

EXHIBIT 2

E-MAILS between Nina Baum, Kenneth Manney, Esq. & Patrick Roche, Esq.

Mr. Manney's May 29, 2013 e-mail

"Finally back up with power, phones and DSL! – I'll be sorting out a final version with Patrick either later tonight or tomorrow, which I'll then send to you..."

Nina Baum's May 30, 2013 e-mail

"please please be in touch and send me the last draft you have

as you know I have never spoken to Patrick and am unfamiliar with his input but am relying on YOU

IF you need help of another lawyer – lets get them on board!!!

...

The dr's saw me – but t was uncomfortable and I have to go back as the prosthesis is not properly set in my mouth and I am still in huge discomfort and pain

I got the shots and they help but it is only a very temporary fix and the numbness is getting worse as I have not had my therapy..."

Mr. Manney's May 30, 2013 e-mail (11:59 am)

"Attached is the final version of the Petition that Patrick and I plan to file tomorrow, once I receive back your verification page, which you need to sign before a notary and Fed-Ex to me..."

...All of your suggestions have been thought about and some have been incorporated as you know. Attached is our final version as your attorneys. You need to trust our judgment and sign it and let us get this filed – just remember we are all in this together.

Please email me the fed-ex tracking number."

Mr. Manney's May 30, 2013 email

"I just sent you the Final Petition – we don't need any other attorneys, we are qualified to handle your case. Patrick is an extremely good litigator and when you speak with him you will like him. ...

We need to get that Petition filed asap – I need back the verification page from you having been notarized – please take care of this today."

Mr. Manney's May 30, 2013 (4:42 pm)

"I received a message from you, but it was addressed to Patrick?, not sure if you wanted to speak with him. Regardless, go through this final version and let me know what specifically you need changed..."

When you go through the Petition, I only want you to point out things that are crucial – we put in a ton of time drafting this and like the way it is worded – it is the way we want it from a litigation standpoint. Please provide me with a list with paragraph numbers and what is wrong with the paragraph, in your opinion.

...Patrick and I know what we are doing and you need to trust us.

The Petition is ready to be filed, except for possibly something regarding your mother but before I serve your mother with the Petition, we will have located her and you will have had an opportunity to speak with her – don't worry about your mother getting caught off guard – I can hold off service on her for a while. **I decide when and who to serve, the process server works for me.** I will definitely make sure that we speak with your mother first and explain everything to her so that she understands that the Petition does not affect her and that she is only named because she may have an interest in the estate. I am very sensitive to the situation and her age and don't want to upset her. We will explain everything to her before she is served – in fact we might wind up amending the Petition and turning her into a Plaintiff with a count for an elective share before she is even served – we will cross that bridge later.

Email me the items you consider crucial regarding your mother and I'll go over them with Patrick. We need to get this filed so please make as few suggestions as possible, we can't redraft it again – if we need to amend in the future we will –"

Mr. Manney's May 30, 2013 e-mail (4:52 pm)

"I just got off a lengthy telephone conference with Patrick...He had 30+ years of litigation experience... as much as I want to try to do everything that you want, I need to do what is correct for your case. **You need to trust Patrick and me to do our job (we are both well educated and dedicated attorneys who are doing what we believe is in your best interests in this case.** Let us do our job with this Petition – of your input has been considered and we are at the point that you need to sign the verification and overnight it back to me so that I can get this filed with the court. Please don't overlook the fact that Patrick and I are 100% on your side, which I think that you know, the situation you are in is beyond devastating and I know you are afraid of what is happening. As soon as I receive the verification from you, I'll file the Petition."

Mr. Manney's May 31, 2013 e-mail (12:15 pm)

"I have been out on appointments today, I assume that you spoke with Patrick, I am back but on a conference call. I will call you back shortly."

Mr. Manney's May 31, 2013 e-mail (1:44 pm)

"...Please confirm that you want me to file the attached Petition with your signed verification and I'll file it today, if possible."

Mr. Manney's May 31, 2013 e-mail (4:17 pm)

"This was the final version of the Petition, which Patrick and I would like to file today. I need your written authorization to attach your signed verification page, which I received from you via Fed-Ex today. Please reply to this email confirming that I can file it."

Mr. Manney's June 2, 2013 e-mail

"In my opinion, to answer your question..."

P.S. Please reply to the email containing the Final Version with the changes we discussed today, which I will re-forward to you. I need your confirmation considering all of the notes and emails that you sent to me to not file it until you approved of the final version. Until I get that email from you, I can't do anything."

Mr. Manney's June 3, 2013 e-mail

"I NEED YOU TO REPLY TO THIS EMAIL CONFIRMING THAT YOU ARE IN AGREEMENT WITH MY FILING THE ATTACHED VERSION OF THE PETITION, 'FINAL VERSION BAUM PETITION 3 JUNE 2013'.

Patrick and I worked on the final version from yesterday that you approved for filing. We explored the issue of the forgery and discovered a recorded power of attorney with a drastically different signature executed on 12 day before this will. Therefore, we added paragraph 16 to the prior version..."

Nina Baum's June 25, 2013 e-mail to Lance Ehrenberg, Esq.

"i was completely out of commission today – I am so sorry – i cant wait to get medical and get my life back but headache is slowly dissipating and if history repeats itself hopefully tomorrow and the next few days I will be coherent

attached above, is a pdf of the petition filed by ken manney on my behalf contesting my fathers will – please reply and let me know that you can open and view the above attachment"

Nina Baum's June 26, 2013 e-mail

"let me know when you can do a conf call with lance today"

Mr. Manney's June 27, 2013 e-mail

"Attached are the final versions with those additional changes - please confirm that they are now factually correct and that I should file them."

Nina Baum's June 27, 2013 e-mail

"please file asap

thank you?

did you hear back from the funding people? were you able to send them the info they requested?"

Mr. Manney's June 27, 2013 e-mail

"Will do.

Nothing yet.

Nina Baum's July 13, 2013 e-mail

"i am in the hospital – not good

Please advise asap what is going on with the funding (I need to check into a private rehab) and that you served the amended petition – as we agreed you were to serve the petition immediately and not delay or wait at all or use any cushion time ..."

Nina Baum's July 17, 2013 e-mail

"i have ny gotten a response from my 7/13 email below - please respond

i am quite sick and there was drama in the hospital – as someone was poking around and trying to get my hospital records and location in hospital etc the nurses 'lost' my file and had to try to recreate it --- and I was almost administered wrong meds"

Nina Baum's July 19, 2013 e-mail

"i sent you 2 emails that you have not yet responded to – most probably ill be going back into the hospital on Monday and my #1 priority now is getting better – I'm a whole lot worse than I knew

I'm doing the best i can considering –

But I really need to get a response from you about the funding
I haven't called cause everything hurts incl to talk...

So please let me know so i can plan my rehab

Also confirm the papers have been served"

Nina Baum's July 20, 2013 e-mail

"this is the forth email I am sending and I have also left you a message on your answering machine – but have not heard back from you

please provide me the stays (sic) of the case and the funding"

Mr. Manney's July 20, 2013 e-mail 11:01 a.m.

"Sorry for not getting back to you – I will get back to you early next week. I have had a bad two weeks and am now getting caught up on everything. ...considering that you are currently in a hospital. Am sorry for the delay but hope that you understand. I hope you are feeling a little better now that you are getting some care."

Nina Baum's July 22, 2013 e-mail: 1:40 a.m.

"unfortunately, I am not feeling better as I need a whole lot more care now than I did a couple months ago.

i don't mean to be kurt – but please let me know that status of the funding – as the sooner I get proper medical help the sooner I can be helpful to you, to me and to those I am obliged...

also, just give me confirmation that the parties were served and we are moving forward full speed ahead..."

Mr. Manney's July 22, 2013 e-mail: 10:05 am

"...I worked on your file yesterday and am sticking with it until everything is done with both lawsuits...Just focus on getting well and I'm getting everything else done..."

Nina Baum's July 31, 2013 e-mail

"...just want to follow up –

1) funding

2) make sure papers were served

... I didn't want to be a nudnick and frankly I was hoping that you would recognize the dire straits I am in – but it is worse every day and the money I got from lance is virtually gone

It is a death sentence without \$ to get medical, housing etc – and I am quite afraid with all the crazy things going on and do not know where to go for help...”

Mr. Manney’s July 31, 2013 e-mail (1:39 pm)

“I know the financial situation is dire...

I will let you know when everyone is served... Don’t worry – your file is on the top of my desk and I am working and thing about it constantly – and appreciate your not being a nudnick! (in the past week) Just focus on getting yourself better –”

Nina Baum’s August 4, 2013 e-mail

“I met with lance eherenberg, esq today and in order for him to help me navigate through a few things during this difficult time he needs to speak with you and get some basic information first hand – is it possible to have a conference call tomorrow 3-4ish?

i left you a voice mail earlier but have not heard back.”

Nina Baum’s August 12, 2013 e-mail to Lance Ehrenberg, Esq.

“are you able to do a conference call with Kenneth Manney today? hope so”

Lance Ehrenberg’s August 12, 2013 e-mail

“Has to be before 4:30 today.”

Mr. Manney’s August 12, 2013 e-mail (5:42 pm)

“I got everything filed with the court and am now just waiting for the court to process – see attached.

...

Unfortunately, I have some bad news about that funding source, they told me that they considered the loan and were not willing to do it at this time. I am really sorry about this – they seemed like the most promising source of funds. I am going to spend time to try and find someone else to do it. I feel absolutely terrible about this and I don’t know what else to say. Give

me a little time and I'll try to come up with a solution as I know you are very low on funds."

Nina Baum's August 12, 2013 e-mail

"i am not happy – not one bit – and low on funds is not accurate – negative on funds

Maybe you can take out a loan for me and I will sign it over to you against the suit

...
quick comment regarding the filings below

1) are they just filed with the court or did you serve them also?..."

...
Please also advise when you can do the conf call with lance anytime on Thursday prior to 3:15—he has a very tight schedule - so it would be best if he puts a time definite in his schedule"

Nina Baum's August 16, 2013 e-mail

"I have been trying real hard to reach you but you have not returned my calls or messages

I am very concerned

as you have also not been available for the conference call we were to have with lance early this week

please respond"

Mr. Manney's August 17, 2013 e-mail (9:01 am)

"I did not receive any calls from you? With regard to the service on the defendants, in the past, I would just send all of the paperwork to my process server and he would then go to the court and get the summons and then serve everything. The courts in Florida recently made it mandatory that the attorneys file for the summons themselves and then deliver the summons and paperwork to the process server to serve. The reality is that whether I filed for the summons or my process server filed (as he did in the past) it takes the same amount of time for the court to issue it. As soon as the court sends me the summons, I'll be sending everything to the process server.

I have also been working to find funding...

I have been incredibly busy and there is nothing more that I can do on your case while I'm waiting for the summons to be issued. I will call/email you as soon as I have them and will let you know as soon as everything is out to be served. I'll talk to you next week once I have back the summons."

Nina Baum's August 17, 2013 e-mail

"i am a straight shooter and i am very surprised and disheartened that you misrepresented to us on the conference call we had 10 days ago that you had already filed the petition and you were serving it on all parties last week.

i guess that explains you not being available for the follow up call with lance this past week. i wish you sod have just been straight with us as I do not know anything anymore

regardless, we MUST speak with him on monday and no later than tuesday.

...

Btw, I left you two voice messages on your phone) maybe 3) one was with lance on the call and one was just me"

Mr. Manney's August 18, 2013 e-mail (10:44 am)

"See attached – it was filed as I indicated to you, when I spoke to you, I told you that I needed to assemble all my copies with exhibits to be served, draft the lis pendens, which turned into a big project and very time consuming, and the summons. Everything takes time and everything that I told you was correct and don't appreciate your castigation. I have done a tone of work on your case and will continue...I will speak with you once I have back the summons and everything is in the hands of my process server – there is absolutely nothing I can do until this occurs and I am extremely busy in addition to trying to find funding for you, which is well outside of the scope of my legal representation and am trying my best to help you with all of your problem...I am really offended by your questioning all I have done and how much effort I have put into your case. I understand what is going on in your life so I am not going to hold this against you or think about it again but want you to understand my position. Hopefully the summons get issued shortly and everything will be served."

Mr. Manney's August 23, 2013 e-mail (12:45 pm)

"The summons were issued and everything has been sent to the process server to be served. I'll keep you posted on the service. In addition, as I recall, you had wanted me to include a note to your mother and Bruce – considering what occurred with your mother I don't think it should be included and considering the cold shoulder that you received from Bruce I wouldn't include it for him either. Therefore, I'm not including any notes to Bruce or your mother."

Nina Baum's September 3, 2013 e-mail

"i am in hospital..."

Mr. Manney's September 4, 2013 e-mail (7:40 am)

"Sorry to hear that you are in the hospital but hopefully they can help...
I spoke to my server after we last spoke and expedited all service and will let you know as soon as I get confirmation of the different parties being served."

Nina Baum's September 5, 2013 e-mail

"Subject: fyi - service of process -- please advise status"

Nina Baum's September 10, 2013 e-mail:

"...1) please advise of the status of service of the papers..."

Nina Baum's September 12, 2013 e-mail

"they usually can do a wire transfer same day
no room here for social graces

please tell me what info you sent him?

did you email it?
if so, please cc me on everything

on the other note – did you serve the papers?
..."

Mr. Manney's September 12, 2013 e-mail

"I have been out all day.... Today, I spoke with the attorney in the office 'Gunster' (that is how his first name is pronounced) - he was going to be reviewing those documents today and calling me back tomorrow. Server has been out to Bruce's place on the West Side and spoke with the older man, to your mother's place, no answer, the registered agent for Israel Defense Force is deceased so we need to find a new party to serve, and Hadassah, I believe, was served, and the Chabad in FL was served (Rabbi's atty took service) - this was verbal - I'll forward you affidavits of service as soon as we get them.

...I know your situation is dire and will do whatever he needs so that he can make the loan asap - I know that you need the money."

Mr. Manney's September 25, 2013 e-mail

"I just saw that you called me. There are a few things that I need to discuss with you and I'll plan to call you later today/tonight. It is good news regarding something that I was trying to work out - nothing for you to be worried about - it might really help with the case."

Nina Baum's September 26, 2013 e-mail

"Subject: tell me status – it has been over 2 months –

i saw your message Kenneth
but I am very sick and cannot talk (literally) – i was i n hospital – not good
- no money
out on street"

Mr. Manney's September 26, 2013 e-mail

"I am really sorry to hear about your situation.

Your brother is trying to strike your creditor claims, see attached; I drafted a reply and an affidavit, which I need you to sign before a notary (there should be one at the hospital) and return to me via Fed-Ex (see below acct / my address) – thre is a hearing next week and I need you to take care of this tomorrow. ...

...The reality of our litigating this case for the next few years is not possible considering your financial and health considerations – and I thought long and hard about how I could solve this problem...

Please get that affidavit back to me tomorrow...”

Nina Baum’s September 27, 2013 e-mail

**“you didn't answer any of my questions
not even the basic one - did you serve my mother? bruce? david?”**

Mr. Manney’s September 28, 2013 e-mail

**“I know that the server has been trying to serve your mother, David,
and Bruce. Bruce had contacted the server and told him that he
would accept service after Sukkot-Simchat Torah holiday.”**

Mr. Manney’s September 30, 2013 e-mail

“...I know that the situation could not be worse for you but I think it will be ending shortly with an offer so don’t give up.

I absolutely need the notary pages back tomorrow for the hearing Thursday – you must fed-ex them to me tomorrow if you didn’t do it today – I need to file the affidavit with the court by Wednesday – I sent you the copies and return fed-ex – it is at your PO Box.”

Mr. Manney’s October 5, 2013 e-mail

“Below are the case files that are online - I think that if you are comparing online vs actual file you can coordinate the Doc #s with the actual file one case shows 1 - 79 and the other is 1 - 14.

I am really glad that we finally had an opportunity to meet and your little girl is so cute!”

Nina Baum's October 6, 2013 e-mail

"1) please send me the lis pendes Order -- we spoke over lunch that you would send it to me - but it is not attached and you have not yet sent it to me.

2) ALSO --- i am only able to open the files below that have an image are you able to send me the images of all the files -

3) i left you a few messages today -- the inventory does not list any of the properties on lis pendes
--- please explain why"

Mr. Manney's October 6, 2013 e-mail

"I can't do that for all the documents - that would take a huge amount of time. If you are looking at the file they should have the documents numbered and you should be able to see which documents were not numbered and part of the electronic file and those would be the ones we need to figure out why they are not part of the electronic file, e.g. the affidavit of service on you...."

Nina Baum's October 19, 2013 e-mail

"i have been trying to reach you
you said you were going to get back to me yesterday - but i did not hear from you"

Mr. Manney's October 19, 2013 e-mail

"**I spoke with my server at length** and did contact Bruce. I did not yet get any information from the server in NY regarding your mother's well being but should have that information for you Monday. Bruce should be contacting the NY server to work out a time and place for him to take the documents - he did however confirm that the address you went to on the West Side is his address - so you now know where he lives...."

In addition, the hearing for the creditor claims and any other matters will be scheduled for December 17th and you will need to be here so that we can have you testify to confirm that your father was supporting you and that he promised to support you for the rest of your life...."

Mr. Manney's October 21, 2013 e-mail

"I spoke to the server" and he said that he got back information on your mother that there was nothing unusual and the description of the lady (your mother) served is in the attached affidavit of service. I had some more communication with Bruce and he did not want to meet with the process server but I conveyed to him that we could not just mail the documents. I requested that he call my server and work out a time and place to take service...

I am sorry to hear that your car was stolen and then returned - that is really strange and doesn't make any sense; however, it seems to be par for the course with the things that you have told me have been happening to you - did you report this to the police maybe they could have lifted finger prints?

You had indicated that December 17th was not okay for you to be in Florida for any hearings on the case. What do you have scheduled for that date, which is creating the conflict? Patrick was planning to be in Florida in December and we were trying to coordinate a possible date to have the creditor claims heard, from the prior cancelled hearing. Please provide me with your schedule of availability for December and for all future months in the event we need to schedule something else that you need to attend.

...
P.S. I tried to call you but the phone just rings - I know that you said your computer was hacked maybe there is something wrong with your phone? Regardless, I'm assuming that your email is functioning properly."

Nina Baum's November 4, 2013 e-mail

i phoned you back kenneth - and left a few messages but you did not pick up and you did not call back

maybe you should get a land line - as you clearly are having way too many issues with your telephone

in addition - as you remember i tried so hard to reach you i even made a trip up to your place and waited hrs until you surfaced (that was after we were disconnected the prior thursday from talking with the accountant and you never did call back) and never did return the many calls i placed (remember - when you told me that you were putting an umbrella out on your terrace for your elderly mother - and you had me wait in that building in the back of your house that you are renovating) **and you had NOTHING to tell me except that** you did not get to any discovery and

you did not have the petition served yet - and you told me that you still could not find the PR (david Baum) - in addition, you were not aware of the affidavit that Hennessey filed in the court - and you were surprised to see it - and stated that you were going to write an answer - however, i have not received any drafts from you or anything

I was at your beckon call for days - IN PERSON - but you avoided me --- and basically told me that there was NOTHING you could do - which makes no sense to me

Nina Baum's January 29, 2014 e-mail

“Dear Kenneth Manney and Patrick Roche

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 any and all correspondences you have had with The Gunster Firm, William Hennessey, any lawyer affiliated with my matter and the discussions kenneth Manney represented he had with Chabad and the Hadassah lawyers. In addition please provide to Teresa Hoffman a detailed account as to WHY the parties were not properly served, or in the alternative, IF the parties were served please provide to Teresa Hoffman the proof of service. Also provide all discovery and anything she asks for.

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

Thank You

Nina baum

Please respond to this email with confirmation that you will cooperate

thank you”