

# EXHIBIT 4

**Eric Palles**

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**From:** Joel Flaxman <jaf@kenlaw.com>  
**Sent:** Wednesday, May 8, 2024 11:40 AM  
**To:** Eric Palles  
**Cc:** Lisa Altukhova; Sean Sullivan; Frank Rocco; Scott Rauscher; Gianna Gizzi; Josh Tepfer; Lilia Martinez; Sean Starr; Theresa Kleinhaus; Valerie Barajas; Kenneth Flaxman  
**Subject:** Re: Amending Mohammed's Answers in William Carter and Lionel White Sr. Cases

Thanks Eric. We do not consent and you do not have our agreement to file the motions unopposed. We will respond to the motions after you file them.

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Joel Flaxman  
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On Tue, May 7, 2024 at 1:32 PM Eric Palles <[epalles@mohangroble.com](mailto:epalles@mohangroble.com)> wrote:

With respect to White, to conform to proof. Regarding Carter, I have made the judgment that a fifth amendment assertion is no longer necessary.

Of course you may ask Kallatt about Carter at his next deposition. Will you consent? Alternatively will you oppose my motion for leave to amend?

Sent from my iPhone

On May 7, 2024, at 10:59 AM, Joel Flaxman <[jaf@kenlaw.com](mailto:jaf@kenlaw.com)> wrote:

I added my co-counsel (including lawyers at the Loevy firm in White Sr.) to the email. Can you let us know the basis for amending at this stage of the cases? Thanks

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On Mon, May 6, 2024 at 4:43 PM Lisa Altukhova <[lisaa@mohangroble.com](mailto:lisaa@mohangroble.com)> wrote:  
Hello Joel,

We want to file amendments in the cases referenced above to withdraw our Fifth Amendment assertions. Would you agree to sign a written consent under FRCP 15?

Thank you,  
Lisa

**Lisa Altukhova | Mohan Groble Scolaro, PC**  
Associate Attorney

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