

LAW OFFICES OF
BELLI, DRIVON & BAKERINK

215 NORTH SAN JOAQUIN
STOCKTON, CALIFORNIA 95202
TELEPHONE (209) 466-0982

July 27, 1983

MELVIN M. BELLI, SR.
LAURENCE E. DRIVON
G. ARCHER BAKERINK
STEWART M. TABAK
DALL S. BALCAO
LAURENCE DRIVON
OF COUNSEL
JAMES F. BURLINGTON

1090 CENTRAL
P.O. BOX 650
TRACY, CALIFORNIA 95376
TELEPHONE (209) 835-9590

Reply to Stockton

Richard Berberian
605 Hamden Lane
Modesto, California 95350

Re: , Our Reference #40,749

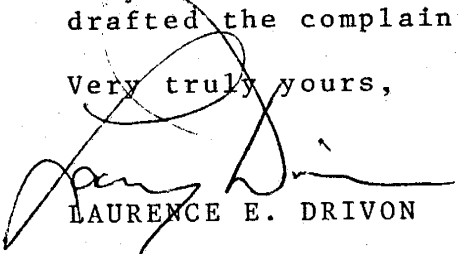
Dear Mr. Berberian:

Please be advised that with respect to your letter of July 21, 1983 I intend to draft the complaint next week with respect to this particular matter. At this time I intend to sue the Wells Fargo Bank only with a sufficient number of DOES to be able to name later.

It is impossible for Rudy or I to assess the liability, under the law, of Pete Jeppson or of your uncle at this time. This is because the direct legal relationships that are necessary to ground a lawsuit must be explored prior to naming these parties. We are not going to lose our right to name these parties by failing to file a complaint against them by September because we will have a complaint on file and we will be able to amend them in as DOES when we have more of an opportunity to determine the legal significance of what has happened.

I am sending a letter to Rudy with a copy to you enclosed herein where I ask him the question that you want me to ask with respect to your father. I will be in touch with as soon as I have drafted the complaint.

Very truly yours,



LAURENCE E. DRIVON

LED/sb
Enclosure

cc: Rudy V. Bilawski

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July 27, 1983

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OF COUNSEL

JAMES E. BURLINGTON

Reply to Stockton

RUDY V. BILAWSKI
NEUMILLER & BEARDSLEE
A Professional Corporation
P.O. Box 20
Stockton, California 95201

Re: Richard Berberian
Our Reference #40,749

Dear Rudy:

Richard Berberian has requested that I ask you whether or not his father has taken any legal action or any other action that you are aware of with respect to any of the matters concerned herein that Richard doesn't know about. If he has please let me know immediately or let Richard know directly.

I am drafting the complaint at this time and have explained to Richard by way of letter a copy of which is enclosed exactly what we intend to do at this time.

Very truly yours,

Laurence E. Drivon

LAURENCE E. DRIVON

LED/sb

Enclosure

cc: Richard Berbarian

LAW OFFICES OF
BELLI, DRIVON & BAKERINK

September 23, 1983

215 NORTH SAN JOAQUIN
STOCKTON, CALIFORNIA 95202
TELEPHONE (209) 466-0982

1030 CENTRAL
P.O. BOX 650
TRACY, CALIFORNIA 95376
TELEPHONE (209) 835-9590

911 INDUSTRIAL WAY
SUITE A
LODI, CALIFORNIA 95240
TELEPHONE (209) 334-4109

MELVIN M. BELLI, SR.
LAURENCE E. DRIVON
G. ARCHER BAKERINK
STEWART M. TABAK
DALE S. BALCAO
DEAN F. COOPER

LAURENCE DRIVON
OF COUNSEL

Reply to Stockton

Richard Berbarian
605 Hamden Lane
Modesto, California 95350

Re: Berbarian vs. Berbarian
Our Reference #40,749

Dear Richard:

Please be advised that I have instructed Sheri to have the complaint served on your uncle and Wells Fargo Bank as soon as possible.

I have been very busy with a couple of other cases and you should understand that your rights have been fully protected in this matter and that we will handle it in the most expeditious way possible.

As soon as I have a chance I will talk to Rudy Bilawski personally and pose the question to him that you have previously posed. I feel confident in my own mind that his answer is going to be no, that nothing has been done such as that, however we will find out. Try to be patient these matters often take considerable time and we are moving on it as quickly as we can.

Very truly yours,

LAW OFFICES OF BELLI, DRIVON & BAKERINK


LAURENCE E. DRIVON

LED/sb

LAW OFFICES OF
BELLI, DRIVON & BAKERINK

September 28, 1983

215 NORTH SAN JOAQUIN
STOCKTON, CALIFORNIA 95202
TELEPHONE (209) 466-0982

1030 CENTRAL
P.O. BOX 650
TRACY, CALIFORNIA 95376
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LAURENCE E. DRIVON
G. ARCHER BAKERINK
STEWART M. TABAK
DALE S. BALCAO
DEANE COOPER

LAURENCE DRIVON
OF COUNSEL

Reply to Stockton

Richard Berberian
605 Hamden Lane
Modesto, California 95350

Re: Berberian vs. Berberian, et al.,
Our Reference #40,749

Dear Mr. Berberian:

In response to your letter of September 25, 1983 and your telephone calls which we have been receiving in the office I am writing this letter.

I realize that you have a great deal at stake in this matter and that it is the item which is apparently occupying most of your thinking at the present time.

We will handle this file in as expeditious a manner as we can, however, we have a good many other clients who also deserve a certain amount of our attention.

Your legal rights have not to this time been jeopardized by the actions of this office and will not be in the future. We are currently in the process of serving the complaint which is not merely a matter of stuffing it into a envelope and mailing it first class.

Perhaps you feel that our office cannot devote sufficient time to your case under the circumstances. If this is so please feel free to get together to discuss it with me so that we can make arrangements to get your file together for another attorney that you might find who has find to work on your matter on a more exclusive basis.

If you have any problem please feel free to give me a call, I have attempted to return your telephone calls but have not always been able to get you.

Thank you very much.

Very truly yours,

LAURENCE E. DRIVON

LED/sb

LAW OFFICES OF
ELLI, DRIVON & BAKERINK
215 N. SAN JOAQUIN STREET
STOCKTON, CA 95202

(209) 466-0982

August 11, 1983

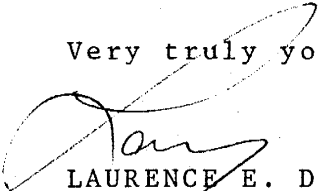
Richard Berbarian
605 Hamden Lane
Modesto, California 95350

Re: Berbarian vs. Berbarian
Our Reference #40,749

Dear Mr. Berbarian:

As per your telephone conversation with my secretary enclosed please find a copy of the telephone message taken on August 2, 1983 from Mr. Bilaski.

Very truly yours,



LAURENCE E. DRIVON

LED/sb

Enclosure

MESSAGE

TO: *SEA*

<input checked="" type="checkbox"/>	SEARCHED
<input checked="" type="checkbox"/>	SERIALIZED
<input checked="" type="checkbox"/>	INDEXED
<input checked="" type="checkbox"/>	FILED
<input type="checkbox"/>	OTHER

FROM: *Judy Bilasku* DATE: *8-2-83*

RE: *Your letter 9:00*

MESSAGE: *No such knowledge of any legal action of*

Richard Barbarians father
9488200 *SB*