

EXHIBIT 3

E-MAILS between Nina Baum & Mark Guralnick, Esq.

Nina Baum's November 23, 2013 e-mail

“hello Mark

I sent the below to you /jill a while ago
I asked jill if she was able to OPEN the IMAGES
and she replied YES

I asked her to print all the images out for you - but she said she would relay the message to you and it would be up to you to determine if you wanted them printed etc.

I am sending this to you again as yesturday you seemed to not have any of my file - and i am very very concerned

please note - the below is not to be relied on as a complete file -but it is what i have at the moment

also - please note - what is physically in the curt is slightly different than what is on line (so - it might be important to go see the file first hand)

PLEASE CONFIRM RECEIPT OF THIS EMAIL AND PLEASE CONFIRM YOU ARE ABLE TO OPEN THE BELOW IMAGES (it is a work product that you might want to build on)”

Nina Baum's November 25, 2013 e-mail

“Subject: Still waiting to hear from you - re you postponing our telephone conference to go over discovery requests LET ME KNOW WHEN IN WRITING!!!!

Hello Mark

This past friday you were unable to go over discovery requests and start responding to them and advised me that you needed to contact my prior lawyers for the case file as you did not have it. However, you did request that we have a telephone conference today so you could respond to the discovery requests due early next month. The telephone conference was scheduled at 1:30. I waited to hear from you and when i phoned your office a few minutes after 1:30 jill told me you were still on conference with someone else and she asked me to call back in 10 minutes. I did. I

was put on hold - when you came to the phone i asked you about the status of getting the file as I did not get a response from my email i sent you over the weekend. You said you got nothing yet.

Instead of addressing the discovery requests you told me you were going to patch me in with Kenneth Manney. I held on the phone 20 minutes and NO connection. Later - you advised me he refused to talk with you if i was on the phone so you just didn't connect me. Then after 2pm when i finally got you on the telephone, you proceeded to tell me you didn't have time to do the discovery requests but you did not set another time. You put me on hold and did not return to the telephone - however, jill advised you had a scheduled conference with a judge at 2:30 and you would not have time to do the response to discovery.

As i told you, one of the geniuses at the apple store has assisted me to get access to an iCloud account and he has assisted in forwarding to you over 300 emails documenting \$\$ and Davids involvement via my Dads directive - and Davids own over the years

The emails also document that David is in Full control of much of the discovery he is asking for --and we might want to compel him to release the administrative authority so we can access the evidence.

There are possibly 1000 emails that will be sent to you over the course of the next few days - all in response to the discovery request

in addition, later this week - i will try to fax you the papers I gave to my prior lawyers (about 500 pages)

it s just very difficult for me as i am at the beckon call of who will help me here --

my dr tried to all you - but you did not answer and he said your phone just rang and rang and then rang busy -

--LET ME KNOW WHEN YOU WILL HAVE TIME TO RESPOND TO ALL THE DISCOVERY REQUESTS AND ADVISE WHICH REQUESTS ARE PRIVILEDGED ETC---

PLEASE REVIEW EVERYTHING PRIOR TO PRODUCTION- AS YOU ARE IN CHARGE HERE

ALSO PLEASE CNFIRM YOU SERVED THE PAPERS YOU HAD TO THE ONES THAT HAD THE DEADLINE THIS WEEK OR NEXT WEEK

Nina Baum's November 25, 2013 e-mail

“Subject: Re: Still waiting to hear from you - re you postponing our telephone conference to go over discovery requests LET ME KNOW WHEN IN WRITING!!!!

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ALSO _ PLEASE CNFIRM YOU SERVED THE PAPERS YOU HAD TO _THE ONES THAT HAD THE DEADLINE THIS WEEK OR NEXT WEEK”

Mr. Guralnick's November 25, 2013 e-mail

“Subject: RE: Still waiting to hear from you - re you postponing our telephone conference to go over discovery requests LET ME KNOW WHEN IN WRITING!!!!

“Nina-

There appears to be a “disconnection” here. Your emails are not responsive to my requests by phone; they say things that are not true; they make demands that are unreasonable, and which completely ignore the subject of our conversations.

You seem to have an agenda that is different than mine, and you seem to want to navigate the case while artificially reminding me that “I’m in charge.

I see no choice but to terminate this relationship.”

Mark.”

Nina Baum's November 27, 2013 e-mail

“Hello
STILL WAITING FOR MARK GURALNICK TO ADVISE WHEN HE WILL RESPOND TO DISCOVERY - it is wednesday 11/27 and i have sent you over 500 emails and the genius at the apple store will be sending

more that are responsive to discovery but you have not yet made an appointment with me as you said you would
I am asking again that you do
I know Jill has taken many messages from me referring to this and to the other outstanding items but still no response
please advise asap and phone me at 917 971 8763
thank you Nina Anneen”

Mr. Hennessey's November 27, 2013 e-mail

“I have been included on this list. I am deleting all emails without review. Please cease sending these to me immediately.

Bill Hennessey”

Mr. Guralnick's November 27, 2013 e-mail

“Once again, Nina, I do not know why you are sending these emails. And please stop sending them to Mr. Hennessey.

Please STOP sending these emails immediately!

Thank you.

Mark S. Guralnick”

Mr. Hennessey's November 27, 2013 e-mail (6:07 pm)

“Mark. She continues to send me emails. Please contact her and tell her to stop.

Bill”

Nina Baum's November 28, 2013 e-mail

“I think the emails are in response to the document request requested by Bill Hennessey. the geeks offered to try to retrieve what they could off the server and send it so we are not in default in any way st all regarding production - And comply completely Since I don't have a working.g computer at this time and wouldn't know how to do that anyway
Mark- if you need to reach me you know I am available at 917 971 8763 except when I am at hospital and then I will call you back when I leave.

Please call me and confirm you have responded In full to the document request. Also confirm that you have made service on everyone and have complied with all deadlines and outstanding issues

Thank you

Regards

A nina”

Mr. Guralnick’s November 28, 2013 e-mail (8:49 am)

“Subject: STOP SENDING EMAILS

If you do not stop flooding me and Mr. Hennessey with these incessant emails, I will have no choice but to seek an injunction against you.

I urge you to STOP! Read my emails to you! Stop sending and forwarding emails that are more than ten years old to my inbox – you have gone way overboard!

STOP.

Mark S. Guralnick”

Mr. Guralnick’s November 28, 2013 e-mail (3:54 pm)

“Once again, I cannot represent you.

Once again, I have filed a Motion to Withdraw as your attorney.

Once again, I cannot respond to the Request for production of documents without your cooperation, and your strategy of bombarding me (after the fact) with hundreds of irrelevant emails does not constitute cooperation.

Once again, I cannot serve anybody without the file, and without more information from you, which you haven't provided.

Once again, you should IMMEDIATELY seek new counsel.

And once again, stop sending copies of everything to Mr. Hennessey as it will destroy your attorney client privilege.”

Nina Baum’s December 5, 2013 e-mail

“I cannot open attachments from this phone. I will try to get to computer tomorrow. I sent you upwards of 3000 emails responsive to doc request. As you should now know by all the info in The emails- I was not handling most of my life affairs relating to money and legal but David Baum and rich Bennett were. In fact David created an email law aka me.

Also know you have not returned my calls from last weeks
Please confirm you have responded yo doc request and have made proper service.”

Mr. Guralnick’s December 11, 2013 e-mail

Subject:Deposition and other Deadlines

“Nina:

The Court refused to extend deadlines for you today. The judge seemed to indicate (but not expressly) that he might consider your circumstances if you miss certain deadlines, and if you have a good excuse for doing so. I explained that you had hospital and medical treatment occurring in New York, but the judge was clearly resistant to extending any more deadlines.

The judge also declined to grant my motion to withdraw yet, indicating that he wanted me to be available for an additional period of time should you appear at your deposition or the upcoming hearing on December 17, 2013. The judge indicated, however, that he would take my request under advisement and would address it shortly.

Please advise if you intend to appear at your deposition tomorrow in Brevard County.

Thank you.

Mark S. Guralnick, Esq.

Nina Baum’s December 11, 2013 e-mail

“Yes

When will u prepare me?

Also- as u know it is best to reach me at 917 9718763 as I do not have internet connection regularly”

Nina Baum’s December 11, 2013 e-mail

“I am here in Florida as you should. Know and of course will be going to deposition. But you have not yet prepared me nor returned my calls or my doctors calls

Regarding the file- You must get it from the court and you must prepare properly and do the discovery we spoke about

I am not certain what the hearing is for exactly

But please tell me and let us get prepared asap.

I have been available and waiting so please get to it

I will be there tomorrow

As you know I cancelled my flight to Israel

And spent the last 2 days traveling here

I had to sell jewelry to make the trip”

Mr. Guralnick’s December 12, 2013 e-mail

“I have no idea what you're talking about. None of this has been communicated to me in the past. I know nothing of any trip to Israel and you clearly did NOT indicate you would be attending your deposition today. As you know, however, I traveled out of state for a trial, and I will not be there today.”

Nina Baum’s December 12, 2013 e-mail to Mr. Guralnick’s assistant

“We are taking lunch break. I tried to call you but you did not answer nor return my call. Please call me before we 'resume.
Also_ of course I am here. It was court ordered and I sent you two emails at least letting you know I would be. here and many phone calls.
Please call me to help me remember which docs I have to support my case.”

Mr. Guralnick’s December 14, 2013 e-mail

“Nina—

Stop sending/forwarding emails to me to my inbox.

As we’ve instructed you in the past, I DO NOT WANT TO RECEIVE EVERY SINGLE RANDOM EMAIL you have in your possession.

They are being diverted to a Junk File, until I can decide what to do with them, and where to put them.

Please dedicate your time to finding another attorney.

Mark S. Guralnick

Mark.”

Nina Baum’s January 29, 2014 e-mail

“Mr Guralnick

I am writing to advise you that Teresa Hoffman of Hoffman & Hoffman is my lawyer. I am requesting that you cooperate with her regarding any and all requests she has of you including but not limited to handing over my file and the discovery responses you represent you sent to Mr.

Henessey.

Please accept this letter as full authority given to Teresa Hoffman.

Thank You

Nina baum”