

Dear Robert:

The list that you provided, after my demand on behalf of Mr. Migut, was incomplete. The Corporation's By-laws, specifically, Article III, Section 4 require that a stock book be maintained "containing the names alphabetically arranged of all persons who are shareholders of the Corporation showing their places of residence, the number of shares of stock held by them respectively, the time when they respectively became the owners therefrom..." The Section goes on to provide that "such books shall be open...to any person who shall have been a shareholder for at least six months. (Mr. Migut qualifies as such a shareholder.)

The list you provided me is deficient in the following ways:

1. It does not set forth the places of residence of the shareholders. (Access to the actual addresses of the shareholders is supported by case law: *Matter of Goldstein v. Acropolis Gardens Realty Corp.*, 116 AD. 3d 776 (2nd, 2014).
2. There is no date provided as to when each became a shareholder. One deficiency in the list provided is that "[REDACTED]" is listed as the owner of the shares allocated to Apartments [REDACTED] and [REDACTED] in the 9740 building. [REDACTED] died nearly 18 years ago. Plainly, the list is not current and appears to be many years old.
3. The list did not include the number of shares allocated to each apartment as required by the By-laws.
4. The aforementioned section of the By-laws requires that the list be maintained alphabetically. The list you provided was not so arranged.

Please provide me the list as required by the Corporation's By-laws and in accordance with the foregoing as soon as possible to be in compliance with our demand.

Further, please be advised that Mr. Migut has been billed for "attorney's fees" by the management. There is no authority in the proprietary lease for your client to bill my client for its attorney's fees.

Finally, my client is entitled to reasonable access to continue his review of minutes of Board and shareholders' meetings. A minimum of three hours per session is reasonable. Your client has restricted his access to much less than three hours.