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SAN FRANCISCO FINANCIAL DISTRICT
AND SAN RAFAEL OFFICES AVAILABLE
FOR APPTS. MEETINGS & DEPOSITIONS

USE POB 686, NOVATO, FOR ALL MAIL
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February 17, 2000

Daly D. E. Temchine, Esq.
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1227 25th Street, N.W., Suite 700
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Via United States Mail and
Via Fax to 202 296 2882

Daniel Rapaport, Esq.
Thiele R. Dunaway, Esq.
Wendel, Rosen, Black & Dean, LLP
1111 Broadway, 24th Floor
Oakland, CA 94607

Via United States Mail and
Via Fax to 510 834 1928

Re: *People of the State of California ex rel. Spooner v. Pacifica Foundation, et al.*

Gentlemen:

Relators hereby demand from you proof that any and all individual defendants whom you are representing at the expense of Pacifica Foundation have provided to Pacifica Foundation the undertaking required by California Corporations Code §§5238(c) and (f), pertaining to a charitable trust's indemnification of directors, officers, employees, and agents.

Very truly yours,


Daniel Robert Bartley

cc Taylor Carey, Esq., Special Asst. AG
Harold J. Engel, Esq.
Kenneth Frucht, Esq.
Dan M. Siegel, Esq.