

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

**B.P., H.A., and S.H. individually, and
On behalf of all others similarly situated,**

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE, et al.,

Defendants.

_____ /

**DECLARATION OF VANESSA BAEHR-JONES IN SUPPORT OF PLAINTIFFS’
MOTION TO SUPPLEMENT THE RECORD FOR PLAINTIFFS’ RENEWED MOTION
TO ENJOIN EXTRAJUDICIAL CONDUCT; MOTION FOR SANCTIONS**

I, VANESSA BAEHR-JONES, declare under penalty of perjury of the laws of the United States of America that the following is true and correct:

1. I am over twenty-one years of age and am competent in all respects to give this Declaration. This Declaration is given freely and voluntarily. I have personal knowledge of the foregoing matter and could, and would, testify competently thereto under penalty of perjury.
2. I am lead counsel for Plaintiffs B.P., et al., in the above-referenced case. I am a licensed attorney in good standing in the State of California (CABN 281715) and admitted to appear *pro hac vice* in this District.
3. On June 3, 2024, Plaintiffs’ counsel verbally requested that counsel for the City produce Ball’s real estate contract with Sean Williams (“Ball Williams Contract”). Counsel for the

City represented that Ball had entered into the Ball Williams Contract in her personal capacity, and therefore the City did not have an obligation to produce it.

4. Attached hereto as **Exhibit 1**, is a true and correct copy of text messages between Cathy Ball and Shannon Castillo provided in response to a subpoena duces tecum issued to Shannon Castillo.
5. Attached hereto as **Exhibit 2**, is a true and correct copy of text messages between Shannon Castillo and Sean Williams provided in response to a subpoena duces tecum issued to Shannon Castillo.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and based upon my own personal knowledge, and that if called upon to testify, I could verify the accuracy of the same.

Friday, August 9, 2024.

/s/ Vanessa Baehr-Jones
VANESSA BAEHR-JONES

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on August 9, 2024 to counsel of record:

<p>K. Erickson Herrin HERRIN, McPEAK & ASSOCIATES 515 East Unaka Avenue P. O. Box 629 Johnson City, TN 37605-0629 lisa@hbm-lawfirm.com sandy@hbm-lawfirm.com</p> <p>Emily C. Taylor Maria Ashburn WATSON, ROACH, BATSON & LAUDERBACK, P.L.C. P.O. Box 131 Knoxville, TN 37901-0131 etaylor@watsonroach.com mashburn@watsonroach.com</p> <p><i>Attorneys to Defendants, Johnson City, Tennessee, Karl Turner, in his individual and official capacities, Captain Kevin Peters, in his official capacity, and Investigator Toma Sparks, in his official capacity</i></p> <p>Jonathan P. Lakey Burch, Porter, & Johnson, PLLC 130 N. Court Ave. Memphis, TN 38103 901-524-5000 jlakey@bpjlaw.com mchrisman@bpjlaw.com</p> <p><i>Attorney to Defendant City of Johnson City, Tennessee</i></p>	<p>Daniel H. Rader III Daniel H. Rader IV MOORE, RADER & YORK PC 46 N. Jefferson Avenue P.O. Box 3347 Cookeville, TN 38502-3347 danrader@moorerader.com danny@moorerader.com andre@moorerader.com</p> <p><i>Counsel for Kevin Peters in his individual capacity</i></p> <p>Kristin Ellis Berexa Ben C. Allen FARRAR BATES BEREXA 12 Cadillac Drive, Suite 480 Brentwood, TN 37027-5366 kberexa@fbb.law ballen@fbb.law jdowd@fbb.law msutton@fbb.law</p> <p><i>Counsel for Toma Sparks in his individual capacity</i></p> <p>Keith H. Grant Laura Beth Rufolo Robinson, Smith & Wells, PLLC 633 Chestnut Street, Suite 700 Chattanooga, TN 37450 kgrant@rswlaw.com lrufolo@rswlaw.com awells@rswlaw.com</p> <p><i>Counsel for Justin Jenkins in his individual capacity, Jeff Legault in his individual capacity and Brady Higgins in his individual capacity</i></p>
--	--

/s Heather Moore Collins
Heather Moore Collins

11:07

EXHIBIT 1



Cathy >

iMessage

Mar 31, 2022 at 11:12 AM

Hi Shannon, this is Cathy Ball. Do you all have any residential condos for sale downtown?

Hi Cathy!! I actually know of someone looking to sell their condo! It's 3000sf. In 200 e main. Floor 5.

Who is looking? Residential is definitely not My specialty but I'm always keeping my eyes open in DT JC

I am looking! 🙄

Oh let's make this happen!!

I LOVE this particular condo. Let me see what I can do



iMessage



11:07



Cathy >

Mar 31, 2022 at 1:15 PM

It seems really big!

I would love to see it.

Mar 31, 2022 at 4:02 PM

Do you have time
To chat?

Yea

Sorry, yes

Could we go look at that
condo tomorrow at 3P??

I'm getting the keys!

Yes



Great. Let plan on 3:15 at
200 e Main Street. We'll
head up from there



iMessage



11:07

70

< 4



Cathy >

Apr 1, 2022 at 9:30 AM

Any change I can look at the apartment at 1:15 today. I have a conflict at 3:15.

Unfortunately I'm booked. Want to reschedule to Monday?

Or 4:15??

I a an do Monday.

Ok good. Time?

Afternoon ? I'm wide open right now

Can we do 4:00 on Monday?



Yes!!

Apr 1, 2022 at 2:12 PM



iMessage



11:07

70

< 4



Cathy >

Apr 1, 2022 at 2:12 PM

Condo fees are running \$575 per floor a month.

Not a problem



Prop taxes are \$4466.66 a year

What is tax value?

Current tax value is \$287,800

I am very interested.



And- I'm going to take an educated guess and say that utilities will run \$400 a month based on sf

I told the owner I'd take a reduced commission, so he



iMessage



11:07

70

< 4



Cathy >



I told the owner I'd take a reduced commission- so he will sell at \$416,000

Any change I could run by there now for a quick look?

I'm still at the office and don't have keys yet

No p.

HA
HA

I am traveling for my

[REDACTED]
[REDACTED]. If you get the keys and can send me some pics over the weekend, I would love you even more.

I was just going to ask if you wanted to see it this weekend! Have a great time [REDACTED] If you want to see it Monday morning let me know. I'm flexible

+

iMessage



11:08



Cathy >

Apr 4, 2022 at 8:17 AM



See you today at 4p

I think my brother and sister-in-law will be with me.

That's great. I look forward to meeting them!

Apr 4, 2022 at 3:44 PM

I'm early. And walking around the 5th floor. Let's just say - it's needs a little work.

A little as in "a lot."

Replace some flooring for sure.

You can tell a dude lived here for years. Before him was a family w 2 kids



iMessage



11:08



Cathy >

3 1/2 baths. That's nice

I am in the parking lot.
Waiting on my brother.

Ok

Apr 4, 2022 at 8:26 PM

Thanks for showing me the
condo. I need to have a
contractor look at it but
depending on the estimate
they give me to do what I
would like to do, I think I want
it! 🤔

Apr 4, 2022 at 9:28 PM

That's amazing! I loved
meeting your fam too!

Apr 5, 2022 at 11:13 AM

Would you be able to meet



iMessage



11:08

70



Cathy >

Apr 5, 2022 at 11:13 AM

Would you be able to meet Ernest Campbell and I at 2:00 on Wednesday at the condo.

Love Ernest Campbell!! I'm booked then - but could do 4p. Can you do that?

Apr 5, 2022 at 12:42 PM

I will check with him.

Apr 5, 2022 at 8:13 PM

He is good with 4:00 tomorrow.

In the calendar.



See u tomorrow



iMessage



11:08



Cathy >

Apr 6, 2022 at 2:19 PM

Are you okay if Michael Ray join us at 4:00?

That's good! Remind me. Who is Michael Ray?

Jenny's husband.



Oh ya! Of course

Apr 7, 2022 at 7:56 AM

I think I left my black notebook in the condo yesterday. Would you have some time this morning to see if it is there. I can run by your office and pick it up.

Sent with Siri

Sure. I'll check. Where do you think you left it?



iMessage



11:08



Cathy >

Probably laid it down in the kitchen area but not sure.

Found it! I will drop it by City Hall on my way out of downtown now

Thank you.

Left it with Pam at reception

Thanks again. Let me know when you hear from Mr. Williams.



Apr 7, 2022 at 1:45 PM

Wondering if you have heard from Mr. Williams. I would love to talk with you this afternoon. I looked at the sneakeasy/man Cave condo



iMessage



11:08



Cathy >

I'm driving right now and can take a call right now. Haven't heard from Sean yet

If you're free to chat I'm open until 345 today

Apr 7, 2022 at 4:05 PM

Talked to sean. W your offer. He is Going to call me Tomorrow. 🙏👉

Thanks. Any signs from him?



Seemed promising. But he's squirrely. Lol.

Apr 8, 2022 at 3:26 PM

He accepts!!

I'll pull everything together



iMessage



11:08



Cathy >

I can do 30 days closing. My husband's name is [REDACTED]

Do you want me to put in 30 days due diligence. And 30 days after that to close?

Apr 8, 2022 at 5:11 PM

I would like 30 days due diligence and 15 days to close. My personal email is [REDACTED]

Apr 8, 2022 at 7:44 PM

Got it. What time would you like to talk tomorrow? Whenever is convenient for you. I'm flexible

Would 9:00 am work? We are going out of town around 10.



iMessage



11:08

70



Cathy >

Apr 8, 2022 at 9:23 PM

Sure!! I'll call you then

Apr 9, 2022 at 8:50 AM

I'm ready to chat when you are. Give me a call when you're ready

Apr 10, 2022 at 8:24 AM

Let me know if you have a few minutes to talk this morning. I won't take more than 5 min.

Sure. How about now?

Perfect

Apr 11, 2022 at 10:15 AM



Sent to your email



iMessage



11:09

70

< 4



Cathy >



After you sign. Then it will go to your husband next

I think I have signed.

Apr 11, 2022 at 12:20 PM

 has signed.

Apr 12, 2022 at 8:51 AM

Good morning!!! We are officially UNDER CONTRACT!!

WOW! Amazing!

Thank you so much.

We will send the executed offer to you this morning. Next steps - get It to your bank and ask who will do the title work and closing. If it will be in TN and

+

iMessage



11:09



Cathy >

closing. It will be in TX and
if they need suggestions for
a title
Company. When you get
Back you can write the
earnest money check
payable to Mitch Cox realtor.
ENJOY YOUR VACATION

Will do.....

Apr 12, 2022 at 11:51 AM

I sent the loan docs to my
lender. She has some other
clients that are buying in JC.
She thinks the closing date is
good.

Sweet

Apr 12, 2022 at 3:23 PM

Got your message!! I think
you will need to call Scott
Buckingham w the county



iMessage



11:09



Cathy >

Buckingham with the county assessors office. I pulled other condos in that building and some ARE classified as residential. This one certainly should have been. Ill shoot you his contact info

Washington county assessor of property 423-753-1672

Propertyassessor@washingtoncountyttn.org

I think I have it. Thanks.

Apr 18, 2022 at 9:32 AM

Happy Monday! Could I get a copy of the home owners association docs for the Condo? Also can you check on the parking? Thanks.

Apr 19, 2022 at 7:52 AM

Hi! Working on getting that



iMessage



11:09

69



Cathy >

Apr 19, 2022 at 7:52 AM

Hi! Working on getting that info

Would you be able to talk at 10:30. I received an estimate from Earnest.

I left the earnest money check at you office yesterday.

Excellent. Call you at 10:30

Apr 19, 2022 at 1:23 PM

Cathy - I have a suggestion on a real estate Attorney for this condo deal - it's Marcy Walker. I'll send over her contact info

Marcy E. Walker MW >



iMessage



11:09



Cathy >

Thanks I will contact her.

Apr 19, 2022 at 4:41 PM

I just met her at another meeting.

Good. She's amazing

The seller is getting increasingly agitated. Regarding the x- girlfriend. He's convinced she is going to gain control over the condo - even though it's only his name. I've encouraged him to get his sister as POA so she can sign for him if he can't be at closing. 🤔

Apr 20, 2022 at 11:39 AM

Let me know when you have called Marcy Walker and engaged her to do the title



iMessage



11:10



Cathy >

Apr 20, 2022 at 11:39 AM

Let me know when you have called Marcy Walker and engaged her to do the title work. I will fill her in on all the details regarding the seller.

I just talked to her. She is expecting you to reach out.

Ok good!!

Small world. Just ran into her at Gourmet.

Hahah good

Do you have a minute to talk?



Just walked in to a doc appt. Will call you as soon as I'm done



iMessage



11:10



Cathy >

I would like to get Micheal to do an inspection on the condo. Can you tell me how we can make that happen?

Sent with Siri

I have Keys - let me know his Schedule and we'll get him in there

Apr 22, 2022 at 11:09 AM

Also - confirmed w appraiser - he is coming Wednesday 4/27

Awesome

Apr 25, 2022 at 10:18 AM

Good morning. Not sure if you are off today. I think Michael confirmed that he will be doing the home inspection tomorrow



iMessage



11:10



Cathy >

Good morning. Not sure if you are off today. I think Michael confirmed that he will be doing the home inspection tomorrow morning. I did not tell him the story behind Sean.

I am confirmed to meet with Micheal tomorrow morning

Apr 26, 2022 at 2:20 PM



Talked to seller. He found an attorney to be the POA.

Apr 26, 2022 at 4:02 PM

So the attorney already has POA?



He is working on it. 🤞



iMessage



11:10



Cathy >

Apr 27, 2022 at 11:57 AM

Latest update. Attorney is drawing up POA. hope To have It today - then get sellers signature and notarized

Awesome. Has the appraiser been to the condo.

Supposed to be Today

Seller is also arranging for the repair of the leak in the laundry room.

Did you see the inspection report?

I did

Did you?

I did.



iMessage



11:10



Cathy >

May 5, 2022 at 4:31 PM

Have you heard from the appraiser? Would I need to get the appraisal from the lender?

May 5, 2022 at 7:05 PM

Waiting on appraiser to submit Check w lender.

Also - working on plumber to fix leak at condo. 🤔

Also - May have lost my cool today w the seller's half sister 😂.

I am so sorry.



iMessage



11:10



Cathy >



It's ok. It's going to be a wild story when it's all over. After my conversation w Sean's sister, Jose hand delivered me a margarita 🍹

She must be wanting some of the money

She's just protective. And sean isn't thinking clearly. So he is telling her things that aren't reality. And she is reacting to that.



I set her straight. Lol

May 5, 2022 at 8:24 PM

Did his attorney get the power of attorney for him?

Sent with Siri



iMessage



11:11



Cathy >

Sent with Siri

Still working on it. It's maddening

I am so sorry 🥲

May 9, 2022 at 12:45 PM

Any update from the bank and the appraisal?

No. I talked to her Friday and she did not have it yet. I will follow up. Any word on your end?



Talked to him today ... now he wants to do a remote closing -which is fine. I told him to call Marcy to arrange. (Honestly the limited POA we had arranged is better - and easier - and more reliable but he's waffling)



iMessage



11:11

69



Cathy >



Would love to get done asap.

Amen

You and me both. Lol

May 10, 2022 at 11:09 AM

I have the appraisal.

And?

Don't leave me in suspense!
Lol

\$426k I will email it to you.

What's next?

That's great news'. Ok. Let
me know when bank wants
to close!

Then we will pray the seller
cooperates



iMessage



11:11

69



Cathy >

Do you have time for a call?

Yes

Marcy is going to call you. She has title work done. She said she cannot do remote closing. Call if you have questions.

Ok. We'll figure this out!

Did you talk with her?



Not yet. Calling her now

May 12, 2022 at 11:27 AM

Can't talk but can text



In a meeting

I am working on flood



iMessage



11:11

69



Cathy >

insurance

It is crazy

Ok. And yes. I totally agree

May 12, 2022 at 8:46 PM

Alley for getting into your family time. Have you heard from our friend? I now have flood insurance for a year on that unit.....

Ok that's great!! No contact today from him but will follow up tomorrow afternoon. Did bank and atty give go ahead to close? What date?

Would like to see a closing statement I can email to him - would be helpful I think

Natalia is still saying May 27. I will see if she has sent me the closing statement



iMessage



11:11

69

< 4



Cathy >



the closing statement.

Ahhh. Ok.

Marcy would be the one to do the closing statement

I wonder why we need to wait to may 27? Would you like to close sooner?

Me too. I am ready.

I am not sure who is making the decision on the date.

Ok - how about you email Natalia to see if it's possible to move Up the date. I'll call seller to follow up.

Sounds good.

May 16, 2022 at 9:56 AM



iMessage



11:12



Cathy >

May 16, 2022 at 9:56 AM

Call you right back!!

Sure

Just talked to Natalia. Can you talk?

May 18, 2022 at 1:54 PM



That's great news! Have the bank give their approval to close to Marcy. Then let's get this scheduled!! Just need that limited POA! If Marcy can give a date - I can forward to the seller. I'm excited!!!

I saw you and Jose this morning. Sorry could not say high.

We saw you too. I told Jose



iMessage



11:12



Cathy >

We saw you too. I told Jose
you wanted to be his friend.



He said "absolutely! I want
to be her friend too". lol

I feel like I may be coming on
a little too desperate. Please
tell him that I have just heard
wonderful things about him.

HA
HA

Hahah. Well - I've talked you
up to him too. Haha

May 23, 2022 at 10:18 AM

Any updates?

May 23, 2022 at 2:28 PM

Nothing yet. Will try to call
for an update on his end at
4p today.



iMessage



11:12



Cathy >

Thanks

May 25, 2022 at 2:45 PM

Message from seller

I just talked to the bank. They are sending the info over to Marcy. I got the poa so everything's squared away. Sorry for the bad service in the mountains

Text Message

Is this good news to you? Or still to be determined.

iMessage



It's positive news yes. I want the name and contact of the poa. Then I will be a bit more settled



iMessage



11:12



Cathy >

I've checked email and called the seller multiple times ... no response. I'm afraid closing will not take place tomorrow. I'm terribly sorry I'm not saying it won't ever happen - I'm just saying it won't happen tomorrow.

Marcy called me and let me know. Hopefully something can happen next week. I have some time on my loan interest rate. No need to be sorry.

May 31, 2022 at 9:57 PM

Any idea how much he will want for the condo on Roan? I drove by.

Jun 1, 2022 at 6:41 AM



iMessage



11:12



Cathy >

I will find out

Jun 1, 2022 at 6:19 PM

Ok - so looks like the new owners are going to list it for \$575k! 🙄

Good luck!! That is crazy.

Did you get any info on the other condo? It is a beautiful building.

Well - I'm not listing it. I decided against it. And I have an inquiry out on the other condo they will get back to us asap on a price

If I think on it too long the whole situation makes me furious

I know. Me too. I have lost a little faith in humanity.



iMessage





Sean

Text Message
Mar 31, 2022 at 11:19 AM

Hi! Shannon castillo here.
Wanted to chat about the
condo you called me about

Mar 31, 2022 at 2:36 PM

Call anytime

Apr 4, 2022 at 10:36 AM

Steve Crouch
Biker Wear

SC



Also - just sent you a
"permission to show "
document for the 5th floor.
W all the details we
discussed. \$416,000 w a
4% commission (you netting
\$400,000)



iMessage



11:17



Sean

Apr 4, 2022 at 1:30 PM

Can you send the contact info in text ? Sorry and thank you!

Steve crouch

(423) 946-0887

Wanna talk about fith?

Sure. Now?

Any time is good for me

Apr 4, 2022 at 4:11 PM

Can I call you later

Apr 4, 2022 at 5:11 PM

Showed the fifth floor. I think it went well. We'll see if she



iMessage



11:17



Sean

it went well. We need to
put in an offer. I'm gonna be
out of the office tomorrow
back at it on Wednesday!
Talk soon

Apr 6, 2022 at 12:18 PM

Hey! They want to look at
the 5th floor again today if
That's ok

Apr 6, 2022 at 5:24 PM

Sure

Apr 7, 2022 at 3:04 PM

Hey. The buyer of the 5th
floor will make an offer of
\$416,000. (I will only take
4% -
So you will clear \$400,000)
Would you accept that?)



iMessage



11:18



Sean >

Apr 8, 2022 at 3:23 PM

I accept . Thank you

Excellent. That's great news.
I'll pull everything together.

Apr 9, 2022 at 9:13 AM

Sean - you mentioned that
your sister was going to be in
town. I'd love
To talk to you and her about
getting a working email
address for you. And if she
is going to be power
Of Attorney- she can sign
documents. Let me know.
Happy to talk today

Apr 18, 2022 at 4:17 PM

How much do you own on
the garage?



iMessage



11:18



68



Sean >

Apr 19, 2022 at 8:27 AM

Power of attorney revocation
for sean williams is active
and filed

Apr 21, 2022 at 8:45 AM

Saw that I missed your call.
Call me back

Apr 25, 2022 at 5:44 PM

Sean! Wanted you to know
that the inspector and
appraiser for the 5th floor
will be at the condo Tuesday.
And Wednesday.

Apr 27, 2022 at 6:44 AM

Plumber said the leak is
pretty bad anyway way to
rescheg the inspector?

He said ceiling is coming



iMessage



11:18

68



Sean >

He said ceiling is coming down and the floor is floodee

Oh no!!

I'll check on it today! The inspector already was there.

Can you call sixth? He said its through floor not between

I will go there too. I know Ernest Campbell was up there in the past couple weeks.

I'll let you know

Apr 27, 2022 at 10:12 AM

Talked to don spurrell. I need some info from you for the POA. Call me.

They have a key



iMessage



11:18

68



Sean

I have my key here.

No one has the key I have

She had one

She is in my office and returned the key

I'll let you know when the appraiser and I will be there.

Apr 27, 2022 at 12:38 PM

Looks like I'll be there w the appraiser at 2p today

Apr 27, 2022 at 2:14 PM

The appraiser isn't coming until 2:45. So I will be there then.

I'm walking over now



iMessage



11:18

68

< 4



Sean >



Ok

Will I be able to get in?

Yes

Lmk if anything exciting happens

Lol

Here's hoping it's boring.

He is measuring the space.
I'll let you know when we leave

Just left.

Locked the door

The POA is on the floor for you to sign and get notarized.

Apr 29, 2022 at 2:39 PM



iMessage





Sean

Apr 29, 2022 at 2:55 PM

Let me know when you get
The limited POA notarized

May 2, 2022 at 9:59 AM

Hi Sean! Shannon here.
When I can pick up the
signed notarized limited
POA?



Not Delivered

May 3, 2022 at 1:51 PM

Sean. The contractor for the
buyer of your condo would
like to get inside tomorrow
(Wednesday) at 11:30. May I
let them in at that time?

Of course

Thanks!!

May 4, 2022 at 11:00 AM



iMessage



11:18



Sean >

May 4, 2022 at 11:00 AM

Will be at your condo today at 11:30.

May 4, 2022 at 12:12 PM

I found a plumber - would you like me to call him to fix the leak?

May 4, 2022 at 4:01 PM

Yes please

I'll text them and arrange a time

They can get there Friday at 8:20. Is that ok? I can let them in.

8:20 in the morning

May 5, 2022 at 9:33 AM



iMessage





Sean

Let me know if Friday at 8:20 will work to let plumber in

May 5, 2022 at 3:54 PM

Is it ok to get in the condo tomorrow at 8:20?

May 5, 2022 at 6:37 PM

Sent you several emails. And I got one from you but it won't let me open it. Do you have a password for Me?

May 5, 2022 at 9:00 PM

Sry its

Ok thanks

May 6, 2022 at 8:04 AM



iMessage



11:19

68



Sean

May 6, 2022 at 8:04 AM

I'll be at the condo w
The plumber at 8:20

The power is off?

I didnt know

Its alunda

Marcy Walker. +1 (423)
378-8800

Call her to tell her you want
to do a remote closing

Lets sell the third floor too

Ok!

Cynthia wants to keep it
really bad i told her a really
low cash price but she ,..call
me when you have a min



iMessage



11:19

68



Sean >

Can i get the name and number for the office landlord

Yes!

Shawn Blount

(423) 384-4649

Thank you

May 6, 2022 at 2:59 PM

They found the leak and replaced the copper pipe
Grateful for that!

The drywall is cut out - and they are letting everything dry out

May 10, 2022 at 3:07 PM

Call me back



iMessage



11:19

68



Sean

I'm headed to the condo to take a pic of the repair



Not Delivered

I'm headed to the condo to take a pic of the repair

The door to your condo was wide open. I did not feel safe going in. I didn't even get off the elevator. No idea why the door is ope.

I left immediately

May 18, 2022 at 6:36 PM

Sry call about garage anytime

Hey. Sorry I missed your call. I'll call you tomorrow about the garage. I'm



iMessage



11:19



Sean

Hey. Sorry I missed your call.
I'll call you tomorrow about
the garage. I'm

May 20, 2022 at 8:58 AM

Call me back when you have
a chance

May 20, 2022 at 11:36 AM

sry at library lol

Hopefully you are working on
the limited power of attorney
so you can close on the
condo on Friday 5/27

May 20, 2022 at 3:40 PM

Call you back!

My advice to you regarding
GCC is to call Alunda and
work it out. Or call an



iMessage



11:20



Sean >

My advice to you regarding GCC is to call Alunda and work it out. Or call an attorney and get things changed into only your name

Will you call alunda? Or may I give her your number?

u can

Thank you. I wanted your permission. I appreciate it

May 24, 2022 at 12:03 PM

Call when you have a chance please. Talked to the attorney, she said you tried to call her. She would like to talk to the person that will have the limited power of attorney.

May 24, 2022 at 1:21 PM



iMessage



11:20



Sean >

Please call Renasant and get the following to Marcy Walker

1. The payoff amount as of 5/27

2. The per diem

3. Wire instructions

Have them email Marcy at mwalker@hsdlaw.com

Also - Marcy needs the original limited power of attorney on Thursday so she can review and communicate w that person ...

she will record that Limited poa at the Washington county court house before she records the new deed after closing on Friday

She will need the contact name, phone and email of your Limited POA so she can



iMessage



11:20



67



4



Sean

you can arrange for them to be at closing and bring a drivers license and the wire instructions of the account where the money will go to. Needs to be in their name since they are signing. Then they can get you what you need after that.

May 25, 2022 at 2:41 PM

I just talked to the bank. They are sending the info over to Marcy. I got the poa so everything's squared away. Sorry for the bad service in the mountains

That's great. Can you send me the name and number of The person that has agreed to the POA? Marcy needs to coordinate w them



iMessage



11:20



Sean

May 25, 2022 at 2:41 PM

I just talked to the bank. They are sending the info over to Marcy. I got the poa so everything's squared away. Sorry for the bad service in the mountains

That's great. Can you send me the name and number of The person that has agreed to the POA? Marcy needs to coordinate w them

Do you want to email Me the persons name number? Or have them call me? I'll be in and out of cell service until this evening

May 27, 2022 at 8:24 AM

Is your phone still working?

Read



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