

The Law Offices of
JOSÉ A. ANDRÉU FUENTES

261 Domenech Avenue
San Juan, Puerto Rico 00918-3518
email: jaf@andreu-sagardia.com

José A. Andréu-García
Founding Member

José A. Andréu-Fuentes
José J. Lamas-Rivera
José A. Andreu-Collazo

Tels. (787) 754-1777
(787) 754-1888
(787) 763-8044
Fax. (787) 763-8045

September 13, 2023

By Email
jcasillas@cstlawpr.com

Mr. Juan Casillas-Ayala
Casillas, Santiago & Torres LLC
El Caribe Office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901-2419

Re: Memorandum dated September 13, 2023

Dear Mr. Casillas:

Your client, Mr. John Paulson, circulated a Memorandum to all the employees of Paulson Puerto Rico highlighting a video which was sent to him seven (7) years ago by the former managers of the Condado Duo restaurants. No action was taken against Mr. Ghaffar during those seven years.

Using this video now, seven years later, has the sole purpose of affecting Mr. Ghaffar's reputation in retaliation of the recent judicial actions pursued by Mr. Ghaffar against Mr. Paulson and its entities. This kind of fabrication is in open violation of the non-disparagement clause agreed by the parties in the Special Payment Letter and contrary to the JAMS' rules. Therefore, we demand that your client cease and desist from any further violation of the non-disparagement agreement and for which our client will requests the appropriate sanctions before JAMS. In fact, we will assess the value of the reputation all damages caused by these disparaging statements and circulation of the video and file appropriate claims in the ongoing arbitration.

Finally, please be advised that if any person at the behest of your client intervenes with Mr. Ghaffar's property rights in Bahia Beach Resort, Mr. Ghaffar will pursue all legal remedies available to him against Mr. Paulson and Paulson Puerto Rico.

Cordially,

s/ José A. Andréu Fuentes

cc. Matin Russo
Peter Mahler