

Adams, Rory

From: Gately, Mary <mary.gately@dlapiper.com>
Sent: Thursday, October 20, 2016 1:50 PM
To: Chew, Benjamin
Cc: Adams, Rory; Drian, Joshua
Subject: RE: Bank of Palestine

Dear Ben, in response to question one below, please be advised that Bank of Palestine has not authorized me to accept service of process for this complaint.

In response to question two below, as I have told you in the past, Bank of Palestine has no knowledge of what information your client, Mr. Fadi Elsalameen, may have shared with others or who has access to the information you reference in the complaint and in prior emails. In addition, I have previously explained that Bank of Palestine did not leak any of Mr. Elsalameen's information to the media.

Bank of Palestine is unable to provide the information that is requested in your associate's email because the subject account is in the name of a corporation, Al Serena International Company for Trade and Investment, and is not in Mr. Elsalameen's personal name. There are two signatories to the account, one of whom is deceased and Mr. Elsalameen. To our knowledge, the paperwork to substitute in an heir to the deceased relative has not been done to date. Therefore, under applicable laws, Bank of Palestine is unable to accommodate your request.

Finally, I would note that we find this lawsuit to be meritless and suggest that your client voluntarily dismiss it. Should it be served properly, Bank of Palestine will mount a vigorous defense to it.

Regards, Mary

Mary Gately

Partner

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From: Chew, Benjamin [<mailto:BCheW@manatt.com>]
Sent: Wednesday, October 19, 2016 1:18 PM
To: Gately, Mary
Cc: Adams, Rory; Drian, Joshua
Subject: Bank of Palestine

Good afternoon, Mary,

Hope you are doing well. Two questions:

1. Are you amenable to accept service of process on behalf of your client Bank of Palestine of the attached Complaint?
2. In response to our request for the contract documents, you advised my colleague Rory Adams that you planned to consult with your client back on September 19 (one month ago). Will you now please send us the requested documents (to which Mr. Elsalameen, as an account holder, is clearly entitled)?

Warm regards,

Ben

Benjamin Chew
Partner

Fellow of the American College of Trial Lawyers



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