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March 5, 2021

BY EMAIL ONLY b.tuckerjoyce@gmail.com

B. Tucker Joyce
Buyer of 101 Scholz Plz. #221,
Newport Beach

Re: Versailles Homeowners Assn. v. Rosemary Rolfes, et al., O.C.S.C. Case No. 30-2014-00761946

Dear Mr. Joyce:

This firm has been assigned by the liability insurance carrier for the Versailles Homeowners Association ("HOA) in Newport Beach, CA to defend the HOA in connection with a claim against the HOA filed by Rosemary C. Steinbrecher in the above lawsuit (the "Second Amended Cross Complaint"). In her Second Amended Cross Complaint, Ms. Steinbrecher seeks compensation for damage allegedly caused by certain HOA actions.

This is to advise you that the case brought by Steinbrecher has minimal merit and minimal damages, if any. The likely result is a verdict in favor of the HOA. The case may be dismissed at a hearing on 4/20/21 before it even goes to trial for Plaintiff's failure to comply with discovery rules. Even if there is a favorable verdict in Plaintiff's favor, the HOA is backed by a \$2,000,000 insurance policy which appears to provide plenty of coverage in this case. Even at full value, I do not see this as even close to a 6 figure case.

Sincerely,



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DMK/kxm