On May 6, 2015, at 1:07 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

> Sydney was equally clear with me that the Aretha rights had not been cleared. Please send me the documentation so I can take a look. At some point (sooner rather than later) I should also see your agreement with Warners. Thanks.

Does this mean that you have not heard from anyone on behalf of Aretha recently?

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, May 06, 2015 1:06 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hey barry

as John Calley quite clearly yelled at me at a certain point… "Do you think I would send Sydney Pollack to go film Aretha Franklin if there wasn't a release?!"

the answer is:

there is.

Aretha signed a personal service contract with warner 7 arts (The film company) which wb and Sydney relied upon to make the film.

the man whose responsibility it was to secure all releases for filming, joe Boyd, (joe was director of film music at wb in 1972) has signed a letter re-stating these facts.

as jerry wexler always implored me to do, "check what's in the contract!" (we did, and that's what we are relying upon.)

thank you.

---
phone: 323 988 9692

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On May 6, 2015, at 12:32 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

In your response you did not address the issue of the Aretha Franklin rights. Have you made an arrangement with her? And is there a deal with the record label? There is absolutely no way that the Sydney Pollack rights will be cleared, including any possibility of the film being attributed to him (the whole notion of "Directed by Sydney Pollack" is an issue), unless and until all of this has been worked through and fully documented.

Given the various items to be resolved, all rights, positions and remedies are expressly reserved.

Thanks. Barry

PS. None of these necessary “legalities” reflect on the quality of the project or our collective desire hopefully to see Sydney’s good work finally and respectfully made available to an audience.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305

Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

To: Tyerman, Barry
Subject: Fwd: amazing grace links...

hey barry

I reached out to Sydney's girls through Donna (see Rachel's sweet email below).

as discussed I am taking the film to premiere at telluride.

as of now I am planning on:

directed by Sydney pollack

produced by Sydney pollack and alan Elliott

if the girls have any issues or concerns, please have them contact me. I will try to do what they feel is appropriate re credits.

and if there's any documentation or... anything else that I should know about re: the iteration of the project Sydney and I started on in 2007... or anything from the passed (I'd be very interested to see the 1997 file!) please send it over and let's discuss.

hope this finds you well.

thank you.

---
phone: 323 988 9692

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(all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.

Begin forwarded message:

From: Donna Ostroff <missdo@aol.com>
Date: April 22, 2015 at 3:44:03 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Subject: Fwd: amazing grace links...

From: Rachel Pollack <rpollack@mac.com>
Date: April 22, 2015 at 2:42:27 PM PDT
To: MissDO@aol.com
Subject: Re: amazing grace links...

I just watched the trailer and will watch the rest when I get home. What a wonderful wonderful thing he has done!!! How awful if that had just sat there. I am so thankful to him for doing it and I can't wait to see it!!!!

Thanks you so Donna.
Much love to you.

---

may 5, 2015

I reviewed my file on the project and was reminded that in 1997 we were discussing a possible deal with Warner Bros. but it was not ever completed or executed. The broad strokes were that Warners had proposed a $150,000 fee and 50% of the net to Sydney Pollack but we responded that Sydney was obviously a “1st dollar gross” participant and therefore a split of traditional net profits would not work. We had also discussed at the time a direct soundtrack album royalty from Warners on the presumed rerelease of the Aretha Franklin record

project and a greater share of home video.

We would also need to discuss and agree how Sydney's work would be credited; given that tragically he was not around to complete the film, simply billing this as "Directed by Sydney Pollack" would be potentially misleading and inappropriate. Prior to any public exhibition I would expect you to extend the courtesy to Mr. Pollack's heirs of their seeing the film and having the right to comment.

And finally have you "made peace" with Aretha Franklin? Sydney clearly would not countenance the film being released in any way without her creative and economic rights and interests being taken into account.

I look forward to your thoughts as a priority.

From: "Tyerman, Barry" <BTyerman@jtwamm.com>
Subject: RE: amazing grace/redford...
Date: January 22, 2015 at 11:14:47 AM PST
To: "Alan@AlanElliott.net" <Alan@AlanElliott.net>

No. It has always been made clear that any exploitation of this material was conditional on a deal being made.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

-----Original Message-----
From: Alan Elliott [Alan@AlanElliott.net]
Received: Thursday, 22 Jan 2015, 10:33AM
To: Tyerman, Barry [BTyerman@jtwamm.com]
Subject: Re: amazing grace/redford...

(according to the wb records… he signed… and got paid!)

(but if there's something you think we are missing… let's do it.)

thank you.

-alan

---

phone: 323 988 9692

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> On Jan 22, 2015, at 10:31 AM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:
>
> Shouldn't we first try to make a deal for Sydney's rights in the film?
>
> Barry W. Tyerman, Esq.
> Jackoway Tyerman Wertheimer
> Austen Mandelbaum Morris & Klein
> 1925 Century Park East, 22nd Floor
> Los Angeles, California 90067
> Phone: (310) 553-0305
> Firm Fax: (310) 553-5036
> Direct Fax: (310) 551-4448
>
> -----Original Message-----
> **From:** alan elliott [alan@alanelliott.net]
> **Received:** Thursday, 22 Jan 2015, 10:27AM
> **To:** Tyerman, Barry [BTyerman@jtwamm.com]
> **Subject:** amazing grace/redford...
>
> barry:
>
> i called as... i am finishing up the "amazing grace" doc... and i want robert redford to read the letter sydney wrote to aretha for the top of the picture.
>
> if it's a no... i will really move on this time... but i feel he is the right choice for it... here's the letter:
>
> attached is a link for "amazing grace."
>
> here's the link:
>
> https://vimeo.com/91847063

> **From:** "Tyerman, Barry" <BTyerman@jtwamm.com>
> **Subject: RE: Sydney Pollack; Aretha Franklin; "Amazing Grace"**

Date: July 29, 2014 at 3:31:38 PM PDT
To: alan elliott <Alan@AlanElliott.net>

Sydney obviously produced and directed the original production and no rights were granted to anyone in the results and proceeds of those services. As a result, the film may not be commercially or otherwise exploited in any manner whatsoever unless and until a full and complete agreement is negotiated for those rights, which would include financial arrangements as well as appropriate approvals and controls on the part of Sydney's heirs.

Where are you on the project overall? And specifically where are you with Aretha Franklin?

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles,
California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [mailto:Alan@AlanElliott.net]
Sent: Tuesday, July 29, 2014 3:14 PM
To: Tyerman, Barry
Subject: Re: Sydney Pollack; Aretha Franklin; "Amazing Grace"

hi barry

this (the tmz) is a bit of... noise.

re: sydney: is there some specific rights i would need from you/the estate?

thank you.

-alan

---

phone: 323 988 9692

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On Jul 29, 2014, at 3:05 PM, Tyerman, Barry

<BTyerman@jtwamm.com> wrote:

Alan,

You will recall our discussions and correspondence a number of years back concerning this project. At that time it was understood and documented that the project would not proceed unless and until we discussed and agreed mutually acceptable economic and other terms for the Sydney Pollack rights. Also, as we discussed, this would all be conditional on your clearing the Aretha Franklin rights, possibly among other individuals appearing in the film and/or on the soundtrack.

Our curiosity was piqued by the attached article which was forwarded to us. Can you please give me an update as to where you are on all this? Thanks. Barry

---

sydney passed away on may 26, 2008

below is sydney telling barry tyerman to release the files to me (he never did).

From: "Tyerman, Barry" <BTyerman@jtwamm.com>
Subject: RE: Amazing Grace
Date: May 28, 2008 at 11:52:25 AM PDT
To: <Jordii824@cs.com>
Cc: <alan@alanelliott.net>, <Werthie@aol.com>, "Wertheimer, Alan" <AWertheimer@jtwamm.com>

Thanks, Herb. I assume this is being done under the authority of Warners as owners of the raw footage? Good luck with the work. Barry T.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036

Direct Fax: (310)551-4448

Email: BTyerman@jtwamm.com

From: Jordii824@cs.com [mailto:Jordii824@cs.com]
Sent: Wednesday, May 28, 2008 10:54 AM
To: Tyerman, Barry
Cc: alan@alanelliott.net; Werthie@aol.com
Subject: Re: Amazing Grace

Barry, I'm very sorry to hear about Mr. Pollack. He was quite gracious in speaking to Alan and enthusiastic about the prospect of us finishing this film. We hope our work will exceed his expectations. Warmest regards, Herb Jordan

I literally have the file in front of me and am happy to answer any questions that you may have. Unfortunately the file relates principally to the deal in 1997 for Mr. Pollack to complete the editing of the material (as opposed to the original shoot). Please let me know how I can help.

Barry T.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris &Klein
1925 Century Park East, 22nd Floor Los Angeles,
California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036

Direct Fax: (310)551-4448

Email: BTyerman@jtwamm.com

From: Werthie@aol.com [mailto:Werthie@aol.com]
Sent: Wednesday, May 07, 2008 10:21 AM
To: Jordii824@cs.com
Cc: Tyerman, Barry
Subject: Re: Amazing Grace

hi jordan . . . probably best if you contact barry's office directly . . . i've copied him on this email, and our number here is 310-553-0305 . . . hope all's well . . .

werth

Hello Alan. Donna Ostroff from Sydney Pollack's office has relayed that Mr. Pollack has authorized Barry to release the Amazing Grace legal file to Alan Elliott or to me. I'd like to arrange to stop by the office, or if it's more convenient for Barry, have the file sent to my office. The project is moving quickly so it would be helpful if we could make arrangements as soon as possible. All Best, Jordan

Herb Jordan
The Adage Group, LLC
328 South Beverly DriveSuite G
Beverly HillsCa 90212
310 785 0574
cell 310 613 4517

Begin forwarded message:

From: Donna Ostroff <dostroff@mirageenterprises.com>
Date: March 12, 2008 5:11:58 PM PDT
To: Alan Elliott <Alan@AlanElliott.net>
Subject: Re: thought...

Just got the following reply from Barry Tyerman....

"I have a file on this and have discussed it with Sydneyon many occasions over the years. I am traveling out of the country but will pull my file on my return on Monday."

Let you know when I hear from him.

we just chatted. talked about bill going to see sydneyon wed. and needing to see any files barry might have.
she said she would be happy to tell barry tyerman that sydneyhas given

> permission to see the files.

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Time response
Date: August 24, 2015 at 8:05 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com
Cc: Liesl Copland LCopland@wmeentertainment.com, Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com

hi stephen and Annette

the essence festival would like to show "amazing grace" next July. can they be added on the coverage or how is that handled?

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Aug 24, 2015, at 7:58 AM, Todd Musburger <todd@musburger.com> wrote:

> It could be premature to sign this deal as anxious as we are...the Essence Festival is a material part of it. So, Alan, check with the insurance folks...we need to add Time as an additional insured and we need to see if the policy can cover you for the Essence fest. And Liesl, please confirm for me that you are OK with the language which does state "...at Producer's sole discretion..." Thanks
>
> **Todd W. Musburger**
> **Todd W. Musburger, Ltd.**
> **142 E. Ontario**
> **Suite 500**
> **Chicago, Illinois 60611**
> **312 664 2600**
>
> ---------- Forwarded message ----------
> From: **Todd Musburger** <todd@musburger.com>
> Date: Sat, Aug 22, 2015 at 12:07 PM
> Subject: Time response
> To: alan elliott <alanelliott@g.ucla.edu>, Liesl Copland <LCopland@wmeentertainment.com>
>
> Please advise...
>
> IPhone Transmission Please excuse Typos & Peculiar abbreviations
>
> Begin forwarded message:
>
> > **From:** Zach McGee <zach@rampante.net>
> > **Date:** August 22, 2015 at 11:20:04 AM CDT
> > **To:** Todd Musburger <todd@musburger.com>
> > **Subject: Re: Greetings...**
> >
> > Todd:
> >
> > I spoke with folks here and we can make the 1 EP credit work and go to $45K on the rights option if we were granted both non-exclusive SVOD and AVOD rights. With respect to the latter, I think the prior term sheet may not have been clear in terms of how we described the various flavors of AVOD and SVOD rights so we have clarified that in this version by adding examples of the services that currently exploit the different rights (i.e., AVOD only, SVOD only and S+AVOD [to refer to the combination of SVOD and AVOD on the same service, not the combination of separate AVOD and SVOD rights]) and breaking out the license fee by type of right.
> >
> > Please let me know if you have any questions or would like to discuss. Otherwise, please confirm that this version works for your side. Thanks.
> >
> > Zach
> >
> > On Thu, Aug 20, 2015 at 8:28 AM, Todd Musburger <todd@musburger.com> wrote:
> > > **Zach: I wanted to expedite the process by addressing your suggested changes. We can get a**

Zach: I wanted to expedite the process by addressing your suggested changes. We can set a call for this afternoon if need be.

Credits - We are comfortable with either/or but not both, which we believe would be inconsistent with industry standards.
Window - The feeling is that 60 days makes it unlikely a distributor can take it all, so we actually think the 180 helps you.
Pricing - Can go to 45k.
Archives - Your language is fine.

Let me know your thoughts ...thanks again, Todd

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

--
Zach McGee
zach@rampante.net
(310) 773-1972 (cell)

<8.10.15aretha.term.sheet.rev4 red.docx>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: WHY DOESN'T ARETHA PAY HER BILLS?- detroit free press
Date: September 17, 2015 at 12:50 PM
To: Stephen Carroll stephen.carroll@aon.com

fyi...

WHY DOESN'T ARETHA PAY HER BILLS?
THE WORLD KNOWS FRANKLIN IS RICH, FAMOUS, A GREAT SINGER, A DETROIT ICON. BUT BAD CREDIT IS TARNISHING HER GOLDEN LUSTER.

Byline/Affiliation:
DAVID ZEMAN, BRIAN MCCOLLUM AND L.L. BRASIER
Free Press Staff Writers

PubDate: Monday, 2/15/1999

Aretha Franklin has won more Grammys than any woman and was among the first inductees into the Rock and Roll Hall of Fame. She owns grand homes in Detroit's posh suburbs and has earned millions from recordings, concerts, films and book contracts.

So why won't she pay her plumber?

Or her florist? Or, for that matter, her caterer, dentists, accountants, lawyers, songwriter, music arranger, moving company, landlords, dressmaker, limo drivers, tax collectors, landscaper, home inspector or even the guardian for her mentally ill son?

Since 1988, more than 30 lawsuits have been filed against Franklin in Oakland and Wayne counties by people seeking payment on bills. In most cases, Franklin paid only after being taken to court, most recently in January.

She and her aides tried to avoid some suits, turning away process servers from palatial homes in Bloomfield Hills and Bloomfield Township. Some creditors gave up. In other cases, Franklin ignored court judgments, forcing them to seek liens on homes or assets.

"I made it as easy for her as I could," Dean Pitcairn, former owner of Hilton Limousine in Ferndale, said of his suit to recoup nearly $1,900 from Franklin in 1991.

"I think it was the type of thing where they felt if they prolonged it long enough, we would forget about them. It just made me mad because everyone thinks she's a big hero, and she doesn't think twice about stepping on little people."

Franklin, her lawyers and publicists declined to be interviewed for this article, though one noted that Franklin gives generously to good causes.

And that's the puzzle: that a woman who regularly contributes her time and talents to charity, a beloved star with roots in gospel music, can show such disregard for those she owes money to.

While some creditors dismiss Franklin as a spoiled diva, those who have known her for years say the answer is more complicated -- that her lapses may be explained by a distrust of outsiders and deep personal loss.

"She's a wonderful artist who shouldn't be handling her own business, but she does," said Wayne County Circuit Judge Harvey Tennen, who represented Franklin in the 1980s and believes she is overwhelmed by her financial affairs.

"She just doesn't have time for it and she doesn't realize the kind of bad press she gets from not dealing with things like that. She needs a manager, she needs a lawyer, she needs professionals. But she usually doesn't talk to them until it's too late."

Franklin's reputation as a mercurial and enigmatic personality is a common, if hushed, topic in the music industry.

In 1988, Franklin failed to show up to sing for the second of singer George Michael's concerts at the Palace. Four years earlier, she backed out of a Broadway musical based on the life of Mahalia Jackson, for which a judge later ordered her to pay $230,000 to the show's producer.

Franklin has also sometimes chewed out musicians -- onstage -- during concerts when she felt their playing wasn't up to snuff.

Many industry insiders requested anonymity for this article because, despite her financial reputation, the music superstar is viewed in Detroit with honor, even reverence. Unlike many Detroiters who became celebrities and left

even reverence. Unlike many Detroiters who became celebrities and left, Franklin has lived in the area nearly all her life and is beloved by its residents. It's that same hometown clout, some say, that has allowed her to ignore some debts.

"That was her style. She was above all the mundane activity of paying bills," said David Greenbaum, Franklin's accountant until 1992, when his firm sued Franklin. "She was an artist."

Possible reasons

Tennen and others say Franklin, 56, won't delegate her business affairs because she finds it difficult to trust others. It's a wariness, they say, born of a failed first marriage -- which reportedly included physical abuse -- and exposure to the music industry at a young age. "People have taken advantage of her her whole life," Tennen said.

Others say Franklin assumed more control of her finances after the loss of her father and brother, who served as protective and guiding figures in her career and business affairs.

The Rev. C.L. Franklin died in 1984 after several years in a coma. Aretha Franklin, who returned to Detroit from Los Angeles to be with him, is said to have spent more than $300,000 on his care. Brother-manager Cecil Franklin died in 1989.

"When the two people you trust and count on are gone, suddenly you're on your own," said Larry Robinson, owner of God's World record store in Detroit. "And suddenly you're working in areas you don't care much about. You love to sing -- not do taxes."

In 1996, Robinson's store helped sell tickets for a Christmas concert Franklin hosted at her late father's New Bethel Baptist Church. Because of a miscalculation by Franklin and church staff, about 1,000 extra tickets were sold -- at $17.50 each -- leaving a seething swarm of gospel lovers literally out in the cold.

Some people say such goof-ups can be blamed on the flimsy infrastructure of Franklin's camp, a loose-knit coterie of attorneys, publicists and personal coordinators who leave many details in Franklin's hands.

"She really needs somebody else to serve as a buffer," Robinson said. "She's not a bad person. But when you're trying to play every position on the team -- catching and throwing -- it's going to be rough."

Speculation over Franklin's failure to pay bills has become something of a parlor game among the people who have sued her. Her creditors are like a loosely constructed support group; they make condolence calls to new members and swap stories about efforts to collect from the singer.

Rather small amounts

It's not unusual for celebrities to be magnets for lawsuits from plaintiffs looking for a big payday. But the majority of cases against Franklin are for less than $4,000.

And in interviews with more than 20 people who have sued Franklin, some said they were reluctant plaintiffs. It was not merely the expense of litigation that bothered them. Manysaid they were fans of Franklin and admired her contributions to music and to Detroit.

Frank Winton, who owned Mark of Excellence Catering in Southfield, sued Franklin in 1988 over a $2,300 bill for four parties, including one for her birthday. He put off suing for months and hesitated to mention the debt when he saw her at social functions.

"She did a lot of charity work, and I didn't want to embarrass her," Winton said.

Other creditors waited years.

In 1994, Franklin booked seven rooms at the Westin Hotel in Detroit for a scholarship dinner. When her credit-card company wouldn't pay, the hotel sent invoices to Franklin.

In 1997 -- 28 months later -- the Westin sued. The hotel needed a judge's help to reach Franklin, who avoided a process server. She was later ordered to pay $1,068. She didn't. Westin tried in vain to seize Franklin's wages from Arista, her record label. A Westin lawyer declined to say if Westin ever collected.

Other creditors said their respect for Franklin dissolved when it became clear she would not pay.

"Hey, she should have to pay her bills like everyone else," said Bob Beutel of All Star Limousine in Royal Oak, which recently collected a $3,652 bill from last summer. Beutel said competitors warned him about Franklin. He said his own lawyer told him, "It's not a matter of if, it's just a matter of when she's going to stiff you."

So every time Franklin used All Star, the driver made her sign a contract promising that if her bill went to court she would pay All Star's legal fees. It did, and she did.

Even so, Beutel said, chasing old bills can wear on a small business.

"How'd you like to go two weeks without being paid? And now you have to bug people about money and they tell you, 'Hey, I'll give it to you next week,' and they don't?"

Discounts, too

Some merchants felt betrayed after babying Franklin with sweet deals, liberal credit or rushed deliveries.

"We gave her a great price," said Bruce Bolton of Breath of Spring Florist in Bloomfield Hills, which sued over $1,111 for flowers sent to a 1995 Christmas party.

"Sometimes, you write these things off," he said. "But I think I just felt

that she does this to so many people and I didn't want to be among the people she did it to."

In 1988, Orville Brown of Flatrock Bagging rushed a special order of white sand to her swimming pool for a luau. His lawyer said Brown also gave the singer a discount. Invoices were mailed later, with no response.

"Flatrock Bagging is a family-owned deal," said the attorney, Murdoch Hertzog. "This guy is just good as gold. Here he went out of his way to help her make a fine, wonderful event -- and he got stuck."

And then there is attorney Suzanne Dreifus, who in 1989 was appointed guardian for Franklin's adult son, Clarence, a chronic paranoid schizophrenic. Two years later, when Franklin fell more than $10,000 behind in paying Dreifus for finding foster homes for her son, visiting him and arranging for his medical care, Dreifus sued.

"Her attorney simply said to me, 'She's not going to pay you,' " Dreifus recalled. Dreifus called her own lawyer. "I told him if they come up with 10 cents less, don't even call me.... It was a matter of principle."

But the Aretha Franklin creditors describe is not the woman Tennen, her former lawyer, knows.

Tennen was introduced to Franklin in the early 1980s by her brother,Cecil.

When Franklin asked Tennen to represent her, he told her he had never

represented an entertainer.

"So she bought two sets of encyclopedias on entertainment law and gave one to

me," Tennen said. "And she said to me, 'We'll learn together, Harvey.' "

"I was always honored to represent her," he said.

"On the other hand, she needed help."

Brian McCollum
Music Writer
Detroit Free Press

313-223-4450

(Note new office address)
160 W. Fort St.
Detroit, MI 48226
thank you.

-alan

---

phone: 323 988 9692

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: 2700815 Amazing Grace
Date: March 14, 2016 at 2:41 PM
To: Stephen Carroll stephen.carroll@aon.com

hey stephen

has hiscox taken a position re point #2 (below)?

thank you.

-alan

---
phone: 323 988 9692
peace and love.

Begin forwarded message:

> **From:** "alan elliott (ucla)" <alanelliott@g.ucla.edu>
> **Date:** March 2, 2016 at 1:08:14 PM PST
> **To:** Stephen Carroll <stephen.carroll@aon.com>
> **Subject: Re: 2700815 Amazing Grace**
>
> hi stephen:
>
> i have a couple items i could use your help with please:
>
> 1) i will send you a note about previous coverage re: the chubb group. (it'll be the next email i send to you).
>
> 2) something i'd like to go back to hiscox on:
>
> the warner seven arts contract which we asked hiscox to vet (see below).
>
> the contract has an indemnification page (page two: http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20(Atlantic%20and%20Warner%20Bros.%20Seven%20Arts).pdf).
>
> i would like, as was discussed, ask the insurer to go to atlantic records for reimbursement. the contract reads (page 2 of the aretha/warner seven arts personal service agreement):
>
> "To Warner Bros.- Seven Arts, Inc…" (from whom i have quitclaim)
>
> "…in consideration thereof and as an inducement for you so to do, we do hereby undertake and agree to hold and save you harmless of, from and against any loss, cost, damage or expense which may arise or result from said agreement, and we further agree that we will, upon demand, reimburse you for any cost, liability, or expense which you may incur or any payment which you make in accordance with, or as a result of, such agreement.
>
> - ATLANTIC RECORDING CORPORATION"
>
> because the indemnification and contract are vetted and not excluded, i want hiscox to be put on notice and to start with the process of doing good on the claim.
>
> thank you.
>
> -alan
>
> **---**
> **phone: 323 988 9692**
> **peace and love.**
>
> **http://songsoundrecord.tumblr.com**
>
> > Begin forwarded message:
> >
> > **From:** Stephen Carroll <stephen.carroll@aon.com>
> > **Date:** July 13, 2015 at 8:12:25 AM PDT
> > **To:** "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>
> > **Cc:** Annette Shavuo <annette.shavuo@aon.com>
> > **Subject: FW: 2700815 Amazing Grace**

See comments from underwriter at Hiscox. Let me know if you have any questions.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: Richardson Joanne [mailto:Joanne.Richardson@Hiscox.com]
Sent: Monday, July 13, 2015 11:02 AM
To: Stephen Carroll
Cc: Annette Shavuo
Subject: 2700815 Amazing Grace

Per the insured's request, I want to confirm that we aware of the contract attached and that the insured is relying on this contract/document to make this film. We have vetted it's validity and are satisfied it is acceptable and therefore have not placed any special exclusions on the policy that would prohibit coverage under the policy . Of course, there are standard insurance policy terms, conditions and exclusion that apply regardless and we could never confirm or deny any coverage in advance as each and every claims sencerio is unique and must be evaluated on the specific facts and circumstances of the case. But again, the quote does not contain a chain of tile exclusion or any other specific exclusion involving this project and we recognize the Atlantic records indemnification letter in the Warner contract to be valid. Please note we have not yet cleared the title, as a title report and legal opinion has not been received to date.

Please let me know if you have any further questions.

Best,
Joann

Joanne Richardson, CPCU
Media & Entertainment Practice Leader
Hiscox Partner
Hiscox USA
T 646.452.2355
M 646.823.8092
joanne.richardson@hiscox.com
Connect with Hiscox online
Web www.hiscoxbroker.com
Twitter @Hiscox_USA

<image003.png>

From: Stephen Carroll [mailto:stephen.carroll@aon.com]
Sent: Thursday, July 09, 2015 3:11 PM

Sent: Thursday, July 09, 2015 3:11 PM
To: Richardson Joanne
Cc: Annette Shavuo
Subject: FW: Favorites

Attached is the contract Alan Elliott at Amazing Grace wanted you to acknowledge. I will be sending a bind order to you shortly.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Thursday, July 09, 2015 2:37 PM
To: Stephen Carroll
Subject: Favorites

http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20(Atlantic%20and%20Warner%20Bros.%20Seven%20Arts).pdf

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<4-1-1968 Aretha Franklin Recording Agreement (Atlantic and Warner Bros. Seven Arts).pdf>

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 29, 2015 at 1:37 PM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com, Todd W. Musburger todd@musburger.com

hello annette

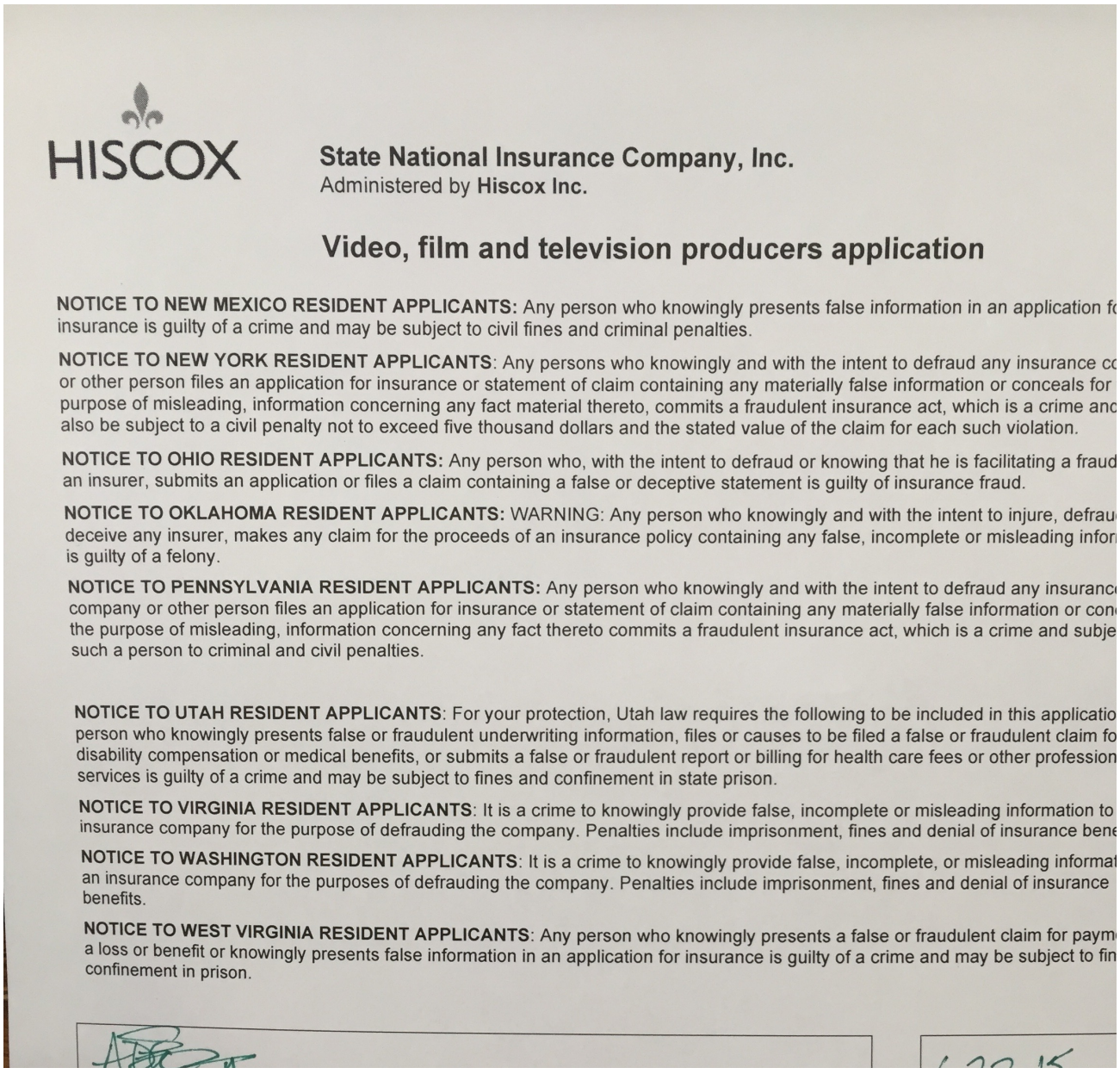
attached is the signed copy and application. still outstanding is:

- the corbis stock shot
- publishing rights (i should have in next two weeks)

thank you.

-alan

amazing grace App- R...03.doc



HISCOX

State National Insurance Company, Inc.
Administered by **Hiscox Inc.**

Video, film and television producers application

NOTICE TO NEW MEXICO RESIDENT APPLICANTS: Any person who knowingly presents false information in an application fo insurance is guilty of a crime and may be subject to civil fines and criminal penalties.

NOTICE TO NEW YORK RESIDENT APPLICANTS: Any persons who knowingly and with the intent to defraud any insurance co or other person files an application for insurance or statement of claim containing any materially false information or conceals for purpose of misleading, information concerning any fact material thereto, commits a fraudulent insurance act, which is a crime and also be subject to a civil penalty not to exceed five thousand dollars and the stated value of the claim for each such violation.

NOTICE TO OHIO RESIDENT APPLICANTS: Any person who, with the intent to defraud or knowing that he is facilitating a fraud an insurer, submits an application or files a claim containing a false or deceptive statement is guilty of insurance fraud.

NOTICE TO OKLAHOMA RESIDENT APPLICANTS: WARNING: Any person who knowingly and with the intent to injure, defrau deceive any insurer, makes any claim for the proceeds of an insurance policy containing any false, incomplete or misleading infor is guilty of a felony.

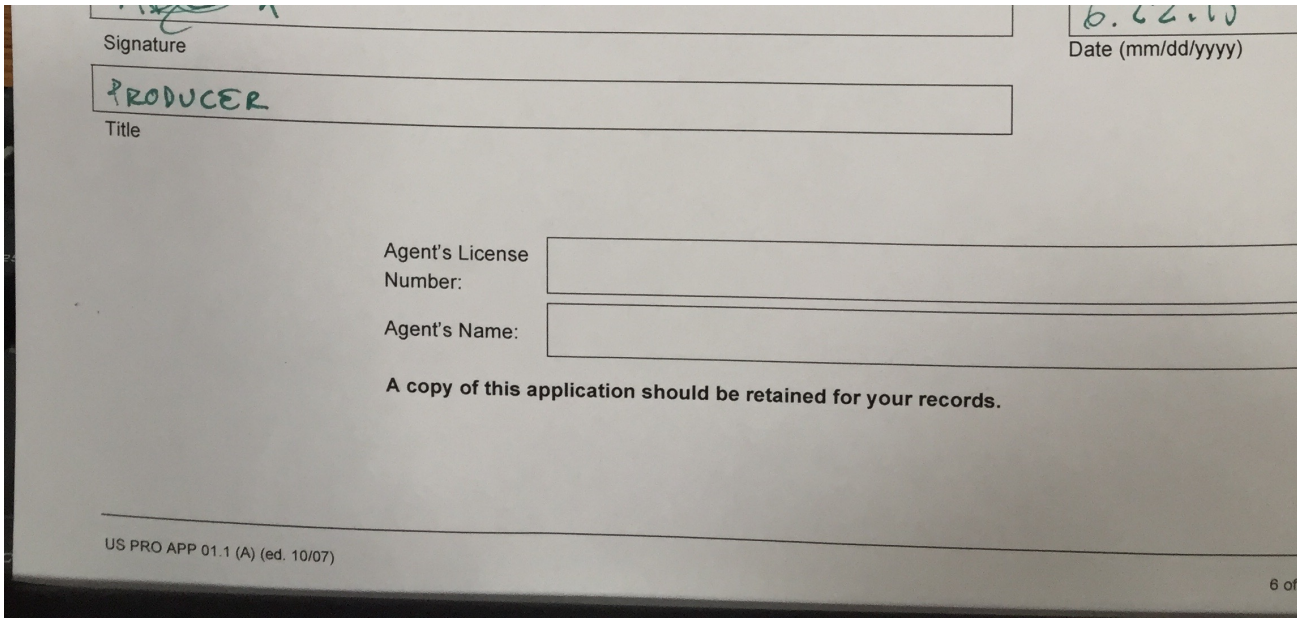
NOTICE TO PENNSYLVANIA RESIDENT APPLICANTS: Any person who knowingly and with the intent to defraud any insurance company or other person files an application for insurance or statement of claim containing any materially false information or con the purpose of misleading, information concerning any fact thereto commits a fraudulent insurance act, which is a crime and subje such a person to criminal and civil penalties.

NOTICE TO UTAH RESIDENT APPLICANTS: For your protection, Utah law requires the following to be included in this applicatio person who knowingly presents false or fraudulent underwriting information, files or causes to be filed a false or fraudulent claim fo disability compensation or medical benefits, or submits a false or fraudulent report or billing for health care fees or other profession services is guilty of a crime and may be subject to fines and confinement in state prison.

NOTICE TO VIRGINIA RESIDENT APPLICANTS: It is a crime to knowingly provide false, incomplete or misleading information to insurance company for the purpose of defrauding the company. Penalties include imprisonment, fines and denial of insurance bene

NOTICE TO WASHINGTON RESIDENT APPLICANTS: It is a crime to knowingly provide false, incomplete, or misleading informat an insurance company for the purposes of defrauding the company. Penalties include imprisonment, fines and denial of insurance benefits.

NOTICE TO WEST VIRGINIA RESIDENT APPLICANTS: Any person who knowingly presents a false or fraudulent claim for paym a loss or benefit or knowingly presents false information in an application for insurance is guilty of a crime and may be subject to fin confinement in prison.


Signature

Date (mm/dd/yyyy)

PRODUCER

Title

Agent's License Number:

Agent's Name:

A copy of this application should be retained for your records.

US PRO APP 01.1 (A) (ed. 10/07)

6 of

---

phone: 323 988 9692

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> On Jul 22, 2015, at 12:32 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:
>
> Alan,
>
> The Errors & Omissions' for **"Amazing Grace"** is bound for the period of 7/21/2015 to 7/21/2018. Here's a copy of the signed binder for your files.
>
> Once the following subjectivities have been satisfactorily met, the underwriter will issue the policy:
>
> 1. Currently signed and dated application, by July 29, 2015 – attached application was not signed.
>
> 2. Per Q# 22 on the application, confirmation that:
>
> 1) the stock shot" of Los Angeles which comes from Corbis has been finalized and all rights obtained
> 2) the publishing of some songs you mention have yet to be negotiated have all been finalized and all music rights have been obtained.
>
> Upon receipt and review of this we can consider removing the exclusion.
>
> Thank you

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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<Binder - EO - 15-18 Amazing Grace.pdf><App- REVISED Q#22 -E&O Video Film and Television Producers Application Admitted_Word1203.doc>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 29, 2015 at 1:37 PM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com, Todd W. Musburger todd@musburger.com

hello annette

attached is the signed copy and application. still outstanding is:

- the corbis stock shot
- publishing rights (i should have in next two weeks- still

thank you.

-alan

amazing grace App- R...03.doc
Downloading...

IMG_8348 (2).jpg
Downloading...

---

phone: 323 988 9692

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> On Jul 22, 2015, at 12:32 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:
>
> Alan,
>
> The Errors & Omissions' for **"Amazing Grace"** is bound for the period of 7/21/2015 to 7/21/2018. Here's a copy of the signed binder for your files.
>
> Once the following subjectivities have been satisfactorily met, the underwriter will issue the policy:
>
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>
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> 2) the publishing of some songs you mention have yet to be negotiated have all been finalized and all music rights have been obtained.

Upon receipt and review of this we can consider removing the exclusion.

Thank you

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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<Binder - EO - 15-18 Amazing Grace.pdf><App- REVISED Q#22 -E&O Video Film and Television Producers Application Admitted_Word1203.doc>

From: **Larry Blake** larry.blake@concordmusicgroup.com
Subject: Amazing Grace / E&O Policy
Date: July 11, 2016 at 3:34 PM
To: stephen.carroll@aon.com
Cc: alan elliott (ucla) alanelliott@g.ucla.edu

LB

Hi Stephen:

Alan Elliott asked me to call you. I got your voicemail when I called about 50 minutes ago.

Please advise as to your available times for you and I to talk.

Thanks,

Larry

Larry Blake
Chief Legal & Business Affairs Officer
Concord Bicycle Music
100 N. Crescent Dr., Garden Level
Beverly Hills, CA 90210
Larry.Blake@concordmusicgroup.com
(O)310.385.4205

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Amazing Grace
Date: March 4, 2015 at 12:23 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Ramona V. Horne ramona.horne@aon.com, George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk, Todd W. Musburger todd@musburger.com

hey stephen

we are checking in re policy.

please let us know.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Feb 27, 2015, at 1:42 PM, Stephen Carroll <stephen.carroll@aon.com> wrote:

> Thank you…I have forwarded info to underwriters
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> Cell: 914-589-2474
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, February 27, 2015 3:50 PM
> **To:** Stephen Carroll
> **Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
> **Subject:** Re: Amazing Grace
>
> hi stephen
>
> please see answers below.
>
> > On Feb 27, 2015, at 11:22 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
> >
> > So after all this time my underwriter finally responded to the submission and had the following questions. I apologize but would appreciate any clarification you can provide:
> >
> > 1. Is this a documentary, music video or something else?

documentary

2. What is the anticipated distribution/dissemination? theatrical release, TV special, etc…?

theatrical, vod, dvd, television

3. Was it previously produced and released and now they're re-releasing it?

it was (technically) produced by warners.

elements of the project have been released at least twice that we know of:

1) the atlantic 25th anniversary film, made with braverman productions <image001.png>
2) aretha franklin; the queen of soul (august 22, 1988)
(http://www.imdb.com/title/tt0210537/)

4. If not previously released please advise who produced it and who currently owns the copyright and what agreements are in place with this applicant.

the current iteration of the footage is owned by me with quitclaim from warner bors. films.

5. Did they obtain rights from Warner Brothers?

yes.

6. Did they obtain rights from Atlantic Records?

none needed, as per atlantic/warner music group.

7. Did Aretha Franklin participate in this production?

yes

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
Cell: 914-589-2474
Fax: 847-953-2692

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 31, 2017 at 7:57 AM
To: Laura Comerford laura.comerford@aon.com
Cc: Maria Clark maria.clark@aon.com

hello laura and maria

can we get a timeline on an answer if not... maybe an actual answer please?

thank you.

-alan

---
phone: 323 988 9692

peace and love.

On May 23, 2017, at 1:51 PM, Laura Comerford <laura.comerford@aon.com> wrote:

> Maria have you heard anything from Hiscox?
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Tuesday, May 23, 2017 1:53 PM
> **To:** Laura Comerford
> **Cc:** Maria Clark
> **Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
>
> hi laura and maria
>
> i am checking up in this. please let me know.
>
> thank you.
>
> -alan
>
> ---
> phone: 323 988 9692
>
> peace and love.
>
> On May 16, 2017, at 10:31 AM, Laura Comerford <laura.comerford@aon.com> wrote:
>
> > Maria is sending to Hiscox and I spoke with the underwriter to let her know that you want them to reconsider the claim. We will make sure you are copied in their response.

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 16, 2017 1:11 PM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i wanted to check in and see where we are on this.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

> On May 12, 2017, at 11:37 AM, Laura Comerford <laura.comerford@aon.com> wrote:
>
> Thanks Alan.
>
> Maria call me when you have a chance.
>
> Laura
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401

171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Friday, May 12, 2017 1:24 PM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

Dear Laura,
I request that AON go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015.
When Hiscox declined coverage, it was because Hiscox claimed I had, after intensive vetted phone calls, emails and discussions with both Hiscox and with AON, failed to disclose previous issues with Ms. Franklin and that I answered the following question incorrectly:
"Have you suffered any loss or has any claim, whether successful or not, ever been made against you that would be covered by this insurance."
Hiscox and AON specifically directed me to answer the question "no." In discussions I had with both Hiscox's counsel Ted Gerdes, as well as AON's Stephen Carroll, we specifically reviewed the 2011 lawsuit and the personal service contract obtained in 2013 when considering how to answer the question. Thus, the answer was discussed and deliberated with both the carrier and the broker.
Because of the 2013 discovery of the personal service contract, AON/Hiscox vetted the contract and when the question came up, everyone was aware of the prior issues and they were satisfied with the enforceability of the personal service contract, which was evinced in the answer.
Coinciding with the time of Hiscox's exclusion of Aretha Franklin in 2015, I made a deal with Ms. Franklin's counsel that would nullify any issues. Because of this deal, I did not fight Hiscox.
However, after more than 15 months of negotiations, Ms. Franklin has declined two fully negotiated contracts that were approved and generated by and with her counsel. Both offers were OVER and above what Ms. Franklin and her counsel asked for. Ms. Franklin has since fired her counsel and I have no hope that she will accept any offer. Because Ms. Franklin refuses to negotiate any further, this leaves me no other option but to reopen the case in Denver.
The fundamental and virtually singular reason for my Hiscox insurance was because of Ms. Franklin's volatility. Insurance would allow me to defend and enforce Ms. Franklin's contract, which was recently discovered (in 2013) by Warner Films. Hiscox directed me to discuss these matters with Ted Gerdes, I specifically told Mr. Gerdes about the 2011 lawsuit, providing him with links in emails to the "cease and desist" settlement which resulted from the lawsuit.
As this film deals with one of the more well known personalities in the world in Ms. Franklin, a woman who is known for her controversial and public disposition and litigious behavior, it is not credible that Hiscox can say, after the intensive application process that we went through, that they had no knowledge.
To remind from where the confusion/untangling emanated:
In 2011, Ms. Franklin filed a very public lawsuit against me, preventing the film from being exhibited.
In 2013, Warner Films discovered Ms. Franklin's personal service contract,

which plainly allowed me to distribute the film.
The 2011 lawsuit was settled out of court, I suffered no loss. This 2011 claim was not something that would be covered by this insurance as we now had a signed contract from Ms. Franklin, one that had been used to make and distribute the film.
Importantly, all communications were done with knowledge by Hiscox/AON that the personal service contract and specifically the “indemnification letter” on page 2 of Ms. Franklin's personal service contract (which states: “We do hereby undertake and agree to hold and save you harmless of, from and against any loss, cost, damage or expense which may arise or result from said agreement, and we further agree that we will, upon demand, reimburse you for any cost, liability, or expense which you may incur or any payment which you make in accordance with, or as a result of, such agreement.”) would serve as the “insurance for the insurance."
The muddiness of these events (Ms. Franklin suing me and hoping I would never find- or enforce her personal service contract) led my counsel and AON/Hiscox to dutifully consider the question, and it is disingenuous for Hiscox to claim otherwise.
Thank you.
Alan
---

phone: 323 988 9692

peace and love.

> On May 9, 2017, at 12:40 PM, Laura Comerford <laura.comerford@aon.com> wrote:
>
> Hi Alan
>
> Per our conversation, you would like to go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015. Please confirm via this e-mail and provide any new details and reason behind your disagreement with carrier, specifically that the claim presented was not related to the 2011 claim and why. Maria will then get in contact with Hiscox and see what they say.
>
> Thanks,

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **Maria Clark** maria.clark@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 31, 2017 at 9:28 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Laura Comerford laura.comerford@aon.com

MC

Hi Alan,

Please be advised that Hiscox sent your request out to coverage counsel and expects to get a response back in the next couple of weeks.

As soon as we hear back from them, we will advise you of their determination.

Thank you.

Sincerely,
Maria Clark | Claims Manager

AON/Albert G. Ruben Company (New York) Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Tel: 212-463-5583 | Main Tel: 212-627-7400
Direct Fax: 847-953-0892
Email: maria.clark@aon.com

****

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Before you print, think about the ENVIRONMENT

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, May 31, 2017 10:57 AM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hello laura and maria

can we get a timeline on an answer if not... maybe an actual answer please?

thank you.

-alan

---

phone: 323 988 9692

peace and love.

On May 23, 2017, at 1:51 PM, Laura Comerford <laura.comerford@aon.com> wrote:

> Maria have you heard anything from Hiscox?
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Tuesday, May 23, 2017 1:53 PM
> **To:** Laura Comerford
> **Cc:** Maria Clark
> **Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
>
> hi laura and maria
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> i am checking up in this. please let me know.
>
> thank you.
>
> -alan
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171 Madison Avenue, Suite 401
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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

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From: **laura comerford** laura.comerford@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 1, 2017 at 12:41 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Maria Clark maria.clark@aon.com
Cc: Todd W. Musburger todd@musburger.com

LC

Hi Alan

Maria will pass on to Hiscox but per her e-mail yesterday, they advised it is with coverage counsel and will probably be a couple of weeks before we hear back.

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Thursday, June 01, 2017 1:57 PM
To: Laura Comerford; Maria Clark
Cc: Todd W. Musburger
Subject: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i want you, as my insurance brokers, to have the following. (see below.)

this case is now becoming EXTREMELY time sensitive as scheduling to make certain deadlines for the fall are now coming on.

if there???s any way to get an answer asap from hiscox, that is very much appreciated.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: Steven Zansberg <SZansberg@lskslaw.com>
Subject: Franlkin v. Elliott
To: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>

Alan:

Attached for your review:

> The DRAFT of the letter I propose to send to Reid Neureiter, after your and Larry???s review and edits, and after I give Reid a ???heads up??? courtesy call that it is coming his way.
>
> Please let me know if you???d like to schedule a call, tomorrow afternoon or Thursday, to discuss these.
>
> Best regards,
> Steve

Steven D. Zansberg

LSKS LEVINE SULLIVAN KOCH & SCHULZ, LLP

1888 Sherman Street
Suite 370
Denver, CO 80203
(303) 376-2409 | Phone
(303) 376-2401 | Fax
www.lskslaw.com

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Cc: Maria Clark maria.clark@aon.com

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Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 1, 2017 at 12:42 PM
To: laura comerford laura.comerford@aon.com
Cc: Maria Clark maria.clark@aon.com, Todd W. Musburger todd@musburger.com

ok.

i want to add that it appears ms. franklin has taken ill and i would like to make all best efforts (as per the email) with full coverage to engage her while she is still able.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

> On Jun 1, 2017, at 12:41 PM, Laura Comerford <laura.comerford@aon.com> wrote:
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> Hi Alan
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> Maria will pass on to Hiscox but per her e-mail yesterday, they advised it is with coverage counsel and will probably be a couple of weeks before we hear back.
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> Laura
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Thursday, June 01, 2017 1:57 PM
> **To:** Laura Comerford; Maria Clark
> **Cc:** Todd W. Musburger
> **Subject:** amazing grace; 27700815 - E&O - Aretha Franklin Claim
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phone: 323 988 9692

peace and love.

Begin forwarded message:

From: Steven Zansberg <SZansberg@lskslaw.com>
Subject: Franlkin v. Elliott
To: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>

Alan:

Attached for your review:

> The DRAFT of the letter I propose to send to Reid Neureiter, after your and Larry???s review and edits, and after I give Reid a ???heads up??? courtesy call that it is coming his way.
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> Please let me know if you???d like to schedule a call, tomorrow afternoon or Thursday, to discuss these.
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> Best regards,
> Steve
>
> Steven D. Zansberg

<image001.jpg>

1888 Sherman Street
Suite 370
Denver, CO 80203
(303) 376-2409 | Phone
(303) 376-2401 | Fax
www.lskslaw.com

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 23, 2017 at 10:53 AM
To: Laura Comerford laura.comerford@aon.com
Cc: Maria Clark maria.clark@aon.com

hi laura and maria

i am checking up in this. please let me know.

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> **phone: 323 988 9692**
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Maria call me when you have a chance.

Laura

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Sent: Friday, May 12, 2017 1:24 PM
To: Laura Comerford
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Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

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Thank you.
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Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

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phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

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phone: 323 988 9692

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 16, 2017 at 9:01 AM
To: Laura Comerford laura.comerford@aon.com
Cc: Maria Clark maria.clark@aon.com, Todd W. Musburger todd@musburger.com

hi laura

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<image001.jpg>

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From: **Laura Comerford** laura.comerford@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 23, 2017 at 1:51 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Maria Clark maria.clark@aon.com

LC

Maria have you heard anything from Hiscox?

Laura R. Comerford
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Direct Phone: 212-337-4354

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From: **Laura Comerford** laura.comerford@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 19, 2017 at 7:28 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Maria Clark maria.clark@aon.com, Todd W. Musburger todd@musburger.com

LC

Maria is back from vacation today and she will be checking her e-mails and will advise of any response.

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Friday, June 16, 2017 12:02 PM
To: Laura Comerford
Cc: Maria Clark; Todd W. Musburger
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

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From: **Maria Clark** maria.clark@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 23, 2017 at 2:26 PM
To: Laura Comerford laura.comerford@aon.com, alan elliott (ucla) alanelliott@g.ucla.edu

MC

I have not heard back. I will follow up with them.

Sincerely,
Maria Clark | Claims Manager

AON/Albert G. Ruben Company (New York) Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Tel: 212-463-5583 | Main Tel: 212-627-7400
Direct Fax: 847-953-0892
Email: maria.clark@aon.com

****

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

Before you print, think about the ENVIRONMENT

From: Laura Comerford
Sent: Tuesday, May 23, 2017 4:51 PM
To: alan elliott (ucla)
Cc: Maria Clark
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim

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As this film deals with one of the more well known personalities in the world in Ms. Franklin, a woman who is known for her controversial and public disposition and litigious behavior, it is not credible that Hiscox can say, after the intensive application process that we went through, that they had no knowledge.
To remind from where the confusion/untangling emanated:
In 2011, Ms. Franklin filed a very public lawsuit against me, preventing the film from being exhibited.
In 2013, Warner Films discovered Ms. Franklin's personal service contract, which plainly allowed me to distribute the film.
The 2011 lawsuit was settled out of court, I suffered no loss. This 2011 claim was not something that would be covered by this insurance as we now had a signed contract from Ms. Franklin, one that had been used to make and distribute the film.
Importantly, all communications were done with knowledge by Hiscox/AON that the personal service contract and specifically the "indemnification letter" on page 2 of Ms. Franklin's personal service contract (which states: "We do hereby undertake and agree to hold and save you harmless of, from and against any loss, cost, damage or expense which may arise or result from said agreement, and we further agree that we will, upon demand, reimburse you for any cost, liability, or expense which you may incur or any payment which you make in accordance with, or as a result of, such agreement.") would serve as the "insurance for the insurance."
The muddiness of these events (Ms. Franklin suing me and hoping I would never find- or enforce her personal service contract) led my counsel and AON/Hiscox to dutifully consider the question, and it is disingenuous for Hiscox to claim otherwise.
Thank you.
Alan

---

phone: 323 988 9692

peace and love.

> On May 9, 2017, at 12:40 PM, Laura Comerford <laura.comerford@aon.com> wrote:
>
> Hi Alan
>
> Per our conversation, you would like to go

back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015. Please confirm via this e-mail and provide any new details and reason behind your disagreement with carrier, specifically that the claim presented was not related to the 2011 claim and why. Maria will then get in contact with Hiscox and see what they say.

Thanks,

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **Maria Clark** maria.clark@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 19, 2017 at 1:38 PM
To: Laura Comerford laura.comerford@aon.com, alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Todd W. Musburger todd@musburger.com

MC

Hi Alan,

I sent a follow up note to the Hiscox adjuster requesting an update of coverage counsel's review.

I will advise once I hear back from her.

Thank you.

Sincerely,
Maria Clark | Claims Manager

AON/Albert G. Ruben Company (New York) Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Tel: 212-463-5583 | Main Tel: 212-627-7400
Direct Fax: 847-953-0892
Email: maria.clark@aon.com

****

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

Before you print, think about the ENVIRONMENT

From: Laura Comerford
Sent: Monday, June 19, 2017 10:29 AM
To: alan elliott (ucla)
Cc: Maria Clark; Todd W. Musburger
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim

Maria is back from vacation today and she will be checking her e-mails and will advise of any response.

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016

New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Friday, June 16, 2017 12:02 PM
To: Laura Comerford
Cc: Maria Clark; Todd W. Musburger
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura

i am checking in to see if there is any response. please let me know.

thank you.

-alan

---
phone: 323 988 9692

peace and love.

On Jun 1, 2017, at 12:41 PM, Laura Comerford <laura.comerford@aon.com> wrote:

> Hi Alan
>
> Maria will pass on to Hiscox but per her e-mail yesterday, they advised it is with coverage counsel and will probably be a couple of weeks before we hear back.
>
> Laura
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Thursday, June 01, 2017 1:57 PM
> **To:** Laura Comerford; Maria Clark
> **Cc:** Todd W. Musburger
> **Subject:** amazing grace; 27700815 - E&O - Aretha Franklin Claim
>
> hi laura and maria

i want you, as my insurance brokers, to have the following. (see below.)

this case is now becoming EXTREMELY time sensitive as scheduling to make certain deadlines for the fall are now coming on.

if there???s any way to get an answer asap from hiscox, that is very much appreciated.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: Steven Zansberg <SZansberg@lskslaw.com>
Subject: Franlkin v. Elliott
To: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>

Alan:

Attached for your review:

> The DRAFT of the letter I propose to send to Reid Neureiter, after your and Larry???s review and edits, and after I give Reid a ???heads up??? courtesy call that it is coming his way.
>
> Please let me know if you???d like to schedule a call, tomorrow afternoon or Thursday, to discuss these.
>
> Best regards,
> Steve
>
> Steven D. Zansberg

<image001.jpg>

1888 Sherman Street
Suite 370
Denver, CO 80203
(303) 376-2409 | Phone
(303) 376-2401 | Fax
www.lskslaw.com

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 23, 2017 at 2:50 PM
To: Maria Clark maria.clark@aon.com
Cc: Laura Comerford laura.comerford@aon.com

thank you.

-alan

---
phone: 323 988 9692

peace and love.

On May 23, 2017, at 2:26 PM, Maria Clark <maria.clark@aon.com> wrote:

> I have not heard back. I will follow up with them.
>
> Sincerely,
> Maria Clark | Claims Manager
>
> _____
> AON/Albert G. Ruben Company (New York) Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Tel: 212-463-5583 | Main Tel: 212-627-7400
> Direct Fax: 847-953-0892
> Email: maria.clark@aon.com
>
> **********
> The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.
>
> Before you print, think about the ENVIRONMENT
>
> **From:** Laura Comerford
> **Sent:** Tuesday, May 23, 2017 4:51 PM
> **To:** alan elliott (ucla)
> **Cc:** Maria Clark
> **Subject:** RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
>
> Maria have you heard anything from Hiscox?
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 23, 2017 1:53 PM
To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i am checking up in this. please let me know.

thank you.

-alan

---
phone: 323 988 9692

peace and love.

On May 16, 2017, at 10:31 AM, Laura Comerford <laura.comerford@aon.com> wrote:

> Maria is sending to Hiscox and I spoke with the underwriter to let her know that you want them to reconsider the claim. We will make sure you are copied in their response.
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> Laura
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> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
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> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Tuesday, May 16, 2017 1:11 PM
> **To:** Laura Comerford
> **Cc:** Maria Clark
> **Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
>
> hi laura and maria
>
> i wanted to check in and see where we are on this.
>
> thank you

thank you.

-alan

---

phone: 323 988 9692

peace and love.

> On May 12, 2017, at 11:37 AM, Laura Comerford <laura.comerford@aon.com> wrote:
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> Thanks Alan.
>
> Maria call me when you have a chance.
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> Laura
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, May 12, 2017 1:24 PM
> **To:** Laura Comerford
> **Cc:** Maria Clark
> **Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
>
> Dear Laura,
> I request that AON go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015.
> When Hiscox declined coverage, it was because Hiscox claimed I had, after intensive vetted phone calls, emails and discussions with both Hiscox and with AON, failed to disclose previous issues with Ms. Franklin and that I answered the following question incorrectly:
> "Have you suffered any loss or has any claim, whether successful or not, ever been made against you that would be covered by this insurance."
> Hiscox and AON specifically directed me to answer the question "no." In discussions I had with both Hiscox's counsel Ted Gerdes, as well as AON's Stephen Carroll, we specifically reviewed the 2011 lawsuit and the personal service contract obtained in 2013 when considering how to answer the question. Thus, the answer was discussed and deliberated with both the carrier and the

broker.
Because of the 2013 discovery of the personal service contract, AON/Hiscox vetted the contract and when the question came up, everyone was aware of the prior issues and they were satisfied with the enforceability of the personal service contract, which was evinced in the answer.
Coinciding with the time of Hiscox's exclusion of Aretha Franklin in 2015, I made a deal with Ms. Franklin's counsel that would nullify any issues. Because of this deal, I did not fight Hiscox.
However, after more than 15 months of negotiations, Ms. Franklin has declined two fully negotiated contracts that were approved and generated by and with her counsel. Both offers were OVER and above what Ms. Franklin and her counsel asked for. Ms. Franklin has since fired her counsel and I have no hope that she will accept any offer. Because Ms. Franklin refuses to negotiate any further, this leaves me no other option but to reopen the case in Denver.
The fundamental and virtually singular reason for my Hiscox insurance was because of Ms. Franklin's volatility. Insurance would allow me to defend and enforce Ms. Franklin's contract, which was recently discovered (in 2013) by Warner Films. Hiscox directed me to discuss these matters with Ted Gerdes, I specifically told Mr. Gerdes about the 2011 lawsuit, providing him with links in emails to the "cease and desist" settlement which resulted from the lawsuit.
As this film deals with one of the more well known personalities in the world in Ms. Franklin, a woman who is known for her controversial and public disposition and litigious behavior, it is not credible that Hiscox can say, after the intensive application process that we went through, that they had no knowledge.
To remind from where the confusion/untangling emanated:
In 2011, Ms. Franklin filed a very public lawsuit against me, preventing the film from being exhibited.
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The 2011 lawsuit was settled out of court, I suffered no loss. This 2011 claim was not something that would be covered by this insurance as we now had a signed contract from Ms. Franklin, one that had been used to make and distribute the film.
Importantly, all communications were done with knowledge by Hiscox/AON that the personal service contract and specifically the "indemnification letter" on page 2 of Ms. Franklin's personal service contract (which states: "We do hereby undertake and agree to hold and save you harmless of, from and against any loss, cost, damage or expense which may arise or result from said agreement, and we further agree that we will, upon demand, reimburse you for any cost, liability, or expense which you may incur or any payment which you make in accordance with, or as a result of, such agreement.") would serve as the "insurance for the insurance."
The muddiness of these events (Ms. Franklin suing me and hoping I would never find- or enforce her personal service contract) led my counsel and AON/Hiscox to dutifully consider the question, and it is disingenuous for Hiscox to claim otherwise.
Thank you.
Alan
---

phone: 323 988 9692

peace and love.

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Hi Alan

Per our conversation, you would like to go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015. Please confirm via this e-mail and provide any new details and reason behind your disagreement with carrier, specifically that the claim presented was not related to the 2011 claim and why. Maria will then get in contact with Hiscox and see what they say.

Thanks,

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 25, 2017 at 8:55 AM
To: laura comerford laura.comerford@aon.com
Cc: Maria Clark maria.clark@aon.com

any response?

thank you.

-alan

---

phone: 323 988 9692

peace and love.

> On May 23, 2017, at 1:51 PM, Laura Comerford <laura.comerford@aon.com> wrote:
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> Maria have you heard anything from Hiscox?
>
> Laura R. Comerford
> Vice President
> Aon/Albert G. Ruben Insurance Services, Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Tuesday, May 23, 2017 1:53 PM
> **To:** Laura Comerford
> **Cc:** Maria Clark
> **Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
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Cc: Maria Clark
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Thank you.
Alan

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phone: 323 988 9692

peace and love.

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Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

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phone: 323 988 9692

peace and love.

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with the underwriting of my 2015-2018 policy.

please let me know.

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---

phone: 323 988 9692

peace and love.

From: **Maria Clark** maria.clark@aon.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 25, 2017 at 11:25 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Laura Comerford laura.comerford@aon.com

MC

Hi Alan,

The adjuster, Tara Bodden, who was assigned to the handling of this claim is in a mediation today. I forwarded her an e-mail following up for a response.

Thank you.

Sincerely,
Maria Clark | Claims Manager

AON/Albert G. Ruben Company (New York) Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Tel: 212-463-5583 | Main Tel: 212-627-7400
Direct Fax: 847-953-0892
Email: maria.clark@aon.com

****

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
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phone: **323 988 9692**

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Laura R. Comerford
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> Maria call me when you have a chance.
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> Direct Phone: 212-337-4354
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, May 12, 2017 1:24 PM

To: Laura Comerford
Cc: Maria Clark
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

Dear Laura,
I request that AON go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015.
When Hiscox declined coverage, it was because Hiscox claimed I had, after intensive vetted phone calls, emails and discussions with both Hiscox and with AON, failed to disclose previous issues with Ms. Franklin and that I answered the following question incorrectly: "Have you suffered any loss or has any claim, whether successful or not, ever been made against you that would be covered by this insurance."
Hiscox and AON specifically directed me to answer the question "no." In discussions I had with both Hiscox's counsel Ted Gerdes, as well as AON's Stephen Carroll, we specifically reviewed the 2011 lawsuit and the personal service contract obtained in 2013 when considering how to answer the question. Thus, the answer was discussed and deliberated with both the carrier and the broker.
Because of the 2013 discovery of the personal service contract, AON/Hiscox vetted the contract and when the question came up, everyone was aware of the prior issues and they were satisfied with the enforceability of the personal service contract, which was evinced in the answer.
Coinciding with the time of Hiscox's exclusion of Aretha Franklin in 2015, I made a deal with Ms. Franklin's counsel that would nullify any issues. Because of this deal, I did not fight Hiscox.
However, after more than 15 months of negotiations, Ms. Franklin has declined two fully negotiated contracts that were approved and generated by and with her counsel. Both offers were OVER and above what Ms. Franklin and her counsel asked for. Ms. Franklin has since fired her counsel and I have no hope that she will accept any offer. Because Ms. Franklin refuses to negotiate any further, this leaves me no other option but to reopen the case in Denver.
The fundamental and virtually singular reason for my Hiscox insurance was because of Ms. Franklin's volatility. Insurance would allow me to defend and enforce Ms. Franklin's contract, which was recently discovered (in 2013) by Warner Films. Hiscox directed me to discuss these matters with Ted Gerdes, I specifically told Mr. Gerdes about the 2011 lawsuit, providing him with links in emails to the "cease and desist" settlement which resulted from the lawsuit.
As this film deals with one of the more well known personalities in the world in Ms. Franklin, a woman who is known for her controversial and public disposition and litigious behavior, it is not credible that Hiscox can say, after the intensive application process that we went through, that they had no knowledge.
To remind from where the confusion/untangling emanated:
In 2011, Ms. Franklin filed a very public lawsuit against me, preventing the film from being exhibited.
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contract, which plainly allowed me to distribute the film.
The 2011 lawsuit was settled out of court, I suffered no loss. This 2011 claim was not something that would be covered by this insurance as we now had a signed contract from Ms. Franklin, one that had been used to make and distribute the film.
Importantly, all communications were done with knowledge by Hiscox/AON that the personal service contract and specifically the "indemnification letter" on page 2 of Ms. Franklin's personal service contract (which states: "We do hereby undertake and agree to hold and save you harmless of, from and against any loss, cost, damage or expense which may arise or result from said agreement, and we further agree that we will, upon demand, reimburse you for any cost, liability, or expense which you may incur or any payment which you make in accordance with, or as a result of, such agreement.") would serve as the "insurance for the insurance."
The muddiness of these events (Ms. Franklin suing me and hoping I would never find- or enforce her personal service contract) led my counsel and AON/Hiscox to dutifully consider the question, and it is disingenuous for Hiscox to claim otherwise.
Thank you.
Alan

---

phone: 323 988 9692

peace and love.

> On May 9, 2017, at 12:40 PM, Laura Comerford <laura.comerford@aon.com> wrote:
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> Hi Alan
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and see what they say.

Thanks,

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla)
[mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla)
<alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT

Date: May 8, 2017 at 1:36:22 PM PDT
To: Stephen Carroll
<stephen.carroll@aon.com>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 1, 2017 at 10:57 AM
To: laura comerford laura.comerford@aon.com, Maria Clark maria.clark@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi laura and maria

i want you, as my insurance brokers, to have the following. (see below.)

this case is now becoming EXTREMELY time sensitive as scheduling to make certain deadlines for the fall are now coming on.

if there's any way to get an answer asap from hiscox, that is very much appreciated.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

> Begin forwarded message:
>
> **From:** Steven Zansberg <SZansberg@lskslaw.com>
> **Subject:** **Franlkin v. Elliott**
> **To:** "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>
>
> Alan:
>
> Attached for your review:
>
> The DRAFT of the letter I propose to send to Reid Neureiter, after your and Larry's review and edits, and after I give Reid a "heads up" courtesy call that it is coming his way.
>
> Please let me know if you'd like to schedule a call, tomorrow afternoon or Thursday, to discuss these.
>
> Best regards,
> Steve
>
> Steven D. Zansberg
>
> LSKS LEVINE SULLIVAN KOCH & SCHULZ, LLP
>
> 1888 Sherman Street
> Suite 370
> Denver, CO 80203
> (303) 376-2409 | Phone
> (303) 376-2401 | Fax
> www.lskslaw.com

Elliott-Franklin - ltr to N...).docx

From: **Laura Comerford** laura.comerford@aon.com
Subject: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 12, 2017 at 11:37 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Maria Clark maria.clark@aon.com, Laura Comerford laura.comerford@aon.com

LC

Thanks Alan.

Maria call me when you have a chance.

Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

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Thank you.
Alan
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phone: **323 988 9692**

peace and love.

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> Thanks,
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> Laura

Laura R. Comerford
Vice President
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Phone: 212-337-4354

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 12:48 PM
To: Laura Comerford
Subject: Fwd: amazing grace; 27700815

thank you.

-alan

---

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

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peace and love.

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Date: May 9, 2017 at 12:40 PM
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Cc: Maria Clark maria.clark@aon.com, Laura Comerford laura.comerford@aon.com

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please let me know.

thank you.

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phone: 323 988 9692

peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: amazing grace; 27700815
Date: May 9, 2017 at 9:47 AM
To: laura.comerford@aon.com

thank you.

-alan

---

phone: 323 988 9692

peace and love.

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> **From:** alan elliott (ucla) <alanelliott@g.ucla.edu>
> **Subject:** **amazing grace; 27700815**
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>
> -alan
>
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>
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>
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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56 PM
To: Stephen Carroll stephen.carroll@aon.com

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---

phone: 323 988 9692

peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace; 27700815
Date: May 4, 2017 at 2:37 PM
To: Stephen Carroll stephen.carroll@aon.com

hi stephen

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thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: RE: Amazing Grace
Date: March 4, 2015 at 12:25 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Ramona V. Horne ramona.horne@aon.com, George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk, Todd W. Musburger todd@musburger.com

SC

Here is the quote from Hiscox. I am waiting on Axis.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
Cell: 914-589-2474
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, March 04, 2015 3:24 PM
To: Stephen Carroll
Cc: Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
Subject: Re: Amazing Grace

hey stephen

we are checking in re policy.

please let us know.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Feb 27, 2015, at 1:42 PM, Stephen Carroll <stephen.carroll@aon.com> wrote:

> Thank you…I have forwarded info to underwriters
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401

New York, NY 10016
Phone: 212-337-4353
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Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Friday, February 27, 2015 3:50 PM
To: Stephen Carroll
Cc: Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
Subject: Re: Amazing Grace

hi stephen

please see answers below.

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documentary

2. What is the anticipated distribution/dissemination? theatrical release, TV special, etc…?

theatrical, vod, dvd, television

3. Was it previously produced and released and now they're re-releasing it?

it was (technically) produced by warners.

elements of the project have been released at least twice that we know of:

1) the atlantic 25th anniversary film, made with braverman productions <image001.png>
2) aretha franklin; the queen of soul (august 22, 1988) (http://www.imdb.com/title/tt0210537/)

4. If not previously released please advise who produced it and who currently owns the copyright and what agreements are in place with this applicant.

the current iteration of the footage is owned by me with quitclaim from warner bors. films.

5. Did they obtain rights from Warner Brothers?

yes.

6. Did they obtain rights from Atlantic Records?

none needed, as per atlantic/warner music group.

7. Did Aretha Franklin participate in this production?

yes

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171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
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Fax: 847-953-2692

Amazing Grace
Hiscox...te.PDF

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: RE: Amazing Grace
Date: March 11, 2015 at 8:13 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Ramona V. Horne ramona.horne@aon.com, George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk, Todd W. Musburger todd@musburger.com

SC

Alan: I got the following indication from Axis:

Full/Wide theatrical release:
$1m/$3m $25k SIR $15,539 3 year policy with TOIE

Limited theatrical release:
$1m/$3m $25k SIR $7,063 3 year term with TOIE

All forms of non-theatrical release:
$1m/$3m $25k SIR $4,528 3 year term with TOIE.

Unfortunately on this type of risk we cannot offer music coverage as the artist should have own coverage.

Clearly Hiscox is the way to go. Give me a call to discuss.

Stephen Carroll, V.P.
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171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, March 09, 2015 8:02 PM
To: Stephen Carroll
Cc: Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
Subject: Re: Amazing Grace

hey stephen

checking to see if you had an axis quote.

thank you.

---
phone: 323 988 9692

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> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Wednesday, March 04, 2015 3:24 PM
> **To:** Stephen Carroll
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Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Amazing Grace
Date: May 18, 2015 at 9:34 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi stephen

can i get a 60 day extension on this quote please?

thank you.

-alan

---

phone: 323 988 9692

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On Feb 27, 2015, at 1:42 PM, Stephen Carroll <stephen.carroll@aon.com> wrote:

> Thank you…I have forwarded info to underwriters
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> Cell: 914-589-2474
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, February 27, 2015 3:50 PM
> **To:** Stephen Carroll
> **Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
> **Subject:** Re: Amazing Grace
>
> hi stephen
>
> please see answers below.
>
> > On Feb 27, 2015, at 11:22 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
> >
> > So after all this time my underwriter finally responded to the submission and had the following questions. I apologize but would appreciate any clarification you can provide:
> >
> > 1. Is this a documentary, music video or something else?
>
> documentary
>
> > 2. What is the anticipated distribution/dissemination? theatrical release, TV special, etc…?
>
> theatrical, vod, dvd, television

3. Was it previously produced and released and now they're re-releasing it?

it was (technically) produced by warners.

elements of the project have been released at least twice that we know of:

1) the atlantic 25th anniversary film, made with braverman productions
<image001.png>
2) aretha franklin; the queen of soul (august 22, 1988)
(http://www.imdb.com/title/tt0210537/)

4. If not previously released please advise who produced it and who currently owns the copyright and what agreements are in place with this applicant.

the current iteration of the footage is owned by me with quitclaim from warner bors. films.

5. Did they obtain rights from Warner Brothers?

yes.

6. Did they obtain rights from Atlantic Records?

none needed, as per atlantic/warner music group.

7. Did Aretha Franklin participate in this production?

yes

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: February 26, 2016 at 12:59 PM
To: Stephen Carroll stephen.carroll@aon.com

thank you.

-alan

---
phone: 323 988 9692
peace and love.

On Feb 26, 2016, at 12:56 PM, Stephen Carroll <stephen.carroll@aon.com> wrote:

> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> **New Cell: 914-588-4290**
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott [mailto:alanelliott@g.ucla.edu]
> **Sent:** Thursday, February 25, 2016 1:58 PM
> **To:** Stephen Carroll
> **Subject:** Re: amazing grace confirmation
>
> hi stephen
>
> can you please send me a copy of the full policy for “amazing grace.” (i can’t find the full policy.)
>
> thank you.
>
> -alan
>
> ---
> **phone: 323 988 9692**
> **peace and love.**
>
> **http://songsoundrecord.tumblr.com**
>
> > On Jul 21, 2015, at 8:37 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:
> >
> > Alan,

We did not receive it yet. Mail is delivered in the afternoon,

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, July 21, 2015 11:34 AM
To: Annette Shavuo
Subject: Re: amazing grace confirmation

hi Annette

any sign of the check yet? please let me know.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Jul 20, 2015, at 2:10 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:

OK great

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, July 20, 2015 5:00 PM
To: Annette Shavuo
Subject: Fwd: amazing grace confirmation

hi annette- as per below… it should be there tomorrow (we hope).

thank you.

-alan

---

phone: 323 988 9692

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Begin forwarded message:

From: Julie Huntsinger <juliehuntsinger@me.com>
Subject: Re: amazing grace confirmation
Date: July 20, 2015 at 1:55:48 PM PDT

To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

Hi Alan,

It is en route.

Forgive us- for some reason it was held Thursday- when i expected it to go out- and it went out Friday instead.

Really embarrassed.

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com
www.telluridefilmfestival.org
42nd TELLURIDE FILM FESTIVAL
September 4-7, 2015

On Jul 20, 2015, at 1:51 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hey Julie

Can you pls see if this is en route?

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

> **From:** Annette Shavuo <annette.shavuo@aon.com>
> **Date:** July 20, 2015 at 1:27:21 PM PDT
> **To:** "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
> **Subject: FW: amazing grace confirmation**

Alan,

We did not receive the check. Maybe by tomorrow.

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: juliehuntsinger@mac.com
Cc: Annette Shavuo
Subject: FW: amazing grace confirmation

Hi Julie,
Attached is the E&O policy invoice.
Please remit payment. Thank you.

Best Regards,
Amanda Roytbak
Assisting Laura Comerford
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
212.337.4357

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, July 14, 2015 2:16 PM
To: Amanda Roytbak
Cc: Annette Shavuo; Stephen Carroll; Todd W. Musburger; Julie Huntsinger
Subject: Re: amazing grace confirmation

hi

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

---

phone: 323 988 9692

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> On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <amanda.roytbak@aon.com> wrote:
>
> # please bill directly to:
>
> # Julie Huntsinger

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

<2700815_9.pdf>

From: **Annette Shavuo** annette.shavuo@aon.com
Subject: RE: amazing grace confirmation
Date: July 14, 2015 at 6:30 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com

AS

Thank you Alan.

Once we receive the check for $ 5,700 ($ 5,400 + $ 300 administration fee), we will request to bind coverage.

Please make check payable to Aon/Albert G. Ruben.

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, July 13, 2015 5:02 PM
To: Stephen Carroll; Annette Shavuo
Cc: Todd W. Musburger
Subject: amazing grace confirmation

hi stephen and annette and thank you again for your patience and diligence.

attached is my signature for option “b”.

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

EXECUTIVE SUMMARY

You have asked us to provide you with a new proposal. Our goal is to obtain the appropriate insurance coverage, at the most competitive price. We approached Hiscox who specializes in this type of insurance coverage. Please refer to the Quote Disclosure Report attached, which outlines our commission for the quoted coverage. If you wish to bind coverage as outlined in this proposal, please check the lines of coverage you are accepting and sign the Acknowledgment and Approval of Insured below.

Acknowledgment and Approval of Insured

We hereby acknowledge receipt and review of the information presented in the New Proposal ("Proposal") dated 7/8/2015 for Errors & Omissions and provided in the attached Quote Disclosure Report dated 7/8/2015. We hereby instruct Aon/Albert G. Ruben Insurance Services, Inc. (AGR) to bind the insurance program(s) selected by us and understand that our instruction to bind constitutes an acceptance of the terms and conditions and payments described in this Proposal, including ARS U.S. Business Terms. We consent to the procedure whereby Aon will place or renew additional policies we are likely to need in the twelve months following this program inception with the insurer we have selected. We understand that Aon will advise us of any variances in premium rates, coverages, terms or conditions applicable to additional placed policies prior to binding them for our approval.

Coverage	Accept	Decline
Errors & Omissions "Amazing Grace"	X	

Date: 7.13.15 By: _____

Signature On behalf of Amazing Grace, LLC.

	Email	Mail	Both
Policy Delivery Via:			

This insurance document is furnished to you as a matter of information for your convenience. It only summarizes the listed proposed policy(ies) and is not intended to reflect all the terms and conditions or exclusions of such proposed policy(ies). Moreover, the information contained in this document reflects proposed coverage as of the effective date(s) of the proposed policy(ies) and does not include subsequent changes. This document is not an insurance policy and does not amend, alter or extend the coverage afforded by the listed proposed policy(ies). The insurance afforded by the listed proposed policy(ies) is subject to all the terms, exclusions and conditions of such policy(ies).
The services and placements outlined in this proposal will be provided in accordance with the terms of the notices and policies set forth in the ARS US Business Terms.

thank you.

-alan

---

phone: **323 988 9692**

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From: **Amanda Roytbak** amanda.roytbak@aon.com
Subject: RE: amazing grace confirmation
Date: July 14, 2015 at 11:13 AM
To: Annette Shavuo annette.shavuo@aon.com, alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Stephen Carroll stephen.carroll@aon.com, Todd W. Musburger todd@musburger.com

AR

Hi Alan,
Please see the attached invoice for the E&O policy.
Please remit payment. Thank you.

Best Regards,
Amanda Roytbak
Assisting Laura Comerford
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
212.337.4357

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From: Annette Shavuo
Sent: Tuesday, July 14, 2015 12:26 PM
To: alan elliott (ucla)
Cc: Stephen Carroll; Todd W. Musburger; Amanda Roytbak
Subject: RE: amazing grace confirmation

Alan,

Amanda will send an invoice shortly.

Thanks,

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, July 14, 2015 10:19 AM
To: Annette Shavuo
Cc: Stephen Carroll; Todd W. Musburger
Subject: Re: amazing grace confirmation

hi Annette

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

they will get you paid today!

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Jul 14, 2015, at 6:30 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:

> Thank you Alan.
>
> Once we receive the check for $ 5,700 ($ 5,400 + $ 300 administration fee), we will request to bind coverage.
>
> Please make check payable to Aon/Albert G. Ruben.

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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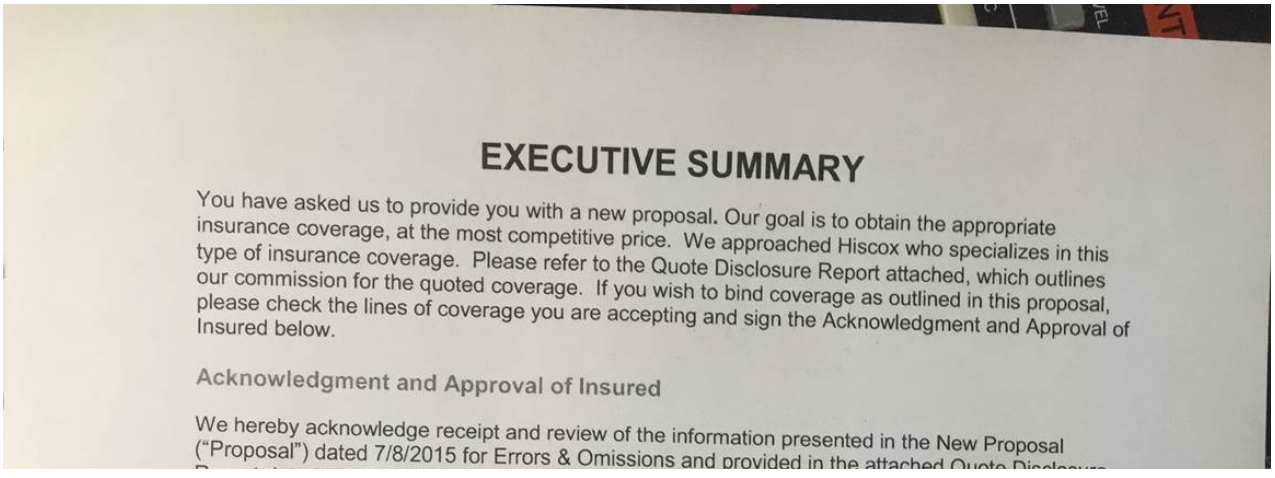
From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, July 13, 2015 5:02 PM
To: Stephen Carroll; Annette Shavuo
Cc: Todd W. Musburger
Subject: amazing grace confirmation

hi stephen and annette and thank you again for your patience and diligence.

attached is my signature for option “b”.

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

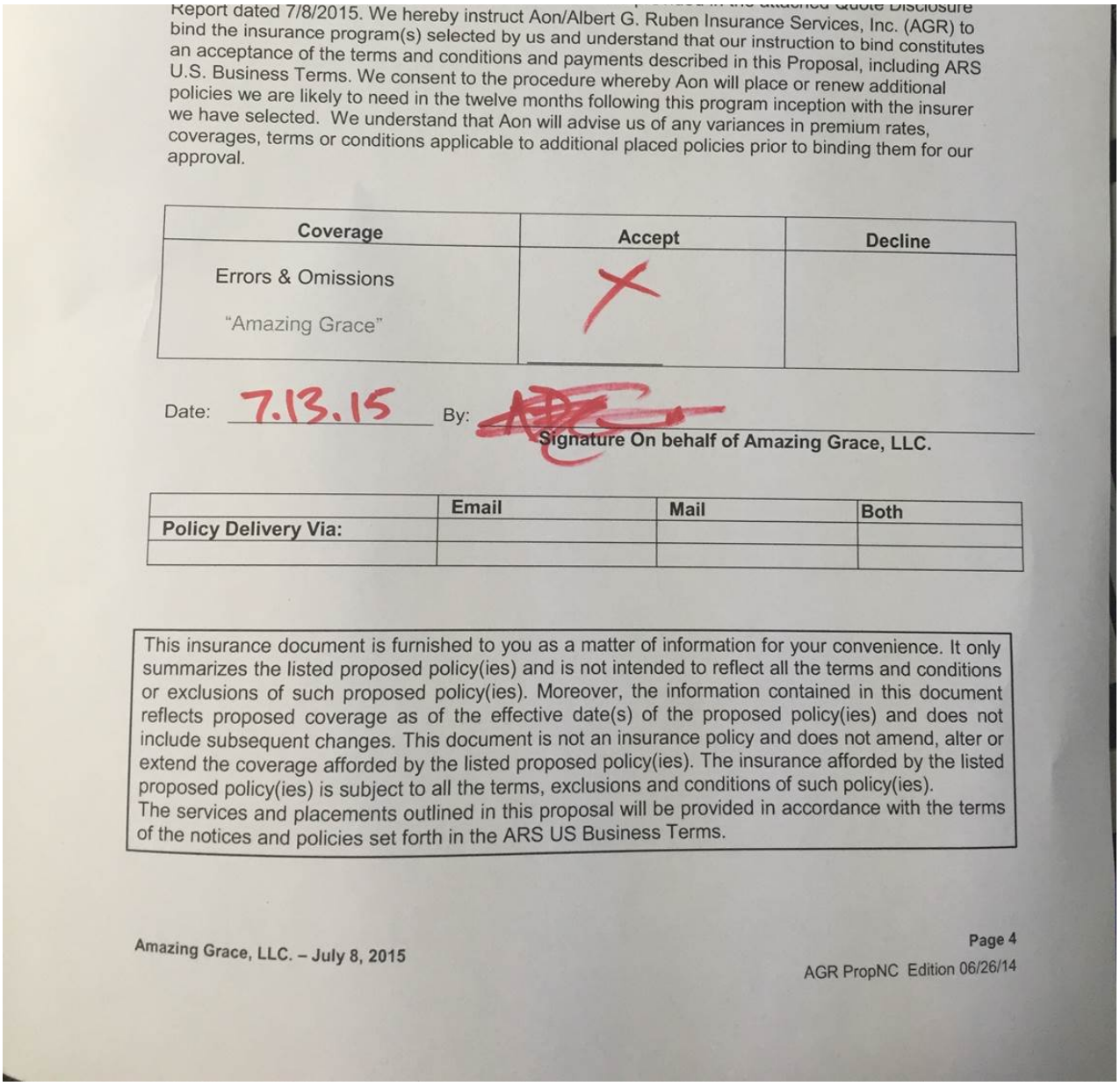


EXECUTIVE SUMMARY

You have asked us to provide you with a new proposal. Our goal is to obtain the appropriate insurance coverage, at the most competitive price. We approached Hiscox who specializes in this type of insurance coverage. Please refer to the Quote Disclosure Report attached, which outlines our commission for the quoted coverage. If you wish to bind coverage as outlined in this proposal, please check the lines of coverage you are accepting and sign the Acknowledgment and Approval of Insured below.

Acknowledgment and Approval of Insured

We hereby acknowledge receipt and review of the information presented in the New Proposal (“Proposal”) dated 7/8/2015 for Errors & Omissions and provided in the attached Quote Disclosure



Report dated 7/8/2015. We hereby instruct Aon/Albert G. Ruben Insurance Services, Inc. (AGR) to bind the insurance program(s) selected by us and understand that our instruction to bind constitutes an acceptance of the terms and conditions and payments described in this Proposal, including ARS U.S. Business Terms. We consent to the procedure whereby Aon will place or renew additional policies we are likely to need in the twelve months following this program inception with the insurer we have selected. We understand that Aon will advise us of any variances in premium rates, coverages, terms or conditions applicable to additional placed policies prior to binding them for our approval.

Coverage	Accept	Decline
Errors & Omissions "Amazing Grace"	X	

Date: 7.13.15 By: _____
Signature On behalf of Amazing Grace, LLC.

	Email	Mail	Both
Policy Delivery Via:			

This insurance document is furnished to you as a matter of information for your convenience. It only summarizes the listed proposed policy(ies) and is not intended to reflect all the terms and conditions or exclusions of such proposed policy(ies). Moreover, the information contained in this document reflects proposed coverage as of the effective date(s) of the proposed policy(ies) and does not include subsequent changes. This document is not an insurance policy and does not amend, alter or extend the coverage afforded by the listed proposed policy(ies). The insurance afforded by the listed proposed policy(ies) is subject to all the terms, exclusions and conditions of such policy(ies).
The services and placements outlined in this proposal will be provided in accordance with the terms of the notices and policies set forth in the ARS US Business Terms.

Amazing Grace, LLC. – July 8, 2015

Page 4
AGR PropNC Edition 06/26/14

thank you.

-alan

---

phone: 323 988 9692

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INVOICE

Agency:

Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016

212-627-7400
847-953-0872
rubenny@aon.com

Insured:

Amazing Grace LLC
1633 N Stanley Ave

Los Angeles CA 90046-2712

Invoice Date:	07/14/2015

Invoice No.:	1228
Account No.:	TBD
Policy No.:	TBD
Policy Type.:	Errors & Omissions
Company:	Hiscox
Effective Date:	TBD
Expiration Date:	TBD

Policy Description / Endorsements and Payments	Amount
Policy	$ 5400
Erros & Omissions Policy (3 year term) - "Amazing Grace"	0.00
Administrative Fee	300
	0.00
	0.00
	0.00
	0.00
	0.00
	0.00
	0.00
	0.00
	0.00
	0.00
Mortgagee:	Balance: $5,700.00

Comments

Please remit payment. Thank you.

cut below on dotted line and return

Insured Copy

Insured:

Policy Number
TBD

Policy Period		
TBD	-	TBD

Amazing Grace LLC
1633 N Stanley Ave

Los Angeles CA 90046-2712

Account:	TBD
Invoice:	1228
Date:	07/14/2015
Balance:	$5,700.00

Agency:

Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016

$

Indicate Amount Paid

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: July 14, 2015 at 11:15 AM
To: Amanda Roytbak amanda.roytbak@aon.com
Cc: Annette Shavuo annette.shavuo@aon.com, Stephen Carroll stephen.carroll@aon.com, Todd W. Musburger todd@musburger.com , Julie Huntsinger juliehuntsinger@me.com

hi

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

---

phone: 323 988 9692

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> On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <amanda.roytbak@aon.com> wrote:
>
> # please bill directly to:
>
> # Julie Huntsinger
> # Executive Director
> # Telluride Film Festival
> # (510) 665-9494
> # juliehuntsinger@mac.com

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: July 15, 2015 at 10:16 AM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com, Todd W. Musburger todd@musburger.com, Amanda Roytbak amanda.roytbak@aon.com

good morning

checking to see that this is on it's path to being bound. please let me know.

thank you.

-alan

---

phone: 323 988 9692

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> On Jul 14, 2015, at 9:26 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:
>
> Alan,
>
> Amanda will send an invoice shortly.
>
> Thanks,
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
> Fax: (212) 633-1457 / Direct: (847) 953-0849
>
> Before you print, think about the ENVIRONMENT
>
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>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Tuesday, July 14, 2015 10:19 AM
> **To:** Annette Shavuo
> **Cc:** Stephen Carroll; Todd W. Musburger
> **Subject:** Re: amazing grace confirmation
>
> hi Annette

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

they will get you paid today!

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Jul 14, 2015, at 6:30 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:

> Thank you Alan.
>
> Once we receive the check for $ 5,700 ($ 5,400 + $ 300 administration fee), we will request to bind coverage.
>
> Please make check payable to Aon/Albert G. Ruben.
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
> Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, July 13, 2015 5:02 PM
To: Stephen Carroll; Annette Shavuo
Cc: Todd W. Musburger
Subject: amazing grace confirmation

hi stephen and annette and thank you again for your patience and diligence.

attached is my signature for option “b”.

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<image001.jpg>

thank you.

-alan

---

phone: 323 988 9692

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: amazing grace confirmation
Date: July 20, 2015 at 2:00 PM
To: Annette Shavuo annette.shavuo@aon.com

hi annette- as per below… it should be there tomorrow (we hope).

thank you.

-alan

---

phone: 323 988 9692

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> Begin forwarded message:
>
> **From:** Julie Huntsinger <juliehuntsinger@me.com>
> **Subject:** **Re: amazing grace confirmation**
> **Date:** July 20, 2015 at 1:55:48 PM PDT
> **To:** "alan elliott (ucla)" <alanelliott@g.ucla.edu>
>
> Hi Alan,
>
> It is en route.
>
> Forgive us- for some reason it was held Thursday- when i expected it to go out- and it went out Friday instead.
>
> Really embarrassed.
>
> Julie Huntsinger
> Executive Director
> Telluride Film Festival
> (510) 665-9494
> juliehuntsinger@mac.com
> www.telluridefilmfestival.org
> 42nd TELLURIDE FILM FESTIVAL
> September 4-7, 2015
>
> On Jul 20, 2015, at 1:51 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:
>
> > hey Julie
> >
> > Can you pls see if this is en route?
> >
> > thank you.
> >
> > ---
> > phone: 323 988 9692
> >
> > Sent from a iPhone
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> >
> > Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Subject: FW: amazing grace confirmation

Alan,

We did not receive the check. Maybe by tomorrow.

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: juliehuntsinger@mac.com
Cc: Annette Shavuo
Subject: FW: amazing grace confirmation

Hi Julie,
Attached is the E&O policy invoice.
Please remit payment. Thank you.

Best Regards,
Amanda Roytbak
Assisting Laura Comerford
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
212.337.4357

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, July 14, 2015 2:16 PM
To: Amanda Roytbak
Cc: Annette Shavuo; Stephen Carroll; Todd W. Musburger; Julie Huntsinger
Subject: Re: amazing grace confirmation

hi

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

---

phone: 323 988 9692

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> On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <amanda.roytbak@aon.com> wrote:
>
> please bill directly to:
>
> Julie Huntsinger
> Executive Director
> Telluride Film Festival
> (510) 665-9494

juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: July 21, 2015 at 8:34 AM
To: Annette Shavuo annette.shavuo@aon.com

hi Annette

any sign of the check yet? please let me know.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Jul 20, 2015, at 2:10 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:

> OK great
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
> Fax: (212) 633-1457 / Direct: (847) 953-0849
>
> Before you print, think about the ENVIRONMENT
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>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Monday, July 20, 2015 5:00 PM
> **To:** Annette Shavuo
> **Subject:** Fwd: amazing grace confirmation
>
> hi annette- as per below… it should be there tomorrow (we hope).
>
> thank you.
>
> -alan
>
> ---
>
> **phone: 323 988 9692**

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Begin forwarded message:

From: Julie Huntsinger <juliehuntsinger@me.com>
Subject: Re: amazing grace confirmation
Date: July 20, 2015 at 1:55:48 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

Hi Alan,

It is en route.

Forgive us- for some reason it was held Thursday- when i expected it to go out- and it went out Friday instead.

Really embarrassed.

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com
www.telluridefilmfestival.org
42nd TELLURIDE FILM FESTIVAL
September 4-7, 2015

On Jul 20, 2015, at 1:51 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hey Julie

Can you pls see if this is en route?

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Subject: FW: amazing grace confirmation

Alan,

We did not receive the check. Maybe by tomorrow.

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: juliehuntsinger@mac.com
Cc: Annette Shavuo
Subject: FW: amazing grace confirmation

Hi Julie,
Attached is the E&O policy invoice.
Please remit payment. Thank you.

Best Regards,
Amanda Roytbak
Assisting Laura Comerford
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401

New York, NY 10016
212.337.4357

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, July 14, 2015 2:16 PM
To: Amanda Roytbak
Cc: Annette Shavuo; Stephen Carroll; Todd W. Musburger; Julie Huntsinger
Subject: Re: amazing grace confirmation

hi

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

---

phone: 323 988 9692

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> On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <amanda.roytbak@aon.com> wrote:
>
> # please bill directly to:
>
> # Julie Huntsinger

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: February 24, 2016 at 10:05 PM
To: Annette Shavuo annette.shavuo@aon.com

hi annette

can you please send me a copy of the full policy for “amazing grace."

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

> On Jul 21, 2015, at 8:37 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:
>
> Alan,
>
> We did not receive it yet. Mail is delivered in the afternoon,
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
> Fax: (212) 633-1457 / Direct: (847) 953-0849
>
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>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Tuesday, July 21, 2015 11:34 AM
> **To:** Annette Shavuo
> **Subject:** Re: amazing grace confirmation
>
> hi Annette
>
> any sign of the check yet? please let me know.
>
> thank you.

---
phone: 323 988 9692

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On Jul 20, 2015, at 2:10 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:

> OK great
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
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>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Monday, July 20, 2015 5:00 PM
> **To:** Annette Shavuo
> **Subject:** Fwd: amazing grace confirmation
>
> hi annette- as per below… it should be there tomorrow (we hope).
>
> thank you.
>
> -alan
>
> ---
>
> **phone: 323 988 9692**

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Begin forwarded message:

From: Julie Huntsinger <juliehuntsinger@me.com>
Subject: Re: amazing grace confirmation
Date: July 20, 2015 at 1:55:48 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

Hi Alan,

It is en route.

Forgive us- for some reason it was held Thursday- when i expected it to go out- and it went out Friday instead.

Really embarrassed.

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com
www.telluridefilmfestival.org
42nd TELLURIDE FILM FESTIVAL
September 4-7, 2015

On Jul 20, 2015, at 1:51 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hey Julie

Can you pls see if this is en route?

thank you.

---
phone: 323 988 9692

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Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Subject: FW: amazing grace confirmation

Alan,

We did not receive the check. Maybe by tomorrow.

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: juliehuntsinger@mac.com
Cc: Annette Shavuo
Subject: FW: amazing grace confirmation

Hi Julie,
Attached is the E&O policy invoice.
Please remit payment. Thank you.

Best Regards,
Amanda Roytbak
Assisting Laura Comerford
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
212.337.4357

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, July 14, 2015 2:16 PM
To: Amanda Roytbak
Cc: Annette Shavuo; Stephen Carroll; Todd W. Musburger; Julie Huntsinger
Subject: Re: amazing grace confirmation

hi

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

---

phone: 323 988 9692

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info@alanelliott.net.

On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <amanda.roytbak@aon.com> wrote:

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: February 25, 2016 at 10:57 AM
To: Stephen Carroll stephen.carroll@aon.com

hi stephen

can you please send me a copy of the full policy for “amazing grace.” (i can’t find the full policy.)

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

> On Jul 21, 2015, at 8:37 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:
>
> Alan,
>
> We did not receive it yet. Mail is delivered in the afternoon,
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> Aon/Albert G. Ruben
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>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Tuesday, July 21, 2015 11:34 AM
> **To:** Annette Shavuo
> **Subject:** Re: amazing grace confirmation
>
> hi Annette
>
> any sign of the check yet? please let me know.
>
> thank you.

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phone: 323 988 9692

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> OK great
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
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>
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>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Monday, July 20, 2015 5:00 PM
> **To:** Annette Shavuo
> **Subject:** Fwd: amazing grace confirmation
>
> hi annette- as per below… it should be there tomorrow (we hope).
>
> thank you.
>
> -alan
>
> ---
>
> **phone: 323 988 9692**

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Begin forwarded message:

From: Julie Huntsinger <juliehuntsinger@me.com>
Subject: Re: amazing grace confirmation
Date: July 20, 2015 at 1:55:48 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

Hi Alan,

It is en route.

Forgive us- for some reason it was held Thursday- when i expected it to go out- and it went out Friday instead.

Really embarrassed.

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com
www.telluridefilmfestival.org
42nd TELLURIDE FILM FESTIVAL
September 4-7, 2015

On Jul 20, 2015, at 1:51 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hey Julie

Can you pls see if this is en route?

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Subject: FW: amazing grace confirmation

Alan,

We did not receive the check. Maybe by tomorrow.

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: juliehuntsinger@mac.com
Cc: Annette Shavuo
Subject: FW: amazing grace confirmation

Hi Julie,
Attached is the E&O policy invoice.
Please remit payment. Thank you.

Best Regards,
Amanda Roytbak
Assisting Laura Comerford
Aon/Albert G. Ruben Insurance Services, Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
212.337.4357

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, July 14, 2015 2:16 PM
To: Amanda Roytbak
Cc: Annette Shavuo; Stephen Carroll; Todd W. Musburger; Julie Huntsinger
Subject: Re: amazing grace confirmation

hi

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

---

phone: 323 988 9692

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info@alanelliott.net.

On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <amanda.roytbak@aon.com> wrote:

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace confirmation
Date: July 13, 2015 at 2:01 PM
To: Stephen Carroll Stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi stephen and annette and thank you again for your patience and diligence.

attached is my signature for option “b”.

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

EXECUTIVE SUMMARY

You have asked us to provide you with a new proposal. Our goal is to obtain the appropriate insurance coverage, at the most competitive price. We approached Hiscox who specializes in this type of insurance coverage. Please refer to the Quote Disclosure Report attached, which outlines our commission for the quoted coverage. If you wish to bind coverage as outlined in this proposal, please check the lines of coverage you are accepting and sign the Acknowledgment and Approval of Insured below.

Acknowledgment and Approval of Insured

We hereby acknowledge receipt and review of the information presented in the New Proposal (“Proposal”) dated 7/8/2015 for Errors & Omissions and provided in the attached Quote Disclosure Report dated 7/8/2015. We hereby instruct Aon/Albert G. Ruben Insurance Services, Inc. (AGR) to bind the insurance program(s) selected by us and understand that our instruction to bind constitutes an acceptance of the terms and conditions and payments described in this Proposal, including ARS U.S. Business Terms. We consent to the procedure whereby Aon will place or renew additional policies we are likely to need in the twelve months following this program inception with the insurer we have selected. We understand that Aon will advise us of any variances in premium rates, coverages, terms or conditions applicable to additional placed policies prior to binding them for our approval.

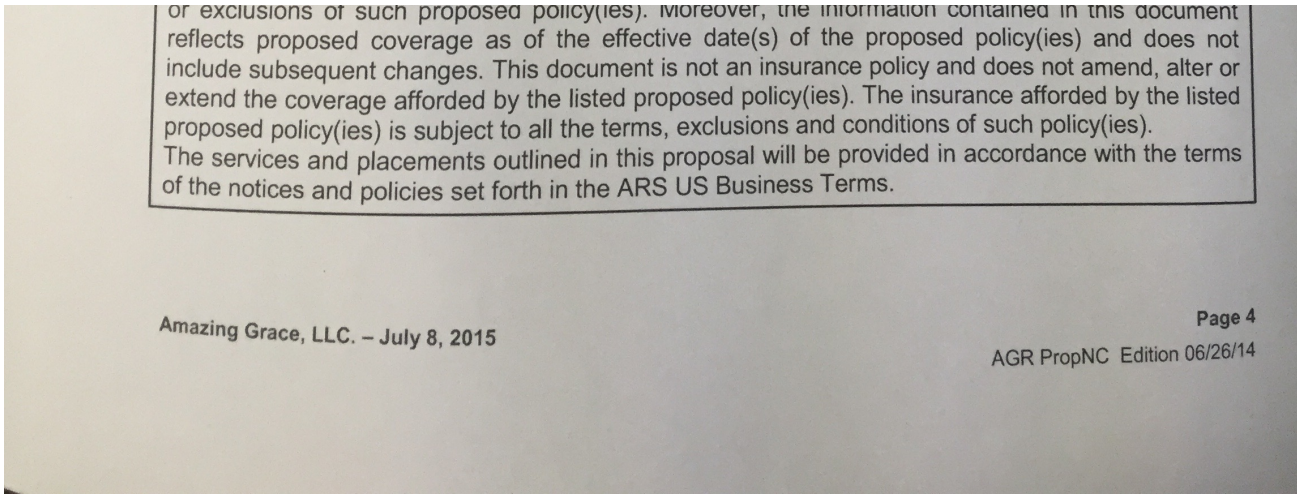
Coverage	Accept	Decline
Errors & Omissions “Amazing Grace”	X	

Date: 7.13.15 By: _____

Signature On behalf of Amazing Grace, LLC.

	Email	Mail	Both
Policy Delivery Via:			

This insurance document is furnished to you as a matter of information for your convenience. It only summarizes the listed proposed policy(ies) and is not intended to reflect all the terms and conditions


or exclusions of such proposed policy(ies). Moreover, the information contained in this document reflects proposed coverage as of the effective date(s) of the proposed policy(ies) and does not include subsequent changes. This document is not an insurance policy and does not amend, alter or extend the coverage afforded by the listed proposed policy(ies). The insurance afforded by the listed proposed policy(ies) is subject to all the terms, exclusions and conditions of such policy(ies).
The services and placements outlined in this proposal will be provided in accordance with the terms of the notices and policies set forth in the ARS US Business Terms.

thank you.

-alan

---

phone: 323 988 9692

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace coverage
Date: July 20, 2015 at 7:25 AM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com

I will ask.

is there another way to pay directly?

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Jul 20, 2015, at 7:15 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:

> Alan,
>
> Check was not received. Maybe later when we receive the mail.
>
> What address did you send it to?
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
> Fax: (212) 633-1457 / Direct: (847) 953-0849
>
> Before you print, think about the ENVIRONMENT
>
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>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Monday, July 20, 2015 9:54 AM
> **To:** Stephen Carroll; Annette Shavuo
> **Subject:** amazing grace coverage
>
> good morning stephen and Annette
>
> I am checking in to see if the telluride money has come in and if so if you might please forward over asap the new bound coverage (without the exclusion for the corrected #22

forward over asap the new bound coverage (without the exclusion for the corrected #22 question).

please let me know.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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From: **Annette Shavuo** annette.shavuo@aon.com
Subject: RE: amazing grace coverage
Date: July 21, 2015 at 12:51 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Stephen Carroll stephen.carroll@aon.com

AS

Alan,

We received check # 9953 in the amount of $ 5,700. I will request to bind coverage. Once I receive confirmation from our underwriter, I will send to you.

Thank you,

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: **Annette Shavuo** annette.shavuo@aon.com
Subject: RE: amazing grace coverage
Date: July 17, 2015 at 7:05 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Stephen Carroll stephen.carroll@aon.com

AS

Alan,

We have not received payment. When did you send the check?

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Friday, July 17, 2015 1:40 AM
To: Stephen Carroll; Annette Shavuo
Subject: amazing grace coverage

good morning stephen and Annette

I am checking in to see if the telluride money has come in and if so if you might please forward over asap the new bound coverage (without the exclusion for the corrected #22 question).

please let me know.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace coverage
Date: July 20, 2015 at 6:53 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com

good morning stephen and Annette

I am checking in to see if the telluride money has come in and if so if you might please forward over asap the new bound coverage (without the exclusion for the corrected #22 question).

please let me know.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace coverage
Date: March 23, 2015 at 6:34 AM
To: Stephen Carroll stephen.carroll@aon.com

hey stephen

I need to get coverage on the "consents" for all that are on screen- from Aretha Franklin to the choir to the band.

I have separate releases for each- including Aretha's personal service contract with warner brothers.

can we get on the phone today with the insurance company so we can get that going please?

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: amazing grace follow up
Date: February 2, 2016 at 7:09 PM
To: Annette Shavuo annette.shavuo@aon.com

hello annette

i sent the below to stephen and got a response that he is on vacation. can you please let me know where this stands.

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

> Begin forwarded message:
>
> **From:** "alan elliott (ucla)" <alanelliott@g.ucla.edu>
> **Subject:** **amazing grace follow up**
> **Date:** February 2, 2016 at 4:00:15 PM PST
> **To:** Stephen Carroll <stephen.carroll@aon.com>
> **Cc:** "Todd W. Musburger" <todd@musburger.com>
>
> hi stephen
>
> where are we at re: reinstating insurance?
>
> thank you.
>
> -alan
>
> ---
> phone: 323 988 9692
> peace and love.

From: **Todd Musburger** todd@musburger.com
Subject: Re: amazing grace follow up
Date: February 18, 2016 at 8:57 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: alan elliott (ucla) alanelliott@g.ucla.edu

TM

Hello Stephen: I am one of the attorneys working with Alan Elliott regarding the Aretha Franklin concert footage project. I have been asked to provide some answers to coverage questions that have arisen and I would like to set a call with you today or tomorrow...Please let me know what would work for you...Thanks, Todd

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Wed, Feb 3, 2016 at 11:44 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:

> The answer re Aretha was a firm no. I don't know what we can do. I will call u when I return next week
>
> ---
>
> **From:** alan elliott (ucla)
> **Sent:** Tuesday, February 02, 2016 7:00:15 PM
> **To:** Stephen Carroll
> **Cc:** Todd W. Musburger
> **Subject:** amazing grace follow up
>
> hi stephen
>
> where are we at re: reinstating insurance?
>
> thank you.
>
> -alan
>
> ---
> phone: 323 988 9692
> peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace follow up
Date: February 2, 2016 at 4:00 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi stephen

where are we at re: reinstating insurance?

thank you.

-alan

---
phone: 323 988 9692
peace and love.

From: **Alan Elliott** alanelliott@ucla.edu
Subject: amazing grace insurance form
Date: February 4, 2015 at 10:22 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Todd W. Musburger todd@musburger.com

hello

attached is the insurance application. please let me know if any adjustments are needed (i left what i didn't know blank).

amazing 02021...03.doc

thank you.

-alan

---

phone: 323 988 9692

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> On Feb 2, 2015, at 9:57 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> Cell: 914-589-2474
> Fax: 847-953-2692
>
> ---
>
> **From:** ALAN ELLIOTT [mailto:alanelliott@g.ucla.edu] **On Behalf Of** Alan Elliott
> **Sent:** Monday, February 02, 2015 12:37 PM
> **To:** Stephen Carroll; Ramona V. Horne
> **Cc:** George Chignell; john battsek; Joe Boyd
> **Subject:** insurance needed!
>
> hello
>
> i need to start the process of getting insurance for my film and john battsek and george chignell suggested we start.
>
> how do we start?
>
> thank you.
>
> -alan

-alan

---

phone: 323 988 9692

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<Video Film and Television Producers Application Admitted_Word1203.doc>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace insurance form
Date: February 9, 2015 at 1:48 PM
To: Stephen Carroll Stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk

please let me know if there's anything missing/askew/wrong/right…

amazing 02091...3.docx

thank you.

-alan

---

phone: 323 988 9692

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Amazing Grace, LLC. - E&O QUOTE
Date: July 8, 2015 at 1:31 PM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com

hi

question 22 has been approved according to the lawyer ted gerdes who works for joanne richardson.

thank you.

-alan

---

phone: 323 988 9692

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> On Jul 8, 2015, at 12:55 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:
>
> Alan,
>
> Attached please find the Errors & Omissions' quotes for **"Amazing Grace"** provided by Hiscox. Please review along with our Transparency paperwork and advise if you wish to bind.
>
> **Prior to binding,** we need the following:
>
> **1. "Acknowledgment and Approval of Insured"** form signed, dated and returned **(1st attachment, page 4)**
>
> 2. **Full premium** made payable to Aon/Albert G. Ruben.
>
> **SUBJECTIVITIES:**
>
> **To remove endorsement 2542 - Failure to Obtain License Exclusion**
> Need update on Question # 22 that all final selections have been made and all rights and releases obtained.
>
> **Title Search Report and Opinion**
> To consider removal of the title exclusion, please forward a Title Search Report and an opinion.
>
> Aon Choice Limitation of Liability Program please be advised we are limiting our Liability to $1,000,000. See page 11, Your Limitation of Our Liability of our Insurance Proposal (attached).
>
> Should you have any questions, please contact our office,

Thank you,

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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<T&D Insurance Proposal -Amazing Grace - E&O.pdf><Amazing Grace Hiscox Quote.PDF><QDR AGR Premiums - Amazing Grace 2014 0731 v2.xls>

From: **alan elliott** Alan@AlanElliott.net
Subject: Re: Amazing Grace, LLC E&O #USUUA2700815.15
Date: June 12, 2018 at 12:19 PM
To: Ramona Horne ramona.horne@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi ramona

yes, we will be renewing this. can you please give me the price to reup for 1 yr./3yr/ 5yr or whatever the options may be please.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

On May 14, 2018, at 9:22 AM, Ramona Horne <ramona.horne@aon.com> wrote:

Good afternoon,

The above mentioned E&O is scheduled to expired on 7/21/2018. In order for us to obtain a renewal quote we need an updated application. Please see attached. I have also attached the expiring application as a reference. If coverage is no longer needed please advise. Thanks.

Regards,

Ramona Horne

_____

AON/Albert G. Ruben Company (New York) Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Tel: 212-337-4358
Direct Fax: 847-953-2367
Email: ramona.horne@aon.com

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> ***individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.***
>
> <Video_Film_and_Television_Producers_Application.pdf><amazing grace App- REVISED Q#22 -E&O Video Film and Television Producers....doc>

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **alan elliott** Alan@AlanElliott.net
Subject: Re: Amazing Grace, LLC E&O #USUUA2700815.15
Date: June 14, 2018 at 10:45 AM
To: Ramona Horne ramona.horne@aon.com

hi ramona

i am following up on this since i havent heard back since our call the other day.

yes, we will be renewing this. can you please give me the price to reup for 1 yr./3yr/ 5yr or whatever the options may be please.

thank you.

-alan

---

phone: 323 988 9692

peace and love.

> On May 14, 2018, at 9:22 AM, Ramona Horne <ramona.horne@aon.com> wrote:
>
> Good afternoon,
>
> The above mentioned E&O is scheduled to expired on 7/21/2018. In order for us to obtain a renewal quote we need an updated application. Please see attached. I have also attached the expiring application as a reference. If coverage is no longer needed please advise. Thanks.
>
> Regards,
>
> Ramona Horne
> _____
> AON/Albert G. Ruben Company (New York) Inc.
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Direct Tel: 212-337-4358
> Direct Fax: 847-953-2367
> Email: ramona.horne@aon.com

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<Video_Film_and_Television_Producers_Application.pdf><amazing grace App- REVISED Q#22 -E&O Video Film and Television Producers....doc>

thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **alan elliott** Alan@AlanElliott.net
Subject: Fwd: Amazing Grace, LLC E&O #USUUA2700815.15
Date: June 12, 2018 at 12:18 PM
To: Ramona Horne ramona.horne@aon.com

thank you.

-alan

---

phone: 323 988 9692

peace and love.

> Begin forwarded message:
>
> **From:** "alan elliott (ucla)" <alanelliott@g.ucla.edu>
> **Subject:** **Re: Amazing Grace, LLC E&O #USUUA2700815.15**
> **Date:** June 11, 2018 at 10:52:29 AM PDT
> **To:** Ramona Horne <ramona.horne@aon.com>
> **Cc:** "Todd W. Musburger" <todd@musburger.com>
>
> hi ramona
>
> yes, we will be renewing this. can you please give me the price to reup for 1 yr./3yr/ 5yr or whatever the options may be please.
>
> thank you.
>
> -alan
>
> ---
>
> **phone: 323 988 9692**
>
> **peace and love.**
>
>

On May 14, 2018, at 9:22 AM, Ramona Horne <ramona.horne@aon.com> wrote:

Good afternoon,

The above mentioned E&O is scheduled to expired on 7/21/2018. In order for us to obtain a renewal quote we need an updated application. Please see attached. I have also attached the expiring application as a reference. If coverage is no longer needed please advise. Thanks.

Regards,

Ramona Horne

_____

AON/Albert G. Ruben Company (New York) Inc.
171 Madison Avenue, Suite 401
New York, NY 10016
Direct Tel: 212-337-4358
Direct Fax: 847-953-2367
Email: ramona.horne@aon.com

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thank you.

-alan

---

phone: 323 988 9692

peace and love.

From: **Cope, Victoria** Victoria.Cope@clydeco.us
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 1:03 PM
To: alanelliott@g.ucla.edu
Cc: Bertschi, Scott Scott.Bertschi@clydeco.us, maria.clark@aon.com, Bodden Tara Tara.Bodden@HISCOX.com

VC

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | **Mobile:** +1 404 374 5461

CLYDE&CO | 271 17th Street | Suite 1720 | Atlanta | GA 30363 | USA
Main +1 404 410 3150 | **Fax** +1 404 410 3151 | **www.clydeco.us**

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PDF Adobe
Hiscox_Amazing Grace…7).PDF

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS
Date: July 10, 2015 at 9:33 AM
To: Stephen Carroll Stephen.carroll@aon.com

thank you.

-alan

---

phone: 323 988 9692

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> Begin forwarded message:
>
> **From:** Annette Shavuo <annette.shavuo@aon.com>
> **Subject:** **RE: Amazing Grace- PLEASE CHECK THIS**
> **Date:** July 9, 2015 at 7:56:00 AM PDT
> **To:** alan elliott <alanelliott@g.ucla.edu>, Stephen Carroll <stephen.carroll@aon.com>
>
> Hi Alan,
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> Thank you for answering Q#22. I will send the revised application to Hiscox. We still need the following in order to bind coverage.
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> 2. **Full premium** made payable to Aon/Albert G. Ruben.
>
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> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
> Fax: (212) 633-1457 / Direct: (847) 953-0849
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From: alan elliott [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, July 08, 2015 4:38 PM
To: Stephen Carroll; Annette Shavuo
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS

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thank you.

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> New York, NY 10016
> Phone: 212-337-4353
> Cell: 914-589-2474

Cell: [redacted]
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, March 04, 2015 3:24 PM
To: Stephen Carroll
Cc: Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
Subject: Re: Amazing Grace

hey stephen

we are checking in re policy.

please let us know.

thank you.

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> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> Cell: 914-589-2474
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, February 27, 2015 3:50 PM

Sent: Friday, February 27, 2015 3:30 PM
To: Stephen Carroll
Cc: Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
Subject: Re: Amazing Grace

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documentary

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the current iteration of the footage is owned by me with quitclaim from warner bors. films.

5. Did they obtain rights from Warner Brothers?

yes.

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none needed, as per atlantic/warner music group.

7. Did Aretha Franklin participate in this production?

yes

Stephen Carroll, V.P.
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Phone: 212-337-4353
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Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

T&D Insurance
Propos...O.PDF

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: RE: Amazing Grace- PLEASE CHECK THIS
Date: July 10, 2015 at 11:54 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Annette Shavuo annette.shavuo@aon.com

SC

Alan: you didn't sign page 4 or indicate your option selection.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Friday, July 10, 2015 12:34 PM
To: Stephen Carroll
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS

thank you.

-alan

---

phone: 323 988 9692

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Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: RE: Amazing Grace- PLEASE CHECK THIS
Date: July 9, 2015 at 7:56:00 AM PDT
To: alan elliott <alanelliott@g.ucla.edu>, Stephen Carroll <stephen.carroll@aon.com>

Hi Alan,

Thank you for answering Q#22. I will send the revised application to Hiscox. We still need the following in order to bind coverage.

1. **"Acknowledgment and Approval of Insured"** form signed, dated and returned **(1st attachment, page 4)**

2. **Full** premium made payable to Aon/Albert G. Ruben

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Thanks,

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Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

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To: Stephen Carroll; Annette Shavuo
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> **Sent:** Wednesday, March 04, 2015 3:24 PM
> **To:** Stephen Carroll
> **Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
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> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, February 27, 2015 3:50 PM
> **To:** Stephen Carroll
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<Amazing Grace Hiscox Quote.PDF>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS
Date: July 8, 2015 at 1:37 PM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com

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> **Sent:** Wednesday, March 04, 2015 3:24 PM
> **To:** Stephen Carroll
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> **Subject:** Re: Amazing Grace
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AS

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phone: 323 988 9692

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On Feb 27, 2015, at 1:42 PM, Stephen Carroll <stephen.carroll@aon.com> wrote:

> Thank you…I have forwarded info to underwriters
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> Cell: 914-589-2474
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, February 27, 2015 3:50 PM
> **To:** Stephen Carroll
> **Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
> **Subject:** Re: Amazing Grace
>
> hi stephen
>
> please see answers below.
>
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2) aretha franklin; the queen of soul (august 22, 1988) (http://www.imdb.com/title/tt0210537/)

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<Amazing Grace Hiscox Quote.PDF>

T&D Insurance Propos...O.PDF

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Amazing Grace- PLEASE CHECK THIS
Date: July 9, 2015 at 2:04 PM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com

hi annette and stephen

i was about to sign this and noticed it is not the correct version.

can i please get the revised quote with this taken out of the doc. now that question #22 has been answered:

SUBJECTIVITIES:

To remove endorsement 2542 - Failure to Obtain License Exclusion

Need update on Question # 22 that all final selections have been made and all rights and releases obtained.

thank you.

-alan

---

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> On Jul 9, 2015, at 7:56 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:
>
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>
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>
> **1. "Acknowledgment and Approval of Insured"** form signed, dated and returned **(1st attachment, page 4)**
>
> 2. **Full premium** made payable to Aon/Albert G. Ruben.
>
> Thanks,
>
> Annette Shavuo
> Aon/Albert G. Ruben
> 171 Madison Avenue, Suite 401
> New York, NY 10016
> Tel: (212) 627-7400 / Direct: (212) 463-5586
> Fax: (212) 633-1457 / Direct: (847) 953-0849

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From: alan elliott [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, July 08, 2015 4:38 PM
To: Stephen Carroll; Annette Shavuo
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS

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(of course there are always exclusions for fraud, withholding pertinent information, etc.)

- that the Atlantic records indemnification letter in the warner contract is in effect.

thank you.

-alan

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Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, March 04, 2015 3:24 PM
To: Stephen Carroll
Cc: Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger
Subject: Re: Amazing Grace

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To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com

and… one thing more:

how much is a title report?

thank you.

-alan

---

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<Amazing Grace Hiscox Quote.PDF>

<T&D Insurance Proposal -Amazing Grace - E&O.PDF>

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: RE: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 9:26 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Annette Shavuo annette.shavuo@aon.com
Cc: Liesl Copland LCopland@wmeentertainment.com, Todd Musburger todd@musburger.com

SC

Alan:

This takes care of stock footage. I need confirmation all music has been cleared to remove exclusion.

Stephen Carroll, V.P.
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171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, August 31, 2015 12:06 PM
To: Annette Shavuo; Stephen Carroll
Cc: Liesl Copland; Todd Musburger
Subject: amazing grace policy 2700815 NEED ASAP

hi annette and stephen

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Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: clearance invoice... to rid policy of exclusion...
Date: August 28, 2015 at 12:25:17 PM PDT
To: Annette Shavuo <annette.shavuo@aon.com>, "Todd W. Musburger" <todd@musburger.com>
Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger"

Cc: Liesl Copland <LCopland@wheelentertainment.com>, "Todd W. Musburger <todd@musburger.com>

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Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 9:36 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Annette Shavuo annette.shavuo@aon.com, Liesl Copland LCopland@wmeentertainment.com, Todd W. Musburger todd@musburger.com

here you go:

The Rights Workshop, Inc.
1800 Bryant Street, Suite 104
San Francisco, CA 94110

(415)561-3333
billing@rightsworkshop.com
http://www.rightsworkshop.com

Invoice

Date	Invoice #
08/18/2015	1444
Terms	**Due Date**
Net 10	08/28/2015

Bill To

Julie Huntsinger
Telluride Film Festival
800 Jones Street
Berkeley, CA 94710

Amount Due	Enclosed
$5,250.00	

Please detach top portion and return with your payment.

Project: Amazing Grace

Service	Description	Quantity	Rate	Amount
Music Clearance (Part B)	• Contract procurement, review & admin	7	250.00	1,750.00
License Fee	• Music license fees • Holy Holy, How I Got Over, Precious Lord Take My Hand, You've Got a Friend, My Sweet Lord, • Old Landmark, Mary Don't You Weep	7	500.00	3,500.00
			Total	$5,250.00

Thank you for your business. Please note Federal ID#: 42-1655690.

thank you.

-alan

---

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Subject: Re: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 10:08 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Annette Shavuo annette.shavuo@aon.com, Liesl Copland LCopland@wmeentertainment.com, Todd W. Musburger todd@musburger.com

thank you.

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Subject: Re: amazing grace policy 2700815 NEED ASAP
Date: January 27, 2016 at 9:49 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Annette Shavuo annette.shavuo@aon.com, Todd W. Musburger todd@musburger.com

hello stephen

i have been in touch with some attorneys about hiscox's declining of my coverage and, long story short, they find hiscox's position suspect.

i currently have an offer from a film company that would pay $2.3m- and over the lifetime of the contract (27 years) i believe the value should be at least 5x's that, which is what i may have to walk away from because of hiscox's position currently.

i would like to get your thoughts on how to best challenge hiscox to reinstate the policy asap and/or some referrals to litigators.

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

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Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, August 31, 2015 12:37 PM
To: Stephen Carroll
Cc: Annette Shavuo; Liesl Copland; Todd W. Musburger
Subject: Re: amazing grace policy 2700815 NEED ASAP

here you go:

thank you.

-alan

---

phone: 323 988 9692

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> On Aug 31, 2015, at 9:26 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
>
> Alan:
>
> This takes care of stock footage. I need confirmation all music has been cleared to remove exclusion.
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> **New Cell: 914-588-4290**
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Monday, August 31, 2015 12:06 PM
> **To:** Annette Shavuo; Stephen Carroll
> **Cc:** Liesl Copland; Todd Musburger
> **Subject:** amazing grace policy 2700815 NEED ASAP

hi annette and stephen

we need to get the exclusions for song clearances and stock shots lifted asap so we can get funds today.

thank you.

-alan

---

phone: 323 988 9692

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Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: clearance invoice... to rid policy of exclusion...
Date: August 28, 2015 at 12:25:17 PM PDT
To: Annette Shavuo <annette.shavuo@aon.com>, "Todd W. Musburger" <todd@musburger.com>
Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <todd@musburger.com>

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

---

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<Invoice #1444.pdf>

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: RE: amazing grace policy 2700815 NEED ASAP
Date: January 27, 2016 at 1:08 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Annette Shavuo annette.shavuo@aon.com, Todd W. Musburger todd@musburger.com

SC

This is all I have to date. Let me know how you wish to proceed.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, January 27, 2016 12:50 PM
To: Stephen Carroll
Cc: Annette Shavuo; Todd W. Musburger
Subject: Re: amazing grace policy 2700815 NEED ASAP

hello stephen

i have been in touch with some attorneys about hiscox's declining of my coverage and, long story short, they find hiscox's position suspect.

i currently have an offer from a film company that would pay $2.3m- and over the lifetime of the contract (27 years) i believe the value should be at least 5x's that, which is what i may have to walk away from because of hiscox's position currently.

i would like to get your thoughts on how to best challenge hiscox to reinstate the policy asap and/or some referrals to litigators.

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

> On Aug 31, 2015, at 10:07 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
>
> See below. Exclusion will be removed. Endorsement to follow.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: Richardson Joanne [mailto:Joanne.Richardson@Hiscox.com]
Sent: Monday, August 31, 2015 1:04 PM
To: Stephen Carroll
Cc: Annette Shavuo
Subject: FW: amazing grace policy 2700815 NEED ASAP

Thanks, I'll remove the exclusion.

From: Stephen Carroll [mailto:stephen.carroll@aon.com]
Sent: Monday, August 31, 2015 12:45
To: Richardson Joanne
Cc: Annette Shavuo
Subject: FW: amazing grace policy 2700815 NEED ASAP

Music clearance attached.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, August 31, 2015 12:37 PM
To: Stephen Carroll
Cc: Annette Shavuo; Liesl Copland; Todd W. Musburger
Subject: Re: amazing grace policy 2700815 NEED ASAP

here you go:

thank you.

-alan

---

phone: 323 988 9692

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On Aug 31, 2015, at 9:26 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:

Alan:

This takes care of stock footage. I need confirmation all music has been cleared to remove exclusion.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, August 31, 2015 12:06 PM
To: Annette Shavuo; Stephen Carroll
Cc: Liesl Copland; Todd Musburger
Subject: amazing grace policy 2700815 NEED ASAP

hi annette and stephen

we need to get the exclusions for song clearances and stock shots lifted asap so we can get funds today.

thank you.

-alan

---

phone: 323 988 9692

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Date: August 28, 2015 at 12:25:17 PM PDT
To: Annette Shavuo <annette.shavuo@aon.com>, "Todd W. Musburger" <todd@musburger.com>
Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <todd@musburger.com>

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

---

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<Invoice #1444.pdf>

Amazing Grace - Frank...C.PDF

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: RE: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 9:11 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Annette Shavuo annette.shavuo@aon.com
Cc: Liesl Copland LCopland@wmeentertainment.com, Todd Musburger todd@musburger.com

SC

I have sent into underwriter…waiting for response.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, August 31, 2015 12:06 PM
To: Annette Shavuo; Stephen Carroll
Cc: Liesl Copland; Todd Musburger
Subject: amazing grace policy 2700815 NEED ASAP

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---

phone: 323 988 9692

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Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <todd@musburger.com>

hi again, we need to make sure the exclusions for ALL song clearances is removed

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

From: **Todd Musburger** todd@musburger.com
Subject: "Amazing Grace"
Date: March 17, 2016 at 1:08 PM
To: Stephen Carroll stephen.carroll@aon.com, ALAN ELLIOTT alanelliott@g.ucla.edu

TM

Hi Stephen: Lionsgate has asked us to add the following as additional insureds on the existing policy:

1. "Summit Entertainment, LLC, each partner therein and division thereof, and its respective parents, subsidiaries, and related entities, its distributors, licensees and assigns, and the respective officers, directors, shareholders, employees and agents of the foregoing, 2700 Colorado Avenue, Suite 200, Santa Monica, CA 90404"

2. "Entertainment One UK Ltd., its parent, subsidiaries and all associated, affiliated and related entities, its successors, assigns, licensees, sub-distributors, sub-licensees, exhibitors, broadcasters and advertisers, and the officers, directors, shareholders, attorneys, agents and employees of each of the foregoing, 120 New Cavendish Street, London W1W 6XX"

3. "JP Morgan Chase Bank, 1 Chase Manhattan Plaza, New York, NY 10005"

Please let me know if you have any additional questions...Thanks, Todd

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace
Date: June 15, 2016 at 2:43 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi stephen

is there a time we can please get on the phone to discuss the policy today?

please let me know.

thank you.

-alan

---
phone: 323 988 9692
peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Amazing Grace
Date: February 27, 2015 at 12:50 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Ramona.horne@aon.com, George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk, Todd W. Musburger todd@musburger.com

hi stephen

please see answers below.

> On Feb 27, 2015, at 11:22 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
>
> So after all this time my underwriter finally responded to the submission and had the following questions. I apologize but would appreciate any clarification you can provide:
>
> 1. Is this a documentary, music video or something else?

documentary

> 2. What is the anticipated distribution/dissemination? theatrical release, TV special, etc…?

theatrical, vod, dvd, television

> 3. Was it previously produced and released and now they're re-releasing it?

it was (technically) produced by warners.

elements of the project have been released at least twice that we know of:

1) the atlantic 25th anniversary film, made with braverman productions

2) aretha franklin; the queen of soul (august 22, 1988) (http://www.imdb.com/title/tt0210537/)

> 4. If not previously released please advise who produced it and who currently owns the copyright and what agreements are in place with this applicant.

the current iteration of the footage is owned by me with quitclaim from warner bors. films.

> 5. Did they obtain rights from Warner Brothers?

yes.

> 6. Did they obtain rights from Atlantic Records?

none needed, as per atlantic/warner music group.

> 7. Did Aretha Franklin participate in this production?

yes

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016

Phone: 212-337-4353
Cell: 914-589-2474
Fax: 847-953-2692

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: amazing grace/concord music group
Date: July 11, 2016 at 3:28 PM
To: Larry Blake Larry.Blake@concordmusicgroup.com, Stephen Carroll stephen.carroll@aon.com
Cc: Scott Pascucci scottpascucci@concordbicycle.com

yes.

stephen and i talked at 8:45pst this morning. stephen said he left you a vm.

perhaps you guys can set a time to talk?

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

> On Jul 11, 2016, at 3:15 PM, Larry Blake <Larry.Blake@concordmusicgroup.com> wrote:
>
> Alan,
>
> I never heard back from Stephen Carroll on this. I tried him again about a half hour ago, but got his voicemail again.
>
> Did he respond to you?
>
> Larry
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Friday, July 08, 2016 2:09 PM
> **To:** Larry Blake <Larry.Blake@concordmusicgroup.com>; Scott Pascucci <scottpascucci@concordbicycle.com>
> **Subject:** Fwd: amazing grace/concord music group
>
> thank you.
>
> -alan
>
> ---
>
> **phone: 323 988 9692**
> **peace and love.**
>
> **http://songsoundrecord.tumblr.com**
>
> Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: amazing grace/concord music group
Date: July 8, 2016 at 2:01:51 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>
Cc: "Todd W. Musburger" <todd@musburger.com>

hi stephen

you have on your voice mail a call from larry blake, svp/general counsel from concord music group.

PLEASE call him asap- he needs to hear from you that the policy does not exclude sydney pollack.

Larry Blake <Larry.Blake@concordmusicgroup.com> 310 385 4205

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace/Delivery Schedule
Date: November 6, 2015 at 4:42 PM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com
Cc: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, Lincoln Bandlow lbandlow@foxrothschild.com

hey stephen

can you please ask the carrier re: “amazing grace” if, as suggested by hiscox’s referral (lincoln bandlow), that in fact, if there is a settlement with aretha frankln and amazing grace llc, that producers errors and omissions coverage is in place that provides for a $25,000 deductible and coverage of $5m/$5m for three years? Plus we need a quote because this policy has to be paid for 3 years as part of Delivery.

thank you.

-alan

---

phone: 323 988 9692
peace and love.

> Tom McGuire | WME
> TMcGuire@wmeentertainment.com
> 310.248.3022
>
> ---
>
> **From:** Bandlow, Lincoln [mailto:lbandlow@foxrothschild.com]
> **Sent:** Friday, November 06, 2015 3:38 PM
> **To:** alan elliott (ucla); Tom McGuire
> **Cc:** Todd W. Musburger
> **Subject:** RE: Amazing Grace/Delivery Schedule
>
> The carrier has said that there is no coverage for this dispute because information about prior disputes with Aretha were purportedly not disclosed to the carrier during the application process. I don’t believe that the carrier is taking the position that all coverage is now null and void or if just coverage relating to any claim by Aretha is out. So that would have to be clarified with the carrier. I would lean to thinking they are just excluding Aretha claims.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace/Delivery Schedule
Date: November 6, 2015 at 3:44 PM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com
Cc: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, Lincoln Bandlow lbandlow@foxrothschild.com

hey stephen

can you ask the carrier re: “amazing grace” if, as suggested by hiscox’s referral (lincoln bandlow), that in fact, if there is a settlement with aretha frankln and amazing grace llc, that coverage is in place?

thank you.

-alan

---

phone: 323 988 9692
peace and love.

> Tom McGuire | WME
> TMcGuire@wmeentertainment.com
> 310.248.3022
>
> ---
>
> **From:** Bandlow, Lincoln [mailto:lbandlow@foxrothschild.com]
> **Sent:** Friday, November 06, 2015 3:38 PM
> **To:** alan elliott (ucla); Tom McGuire
> **Cc:** Todd W. Musburger
> **Subject:** RE: Amazing Grace/Delivery Schedule
>
> The carrier has said that there is no coverage for this dispute because information about prior disputes with Aretha were purportedly not disclosed to the carrier during the application process. I don’t believe that the carrier is taking the position that all coverage is now null and void or if just coverage relating to any claim by Aretha is out. So that would have to be clarified with the carrier. I would lean to thinking they are just excluding Aretha claims.

From: **Bodden Tara** Tara.Bodden@HISCOX.com
Subject: Amazing Grace/Franklin
Date: September 16, 2015 at 2:28 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Richardson Joanne Joanne.Richardson@Hiscox.com, stephen.carroll@aon.com

BT

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

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Amazing Grace - Frank...OC.pdf

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: amazing grace/sydney pollack
Date: June 9, 2016 at 11:54 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com, Tom McGuire tmcguire@wmeentertainment.com

hello stephen:

as we are obliged to update you and because sydney pollack is covered under the “amazing grace" e&o policy, as an update:

i had a presumed deal with lionsgate films. the deal was for $2.3m and has fallen through because the sydney pollack estate has refused to further indemnify the film company.

lionsgate, down the stretch of the 8 month + negotiation asked us to “make peace” with barry tyerman- the attorney for the late sydney pollack (pollack died before the film was edited). lionsgate asked for a signed indemnification letter from the estate.

we had sold the film to lionsgate with full disclosure that mr. tyerman had asked me to remove mr. pollack’s name as director of the film prior to the film festival in telluride last year. i did as mr. tyerman asked, removed mr. pollack’s name from the film, and thought that would be the end (the film does NOT have the pollack name on it, nor did we ever warrant that we were selling a sydney pollack film).

to try to satisfy lionsgate, we prepared two separate letters (see below) in addition to the memo from warner films showing that pollack had been paid.

steve spira, the president of business affairs, has told me that mr. tyerman came to warner brothers looking for further payment. mr. spira told me that warners told mr. tyerman that according to mr. pollack’s contract, warners felt there was no further compensation due to the estate.

also, bryan unger, the dga’s associate national executive director, took the following position on behalf of the director’s guild:

> **From:** "Bryan Unger" <Bryan@dga.org>
> **Subject: Re: amazing grace/sydney pollack**
> **Date:** August 24, 2015 at 1:59:30 PM PDT
> **To:** <alanelliott@g.ucla.edu>
>
> Alan, I don't see a DGA issue here. This should be handled directly with the estate. Glad to hear you are moving the project along! - Bryan
>
> G. Bryan Unger
> Associate National Executive Director/Western Executive Director
> Directors Guild of America
> bryan@dga.org
> 310-289-5330
>
> > > > "alan elliott (ucla)" <alanelliott@g.ucla.edu> 8/17/2015 8:09 PM >>>
> hey bryan
>
> I know we have gone over this before but... my "amazing grace" film is now opening both telluride (confidential) and Toronto.
>
> sydney pollack has a contract which wb paid him...
>
> and so I was wondering if the dga wanted to weigh in on this in any way... as the estate may want to pull Sydney's name off the project.

all of this is to inform you of the situation.

we have other offers which are being negotiated. i have no plans to negotiate any further with mr. tyerman.

INTER-OFFICE MEMO

WARNER BROS. INC.

TO: KEN MANCEBO FROM: JACK E. FREEDMAN

SUBJECT: ARETHA FRANKLIN PROJECT - Sanford Productions

DATE: March 14, 1972 COPIES TO: F. Wells B. Wallace
P. Knecht
C. Greenlaw D. Brown
E. Morey S. Kiwitt

We have agreed to pay to Sanford Productions the sum of $1,500 for Sidney Pollack's services in producing and directing this project. We will be billed later for DGA contributions.

Please prepare the check and send it to me for transmittal with an appropriate letter.

JEF:jf

J.E.F.

Tyerman 2016-0...1.docx

Chain of Title Ltr (Am...inal.pdf

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

From: **Linda Lichter** llichter@lgna.com
Subject: Re: Aretha Franklin Cease and Desist Demand
Date: September 4, 2015 at 8:07 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Annette Shavuo annette.shavuo@aon.com, Stephen Carroll stephen.carroll@aon.com, Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, Tom Luddy tom.luddy@gmail.com, Julie Huntsinger juliehuntsinger@me.com

LL

Alan, please also add tom and Julie to the policy. Linda LICHTER.

Sent from my iPad

On Sep 4, 2015, at 8:56 AM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

> dear insurers
>
> please add the telluride film festival to the policy for:
>
> 2700815 Amazing Grace LLC
>
> tom, Julie: if there are any specifics you would like, please contact stephen or Annette.
>
> stephen is at:
>
> (212) 337-4353 w
> (914) 589-2474 c
>
> Annette is at:
>
> (212) 463-5586 w
> (847) 953-0849 c
>
> thank you.
>
> ---
> phone: 323 988 9692
>
> Sent from a iPhone
>
> This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.
>
> On Sep 4, 2015, at 8:17 AM, Julie Huntsinger <juliehuntsinger@me.com> wrote:
>
> > You have?
> >
> > We need to somehow be indemnified. Can your legal help with that?
> >
> > Sent from my iPhone
> >
> > Begin forwarded message:
> >
> > **From:** Linda Lichter <llichter@lgna.com>
> > **Date:** September 4, 2015 at 8:11:39 AM MDT
> > **To:** Julie Huntsinger <juliehuntsinger@me.com>
> > **Cc:** Tom Luddy <tom.luddy@gmail.com>
> > **Subject: Re: Aretha Franklin Cease and Desist Demand**
> >
> > Alan should show you whatever documentation he has concerning the name and likeness rights. Does he claim to have that?
> >
> > Notwithstanding, there is no injunction yet, and not sure they'd get one against a non profit showing.
> >
> > Ask Alan about giving telluride an indemnity.
> >
> > Talk later.
> >
> > Sent from my iPad
> >
> > On Sep 4, 2015, at 12:26 AM, Julie Huntsinger <juliehuntsinger@me.com> wrote:
> >
> > > Alan tells me it ended today but this would indicate otherwise.
> > >
> > > Thoughts?
> > >
> > > Sent from my iPad
> > >
> > > Begin forwarded message:
> > >
> > > **From:** TFF Mail <mail@telluridefilmfestival.org>
> > > **Date:** September 3, 2015 at 10:07:30 PM MDT
> > > **To:** Julie Huntsinger <juliehuntsinger@me.com>
> > > **Subject: Fwd: Aretha Franklin Cease and Desist Demand**
> > >
> > > What?! How can I help here?
> > >
> > > > Begin forwarded message:
> > > >
> > > > **From:** "Fresard, Fred" <FFresard@dykema.com>
> > > > **Subject: Aretha Franklin Cease and Desist Demand**
> > > > **Date:** September 3, 2015 at 9:33:52 PM MDT

To: "mail@telluridefilmfestival.org" <mail@telluridefilmfestival.org>
Cc: "Neureiter, Reid" <Neureiter@wtotrial.com>

Please see attached correspondence regarding Aretha Franklin's demand that the National Film Preserve, Ltd., a/k/a Telluride Film Festival refrain from showing the film "Amazing Grace."

Regards,

Fred Fresard

DYKEMA

Fred J. Fresard
Member
FFresard@dykema.com
Licensed in Michigan and Ontario, Canada

248-203-0593 Direct
248-203-0700 Main
855-233-1801 Fax
248-840-6314 Mobile

39577 Woodward Avenue, Suite 300
Bloomfield Hills, Michigan 48304
www.dykema.com

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<Aretha Franklin Cease and Desist Demand.pdf>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Aretha Franklin Cease and Desist Demand
Date: September 4, 2015 at 8:17 AM
To: Linda Lichter llichter@lgna.com, Annette Shavuo annette.shavuo@aon.com, Stephen Carroll stephen.carroll@aon.com
Cc: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, Tom Luddy tom.luddy@gmail.com, Julie Huntsinger juliehuntsinger@me.com

yes please add tom luddy and Julie Huntsinger to the insurance policy.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Sep 4, 2015, at 9:07 AM, Linda Lichter <llichter@lgna.com> wrote:

> Alan, please also add tom and Julie to the policy. Linda LICHTER.
>
> Sent from my iPad
>
> On Sep 4, 2015, at 8:56 AM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:
>
> > dear insurers
> >
> > please add the telluride film festival to the policy for:
> >
> > 2700815 Amazing Grace LLC
> >
> > tom, Julie: if there are any specifics you would like, please contact stephen or Annette.
> >
> > stephen is at:
> >
> > (212) 337-4353 w
> > (914) 589-2474 c
> >
> > Annette is at:
> >
> > (212) 463-5586 w
> > (847) 953-0849 c
> >
> > thank you.
> >
> > ---
> > phone: 323 988 9692
> >
> > Sent from a iPhone
> >
> > This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.
> >
> > On Sep 4, 2015, at 8:17 AM, Julie Huntsinger <juliehuntsinger@me.com> wrote:
> >
> > > You have?
> > >
> > > We need to somehow be indemnified. Can your legal help with that?
> > >
> > > Sent from my iPhone
> > >
> > > Begin forwarded message:
> > >
> > > **From:** Linda Lichter <llichter@lgna.com>
> > > **Date:** September 4, 2015 at 8:11:39 AM MDT
> > > **To:** Julie Huntsinger <juliehuntsinger@me.com>
> > > **Cc:** Tom Luddy <tom.luddy@gmail.com>
> > > **Subject: Re: Aretha Franklin Cease and Desist Demand**
> > >
> > > Alan should show you whatever documentation he has concerning the name and likeness rights. Does he claim to have that?
> > >
> > > Notwithstanding, there is no injunction yet, and not sure they'd get one against a non profit showing.
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> > > Ask Alan about giving telluride an indemnity.
> > >
> > > Talk later.
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> > > > Alan tells me it ended today but this would indicate otherwise.
> > > >
> > > > Thoughts?
> > > >
> > > > Sent from my iPad

Begin forwarded message:

From: TFF Mail <mail@telluridefilmfestival.org>
Date: September 3, 2015 at 10:07:30 PM MDT
To: Julie Huntsinger <juliehuntsinger@me.com>
Subject: Fwd: Aretha Franklin Cease and Desist Demand

What?! How can I help here?

Begin forwarded message:

From: "Fresard, Fred" <FFresard@dykema.com>
Subject: Aretha Franklin Cease and Desist Demand
Date: September 3, 2015 at 9:33:52 PM MDT
To: "mail@telluridefilmfestival.org" <mail@telluridefilmfestival.org>
Cc: "Neureiter, Reid" <Neureiter@wtotrial.com>

Please see attached correspondence regarding Aretha Franklin's demand that the National Film Preserve, Ltd., a/k/a Telluride Film Festival refrain from showing the film "Amazing Grace."

Regards,

Fred Fresard

DYKEMA

Fred J. Fresard
Member
FFresard@dykema.com
Licensed in Michigan and Ontario, Canada

248-203-0593 Direct
248-203-0700 Main
855-233-1801 Fax
248-840-6314 Mobile

39577 Woodward Avenue, Suite 300
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www.dykema.com

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<Aretha Franklin Cease and Desist Demand.pdf>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Aretha Franklin Cease and Desist Demand
Date: September 4, 2015 at 7:30 AM
To: Annette Shavuo annette.shavuo@aon.com, Stephen Carroll stephen.carroll@aon.com
Cc: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, llichter@lgna.com, Tom Luddy tom.luddy@gmail.com, Julie Huntsinger juliehuntsinger@me.com

dear insurers

please add the telluride film festival to the policy for:

2700815 Amazing Grace LLC

tom, Julie: if there are any specifics you would like, please contact stephen or Annette.

stephen is at:

(212) 337-4353 w
(914) 589-2474 c

Annette is at:

(212) 463-5586 w
(847) 953-0849 c

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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On Sep 4, 2015, at 8:17 AM, Julie Huntsinger <juliehuntsinger@me.com> wrote:

> You have?
>
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> Sent from my iPhone
>
> Begin forwarded message:
>
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> > **Date:** September 4, 2015 at 8:11:39 AM MDT
> > **To:** Julie Huntsinger <juliehuntsinger@me.com>
> > **Cc:** Tom Luddy <tom.luddy@gmail.com>
> > **Subject: Re: Aretha Franklin Cease and Desist Demand**
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> > > > **From:** TFF Mail <mail@telluridefilmfestival.org>
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> > > >
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> > > >
> > > > > Begin forwarded message:
> > > > >
> > > > > **From:** "Fresard, Fred" <FFresard@dykema.com>
> > > > > **Subject: Aretha Franklin Cease and Desist Demand**
> > > > > **Date:** September 3, 2015 at 9:33:52 PM MDT
> > > > > **To:** "mail@telluridefilmfestival.org" <mail@telluridefilmfestival.org>
> > > > > **Cc:** "Neureiter, Reid" <Neureiter@wtotrial.com>
> > > > >
> > > > > Please see attached correspondence regarding Aretha Franklin's demand that the National Film Preserve, Ltd., a/k/a Telluride Film Festival refrain from showing the film "Amazing Grace."

Regards,

Fred Fresard

DYKEMA

Fred J. Fresard
Member
FFresard@dykema.com
Licensed in Michigan and Ontario, Canada

248-203-0593 Direct
248-203-0700 Main
855-233-1801 Fax
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<Aretha Franklin Cease and Desist Demand.pdf>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Aretha Franklin/Injunction/"Amazing Grace"
Date: September 4, 2015 at 11:26 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

> **From:** Tom McGuire <TMcGuire@wmeentertainment.com>
> **Date:** September 4, 2015 at 12:20:47 PM MDT
> **To:** "srodgers@fwlaw.com" <srodgers@fwlaw.com>, "jtanner@fwlaw.com" <jtanner@fwlaw.com>
> **Cc:** "Todd Musburger (todd@musburger.com)" <todd@musburger.com>, "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>
> **Subject: Aretha Franklin/Injunction/"Amazing Grace"**
>
> Gentlemen:
>
> I have spoken to our client and his lawyer on this matter, and Alan will take on the obligation of paying your fees.
>
> Let me know if you have any question on this matter. I look forward to working with you on this.
>
> Tom McGuire
>
> Tom McGuire | WME
> TMcGuire@wmeentertainment.com
> 310.248.3022

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Call with Aretha's counsel
Date: September 4, 2015 at 11:25 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

> **From:** Linda Lichter <llichter@lgna.com>
> **Date:** September 4, 2015 at 12:23:08 PM MDT
> **To:** Tom McGuire <TMcGuire@wmeentertainment.com>
> **Cc:** "Todd Musburger (todd@musburger.com)" <todd@musburger.com>, "Matt Farmer (mifarmer0@gmail.com)" <mifarmer0@gmail.com>, "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>, Liesl Copland <LCopland@wmeentertainment.com>
> **Subject: Re: Call with Aretha's counsel**
>
> If there is a hearing when will it be?
>
> Linda Lichter
>
> On Sep 4, 2015, at 12:15 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:
>
> > Linda:
> >
> > Alan's lawyer Todd Musburger and I had a call with Aretha's Detroit, Denver and LA counsel this morning to fully and fairly discuss matters.
> >
> > Todd promised to get them the documents which form the basis for our chain of title, and he has now done so.
> >
> > They are reviewing, and there will be another call to discuss whether there will be litigation or deal discussions. I believe they heard us when Todd very calmly walked them through our arguments.
> >
> > IMPORTANT: Alan is not a defendant here. The festival is. Does the festival have litigation counsel that will be present if there is a hearing today? if so, we should know who that is so we can speak to them and get them up to speed.
> >
> > Thanks, Linda.
> >
> > Tom
> >
> > Tom McGuire | WME
> > TMcGuire@wmeentertainment.com
> > 310.248.3022

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: clearance invoice... to rid policy of exclusion...
Date: August 28, 2015 at 12:25 PM
To: Annette Shavuo annette.shavuo@aon.com, Todd W. Musburger todd@musburger.com
Cc: Liesl Copland LCopland@wmeentertainment.com, Todd W. Musburger todd@musburger.com

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

The Rights Workshop, Inc.
1800 Bryant Street, Suite 104
San Francisco, CA 94110

(415)561-3333
billing@rightsworkshop.com
http://www.rightsworkshop.com

Invoice

Date	Invoice #
08/18/2015	1444
Terms	**Due Date**
Net 10	08/28/2015

Bill To

Julie Huntsinger
Telluride Film Festival
800 Jones Street
Berkeley, CA 94710

Amount Due	Enclosed
$5,250.00	

Please detach top portion and return with your payment.

Project: Amazing Grace

Service	Description	Quantity	Rate	Amount
Music Clearance (Part B)	• Contract procurement, review & admin	7	250.00	1,750.00
License Fee	• Music license fees • Holy Holy, How I Got Over, Precious Lord Take My Hand, You've Got a Friend, My Sweet Lord, • Old Landmark, Mary Don't You Weep	7	500.00	3,500.00
			Total	$5,250.00

Thank you for your business. Please note Federal ID#: 42-1655690.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7
Date: September 4, 2015 at 8:54 AM
To: Annette Shavuo annette.shavuo@aon.com, Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com, Tom McGuire tmcguire@wmeentertainment.com, llichter@lgna.com

for insurers

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

> **From:** Todd Musburger <todd@musburger.com>
> **Date:** September 4, 2015 at 9:27:31 AM MDT
> **To:** ALAN ELLIOTT <alanelliott@g.ucla.edu>, Tom McGuire <tmcguire@wmeentertainment.com>, Matt Farmer <mifarmer0@gmail.com>
> **Subject: Fwd: FW: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7**
>
> This just arrived. Todd is still on the plane.
> -Rebecca
> **Todd W. Musburger**
> **Todd W. Musburger, Ltd.**
> **142 E. Ontario**
> **Suite 500**
> **Chicago, Illinois 60611**
> **312 664 2600**
>
> ---------- Forwarded message ----------
> From: **Neureiter, Reid** <Neureiter@wtotrial.com>
> Date: Fri, Sep 4, 2015 at 8:59 AM
> Subject: FW: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7
> To: Todd Musburger <todd@musburger.com>
> Cc: "Cantor, Jon D." <JDCantor@dykema.com>, "Fresard, Fred" <FFresard@dykema.com>
>
> Mr. Musburger,
>
> This Complaint was filed early this morning in Denver Federal Court, District of Colorado.
>
> Regards
> Reid Neureiter
> 303-244-1993
>
> -----Original Message-----
> From: Neureiter, Reid
> Sent: Friday, September 4, 2015 1:48 AM
> To: 'shannon@telluridefilmfestival.org'
> Subject: FW: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7
> Importance: High
>
> To whom it may concern at the Telluride Film Festival, including co-Director Julie Huntsinger (as registered agent),
>
> Attached find a federal lawsuit filed early this morning on behalf of Aretha Franklin seeking an injunction to stop the public showing or release of the Film "Amazing Grace," which, based on public reports, is to be shown at 7:30 p.m in Telluride. We will be seeking an immediate audience with the Federal Court in Denver to protect Ms. Franklin's rights to her name and likeness. As the exhibits hereto show, the Producer of the film, Mr. Elliot, was never granted permission by Ms. Franklin to publicly show the film and publicly displaying any footage of Ms. Franklin's 1972 concert would be a significant violation of her rights as well as a violation of the federal anti-bootlegging statute.
>
> Please have an authorized representative of the Festival (preferably your legal counsel) contact me immediately in the event

the Festival wants to be heard by the Court.

I can be reached at my office line 303-244-1993 or my cell phone 303-917-3871.

Thank you for your prompt attention to this request.

Wheeler Trigg O'Donnell LLP
N. Reid Neureiter
Of Counsel
303.244.1993
neureiter@wtotrial.com

370 Seventeenth Street, Suite 4500
Denver, Colorado 80202-5647
P 303.244.1800 F 303.244.1879
wtotrial.com

Exhibit 1.pdf

Exhibit 2.pdf

Declaration

I, Aretha Franklin, do hereby swear and affirm that if called upon to testify, I would testify to the following including but not limited to:

a. That in 1972, I did a live recording of my album Amazing Grace at the New Missionary Baptist Church in Los Angeles, California.
b. That the recording of this album was videotaped.
c. That Mr. Alan Elliott, owner of Al's Tapes and Records claims to have purchased the rights to the film or footage of my 1972 performance at the New Missionary Baptist Church in Los Angeles, California.
d. That I have never given permission or entered into any agreement, verbal, written or otherwise with Alan Elliott, Al's Tapes & Records or any entity to exploit my name and or likeness for commercial purposes with regards to the "Amazing Grace" movie, or any film or footage of my 1972 performance at the New Missionary Baptist Church in Los Angeles, California.
e. That in spite of not having prior authorization, as referenced above, Mr. Alan Elliott has plans to release a movie based on my 1972 performance as mentioned above which exploits my name and likeness solely for commercial purposes

above which exploits my name and likeness solely for commercial purposes.

Further affiant sayeth not

ARETHA FRANKLIN

EXHIBIT 3

Declaration

I, Rhonda Jacobs-Sturges do hereby swear and affirm that if called upon to testify, I would testify to the following including but not limited to:

1. That I have watched a live video recorded performance of Aretha Franklin singing at the New Missionary Baptist Church in Los Angeles, California.
2. That the video is more than 128 minutes long with more than 80% directly focused on Aretha Franklin performing her songs.

Further affiant sayeth not.

RHONDA JACOBS

8/24/11

JUANITA R. COE
NOTARY PUBLIC, STATE OF MI
COUNTY OF WAYNE
MY COMMISSION EXPIRES May 27, 2012
ACTING IN COUNTY OF

EXHIBIT 4

Exhibit 5.pdf

Exhibit 6.pdf

Exhibit 7.pdf

ECF Transaction Receip...ted.pdf

Complaint for Emerg...ted.pdf

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7
Date: September 4, 2015 at 7:50 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com

more for insurers

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

> **From:** "alan elliott (ucla)" <alanelliott@g.ucla.edu>
> **Date:** September 4, 2015 at 8:22:23 AM MDT
> **To:** Julie Huntsinger <juliehuntsinger@me.com>
> **Cc:** Tom Luddy <tom.luddy@gmail.com>, "Todd W. Musburger" <todd@musburger.com>, Tom McGuire <tmcguire@wmeentertainment.com>
> **Subject: Re: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7**
>
> thank you.
>
> ---
> phone: 323 988 9692
>
> Sent from a iPhone
>
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>
> On Sep 4, 2015, at 7:33 AM, Julie Huntsinger <juliehuntsinger@me.com> wrote:
>
> > Loading…

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: E&O Policy
Date: April 22, 2016 at 10:30 AM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Todd Musburger todd@musburger.com, Everett Hendler ehendler@lionsgate.com

hi Annette

can you please make the correction asked for below.

thank you.

-alan

---
phone: 323 988 9692
peace and love.

On Apr 22, 2016, at 10:23 AM, Todd Musburger <todd@musburger.com> wrote:

> Alan: Write to her requesting the change that Everett cites - he is correct - and we will need that with anyone we deal with >Thx
> **Todd W. Musburger**
> **Todd W. Musburger, Ltd.**
> **142 E. Ontario**
> **Suite 500**
> **Chicago, Illinois 60611**
> **312 664 2600**
>
> ---------- Forwarded message ----------
> From: **Everett Hendler** <ehendler@lionsgate.com>
> Date: Fri, Apr 22, 2016 at 12:15 PM
> Subject: RE: E&O Policy
> To: Todd Musburger <todd@musburger.com>
>
> Understood.
>
> One slight mistake that needs to be corrected on this new endorsement. Endorsement 8 is actually numbered “E2542.1” not “E2582” as indicated on Endorsement 10. Please have the carrier update this so it properly identifies the deletion.
>
> Endorsement 10 should read as “…it is agreed that Endorsement **E2542.1** Failure to Obtain License Exclusion is/are deleted…”
>
> Thank you for working through the rest, Todd.
>
> Best,
>
> Everett

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Favorites
Date: July 9, 2015 at 11:36 AM
To: Stephen Carroll stephen.carroll@aon.com

http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20(Atlantic%20and%20Warner%20Bros.%20Seven%20Arts).pdf

4-1-1968
Aretha...ts).pdf

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: FOR IMMEDIATE RELEASE: ARETHA FRANKLIN FILES INJUNCTION AGAINST 'AMAZING GRACE' FILM
Date: September 3, 2015 at 11:02 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi insurers:

so you know...

we just got this. I have not been served. But we wanted to make you aware as soon as possible.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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Begin forwarded message:

> **From:** "McCollum, Brian" <bmccollum@freepress.com>
> **Date:** September 3, 2015 at 9:17:37 AM PDT
> **To:** "alanelliott@ucla.edu" <alanelliott@ucla.edu>
> **Subject: FW: FOR IMMEDIATE RELEASE: ARETHA FRANKLIN FILES INJUNCTION AGAINST 'AMAZING GRACE' FILM**
>
> **From:** waldc@aol.com [mailto:waldc@aol.com]
> **Sent:** Thursday, September 03, 2015 12:00 PM
> **To:** McCollum, Brian <bmccollum@freepress.com>
> **Subject:** Fwd: FOR IMMEDIATE RELEASE: ARETHA FRANKLIN FILES INJUNCTION AGAINST 'AMAZING GRACE' FILM
>
> ---
>
> ---
>
> ---
>
> **FOR IMMEDIATE RELEASE: ARETHA FRANKLIN FILES AN INJUNCTION AGAINST 'AMAZING GRACE' FILM**
>
> **ARETHA FRANKLIN FILES AN INJUNCTION AGAINST RELEASE OF 'AMAZING GRACE' FILM**
>
> Detroit--Aretha Franklin has proceeded to file an injunction

against the release and showing of the film, "Amazing Grace."

Ms. Franklin says she is taking legal action "because the film holders refuse to compensate me for my name and likeness in the film."
The internationally-acclaimed singer has hired the Detroit law firm, Dykema Gossett.

The film shows the making of Ms. Franklin's landmark gospel album, 'Amazing Grace," that she recorded in 1972. It remains the biggest selling gospel album of all time.

###

Media Contact: Clarence Waldron
CW Media
cwmedia24@gmail.com
773 859-0308

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: FW: 2700815 Amazing Grace
Date: July 13, 2015 at 8:12 AM
To: alan elliott (ucla) (alanelliott@g.ucla.edu) alanelliott@g.ucla.edu
Cc: Annette Shavuo annette.shavuo@aon.com

SC

See comments from underwriter at Hiscox. Let me know if you have any questions.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: Richardson Joanne [mailto:Joanne.Richardson@Hiscox.com]
Sent: Monday, July 13, 2015 11:02 AM
To: Stephen Carroll
Cc: Annette Shavuo
Subject: 2700815 Amazing Grace

Per the insured's request, I want to confirm that we aware of the contract attached and that the insured is relying on this contract/document to make this film. We have vetted it's validity and are satisfied it is acceptable and therefore have not placed any special exclusions on the policy that would prohibit coverage under the policy . Of course, there are standard insurance policy terms, conditions and exclusion that apply regardless and we could never confirm or deny any coverage in advance as each and every claims sencerio is unique and must be evaluated on the specific facts and circumstances of the case. But again, the quote does not contain a chain of tile exclusion or any other specific exclusion involving this project and we recognize the Atlantic records indemnification letter in the Warner contract to be valid. Please note we have not yet cleared the title, as a title report and legal opinion has not been received to date.

Please let me know if you have any further questions.

Best,
Joann

Joanne Richardson, CPCU
Media & Entertainment Practice Leader
Hiscox Partner
Hiscox USA
T 646.452.2355
M 646.823.8092
joanne.richardson@hiscox.com
Connect with Hiscox online
Web www.hiscoxbroker.com
Twitter @Hiscox_USA

HISCOX | encourage courage

From: Stephen Carroll [mailto:stephen.carroll@aon.com]
Sent: Thursday, July 09, 2015 3:11 PM
To: Richardson Joanne
Cc: Annette Shavuo
Subject: FW: Favorites

Attached is the contract Alan Elliott at Amazing Grace wanted you to acknowledge. I will be sending a bind order to you shortly.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Thursday, July 09, 2015 2:37 PM
To: Stephen Carroll
Subject: Favorites

http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20(Atlantic%20and%20Warner%20Bros.%20Seven%20Arts).pdf

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4-1-1968
Aretha...ts).pdf

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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From: **Annette Shavuo** annette.shavuo@aon.com
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32 PM
To: alanelliott@g.ucla.edu
Cc: Stephen Carroll stephen.carroll@aon.com

AS

Alan,

The Errors & Omissions' for **"Amazing Grace"** is bound for the period of 7/21/2015 to 7/21/2018. Here's a copy of the signed binder for your files.

Once the following subjectivities have been satisfactorily met, the underwriter will issue the policy:

1. Currently signed and dated application, by July 29, 2015 – attached application was not signed.

2. Per Q# 22 on the application, confirmation that:

1) the stock shot" of Los Angeles which comes from Corbis has been finalized and all rights obtained
2) the publishing of some songs you mention have yet to be negotiated have all been finalized and all music rights have been obtained.

Upon receipt and review of this we can consider removing the exclusion.

Thank you

Annette Shavuo
Aon/Albert G. Ruben
171 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

Before you print, think about the ENVIRONMENT

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Binder - EO - 15-18...ce.pdf

App- REVISED Q#22 -...03.doc

From: **Stephen Carroll** stephen.carroll@aon.com
Subject: FW: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 10:07 AM
To: alan elliott (ucla) (alanelliott@g.ucla.edu) alanelliott@g.ucla.edu
Cc: Annette Shavuo annette.shavuo@aon.com

SC

See below. Exclusion will be removed. Endorsement to follow.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: Richardson Joanne [mailto:Joanne.Richardson@Hiscox.com]
Sent: Monday, August 31, 2015 1:04 PM
To: Stephen Carroll
Cc: Annette Shavuo
Subject: FW: amazing grace policy 2700815 NEED ASAP

Thanks, I'll remove the exclusion.

From: Stephen Carroll [mailto:stephen.carroll@aon.com]
Sent: Monday, August 31, 2015 12:45
To: Richardson Joanne
Cc: Annette Shavuo
Subject: FW: amazing grace policy 2700815 NEED ASAP

Music clearance attached.

Stephen Carroll, V.P.
Aon/Albert G. Ruben Insurance Services Inc.-New York
171 Madison Ave., Suite 401
New York, NY 10016
Phone: 212-337-4353
New Cell: 914-588-4290
Fax: 847-953-2692

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, August 31, 2015 12:37 PM
To: Stephen Carroll
Cc: Annette Shavuo; Liesl Copland; Todd W. Musburger
Subject: Re: amazing grace policy 2700815 NEED ASAP

here you go:

thank you

thank you.

-alan

---

phone: 323 988 9692

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> On Aug 31, 2015, at 9:26 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
>
> Alan:
>
> This takes care of stock footage. I need confirmation all music has been cleared to remove exclusion.
>
> Stephen Carroll, V.P.
> Aon/Albert G. Ruben Insurance Services Inc.-New York
> 171 Madison Ave., Suite 401
> New York, NY 10016
> Phone: 212-337-4353
> **New Cell: 914-588-4290**
> Fax: 847-953-2692
>
> ---
>
> **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> **Sent:** Monday, August 31, 2015 12:06 PM
> **To:** Annette Shavuo; Stephen Carroll
> **Cc:** Liesl Copland; Todd Musburger
> **Subject:** amazing grace policy 2700815 NEED ASAP
>
> hi annette and stephen
>
> we need to get the exclusions for song clearances and stock shots lifted asap so we can get funds today.
>
> thank you.
>
> -alan
>
> ---
>
> **phone: 323 988 9692**
>
> This email transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or

please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: clearance invoice... to rid policy of exclusion...
Date: August 28, 2015 at 12:25:17 PM PDT
To: Annette Shavuo <annette.shavuo@aon.com>, "Todd W. Musburger" <todd@musburger.com>
Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <todd@musburger.com>

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

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The Rights Workshop, Inc.
1800 Bryant Street, Suite 104
San Francisco, CA 94110

(415)561-3333
billing@rightsworkshop.com
http://www.rightsworkshop.com

Invoice

Date	Invoice #
08/18/2015	1444
Terms	**Due Date**
Net 10	08/28/2015

Bill To
Julie Huntsinger Telluride Film Festival 800 Jones Street Berkeley, CA 94710

Amount Due	Enclosed
$5,250.00	

Please detach top portion and return with your payment.

Project
Amazing Grace

Service	Description	Quantity	Rate	Amount
Music Clearance (Part B)	• Contract procurement, review & admin	7	250.00	1,750.00
License Fee	• Music license fees • Holy Holy, How I Got Over, Precious Lord Take My Hand, You've Got a Friend, My Sweet Lord, • Old Landmark, Mary Don't You Weep	7	500.00	3,500.00
			Total	$5,250.00

Thank you for your business. Please note Federal ID#: 42-1655690.

From: **Alan Elliott** alanelliott@ucla.edu
Subject: insurance needed!
Date: February 2, 2015 at 9:37 AM
To: Stephen.carroll@aon.com, Ramona.horne@aon.com
Cc: George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk

hello

i need to start the process of getting insurance for my film and john battsek and george chignell suggested we start.

how do we start?

thank you.

-alan

---

phone: 323 988 9692

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From: **Alan Elliott** alanelliott@ucla.edu
Subject: insurance needed!
Date: February 2, 2015 at 9:36 AM
To: Stephen.carroll@aon.com, Ramona.horne@aon.com
Cc: George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk

hello

i need to start the process of getting insurance for my film and john battsek and george chignell suggested we start.

how do we start?

thank you.

-alan

---

phone: 323 988 9692

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: insurance on all sides needs to be informed.
Date: September 4, 2015 at 12:13 PM
To: Linda Lichter llichter@lgna.com, Todd W. Musburger todd@musburger.com
Cc: Tom Luddy tom.luddy@gmail.com, Julie Huntsinger juliehuntsinger@me.com, Matt Farmer mifarmer0@gmail.com, Stephen Carroll stephen.carroll@aon.com

my insurance company… And my friend Matt Farmer, litigator,… Want to make sure that all sides have reported everything to our respective insurance companies.

hiscox, who is my insurance through stephen carroll (ccd here) knows everything. But they have pointed out… That I am not named on the suit. And that the telluride insurance company needs to be aware.

thank you.

---
phone: 323 988 9692

Sent from a iPhone

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: insurance PRIOR to hiscox...
Date: June 26, 2017 at 1:13 PM
To: Maria Clark maria.clark@aon.com, laura comerford laura.comerford@aon.com

was with chubb.

hiscox is kicking me there.

thank you.

-alan

---
phone: 323 988 9692

peace and love.

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: larry blake info:
Date: July 8, 2016 at 2:03 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Larry Blake Larry.Blake@concordmusicgroup.com

Larry Blake <Larry.Blake@concordmusicgroup.com>

310 385 4205

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: stock shots exclusion removal for amazing grace...
Date: August 28, 2015 at 12:22 PM
To: Annette Shavuo annette.shavuo@aon.com, Stephen Carroll Stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com, Liesl Copland LCopland@wmeentertainment.com

hi guys

Re: 2700815 Amazing Grace LLC

we need to get rid of the exclusions for:

stock shots.

attached is the invoice and we have the clips now.

thank you.

-alan

---

gettyimages

Thanks for your order If you have any questions, call us toll free at 800-IMAGERY (800-462-4379).

Sales order number: 14938832

Not yet available

Reference information

Sales order number:
14938832

Sales order date:
August 27, 2015

Payment method:
Credit card

Job or project title:
AMAZING GRACE FILM

Ordered by:
ALAN ELLIOT

End client:
ALAN ELLIOT

Licensed to:
ALAN ELLIOT

Bill to
J W BOYD
amazing grace film
217 THOMPSON ST

NEW YORK, NY 10012
United States
alanelliott@ucla.edu

License agreements

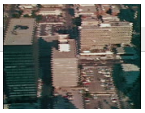
Contact us

1970 AERIAL High-rise apartment buildings, Los Angeles, California, USA, AUDIO

Clip #:	86296671	Price
License type:	Rights-ready	$ 750.00 USD
Filmmaker:	L.A. County	
Collection:	Archive Films: Creative	
Delivery method:	Download by customer	
Release info:	No model or property rel... for this clip; however, rel... for commercial use. Click ... for more information.	
Resolution:	SD 720x486 @ 29.97 fps NTSC	

PAN city traffic, Los Angeles

		Price
		$ 750.00 USD



1970 AERIAL MONTAGE Office buildings, Los Angeles, California, USA, AUDIO

Clip #:	978-64	Price
License type:	Rights-ready	$ 750.00 USD
Filmmaker:	Universal Studios	
Collection:	Universal Studios	
Delivery method:	Download by customer	
Release info:	No model or property rel... for this clip; however, rel... for commercial use. Click ... for more information.	
Resolution:	HD 1920x1080 @ 24p Pro... (HQ)	

Clip #:	86296672	
License type:	Rights-ready	
Filmmaker:	L.A. County	
Collection:	Archive Films: Creative	
Delivery method:	Download by customer	
Release info:	No model or property releases have been obtained for this clip; however, releases may not be required for commercial use. Click here for more information.	
Use:	Media uses: Documentary, news, editorial and educational	
Use definition:	Use in one production or program. Not intended for commercial or promotional purposes. This license includes the right to distribute the production in its final form in all media now known or hereafter devised throughout the world in perpetuity. For documentary film trailers and promotions, please refer to "Media, editorial & entertainment uses: Feature film trailer."	
Resolution:	SD 720x486 @ 29.97 fps NTSC	

Subtotal:	$ 2,250.00 USD
Shipping:	$ 0.00 USD
Tax:	$ 0.00 USD

Total:	$ 2,250.00 USD

A separate invoice will be mailed to you at the address above.

This order is subject to the licensing and purchasing terms that you agreed to when you originally placed your order. You can view our refund and return policy at any time.

*Sales, VAT or other similar transactional taxes may be applied to an order depending on the product licensed and the State, Province and/or Country in which the delivery address is located. If you are paying with terms, you will receive an invoice in the mail detailing the actual tax applied. If you are paying by credit card, the actual tax applied will be included in the transaction amount that appears on your credit card statement. The total amount of the transaction appearing on your invoice or statement may vary slightly from the amount shown on your online purchase order and the initial order confirmation you receive via email. If you have any questions about our tax policy, please feel free to contact us.

Questions? Please call toll free at 800-IMAGERY (800-462-4379).

Thank you.

Have questions? Contact us

Contact us
Call us toll-free at 800 IMAGERY (800 462 4379)

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phone: 323 988 9692

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> On Aug 27, 2015, at 6:07 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:
>
> I just got a call, did they email you Todd? They say the insurance stuff didn't pass their legal and they also need evidence of music clearance. I told them we were effectively partners with WB but that payments for festival were being made now but I wasn't sure what else they needed on the insurance thing. They need a legal opinion letter I think they said? Please advise
>
> Liesl Copland | WME
> LCopland@wmeentertainment.com
> 310.246.3383

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Sydney Pollack; "Amazing Grace"
Date: June 28, 2016 at 9:47 AM
To: Stephen Carroll stephen.carroll@aon.com

thank you.

-alan

---
phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

> Begin forwarded message:
>
> **From:** ALAN ELLIOTT <alanelliott@g.ucla.edu>
> **Subject:** **Fwd: Sydney Pollack; "Amazing Grace"**
> **Date:** April 26, 2016 at 1:36:18 PM PDT
> **To:** Stephen Carroll <Stephen.carroll@aon.com>
> **Cc:** "Todd W. Musburger" <todd@musburger.com>
>
> hi stephen
>
> as i am obliged to report all possible claims… here's a continuation.
>
> thank you.
>
> -alan
>
> ---
> **phone: 323 988 9692**
> **peace and love.**
>
> **http://songsoundrecord.tumblr.com**
>
> > Begin forwarded message:
> >
> > **From:** "Tyerman, Barry" <BTyerman@jtwamm.com>
> > **Subject:** **Sydney Pollack; "Amazing Grace"**
> > **Date:** April 26, 2016 at 1:29:06 PM PDT
> > **To:** Tom McGuire <TMcGuire@wmeentertainment.com>
> > **Cc:** "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>, linda burrow <burrow@caldwell-leslie.com>, Liesl Copland <LCopland@wmeentertainment.com>, "Todd Musburger (todd@musburger.com)" <todd@musburger.com>
> >
> > Tom,
> >
> > I do not want you to be left with some false sense that our clients are any less committed to pursuing any and all claims and all legal, equitable and administrative remedies to protect the rig
> > use of his name, likeness or the results and proceeds of his services.
> >
> > Understandably we are not interested in litigating the legal foundation for those claims in correspondence and it is not the duty of the Pollack parties to correct Ms. Burrow's flawed analysi
> > serious violations of Directors Guild of America creative, economic and other provisions applicable to this project; infringement of Mr. Pollack's droit moral and intellectual property rights
> >
> > It is indisputable that Mr. Elliott, without any authorization from our clients whatsoever, has FOR YEARS been trading openly and brazenly on the Sydney Pollack name, iconic body of fil
> >
> > Mr. Elliott and his representatives have been repeatedly admonished to discontinue misrepresenting to any party that he has any authorization whatsoever from or on behalf of Sydney Polla
> > all available remedies to protect his economic, personal and creative rights and interests, including against any and all parties in the chain of infringement of our clients' rights.
> >
> > On a personal note, although I know you are seriously conflicted about your role in this matter, I am disappointed that you without explanation reversed your position, as it was clear to me
> >
> > In any event, please be advised that the Sydney Pollack rights and claims will not simply go away and our clients are fully committed to whatever litigation or other course of action may be
> >
> > Very truly yours,
> >
> > Barry Tyerman
> >
> > Barry W. Tyerman, Esq.
> > Jackoway Tyerman Wertheimer
> > Austen Mandelbaum Morris & Klein
> > 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> > Phone: (310) 553-0305
> > Firm Fax: (310) 553-5036
> > Direct Fax: (310)551-4448
> > Email: BTyerman@jtwamm.com
> >
> > ---
> > **From:** Tom McGuire [mailto:TMcGuire@wmeentertainment.com]
> > **Sent:** Friday, April 08, 2016 11:59 AM
> > **To:** Tyerman, Barry
> > **Cc:** alan elliott (ucla) (alanelliott@g.ucla.edu); linda burrow; Liesl Copland; Todd Musburger (todd@musburger.com)
> > **Subject:** RE: Sydney Pollack; "Amazing Grace"
> >
> > Barry,
> >
> > In response to your email below, at this time I am not authorized to give you the financial details of this project. We urge you to respond to Linda Burrow's letter to you from a few weeks back. We ar
> >
> > Thank you.
> >
> > Tom
> >
> > Tom McGuire | WME
> > TMcGuire@wmeentertainment.com
> > 310.248.3022
> >
> > ---
> > **From:** Tyerman, Barry [mailto:BTyerman@jtwamm.com]
> > **Sent:** Wednesday, March 30, 2016 12:57 PM
> > **To:** Tom McGuire
> > **Subject:** RE: Sydney Pollack; "Amazing Grace"
> >
> > Tom,
> >
> > Further to our call last week I was expecting by Friday (or at the latest Monday) to receive from you the promised detailed financial information concerning t
> >
> > Barry W. Tyerman, Esq.
> > Jackoway Tyerman Wertheimer
> > Austen Mandelbaum Morris & Klein

1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, March 07, 2016 1:01 PM
To: 'Tom McGuire'
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

When you and I recently met you indicated that your client may not yet have advised the distributor or the errors and omissions insurance carrier of the various client has expressly acknowledged in writing that he has no rights to exploit the foregoing without the prior written consent of our esteemed client's successors

I just did not want there to be any potential misunderstanding and, of course, the foregoing and previous discussions and correspondence are without prejudice

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 24, 2015 12:37 PM
To: 'Tom McGuire'
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Just as a reminder, this is the status quo.

No rights have been granted to use the name, likeness, performance or biography of Sydney Pollack in connection with this project and Mr. Elliott specifically

And clearly despite your encouragement and what I thought was our understanding, Mr. Elliott continues to pester friends, family and professional colleagues

Thank you. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 17, 2015 5:32 PM
To: Tom McGuire
Subject: FW: Sydney Pollack; "Amazing Grace"

Tom,

I know that we have been missing each other. On the chance that it may take some time to connect, please advise your client that, without prejudice, the successors to the rights of Sydney Pollack accept his sug

I understand that quite provocatively Mr. Elliott has flagrantly breached a "standstill" agreement entered into with or on behalf of Aretha Franklin. Clearly not a positive move or one likely to encourage cooperatic

Nothing contained herein or our previous correspondence shall be construed as a waiver of any of our clients' rights, positions or remedies, all of which are expressly reserved.

Barry

PS. Please remind your client that it is unethical for him to be contacting Rachel Pollack or any other member of the family directly. Thank you.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, August 11, 2015 11:45 AM
To: Tyerman, Barry
Cc: Rachel Pollack; Todd W. Musburger
Subject: Re: Sydney Pollack; "Amazing Grace"

and good morning to you to barry!

look… and rachel is on this email too (along with todd, my lawyer and pal)… so mind your manners, please, bar…

again… according to the records we have, sydney was paid for directing and producing. if you have ANYTHING else… please send it so we can sort it through fairly.

look… i was the one who worked with sydney on this. i have his shot notes. he and i had the conversations. and sydney suggested- without prompting- that i finish this because "alan, you k

i can't change the facts of how the movie came to where it is!

and if this is about money… i am still soliciting investors. if the family wants to buy in… now's the time! (me personally… i have re-mortgaged- "jeremiah johnson"-style- my own house.

in sum, i have nothing but love for sydney and the work we did on the film. i am and was honored to work with him on this but i defer to the family as to what to do on the credits. i am putt

thank you.

-alan

---

phone: 323 988 9692

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On Aug 11, 2015, at 9:58 AM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

Your blatant and continuing disregard of the interests of our clients, as well as your self-promotion on the backs of the talents and cont
Presumably you have and will advise the representatives of the Toronto International Film Festival of the serious claims of various int

Not only would exhibition of the film violate various statutory and common law rights of our clients, but also constitute a serious and

The foregoing obviously is not a complete exposition of the claims against you and any and all other parties participating in the unlaw

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, July 14, 2015 12:18 PM
To: 'alan elliott'
Subject: RE: Sydney Pollack; "Amazing Grace"

Alan,

What you have sent me purports to be an internal Warner Bros. memorandum, not anything like a contract. Neither Sydney nor any re

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [mailto:alanelliott@g.ucla.edu]
Sent: Monday, July 13, 2015 8:54 PM
To: Tyerman, Barry
Cc: rpollack@mac.com
Subject: Re: Sydney Pollack; "Amazing Grace"

<image002.png>

phone: 323 988 9692

Sent from a iPhone
This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, conta

On Jul 13, 2015, at 5:40 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

> Nothing is attached.
>
> Barry W. Tyerman, Esq.
> Jackoway Tyerman Wertheimer
> Austen Mandelbaum Morris & Klein
> 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> Phone: (310) 553-0305
> Firm Fax: (310) 553-5036
> Direct Fax: (310) 551-4448
> Email: BTyerman@jtwamm.com
>
> -----Original Message-----
> **From:** alan elliott (ucla) [alanelliott@g.ucla.edu]
> **Received:** Monday, 13 Jul 2015, 5:10PM
> **To:** Tyerman, Barry [BTyerman@jtwamm.com]
> **CC:** Rachel Pollack [rpollack@mac.com]
> **Subject:** Re: Sydney Pollack; "Amazing Grace"
>
> here is Sydney's from wb(see attached).
>
> as I wrote before, Aretha's contract is not available for public (or private) broadcast.

what I can write as assurance re ms franklins contract is:

1) it is insured and vetted
2) it has been used twice by wb films

thank you.

---
phone: 323 988 9692

Sent from a iPhone
<image003.png>
This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messag

On Jul 13, 2015, at 5:01 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

You indicate that there is a "signed contract from Sydney" but religiously have avoide

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, July 13, 2015 4:14 PM
To: Tyerman, Barry
Cc: Rachel Pollack
Subject: Re: Sydney Pollack; "Amazing Grace"

hi barry

as you know, i do have a signed contract from sydney, sydney never asked for anything from me, and

i don't want their to be any bad feelings… and i feel the movie is awesome and a testament to sydney.

and if there's anything else, please let me know if there's something anybody wants specifically.

thank you.

-alan

---
phone: 323 988 9692

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On Jul 13, 2015, at 3:54 PM, Tyerman, Barry <BTyerman@jtwamm.com

Alan,

Simply ignoring this situation will not make it go away. If you
Sydney's involvement, but it is a misrepresentation to say the

All rights, positions and remedies reserved. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 9
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, June 16, 2015 3:28 PM
To: 'alan elliott'
Subject: RE: amazing grace links...

Your deflection is unacceptable, Alan, and clearly we will nee
further use of his name on or in connection with this project.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 9
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, June 16, 2015 3:06 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hi barry

i have ms. franklin's signature on her "personal service contract," it was

as to sydney's credit, he accepted a payment and he never approached me
feel… his best film!!)

ps- i am screening the film tomorrow at wme at 11am if either of the girls

thank you.

-alan

---

phone: **323 988 9692**

This email transmission, including any previous messages or attachments to it, contains informat

On Jun 16, 20

I am not inte
rights neede

To be clear,

All of this is

Barry W. Tye
Jackoway Tye
Austen Mande
1925 Century
Phone: (310
Firm Fax: (3
Direct Fax:
Email: BTyer

From: alan elliott (ucla) [mailto:
Sent: Tuesday, June 16, 2015 2:
To: Tyerman, Barry
Subject: Re: amazing grace link

hi barry

i have one document about sy

the film is now set for telluric

because this journey has been

to this, and i hope you will ur

i hope you'll understand and

i hope this finds you well.

thank you.

-alan

---

phone: **323 988 9692**

This email transmission, including any

On May 6, 2015, at 12:32 PM,

thank you.

-alan

---

phone: **323 988 9692**

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Fwd: Sydney Pollack; "Amazing Grace"
Date: March 7, 2016 at 5:44 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com

thank you.

-alan

---
phone: 323 988 9692
peace and love.

Begin forwarded message:

> **From:** Tom McGuire <TMcGuire@wmeentertainment.com>
> **Date:** March 7, 2016 at 1:32:40 PM PST
> **To:** Todd Musburger <todd@musburger.com>, "alan elliott (ucla)" <alanelliott@g.ucla.edu>
> **Subject: Fwd: Sydney Pollack; "Amazing Grace"**
>
> Sent from my iPad
>
> Tom McGuire | WME
> TMcGuire@wmeentertainment.com
> 310.248.3022
>
> Begin forwarded message:
>
> > **From:** "Tyerman, Barry" <BTyerman@jtwamm.com>
> > **Date:** March 7, 2016 at 1:00:43 PM PST
> > **To:** 'Tom McGuire' <TMcGuire@wmeentertainment.com>
> > **Subject: RE: Sydney Pollack; "Amazing Grace"**
> >
> > Tom,
> >
> > When you and I recently met you indicated that your client may not yet have advised the distributor or the errors and omissions insurance carrier of the various concerning the rampant unauthorized use of his name and likeness for commercial exploitation which has continued for years, the rights to the results and pro in detail in previous discussions and correspondence. Moreover your client has expressly acknowledged in writing that he has no rights to exploit the foregoing
> >
> > I just did not want there to be any potential misunderstanding and, of course, the foregoing and previous discussions and correspondence are without prejudice
> >
> > Very truly yours,
> >
> > Barry Tyerman
> > Barry W. Tyerman, Esq.
> > Jackoway Tyerman Wertheimer
> > Austen Mandelbaum Morris & Klein
> > 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> > Phone: (310) 553-0305
> > Firm Fax: (310) 553-5036
> > Direct Fax: (310)551-4448
> > Email: BTyerman@jtwamm.com
> >
> > ---
> >
> > **From:** Tyerman, Barry
> > **Sent:** Monday, August 24, 2015 12:37 PM
> > **To:** 'Tom McGuire'
> > **Subject:** RE: Sydney Pollack; "Amazing Grace"
> >
> > Tom,
> >
> > Just as a reminder, this is the status quo.
> >
> > No rights have been granted to use the name, likeness, performance or biography of Sydney Pollack in connection with this project and Mr. Elliott specifically Anyone acting inconsistently with this will be held accountable.
> >
> > And clearly despite your encouragement and what I thought was our understanding, Mr. Elliott continues to pester friends, family and professional colleagues
> >
> > Thank you. Barry
> > Barry W. Tyerman, Esq.
> > Jackoway Tyerman Wertheimer
> > Austen Mandelbaum Morris & Klein
> > 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> > Phone: (310) 553-0305
> > Firm Fax: (310) 553-5036
> > Direct Fax: (310)551-4448
> > Email: BTyerman@jtwamm.com
> >
> > ---
> >
> > **From:** Tyerman, Barry
> > **Sent:** Monday, August 17, 2015 5:32 PM
> > **To:** Tom McGuire
> > **Subject:** FW: Sydney Pollack; "Amazing Grace"
> >
> > Tom,
> >
> > I know that we have been missing each other. On the chance that it may take some time to connect, please advise your client that, without prejudice, the successors to the rights of Sydney Pollack accept his su performance or image and, without limiting the generality of the foregoing, delete any and all visual or other references to Mr. Pollack in and in connection with the film.
> >
> > I understand that quite provocatively Mr. Elliott has flagrantly breached a "standstill" agreement entered into with or on behalf of Aretha Franklin. Clearly not a positive move or one likely to encourage cooperatic
> >
> > Nothing contained herein or our previous correspondence shall be construed as a waiver of any of our clients' rights, positions or remedies, all of which are expressly reserved.
> >
> > Barry
> >
> > PS. Please remind your client that it is unethical for him to be contacting Rachel Pollack or any other member of the family directly. Thank you.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, August 11, 2015 11:45 AM
To: Tyerman, Barry
Cc: Rachel Pollack; Todd W. Musburger
Subject: Re: Sydney Pollack; "Amazing Grace"

and good morning to you to barry!

look… and rachel is on this email too (along with todd, my lawyer and pal)… so mind your manners, please, bar…

again… according to the records we have, sydney was paid for directing and producing. if you have ANYTHING else… please send it so we can sort it through fairly.

look… i was the one who worked with sydney on this. i have his shot notes. he and i had the conversations. and sydney suggested- without prompting- that i finish this because "alan, you k
"director" i will...

i can't change the facts of how the movie came to where it is!

and if this is about money… i am still soliciting investors. if the family wants to buy in… now's the time! (me personally… i have re-mortgaged- "jeremiah johnson"-style- my own house.
mortgaged the house on any of thsee four occasion.)

in sum, i have nothing but love for sydney and the work we did on the film. i am and was honored to work with him on this but i defer to the family as to what to do on the credits. i am putt

thank you.

-alan

---
phone: 323 988 9692

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> On Aug 11, 2015, at 9:58 AM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:
>
> Alan,
>
> Your blatant and continuing disregard of the interests of our clients, as well as your self-promotion on the backs of the talents and contractual and c
> unprofessional and disgusting. Since you have ignored our efforts to address this situation amicably we have no recourse but to engage with Warne
> underlying musical and other materials to shut down your rogue activities. Presumably you have and will advise the representatives of the Toronto
> Festival and all other parties in the chain of any unlawful exploitation of these rights. Please confirm that the Festival has been so advised.
>
> Not only would exhibition of the film violate various statutory and common law rights of our clients, but also constitute a serious and direct violati
> creative rights and credits and formal grievances are being initiated.
>
> The foregoing obviously is not a complete exposition of the claims against you and any and all other parties participating in the unlawful exploitati
>
> Very truly yours,
>
> Barry Tyerman
> Barry W. Tyerman, Esq.
> Jackoway Tyerman Wertheimer
> Austen Mandelbaum Morris & Klein
> 1925 Century Park East, 22nd Floor Los Angeles, California 90067
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> ---
>
> **From:** Tyerman, Barry
> **Sent:** Tuesday, July 14, 2015 12:18 PM
> **To:** 'alan elliott'
> **Subject:** RE: Sydney Pollack; "Amazing Grace"
>
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>
> What you have sent me purports to be an internal Warner Bros. memorandum, not anything like a contract. Neither Sydney nor any representative i
> All rights, positions and remedies reserved. Barry
>
> Barry W. Tyerman, Esq.
> Jackoway Tyerman Wertheimer
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> Direct Fax: (310)551-4448
> Email: BTyerman@jtwamm.com
>
> ---
>
> **From:** alan elliott [mailto:alanelliott@g.ucla.edu]
> **Sent:** Monday, July 13, 2015 8:54 PM
> **To:** Tyerman, Barry
> **Cc:** rpollack@mac.com
> **Subject:** Re: Sydney Pollack; "Amazing Grace"

<image002.png>

phone: 323 988 9692

Sent from a iPhone
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On Jul 13, 2015, at 5:40 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

> Nothing is attached.
>
> Barry W. Tyerman, Esq.
> Jackoway Tyerman Wertheimer
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> 1925 Century Park East, 22nd Floor Los Angeles, California 90067
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> Firm Fax: (310) 553-5036
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> Email: BTyerman@jtwamm.com
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> **To:** Tyerman, Barry [BTyerman@jtwamm.com]
> **CC:** Rachel Pollack [rpollack@mac.com]
> **Subject:** Re: Sydney Pollack; "Amazing Grace"
>
> here is Sydney's from wb(see attached).
>
> as I wrote before, Aretha's contract is not available for public (or private) broadcast.
>
> what I can write as assurance re ms franklins contract is:
>
> 1) it is insured and vetted
> 2) it has been used twice by wb films
>
> thank you.
>
> ---
> phone: 323 988 9692
>
> Sent from a iPhone
> <image003.png>
> This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contai
> please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly pro
>
> On Jul 13, 2015, at 5:01 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:
>
> > You indicate that there is a "signed contract from Sydney" but religiously have avoided providing this. And we're led to beli
> > she is being shown, which certainly would not have pleased Sydney. Perhaps you could begin by providing the contracts wh
> >
> > Barry W. Tyerman, Esq.
> > Jackoway Tyerman Wertheimer
> > Austen Mandelbaum Morris & Klein
> > 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> > Phone: (310) 553-0305
> > Firm Fax: (310) 553-5036
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> > Email: BTyerman@jtwamm.com
> >
> > ---
> >
> > **From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
> > **Sent:** Monday, July 13, 2015 4:14 PM
> > **To:** Tyerman, Barry
> > **Cc:** Rachel Pollack
> > **Subject:** Re: Sydney Pollack; "Amazing Grace"
> >
> > hi barry
> >
> > as you know, i do have a signed contract from sydney, sydney never asked for anything from me, and i am not sure what you- or the family want…
> >
> > i don't want their to be any bad feelings… and i feel the movie is awesome and a testament to sydney… and if rachel or rebecca want me to take sy
> >
> > and if there's anything else, please let me know if there's something anybody wants specifically.
> >
> > thank you.
> >
> > -alan
> >
> > ---
> > **phone: 323 988 9692**
> >
> > This email transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission i
> > of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.
> >
> > > On Jul 13, 2015, at 3:54 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:
> > >
> > > Alan,
> > >
> > > Simply ignoring this situation will not make it go away. If you will not voluntarily withdraw any exhibition of th
> > > measures. We are specifically instructed to protect the Sydney Pollack name and not permit its use without authc

measures. We are specifically instructed to protect the Sydney Pollack name and not permit its use without authc
how good you may believe the film is (not surprising given Sydney's involvement, but it is a misrepresentation t
gloss over these serious legal issues.

All rights, positions and remedies reserved. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, June 16, 2015 3:28 PM
To: 'alan elliott'
Subject: RE: amazing grace links...

Your deflection is unacceptable, Alan, and clearly we will need to escalate matters in order properly to address c
of the underlying documentation which you allege exists. With due respect Sydney Pollack has ultimate rights tc
hereby instruct you to cease and desist immediately from any further use of his name on or in connection with th
fully accountable. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, June 16, 2015 3:06 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hi barry

i have ms. franklin's signature on her "personal service contract," it was provided to me by wb. (fyi: ms. franklin signed a "personal s
to the late john calley and by joe boyd- who served as music director at wb films in 1972. both calley and sydney often alluded to suc

as to sydney's credit, he accepted a payment and he never approached me about anything re: further payment. according to the doc i h
according to the contract (a favorite jerry wexler expression…), sydney has no "rights" to the film. if the family wishes for me to rem
what they want, i can do so...but why would anybody want that, barry? (this is, i feel… his best film!!)

ps- i am screening the film tomorrow at wme at 11am if either of the girls wants to come!

thank you.

-alan

---

phone: 323 988 9692

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> On Jun 16, 2015, at 2:42 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:
>
> I am not interested in "opening any cans of worms". Only to protect the rights of Sydney
> sure that his work is not exploited without those issues being addressed and not over the
> would never have countenanced that and was very clear that her rights needed to be add
> manner. If you have contracts to establish that she has given that permission, it is impera
> documentation of any arrangements with Sydney Pollack).
>
> To be clear, you have no rights to utilize any of the rights of Sydney Pollack, including l
> "Directed by Pollack"), without further written agreement from his successors.
>
> All of this is not exhaustive and is without prejudice to the other rights, positions and re
>
> Barry W. Tyerman, Esq.
> Jackoway Tyerman Wertheimer
> Austen Mandelbaum Morris & Klein
> 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> Phone: (310) 553-0305
> Firm Fax: (310) 553-5036
> Direct Fax: (310)551-4448
> Email: BTyerman@jtwamm.com

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, June 16, 2015 2:24 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hi barry

i have one document about sydney's deal with wb. (i'm sure you have that though.) it is the only document that mentior
something specific that you are looking for, i will try to help suss it out.

the film is now set for telluride and i anticipate it will then go to toronto.

because this journey has been extremely lawyer intensive (sydney would have killed a few people by now…)… i am nc

to this, and i hope you will understand that this is written with complete respect… i feel i have put all the worms in the

i hope you'll understand and if there's something i can help you with that requires any non-can opening… especially fo
sydney's wish that i "go finish the film!". if the family wants to discuss ANYTHING having to do with this… please ha

i hope this finds you well.

thank you.

-alan

---

phone: 323 988 9692

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On Jun 16, 2015, at 2:05 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

May I please have the courtesy of a response and copies of the relevant docu

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Wednesday, May 06, 2015 1:08 PM
To: 'alan elliott (ucla)'
Subject: RE: amazing grace links...

Sydney was equally clear with me that the Aretha rights had not been cleared. Please sen
can take a look. At some point (sooner rather than later) I should also see your agreement

Does this mean that you have not heard from anyone on behalf of Aretha recently?

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, May 06, 2015 1:06 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hey barry

as John Calley quite clearly yelled at me at a certain point… "Do you think I would send Sydney Pollack
wasn't a release?!"

the answer is:

there is.

Aretha signed a personal service contract with warner 7 arts (The film company) which wb and Sydney re

the man whose responsibility it was to secure all releases for filming, joe Boyd, (joe was director of film r
letter re-stating these facts.

as jerry wexler always implored me to do, "check what's in the contract!" (we did, and that's what we are

thank you.

---
phone: 323 988 9692

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please delete the original transmission without making copies, disclosing, distributing, saving or making u
which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.

On May 6, 2015, at 12:32 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

In your response you did not address the issue of the Aretha Fran
rights. Have you made an arrangement with her? And is there a c
with the record label? There is absolutely no way that the Sydney

with the record label? There is absolutely no way that the Sydney Pollack rights will be cleared, including any possibility of the film being attributed to him (the whole notion of "Directed by Sydney Pollack" is an issue), unless and until all of this has been worked through and fully documented.

Given the various items to be resolved, all rights, positions and remedies are expressly reserved.

Thanks. Barry

PS. None of these necessary "legalities" reflect on the quality of project or our collective desire hopefully to see Sydney's good w finally and respectfully made available to an audience.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 9006
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

To: Tyerman, Barry
Subject: Fwd: amazing grace links...

hey barry

I reached out to Sydney's girls through Donna (see Rachel's sweet email belo

as discussed I am taking the film to premiere at telluride.

as of now I am planning on:

directed by Sydney pollack

produced by Sydney pollack and alan Elliott

if the girls have any issues or concerns, please have them contact me. I will t do what they feel is appropriate re credits.

and if there's any documentation or... anything else that I should know about iteration of the project Sydney and I started on in 2007... or anything from th passed (I'd be very interested to see the 1997 file!) please send it over and let discuss.

hope this finds you well.

thank you.

---
phone: 323 988 9692

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Begin forwarded message:

From: Donna Ostroff <missdo@aol.com>
Date: April 22, 2015 at 3:44:03 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Subject: Fwd: amazing grace links...

> **From:** Rachel Pollack <rpollack@mac.com>
> **Date:** April 22, 2015 at 2:42:27 PM PDT
> **To:** MissDO@aol.com
> **Subject: Re: amazing grace links...**
>
> I just watched the trailer and will watch the rest when I get home. What a wonderful wonderful thing

he has done!!! How awful if that had just sat there. I am so thankful to him for doing it and I can't wait to see it!!!!

Thanks you so Donna. Much love to you.

thank you.

-alan

---

phone: **323 988 9692**

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reply info@alanelliott.net.

From: **ALAN ELLIOTT** alanelliott@g.ucla.edu
Subject: Fwd: Sydney Pollack; "Amazing Grace"
Date: April 26, 2016 at 1:36 PM
To: Stephen Carroll Stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi stephen

as i am obliged to report all possible claims… here's a continuation.

thank you.

-alan

---
phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

Begin forwarded message:

From: "Tyerman, Barry" <BTyerman@jtwamm.com>
Subject: **Sydney Pollack; "Amazing Grace"**
Date: April 26, 2016 at 1:29:06 PM PDT
To: Tom McGuire <TMcGuire@wmeentertainment.com>
Cc: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>, linda burrow <burrow@caldwell-leslie.com>, Liesl Copland <LCopland@wmeentertainment.com>, "Todd Musburger (todd@musburger.com)" <todd@musburger.com>

Tom,

I do not want you to be left with some false sense that our clients are any less committed to pursuing any and all claims and all legal, equitable and administrative remedies to protect the righ use of his name, likeness or the results and proceeds of his services.

Understandably we are not interested in litigating the legal foundation for those claims in correspondence and it is not the duty of the Pollack parties to correct Ms. Burrow's flawed analysis serious violations of Directors Guild of America creative, economic and other provisions applicable to this project; infringement of Mr. Pollack's droit moral and intellectual property rights h

It is indisputable that Mr. Elliott, without any authorization from our clients whatsoever, has FOR YEARS been trading openly and brazenly on the Sydney Pollack name, iconic body of film

Mr. Elliott and his representatives have been repeatedly admonished to discontinue misrepresenting to any party that he has any authorization whatsoever from or on behalf of Sydney Pollacl all available remedies to protect his economic, personal and creative rights and interests, including against any and all parties in the chain of infringement of our clients' rights.

On a personal note, although I know you are seriously conflicted about your role in this matter, I am disappointed that you without explanation reversed your position, as it was clear to me fr

In any event, please be advised that the Sydney Pollack rights and claims will not simply go away and our clients are fully committed to whatever litigation or other course of action may be r

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tom McGuire [mailto:TMcGuire@wmeentertainment.com]
Sent: Friday, April 08, 2016 11:59 AM
To: Tyerman, Barry
Cc: alan elliott (ucla) (alanelliott@g.ucla.edu); linda burrow; Liesl Copland; Todd Musburger (todd@musburger.com)
Subject: RE: Sydney Pollack; "Amazing Grace"

Barry,

In response to your email below, at this time I am not authorized to give you the financial details of this project. We urge you to respond to Linda Burrow's letter to you from a few weeks back. We are

Thank you.

Tom

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: Tyerman, Barry [mailto:BTyerman@jtwamm.com]
Sent: Wednesday, March 30, 2016 12:57 PM
To: Tom McGuire
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Further to our call last week I was expecting by Friday (or at the latest Monday) to receive from you the promised detailed financial information concerning th

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, March 07, 2016 1:01 PM
To: 'Tom McGuire'
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

When you and I recently met you indicated that your client may not yet have advised the distributor or the errors and omissions insurance carrier of the various client has expressly acknowledged in writing that he has no rights to exploit the foregoing without the prior written consent of our esteemed client's successors.

I just did not want there to be any potential misunderstanding and, of course, the foregoing and previous discussions and correspondence are without prejudice t

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 24, 2015 12:37 PM
To: 'Tom McGuire'
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Just as a reminder, this is the status quo.

No rights have been granted to use the name, likeness, performance or biography of Sydney Pollack in connection with this project and Mr. Elliott specifically a

And clearly despite your encouragement and what I thought was our understanding, Mr. Elliott continues to pester friends, family and professional colleagues o

Thank you. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 17, 2015 5:32 PM
To: Tom McGuire
Subject: FW: Sydney Pollack; "Amazing Grace"

Tom,

I know that we have been missing each other. On the chance that it may take some time to connect, please advise your client that, without prejudice, the successors to the rights of Sydney Pollack accept his sugg

I understand that quite provocatively Mr. Elliott has flagrantly breached a "standstill" agreement entered into with or on behalf of Aretha Franklin. Clearly not a positive move or one likely to encourage cooperation

Nothing contained herein or our previous correspondence shall be construed as a waiver of any of our clients' rights, positions or remedies, all of which are expressly reserved.

Barry

PS. Please remind your client that it is unethical for him to be contacting Rachel Pollack or any other member of the family directly. Thank you.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, August 11, 2015 11:45 AM
To: Tyerman, Barry
Cc: Rachel Pollack; Todd W. Musburger
Subject: Re: Sydney Pollack; "Amazing Grace"

and good morning to you to barry!

look… and rachel is on this email too (along with todd, my lawyer and pal)… so mind your manners, please, bar…

again… according to the records we have, sydney was paid for directing and producing. if you have ANYTHING else… please send it so we can sort it through fairly.

look… i was the one who worked with sydney on this. i have his shot notes. he and i had the conversations. and sydney suggested- without prompting- that i finish this because "alan, you kn

i can't change the facts of how the movie came to where it is!

and if this is about money… i am still soliciting investors. if the family wants to buy in… now's the time! (me personally… i have re-mortgaged- "jeremiah johnson"-style- my own house. fo

in sum, i have nothing but love for sydney and the work we did on the film. i am and was honored to work with him on this but i defer to the family as to what to do on the credits. i am puttir

thank you.

-alan

---
phone: 323 988 9692

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On Aug 11, 2015, at 9:58 AM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

Your blatant and continuing disregard of the interests of our clients, as well as your self-promotion on the backs of the talents and contr
Presumably you have and will advise the representatives of the Toronto International Film Festival of the serious claims of various inte

Not only would exhibition of the film violate various statutory and common law rights of our clients, but also constitute a serious and d

The foregoing obviously is not a complete exposition of the claims against you and any and all other parties participating in the unlawfu

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, July 14, 2015 12:18 PM
To: 'alan elliott'
Subject: RE: Sydney Pollack; "Amazing Grace"

Alan,

What you have sent me purports to be an internal Warner Bros. memorandum, not anything like a contract. Neither Sydney nor any repr

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [mailto:alanelliott@g.ucla.edu]
Sent: Monday, July 13, 2015 8:54 PM
To: Tyerman, Barry
Cc: rpollack@mac.com
Subject: Re: Sydney Pollack; "Amazing Grace"

<image002.png>

phone: 323 988 9692

Sent from a iPhone
This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contain

On Jul 13, 2015, at 5:40 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

> Nothing is attached.
>
> Barry W. Tyerman, Esq.
> Jackoway Tyerman Wertheimer
> Austen Mandelbaum Morris & Klein
> 1925 Century Park East, 22nd Floor Los Angeles, California 90067
> Phone: (310) 553-0305
> Firm Fax: (310) 553-5036
> Direct Fax: (310) 551-4448
> Email: BTyerman@jtwamm.com
>
> -----Original Message-----
> **From:** alan elliott (ucla) [alanelliott@g.ucla.edu]
> **Received:** Monday, 13 Jul 2015, 5:10PM
> **To:** Tyerman, Barry [BTyerman@jtwamm.com]
> **CC:** Rachel Pollack [rpollack@mac.com]
> **Subject:** Re: Sydney Pollack; "Amazing Grace"
>
> here is Sydney's from wb(see attached).
>
> as I wrote before, Aretha's contract is not available for public (or private) broadcast.
>
> what I can write as assurance re ms franklins contract is:
>
> 1) it is insured and vetted
> 2) it has been used twice by wb films
>
> thank you.
>
> ---
> phone: 323 988 9692

phone: 323 988 9692

Sent from a iPhone
<image003.png>
This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous message

On Jul 13, 2015, at 5:01 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

You indicate that there is a "signed contract from Sydney" but religiously have avoided

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, July 13, 2015 4:14 PM
To: Tyerman, Barry
Cc: Rachel Pollack
Subject: Re: Sydney Pollack; "Amazing Grace"

hi barry

as you know, i do have a signed contract from sydney, sydney never asked for anything from me, and i

i don't want their to be any bad feelings… and i feel the movie is awesome and a testament to sydney…

and if there's anything else, please let me know if there's something anybody wants specifically.

thank you.

-alan

---
phone: 323 988 9692

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On Jul 13, 2015, at 3:54 PM, Tyerman, Barry <BTyerman@jtwamm.com>

Alan,

Simply ignoring this situation will not make it go away. If you
Sydney's involvement, but it is a misrepresentation to say the c

All rights, positions and remedies reserved. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, June 16, 2015 3:28 PM
To: 'alan elliott'
Subject: RE: amazing grace links...

Your deflection is unacceptable, Alan, and clearly we will need
further use of his name on or in connection with this project. Y

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, June 16, 2015 3:06 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hi barry

i have ms. franklin's signature on her "personal service contract," it was pr

as to sydney's credit, he accepted a payment and he never approached me a
feel… his best film!!)

ps- i am screening the film tomorrow at wme at 11am if either of the girls

thank you.

-alan

---
phone: 323 988 9692

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On Jun 16, 201

I am not inter
rights needed

To be clear, y

All of this is

Barry W. Tyer
Jackoway Tyer
Austen Mandel
1925 Century
Phone: (310)
Firm Fax: (31
Direct Fax: (
Email: BTyerm

From: alan elliott (ucla) [mailto:al
Sent: Tuesday, June 16, 2015 2:2
To: Tyerman, Barry
Subject: Re: amazing grace links.

hi barry

i have one document about syd

the film is now set for telluride

because this journey has been

to this, and i hope you will und

i hope you'll understand and if

i hope this finds you well.

thank you.

-alan

---

phone: 323 988 9692

This email transmission, including any pr

On May 6, 2015, at 12:32 PM, T

thank you.

-alan

---

phone: **323 988 9692**

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From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: sydney pollack
Date: March 3, 2016 at 2:30 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com, Tom McGuire tmcguire@wmeentertainment.com

Steve-

As we discussed now on the phone, below are my email correspondences re: Sydney Pollack's attorney Barry Tyerman. i have searched my files in an effort to give a complete view. You should also speak with Tom McGuire about his meetings/conversations with Barry Tyerman.

Some context (and please ask any questions):

Barry Tyerman is the attorney for Sydney Pollack (Mr. Pollack passed away in May, 2008). Since I received quitclaim of the project from Warner Bros. in 2007, out of respect for the late Mr. Pollack, I have kept Mr. Tyerman updated on the film's progress. I have, as you can see below, asked Mr. Tyerman what he would consider for additional payment for Mr. Pollack's heirs. Mr. Tyerman has, in these eight years, not given me an answer.

Prior to the Telluride Film Festival in September, 2015, Mr. Tyerman asked me to remove Mr. Pollack's credit from the film, I did so.

Over the years, I have repeatedly provided Mr. Tyerman with the following as proof of Warners' payment:

http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20legal%20pollack%20payment.pdf

I have discussed the issue of Mr. Pollack and Mr. Tyerman's claim on behalf of Mr. Pollack with both Dan Furie, Warner Bros . Pictures, Business Affairs, and the President, Worldwide Business Affairs, Warner Bros. Pictures Steven S. Spira.

Warners has provided me all documents re: Sydney Pollack.

Mr. Tyerman has claimed that there may be a previous 1997 contract with Warners. Mr. Tyerman was asked by Tom McGuire a month or so ago about the contract. Mr. Tyerman has not provided the contract. Warners has no copy of the agreement Mr. Tyerman talked of.

Both Mr. Spira and Mr. Furie advised Mr. Tyerman that, according to all known documents, Mr. Pollack is not owed anything further.

Mr. Spira said to me privately, "Mr. Tyerman asked us for money on this. I told him he had no cause. He is on a fishing expedition."

Other docs. with Sydney Pollack can be found at the web site (http://alsrecordsandtapes.com/amazinglaw/wbdocs/), including a general release for Mr. Pollack's image/likeness (which Mr. Pollack and his crew wrote):

http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazing%20releases%20church%20choir.pdfa

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

these are from emails from you and tom and liesl and herb jordan.

before i call insurance carrier, let's discuss precisely what you want me to say.

> **From:** "Herb Jordan" <jordan@adagegroup.net>
> **Subject: Various**
> **Date:** February 6, 2008 at 11:03:01 AM PST
> **To:** "'Alan Elliott'" <Alan@AlanElliott.net>
>
> Alan, Here's the Latest:
>
> Aretha
> - Spoke with Ann Stockman at Warner Pictures. She checked Sydney's file and came up

blank. I suggested that he may have done business through a loan out company, and that it could conceivably be filed under the company name. She researched his company “Sanford Production” today and found nothing on Amazing Grace. I also suggested that the doc could be traced through the disbursement of his fee. But as with most things, records of that end of the transaction seem to be lost to history. This circles back to the matter of how we deal with Sydney. Alan Wertheimer says that Syd’s lawyer Barry Tyreman was around and remembers the transaction. Chances are he has the doc, if it exists. I haven’t told Alan that we acquired the film because we have our hands full with Aretha. Need to discuss.

From: Tyerman, Barry [mailto:BTyerman@jtwamm.com]
Sent: Wednesday, August 12, 2015 11:01 AM
To: Tom McGuire
Subject: FW: Sydney Pollack; "Amazing Grace"

Tom,

I understand from Warners that you are representing Mr. Elliott and this project, which frankly surprises me given the attitude and disregard for contractual and creative rights he has consistently and routinely exhibited. Contrary to Mr. Elliott’s assertion he has no rights to either the name, likeness, biography or results and proceeds of services of Sydney Pollack or Aretha Franklin (among other essential clearances) and he is about to step off the deepest darkest elevator shaft of his life.

Begin forwarded message:

From: Tom McGuire <TMcGuire@wmeentertainment.com>
Subject: RE: Tyerman question #1.
Date: August 12, 2015 at 3:54:05 PM PDT
To: Liesl Copland <LCopland@wmeentertainment.com>
Cc: Tom McGuire Assistant <tmcguire_asst@wmeentertainment.com>, "alan elliott (ucla)" <alanelliott@g.ucla.edu>, "Todd W. Musburger" <todd@musburger.com>, Liesl Copland Assistant <LCopland_Asst@wmeentertainment.com>

I have asked barry what he wants. ball is in his court

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: Liesl Copland
Sent: Wednesday, August 12, 2015 3:50 PM
To: Tom McGuire
Cc: Tom McGuire Assistant; alan elliott (ucla); Todd W. Musburger; Liesl Copland Assistant
Subject: Re: Tyerman question #1.

Are we formulating a response? How long do we have?

Sent from my iPhone

Liesl Copland | WME
LCopland@wmeentertainment.com
310.246.3383

On Aug 12, 2015, at 2:29 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:

> Alan: please send all emails to me (you can copy my assistant, but I don't want anything getting lost). You are now sending emails to my assistant and Liesl's assistant.
>
> I have asked Barry what he wants in order for the Estate to support the release. We have our arguments about what rights you have, and he has his arguments about what rights he has. I say put those arguments to the side and lets see what he wants. There isnt really any money. A share of the back end, I would say ok, depending on the amount. And the right to use his name and likeness in the film and in promo/advertising. He should have directing credit, but that will depend on the DGA. You can give his estate a consultation right, or even an approval right, over the use of his image in the film and advertising—as long as there is an agreement that they are supporting the release, they will not be obstructionist, I don't believe.
>
> Tom
>
> Tom McGuire | WME
> TMcGuire@wmeentertainment.com
> 310.248.3022

——

From: "Tyerman, Barry" <BTyerman@jtwamm.com>
Subject: RE: Sydney Pollack; "Amazing Grace"
Date: August 17, 2015 at 6:24:58 PM PDT
To: 'Tom McGuire' <TMcGuire@wmeentertainment.com>
Cc: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>, "Todd Musburger (todd@musburger.com)" <todd@musburger.com>, Liesl Copland <LCopland@wmeentertainment.com>

Thanks Tom. I realize that you may not have been made privy to all of the agreements and other commitments your client has made over the years with respect to this project and then "reconsidered". I believe you will ultimately be made aware that the "standstill" agreement with Ms. Franklin was in fact entered into, among others. It goes without saying that I have the utmost respect for you and WME and I'm sure that you and your agency would not want to be party to the violation of these arrangements.

And as to direct communications with our clients, without debating your ethical analysis, our clients have requested that there be no direct communication and that everything be routed through our offices.

As to the use of Mr. Pollack's name and image, Warners will confirm to you that they did not purport to grant any such rights and, whatever his legal position, Mr. Elliott has volunteered to remove Mr. Pollack's unauthorized and inappropriate credit. Perhaps this is another commitment which he is "reconsidering?

Thank you. Barry

From: Tom McGuire <TMcGuire@wmeentertainment.com>

Subject: RE: Sydney Pollack; "Amazing Grace"
Date: August 17, 2015 at 5:41:46 PM PDT
To: "Tyerman, Barry" <BTyerman@jtwamm.com>
Cc: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>, "Todd Musburger (todd@musburger.com)" <todd@musburger.com>, Liesl Copland <LCopland@wmeentertainment.com>

Barry,

I will pass this email on. However, two observations:

1. I am unaware of any "standstill" agreement or other similar agreement that Alan or his production has entered into with Ms. Franklin. I would be happy to be on a call with you and/or her representative(s) to confirm that.
2. I do not believe it is against any ethical laws for Alan to speak directly to anyone involved in this matter. I will advise him that you do not want him to speak to Rachel or any other member of the family.

In addition, I do not know myself that Alan offered to take Mr. Pollack's name off the film, either generally or in the manner in which you suggest. I am passing your email on to Alan.

Tom

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: Tyerman, Barry [mailto:BTyerman@jtwamm.com]

Sent: Monday, August 17, 2015 5:32 PM
To: Tom McGuire
Subject: FW: Sydney Pollack; "Amazing Grace"

Tom,

I know that we have been missing each other. On the chance that it may take some time to connect, please advise your client that, without prejudice, the successors to the rights of Sydney Pollack accept his suggestion to take Mr. Pollack's name off the film, including for the proposed screenings at Toronto. Please have him cease any further use of Mr. Pollack's name, performance or image and, without limiting the generality of the foregoing, delete any and all visual or other references to Mr. Pollack in and in connection with the film.

I understand that quite provocatively Mr. Elliott has flagrantly breached a "standstill" agreement entered into with or on behalf of Aretha Franklin. Clearly not a positive move or one likely to encourage cooperation from anyone. I have been put in contact with her representatives.

Nothing contained herein or our previous correspondence shall be construed as a waiver of any of our clients' rights, positions or remedies, all of which are expressly reserved.

Barry

On Aug 23, 2015, at 2:13 PM, alan elliott <Alan@AlanElliott.net> wrote:

Bill was Sydney's editor. He, Sydney and I worked on the film. (bill cut the original trailer before I engaged JEFF Buchanan- bill might have been the editor but... he got a job in Baton Rouge for a year and during that time I met Buchanan)...

anyway, Bill just called. Donna, Sydney's assistant, had called Bill because Donna is so upset about how barry is mischaracterizing Sydney's involvement in the movie… And Sydney's involvement with me… To the family.

bill's call to me came completely unsolicited. I have not talked to him in a while… Or to Donna… As Donna has a gag order with the family since sydney passed and I knew this so I have been respectful.

but Bill is the one key link who can actually speak as to how much Sydney wanted this to be a "film by Sydney Pollack."

And Bill was apoplectic… As Donna had heard through the grapevine through the girls that things have escalated through barry.

> Long story short… 10% is our limit. I wouldn't mind making it 5%.
>
> Bill, Through no pushing from me at all... seriously... no really, seriously... has told the girls how much Sydney enjoyed working with me…
>
> How much Sydney wanted "amazing grace" to be finished…
>
> And how he- Bill- is the only one who can validate all of this to the family...
>
> and to everyone else if there's any questions about it.
>
> and he isn't press shy having done this in 2010 when there was the variety piece (http://variety.com/2010/music/markets-festivals/grace-film-finally-near-1118013484/).
>
> thank you.

___

From: Tom McGuire
Sent: Monday, August 24, 2015 12:46 PM
To: 'Tyerman, Barry'
Subject: RE: Sydney Pollack; "Amazing Grace"

My understanding is that several people have reached out to Alan with no request or attempt to contact them by Alan. Having said that, I am passing your note on to all.

Where are we in terms of our discussion last week? This project is going to Telluride and Toronto.

Tom

From: Tyerman, Barry [mailto:BTyerman@jtwamm.com]
Sent: Monday, August 24, 2015 12:37 PM
To: Tom McGuire
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Just as a reminder, this is the status quo.

No rights have been granted to use the name, likeness, performance or biography of Sydney Pollack in

connection with this project and Mr. Elliott specifically agreed to take Mr. Pollack's name off the film, of course without prejudice to our other rights, positions and remedies. Anyone acting inconsistently with this will be held accountable.

And clearly despite your encouragement and what I thought was our understanding, Mr. Elliott continues to pester friends, family and professional colleagues of our late client. Please make sure that this is discontinued.

Thank you. Barry

———

From: Tyerman, Barry [mailto:BTyerman@jtwamm.com]
Sent: Monday, August 24, 2015 1:05 PM
To: Tom McGuire
Subject: RE: Sydney Pollack; "Amazing Grace"

I am not talking about people soliciting Alan, but rather the reverse including, for example, his contacting Mr. Pollack's longtime assistant asking her what credit she would like!

As to our discussions, my recollection is that you were talking to Arnold Reed attempting to make a deal for Ms. Franklin's rights, none of which to our knowledge have been granted to date. If you are able to make a mutually acceptable arrangement you were then going to come to us to attempt to make a deal for Mr. Pollack's rights, absolutely none of which have been granted.

In the interim, wherever the project may go, lawfully or unlawfully, it may not go with the use of any Mr. Pollack's rights and Mr. Elliott specifically committed to take his name off the film, which we have accepted. Please confirm that this has been implemented and that there shall not be any inference in any discussions with any third parties that this is anything but a project not authorized by or on behalf of Sydney Pollack.

Thank you. Barry

———

From: Tyerman, Barry [mailto:BTyerman@jtwamm.com]
Sent: Wednesday, August 26, 2015 11:07 AM

To: Tom McGuire
Subject: RE: Amazing Grace

No mention of Sydney Pollack ANYWHERE (Including publicity, promotion, etc.) and no use of his image. This is all of course without prejudice to our basic position that all of this is uncleared as required by the Warner Bros. clip license.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

From: Tom McGuire [mailto:TMcGuire@wmeentertainment.com]
Sent: Wednesday, August 26, 2015 11:04 AM
To: Tyerman, Barry
Subject: Amazing Grace

Hi Barry

Alan is pulling the directed by credit to Sydney off the film. He had planned to give him a producer credit as well ("produced by Alan Elliott, Sydney Pollack and Jerry Wexler"—order for illustrative purposes only, not final).

Do you also want Alan to remove the produced by credit?

Tom
——

> **From:** Tom McGuire <TMcGuire@wmeentertainment.com>
> **Subject: RE: i talked with spira...**
> **Date:** August 26, 2015 at 4:41:51 PM PDT
> **To:** "alan elliott (ucla)" <alanelliott@g.ucla.edu>
>
> Not being flip, even though it will sound flip: I finished with barry—don't know if we have. Really up to Barry—I do not believe he is taking any aggressive action towards us, he just wants sydney's name off as director and producer, and he wants his name out of publicity. We can only control what we control of the publicity. I assume you are not sending out that epk package—that would drive him crazy.
>
> Tom McGuire | WME
> TMcGuire@wmeentertainment.com
> 310.248.3022

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, August 26, 2015 4:38 PM
To: Tom McGuire
Cc: Todd Musburger; Liesl Copland
Subject: Re: i talked with spira...

ok! did we finish with barry?

thank you.

——

From: Tom McGuire <TMcGuire@wmeentertainment.com>
Subject: RE: i talked with spira...
Date: August 26, 2015 at 5:05:51 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

No director, producer or any other Sydney credits

Tom McGuire | WME

——

From: Tom McGuire <TMcGuire@wmeentertainment.com>
Subject: Re: Aretha Franklin Doc 'Amazing Grace' Hosts Secret Screening for Buyers | Variety
Date: September 12, 2015 at 3:53:53 PM PDT
To: Liesl Copland <LCopland@wmeentertainment.com>
Cc: alan elliott <Alan@AlanElliott.net>, Todd Musburger <todd@musburger.com>

There is no pending legal action. There is his new statement that there are unspecified claims

Sent from my iPhone

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

On Sep 12, 2015, at 4:50 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

> We got it. But what i am saying is, we were asked to tale his name off and we dis and now he is bullying With this other stuff. I need an opinion if the pending legal action is real.
>
> Sent from my iPhone
>
> Liesl Copland | WME
> LCopland@wmeentertainment.com

310.246.3383

On Sep 12, 2015, at 6:49 PM, alan elliott <Alan@AlanElliott.net> wrote:

> be clear:
>
> sydney's attorney asked for his name off. we took it off. we are not paying him.
>
> honestly, if there is even $5 less I have to take for putting it back on, I am a pass.
>
> period.
>
> thank you.
>
> ---
> phone: 323 988 9692
>
> Sent from me.
>
> On Sep 12, 2015, at 3:46 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:
>
> > Todd can we connect tomorrow. I am at a wedding until then. We have a clock so we need to act tomorrow.
> >
> > Sent from my iPhone
> >
> > Tom McGuire | WME
> > TMcGuire@wmeentertainment.com
> > 310.248.3022
> >
> > On Sep 12, 2015, at 4:40 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:
> >
> > > He has never mentioned any pending claims. We may have to clarify before i can close and I will need to close tomorrow to keep these levels. Amazon just put a clock on us of 48 hours.
> > >
> > > Sent from my iPhone
> > >
> > > Liesl Copland | WME
> > > LCopland@wmeentertainment.com
> > > 310.246.3383
> > >
> > > On Sep 12, 2015, at 5:42 PM, Todd Musburger <todd@musburger.com> wrote:
> > >
> > > > I will have a go at him on Tuesday...Thanks...

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Sat, Sep 12, 2015 at 4:40 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

> I am. I have said we cant credit him. What will he do, legally?
>
> Lionsgate interest for world expecting offer.
>
> Sent from my iPhone
>
> Liesl Copland | WME
> LCopland@wmeentertainment.com
> 310.246.3383
>
> On Sep 12, 2015, at 5:29 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:
>
> > FYI
> >
> > Sent from my iPhone
> >
> > Tom McGuire | WME
> > TMcGuire@wmeentertainment.com
> > 310.248.3022
> >
> > Begin forwarded message:
> >
> > **From:** "Tyerman, Barry" <BTyerman@jtwamm.com>
> > **Date:** September 12, 2015 at 1:13:21 PM MDT
> > **To:** "TMcGuire@wmeentertainment.com" <TMcGuire@wmeentertainment.com>
> > **Subject: Aretha Franklin Doc 'Amazing Grace' Hosts Secret Screening for Buyers | Variety**
> >
> > I trust you will be advising potential buyers that you have no Sydney Pollack rights and in fact that there are pending claims of which everyone should be placed on notice.
> >
> > http://variety.com/2015/film/festivals/toronto-aretha-franklin-doc-amazing-grace-holds-secret-screening-for-buyers-exclusive-1201591920/
> >
> > Sent from my Android phone using Symantec TouchDown (www.symantec.com)

——

From: **Todd Musburger** <todd@musburger.com>
Date: Sun, Sep 13, 2015 at 10:17 AM
Subject: Greetings...

To: Barry Tyerman <BTyerman@jtwamm.com>

Barry: I am one of the attorneys working with Alan Elliott on the Aretha Franklin concert film project. I have been asked by our group to discuss with you the claim that you are making in reference to your client, the Estate of Sidney Pollack. I know this is not an opportune day to engage you, and you might feel that you have fully explained your position several times before. However, I come to you seeking some guidance as to the nature and validity of your claim. I have reviewed the emails you have written to Tom McGuire and Alan Elliott. I know also that at your request the Pollack name has been removed from the movie. I have studied the Quit Claim Deed from Warner Bros., and the existing paperwork concerning Mr. Pollack's payment for the work he performed on this project. I want to accord you every respect, and I feel that there must be something in your possession that we have not seen. It would be of genuine assistance to all of us if you could provide the basis for your claim with the documentation you are relying on. I assure you I will give this matter the priority it deserves. As we all say on occasion, time is of the essence. Cordially, Todd

Todd W. Musburger

---

here are the highlights (and below more extended). this is ALL i have between barry and me. i will start looking to see if i have more from tom or jordan or you.

---

august 17, 2015:

As to the use of Mr. Pollack's name and image, Warners will confirm to you that they did not purport to grant any such rights and, whatever his legal position, Mr. Elliott has volunteered to remove Mr. Pollack's unauthorized and inappropriate credit. Perhaps this is another commitment which he is "reconsidering?

---

august 11, 2015

Since you have ignored our efforts to address this situation amicably we have no recourse but to engage with Warner Bros., the directors Guild of America and the representatives of Ms. Aretha Franklin and the owners of the underlying musical and other materials to shut down your rogue activities. Presumably you have and will advise the representatives of the Toronto

and will advise the representatives of the Toronto International Film Festival of the serious claims of various interested parties and the accountability of the Festival and all other parties in the chain of any unlawful exploitation of these rights. Please confirm that the Festival has been so advised.

Not only would exhibition of the film violate various statutory and common law rights of our clients, but also constitute a serious and direct violation of the provisions of the applicable agreements of the Directors Guild of America including relating to creative rights and credits and formal grievances are being initiated.

The foregoing obviously is not a complete exposition of the claims against you and any and all other parties participating in the unlawful exploitation of these rights and all rights, positions and remedies are expressly reserved.

———

july 14, 2015

What you have sent me purports to be an internal Warner Bros. memorandum, not anything like a contract. Neither Sydney nor any representative is even copied on this. If this is what you are relying on for rights, your reliance obviously is wildly unjustified. All rights, positions and remedies reserved. Barry

———

july 13, 2015

If you will not voluntarily withdraw any exhibition of the film, including in Toronto, we will be required to take our own legal will measures. We are specifically instructed to protect the Sydney Pollack name and not permit its use without authorization nor without the rights of Aretha Franklin being addressed. No matter how good you may believe the film is (not surprising given Sydney's involvement, but it is a misrepresentation to say the completed film was

misrepresentation to say the completed film was "Directed By" him), we will not permit you to gloss over these serious legal issues.

All rights, positions and remedies reserved. Barry

———

june 16, 2015

With due respect Sydney Pollack has ultimate rights to this film and, as his longtime attorney and Trustee for his beneficiaries, I hereby instruct you to cease and desist immediately from any further use of his name on or in connection with this project. You and any other person or entity violating his rights will be held fully accountable. Barry

———

june 16, 2015

I am not interested in "opening any cans of worms". Only to protect the rights of Sydney Pollack, both economic and creative. And to make sure that his work is not exploited without those issues being addressed and not over the legal or other objections of Aretha Franklin. He would never have countenanced that and was very clear that her rights needed to be addressed before this work could be exploited in any manner. If you have contracts to establish that she has given that permission, it is imperative that those be shared urgently (as well as any documentation of any arrangements with Sydney Pollack).

To be clear, you have no rights to utilize any of the rights of Sydney Pollack, including his name (and certainly not to credit this film as being "Directed by Pollack"), without further written agreement from his successors.

All of this is not exhaustive and is without prejudice to the other rights, positions and remedies of Mr. Pollack's successors.

successors.

---

may 6, 2015

Please send me that contract and your contract with warners or should I ask for the warners contract directly from them?

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

-----Original Message-----
From: alan elliott (ucla) [alanelliott@g.ucla.edu]
Received: Wednesday, 06 May 2015, 1:12PM
To: Tyerman, Barry [BTyerman@jtwamm.com]
Subject: Re: amazing grace links...

Sydney was not correct. there is a contract with Aretha and warner 7arts.

(ps Sydney also failed to mention that the reason the film never got made was because he couldn't sync up the visuals the audio! a small... but important detail.)

I am very hopeful… That Aretha will have a come to Jesus moment at some point… And we are in constant contact… But I am relying on the contract.

thank you.

---
phone: 323 988 9692

Sent from a iPhone
This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.

On May 6, 2015, at 1:07 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

> Sydney was equally clear with me that the Aretha rights had not been cleared. Please send me the documentation so I can take a look. At some point (sooner rather than later) I should also see your agreement with Warners. Thanks.

Does this mean that you have not heard from anyone on behalf of Aretha recently?

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, May 06, 2015 1:06 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hey barry

as John Calley quite clearly yelled at me at a certain point… "Do you think I would send Sydney Pollack to go film Aretha Franklin if there wasn't a release?!"

the answer is:

there is.

Aretha signed a personal service contract with warner 7 arts (The film company) which wb and Sydney relied upon to make the film.

the man whose responsibility it was to secure all releases for filming, joe Boyd, (joe was director of film music at wb in 1972) has signed a letter re-stating these facts.

as jerry wexler always implored me to do, "check what's in the contract!" (we did, and that's what we are relying upon.)

thank you.

---
phone: 323 988 9692

Sent from a iPhone
This email... may have been dictated into the iPhone, so please

forgive the mistakes... transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.

On May 6, 2015, at 12:32 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

In your response you did not address the issue of the Aretha Franklin rights. Have you made an arrangement with her? And is there a deal with the record label? There is absolutely no way that the Sydney Pollack rights will be cleared, including any possibility of the film being attributed to him (the whole notion of "Directed by Sydney Pollack" is an issue), unless and until all of this has been worked through and fully documented.

Given the various items to be resolved, all rights, positions and remedies are expressly reserved.

Thanks. Barry

PS. None of these necessary “legalities” reflect on the quality of the project or our collective desire hopefully to see Sydney’s good work finally and respectfully made available to an audience.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305

Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

To: Tyerman, Barry
Subject: Fwd: amazing grace links...

hey barry

I reached out to Sydney's girls through Donna (see Rachel's sweet email below).

as discussed I am taking the film to premiere at telluride.

as of now I am planning on:

directed by Sydney pollack

produced by Sydney pollack and alan Elliott

if the girls have any issues or concerns, please have them contact me. I will try to do what they feel is appropriate re credits.

and if there's any documentation or... anything else that I should know about re: the iteration of the project Sydney and I started on in 2007... or anything from the passed (I'd be very interested to see the 1997 file!) please send it over and let's discuss.

hope this finds you well.

thank you.

---
phone: 323 988 9692

Sent from a iPhone
This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so

(all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.

Begin forwarded message:

From: Donna Ostroff <missdo@aol.com>
Date: April 22, 2015 at 3:44:03 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Subject: Fwd: amazing grace links...

From: Rachel Pollack <rpollack@mac.com>
Date: April 22, 2015 at 2:42:27 PM PDT
To: MissDO@aol.com
Subject: Re: amazing grace links...

I just watched the trailer and will watch the rest when I get home. What a wonderful wonderful thing he has done!!! How awful if that had just sat there. I am so thankful to him for doing it and I can't wait to see it!!!!

Thanks you so Donna.
Much love to you.

---

may 5, 2015

I reviewed my file on the project and was reminded that in 1997 we were discussing a possible deal with Warner Bros. but it was not ever completed or executed. The broad strokes were that Warners had proposed a $150,000 fee and 50% of the net to Sydney Pollack but we responded that Sydney was obviously a “1st dollar gross” participant and therefore a split of traditional net profits would not work. We had also discussed at the time a direct soundtrack album royalty from Warners on the presumed rerelease of the Aretha Franklin record

project and a greater share of home video.

We would also need to discuss and agree how Sydney's work would be credited; given that tragically he was not around to complete the film, simply billing this as "Directed by Sydney Pollack" would be potentially misleading and inappropriate. Prior to any public exhibition I would expect you to extend the courtesy to Mr. Pollack's heirs of their seeing the film and having the right to comment.

And finally have you "made peace" with Aretha Franklin? Sydney clearly would not countenance the film being released in any way without her creative and economic rights and interests being taken into account.

I look forward to your thoughts as a priority.

From: "Tyerman, Barry" <BTyerman@jtwamm.com>
Subject: RE: amazing grace/redford...
Date: January 22, 2015 at 11:14:47 AM PST
To: "Alan@AlanElliott.net" <Alan@AlanElliott.net>

No. It has always been made clear that any exploitation of this material was conditional on a deal being made.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

-----Original Message-----
From: Alan Elliott [Alan@AlanElliott.net]
Received: Thursday, 22 Jan 2015, 10:33AM
To: Tyerman, Barry [BTyerman@jtwamm.com]
Subject: Re: amazing grace/redford...

(according to the wb records… he signed… and got paid!)

(but if there's something you think we are missing… let's do it.)

thank you.

-alan

---

phone: 323 988 9692

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> On Jan 22, 2015, at 10:31 AM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:
>
> Shouldn't we first try to make a deal for Sydney's rights in the film?
>
> Barry W. Tyerman, Esq.
> Jackoway Tyerman Wertheimer
> Austen Mandelbaum Morris & Klein
> 1925 Century Park East, 22nd Floor
> Los Angeles, California 90067
> Phone: (310) 553-0305
> Firm Fax: (310) 553-5036
> Direct Fax: (310) 551-4448
>
> -----Original Message-----
> **From:** alan elliott [alan@alanelliott.net]
> **Received:** Thursday, 22 Jan 2015, 10:27AM
> **To:** Tyerman, Barry [BTyerman@jtwamm.com]
> **Subject:** amazing grace/redford...
>
> barry:
>
> i called as... i am finishing up the "amazing grace" doc... and i want robert redford to read the letter sydney wrote to aretha for the top of the picture.
>
> if it's a no... i will really move on this time... but i feel he is the right choice for it... here's the letter:
>
> attached is a link for "amazing grace."
>
> here's the link:
>
> https://vimeo.com/91847063

> **From:** "Tyerman, Barry" <BTyerman@jtwamm.com>
> **Subject: RE: Sydney Pollack; Aretha Franklin; "Amazing Grace"**

Date: July 29, 2014 at 3:31:38 PM PDT
To: alan elliott <Alan@AlanElliott.net>

Sydney obviously produced and directed the original production and no rights were granted to anyone in the results and proceeds of those services. As a result, the film may not be commercially or otherwise exploited in any manner whatsoever unless and until a full and complete agreement is negotiated for those rights, which would include financial arrangements as well as appropriate approvals and controls on the part of Sydney's heirs.

Where are you on the project overall? And specifically where are you with Aretha Franklin?

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles,
California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310)551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [mailto:Alan@AlanElliott.net]
Sent: Tuesday, July 29, 2014 3:14 PM
To: Tyerman, Barry
Subject: Re: Sydney Pollack; Aretha Franklin; "Amazing Grace"

hi barry

this (the tmz) is a bit of... noise.

re: sydney: is there some specific rights i would need from you/the estate?

thank you.

-alan

---

phone: 323 988 9692

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On Jul 29, 2014, at 3:05 PM, Tyerman, Barry

<BTyerman@jtwamm.com> wrote:

Alan,

You will recall our discussions and correspondence a number of years back concerning this project. At that time it was understood and documented that the project would not proceed unless and until we discussed and agreed mutually acceptable economic and other terms for the Sydney Pollack rights. Also, as we discussed, this would all be conditional on your clearing the Aretha Franklin rights, possibly among other individuals appearing in the film and/or on the soundtrack.

Our curiosity was piqued by the attached article which was forwarded to us. Can you please give me an update as to where you are on all this? Thanks. Barry

---

sydney passed away on may 26, 2008

below is sydney telling barry tyerman to release the files to me (he never did).

From: "Tyerman, Barry" <BTyerman@jtwamm.com>
Subject: RE: Amazing Grace
Date: May 28, 2008 at 11:52:25 AM PDT
To: <Jordii824@cs.com>
Cc: <alan@alanelliott.net>, <Werthie@aol.com>, "Wertheimer, Alan" <AWertheimer@jtwamm.com>

Thanks, Herb. I assume this is being done under the authority of Warners as owners of the raw footage? Good luck with the work. Barry T.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036

Direct Fax: (310)551-4448

Email: BTyerman@jtwamm.com

From: Jordii824@cs.com [mailto:Jordii824@cs.com]
Sent: Wednesday, May 28, 2008 10:54 AM
To: Tyerman, Barry
Cc: alan@alanelliott.net; Werthie@aol.com
Subject: Re: Amazing Grace

Barry, I'm very sorry to hear about Mr. Pollack. He was quite gracious in speaking to Alan and enthusiastic about the prospect of us finishing this film. We hope our work will exceed his expectations. Warmest regards, Herb Jordan

I literally have the file in front of me and am happy to answer any questions that you may have. Unfortunately the file relates principally to the deal in 1997 for Mr. Pollack to complete the editing of the material (as opposed to the original shoot). Please let me know how I can help.

Barry T.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris &Klein
1925 Century Park East, 22nd Floor Los Angeles,
California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036

Direct Fax: (310)551-4448

Email: BTyerman@jtwamm.com

From: Werthie@aol.com [mailto:Werthie@aol.com]
Sent: Wednesday, May 07, 2008 10:21 AM
To: Jordii824@cs.com
Cc: Tyerman, Barry
Subject: Re: Amazing Grace

hi jordan . . . probably best if you contact barry's office directly . . . i've copied him on this email, and our number here is 310-553-0305 . . . hope all's well . . .

werth

Hello Alan. Donna Ostroff from Sydney Pollack's office has relayed that Mr. Pollack has authorized Barry to release the Amazing Grace legal file to Alan Elliott or to me. I'd like to arrange to stop by the office, or if it's more convenient for Barry, have the file sent to my office. The project is moving quickly so it would be helpful if we could make arrangements as soon as possible. All Best, Jordan

Herb Jordan
The Adage Group, LLC
328 South Beverly DriveSuite G
Beverly HillsCa 90212
310 785 0574
cell 310 613 4517

Begin forwarded message:

From: Donna Ostroff <dostroff@mirageenterprises.com>
Date: March 12, 2008 5:11:58 PM PDT
To: Alan Elliott <Alan@AlanElliott.net>
Subject: Re: thought...

Just got the following reply from Barry Tyerman....

"I have a file on this and have discussed it with Sydneyon many occasions over the years. I am traveling out of the country but will pull my file on my return on Monday."

Let you know when I hear from him.

we just chatted. talked about bill going to see sydneyon wed. and needing to see any files barry might have.
she said she would be happy to tell barry tyerman that sydneyhas given

> permission to see the files.

thank you.

-alan

---

phone: 323 988 9692
peace and love.

http://songsoundrecord.tumblr.com

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: Re: Time response
Date: August 24, 2015 at 8:05 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com
Cc: Liesl Copland LCopland@wmeentertainment.com, Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com

hi stephen and Annette

the essence festival would like to show "amazing grace" next July. can they be added on the coverage or how is that handled?

thank you.

---
phone: 323 988 9692

Sent from a iPhone

This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.

On Aug 24, 2015, at 7:58 AM, Todd Musburger <todd@musburger.com> wrote:

> It could be premature to sign this deal as anxious as we are...the Essence Festival is a material part of it. So, Alan, check with the insurance folks...we need to add Time as an additional insured and we need to see if the policy can cover you for the Essence fest. And Liesl, please confirm for me that you are OK with the language which does state "...at Producer's sole discretion..." Thanks
>
> **Todd W. Musburger**
> **Todd W. Musburger, Ltd.**
> **142 E. Ontario**
> **Suite 500**
> **Chicago, Illinois 60611**
> **312 664 2600**
>
> ---------- Forwarded message ----------
> From: **Todd Musburger** <todd@musburger.com>
> Date: Sat, Aug 22, 2015 at 12:07 PM
> Subject: Time response
> To: alan elliott <alanelliott@g.ucla.edu>, Liesl Copland <LCopland@wmeentertainment.com>
>
> Please advise...
>
> IPhone Transmission Please excuse Typos & Peculiar abbreviations
>
> Begin forwarded message:
>
> > **From:** Zach McGee <zach@rampante.net>
> > **Date:** August 22, 2015 at 11:20:04 AM CDT
> > **To:** Todd Musburger <todd@musburger.com>
> > **Subject: Re: Greetings...**
> >
> > Todd:
> >
> > I spoke with folks here and we can make the 1 EP credit work and go to $45K on the rights option if we were granted both non-exclusive SVOD and AVOD rights. With respect to the latter, I think the prior term sheet may not have been clear in terms of how we described the various flavors of AVOD and SVOD rights so we have clarified that in this version by adding examples of the services that currently exploit the different rights (i.e., AVOD only, SVOD only and S+AVOD [to refer to the combination of SVOD and AVOD on the same service, not the combination of separate AVOD and SVOD rights]) and breaking out the license fee by type of right.
> >
> > Please let me know if you have any questions or would like to discuss. Otherwise, please confirm that this version works for your side. Thanks.
> >
> > Zach
> >
> > On Thu, Aug 20, 2015 at 8:28 AM, Todd Musburger <todd@musburger.com> wrote:
> > > **Zach: I wanted to expedite the process by addressing your suggested changes. We can get a**

Zach: I wanted to expedite the process by addressing your suggested changes. We can set a call for this afternoon if need be.

Credits - We are comfortable with either/or but not both, which we believe would be inconsistent with industry standards.
Window - The feeling is that 60 days makes it unlikely a distributor can take it all, so we actually think the 180 helps you.
Pricing - Can go to 45k.
Archives - Your language is fine.

Let me know your thoughts ...thanks again, Todd

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

--
Zach McGee
zach@rampante.net
(310) 773-1972 (cell)

<8.10.15aretha.term.sheet.rev4 red.docx>

From: **alan elliott (ucla)** alanelliott@g.ucla.edu
Subject: WHY DOESN'T ARETHA PAY HER BILLS?- detroit free press
Date: September 17, 2015 at 12:50 PM
To: Stephen Carroll stephen.carroll@aon.com

fyi...

WHY DOESN'T ARETHA PAY HER BILLS?
THE WORLD KNOWS FRANKLIN IS RICH, FAMOUS, A GREAT SINGER, A DETROIT ICON. BUT BAD CREDIT IS TARNISHING HER GOLDEN LUSTER.

Byline/Affiliation:
DAVID ZEMAN, BRIAN MCCOLLUM AND L.L. BRASIER
Free Press Staff Writers

PubDate: Monday, 2/15/1999

Aretha Franklin has won more Grammys than any woman and was among the first inductees into the Rock and Roll Hall of Fame. She owns grand homes in Detroit's posh suburbs and has earned millions from recordings, concerts, films and book contracts.

So why won't she pay her plumber?

Or her florist? Or, for that matter, her caterer, dentists, accountants, lawyers, songwriter, music arranger, moving company, landlords, dressmaker, limo drivers, tax collectors, landscaper, home inspector or even the guardian for her mentally ill son?

Since 1988, more than 30 lawsuits have been filed against Franklin in Oakland and Wayne counties by people seeking payment on bills. In most cases, Franklin paid only after being taken to court, most recently in January.

She and her aides tried to avoid some suits, turning away process servers from palatial homes in Bloomfield Hills and Bloomfield Township. Some creditors gave up. In other cases, Franklin ignored court judgments, forcing them to seek liens on homes or assets.

"I made it as easy for her as I could," Dean Pitcairn, former owner of Hilton Limousine in Ferndale, said of his suit to recoup nearly $1,900 from Franklin in 1991.

"I think it was the type of thing where they felt if they prolonged it long enough, we would forget about them. It just made me mad because everyone thinks she's a big hero, and she doesn't think twice about stepping on little people."

Franklin, her lawyers and publicists declined to be interviewed for this article, though one noted that Franklin gives generously to good causes.

And that's the puzzle: that a woman who regularly contributes her time and talents to charity, a beloved star with roots in gospel music, can show such disregard for those she owes money to.

While some creditors dismiss Franklin as a spoiled diva, those who have known her for years say the answer is more complicated -- that her lapses may be explained by a distrust of outsiders and deep personal loss.

"She's a wonderful artist who shouldn't be handling her own business, but she does," said Wayne County Circuit Judge Harvey Tennen, who represented Franklin in the 1980s and believes she is overwhelmed by her financial affairs.

"She just doesn't have time for it and she doesn't realize the kind of bad press she gets from not dealing with things like that. She needs a manager, she needs a lawyer, she needs professionals. But she usually doesn't talk to them until it's too late."

Franklin's reputation as a mercurial and enigmatic personality is a common, if hushed, topic in the music industry.

In 1988, Franklin failed to show up to sing for the second of singer George Michael's concerts at the Palace. Four years earlier, she backed out of a Broadway musical based on the life of Mahalia Jackson, for which a judge later ordered her to pay $230,000 to the show's producer.

Franklin has also sometimes chewed out musicians -- onstage -- during concerts when she felt their playing wasn't up to snuff.

Many industry insiders requested anonymity for this article because, despite her financial reputation, the music superstar is viewed in Detroit with honor, even reverence. Unlike many Detroiters who became celebrities and left

even reverence. Unlike many Detroiters who became celebrities and left, Franklin has lived in the area nearly all her life and is beloved by its residents. It's that same hometown clout, some say, that has allowed her to ignore some debts.

"That was her style. She was above all the mundane activity of paying bills," said David Greenbaum, Franklin's accountant until 1992, when his firm sued Franklin. "She was an artist."

Possible reasons

Tennen and others say Franklin, 56, won't delegate her business affairs because she finds it difficult to trust others. It's a wariness, they say, born of a failed first marriage -- which reportedly included physical abuse -- and exposure to the music industry at a young age. "People have taken advantage of her her whole life," Tennen said.

Others say Franklin assumed more control of her finances after the loss of her father and brother, who served as protective and guiding figures in her career and business affairs.

The Rev. C.L. Franklin died in 1984 after several years in a coma. Aretha Franklin, who returned to Detroit from Los Angeles to be with him, is said to have spent more than $300,000 on his care. Brother-manager Cecil Franklin died in 1989.

"When the two people you trust and count on are gone, suddenly you're on your own," said Larry Robinson, owner of God's World record store in Detroit. "And suddenly you're working in areas you don't care much about. You love to sing -- not do taxes."

In 1996, Robinson's store helped sell tickets for a Christmas concert Franklin hosted at her late father's New Bethel Baptist Church. Because of a miscalculation by Franklin and church staff, about 1,000 extra tickets were sold -- at $17.50 each -- leaving a seething swarm of gospel lovers literally out in the cold.

Some people say such goof-ups can be blamed on the flimsy infrastructure of Franklin's camp, a loose-knit coterie of attorneys, publicists and personal coordinators who leave many details in Franklin's hands.

"She really needs somebody else to serve as a buffer," Robinson said. "She's not a bad person. But when you're trying to play every position on the team -- catching and throwing -- it's going to be rough."

Speculation over Franklin's failure to pay bills has become something of a parlor game among the people who have sued her. Her creditors are like a loosely constructed support group; they make condolence calls to new members and swap stories about efforts to collect from the singer.

Rather small amounts

It's not unusual for celebrities to be magnets for lawsuits from plaintiffs looking for a big payday. But the majority of cases against Franklin are for less than $4,000.

And in interviews with more than 20 people who have sued Franklin, some said they were reluctant plaintiffs. It was not merely the expense of litigation that bothered them. Manysaid they were fans of Franklin and admired her contributions to music and to Detroit.

Frank Winton, who owned Mark of Excellence Catering in Southfield, sued Franklin in 1988 over a $2,300 bill for four parties, including one for her birthday. He put off suing for months and hesitated to mention the debt when he saw her at social functions.

"She did a lot of charity work, and I didn't want to embarrass her," Winton said.

Other creditors waited years.

In 1994, Franklin booked seven rooms at the Westin Hotel in Detroit for a scholarship dinner. When her credit-card company wouldn't pay, the hotel sent invoices to Franklin.

In 1997 -- 28 months later -- the Westin sued. The hotel needed a judge's help to reach Franklin, who avoided a process server. She was later ordered to pay $1,068. She didn't. Westin tried in vain to seize Franklin's wages from Arista, her record label. A Westin lawyer declined to say if Westin ever collected.

Other creditors said their respect for Franklin dissolved when it became clear she would not pay.

"Hey, she should have to pay her bills like everyone else," said Bob Beutel of All Star Limousine in Royal Oak, which recently collected a $3,652 bill from last summer. Beutel said competitors warned him about Franklin. He said his own lawyer told him, "It's not a matter of if, it's just a matter of when she's going to stiff you."

So every time Franklin used All Star, the driver made her sign a contract promising that if her bill went to court she would pay All Star's legal fees. It did, and she did.

Even so, Beutel said, chasing old bills can wear on a small business.

"How'd you like to go two weeks without being paid? And now you have to bug people about money and they tell you, 'Hey, I'll give it to you next week,' and they don't?"

Discounts, too

Some merchants felt betrayed after babying Franklin with sweet deals, liberal credit or rushed deliveries.

"We gave her a great price," said Bruce Bolton of Breath of Spring Florist in Bloomfield Hills, which sued over $1,111 for flowers sent to a 1995 Christmas party.

"Sometimes, you write these things off," he said. "But I think I just felt

that she does this to so many people and I didn't want to be among the people she did it to."

In 1988, Orville Brown of Flatrock Bagging rushed a special order of white sand to her swimming pool for a luau. His lawyer said Brown also gave the singer a discount. Invoices were mailed later, with no response.

"Flatrock Bagging is a family-owned deal," said the attorney, Murdoch Hertzog. "This guy is just good as gold. Here he went out of his way to help her make a fine, wonderful event -- and he got stuck."

And then there is attorney Suzanne Dreifus, who in 1989 was appointed guardian for Franklin's adult son, Clarence, a chronic paranoid schizophrenic. Two years later, when Franklin fell more than $10,000 behind in paying Dreifus for finding foster homes for her son, visiting him and arranging for his medical care, Dreifus sued.

"Her attorney simply said to me, 'She's not going to pay you,' " Dreifus recalled. Dreifus called her own lawyer. "I told him if they come up with 10 cents less, don't even call me.... It was a matter of principle."

But the Aretha Franklin creditors describe is not the woman Tennen, her former lawyer, knows.

Tennen was introduced to Franklin in the early 1980s by her brother,Cecil.

When Franklin asked Tennen to represent her, he told her he had never

represented an entertainer.

"So she bought two sets of encyclopedias on entertainment law and gave one to

me," Tennen said. "And she said to me, 'We'll learn together, Harvey.' "

"I was always honored to represent her," he said.

"On the other hand, she needed help."

Brian McCollum
Music Writer
Detroit Free Press

313-223-4450

(Note new office address)
160 W. Fort St.
Detroit, MI 48226
thank you.

-alan

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phone: 323 988 9692

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