

## **Exhibit B**

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July 23, 2018

**Via Electronic Mail**

Gary C. Robb, Esq.  
ROBB & ROBB LLC  
One Kansas City Place – Suite 3900  
1200 Main Street  
Kansas City, Missouri 64105

**Re: Jerry Cadigan, et. al. v. Liberty Helicopters, Inc., et. al.**

Dear Mr. Robb,

We are in receipt of Plaintiffs' Request for Production of Documents on Jurisdictional Issues to Defendant Apical Industries, Inc. and Notice(s) of Videotaped Deposition(s). New York's Civil Practice Law and Rules § 3214 provides, in pertinent part, that "service of a motion under rule 3211 . . . "stays disclosure until determination of the motion unless the court orders otherwise." Because Defendant Apical's Motion to Dismiss pursuant to CPLR § 3211(a)(8) is pending, the discovery you have served is automatically stayed.

Very truly yours,



Anthony W. Eckert III

AWE/bm

cc: Matthew F. Schwartz, Esq.  
Douglas H. Amster, Esq.  
Jonathan M. Stern, Esq.  
David J. Harrington, Esq.