



CityScape  
One East Washington St.,  
Suite 1200  
Phoenix, AZ 85004  
(602) 650-2000  
Facsimile: (602) 264-7033  
www.polsinelli.com

Marty Harper  
Direct Phone: (602) 650-2080  
mharper@polsinelli.com

December 2, 2010

Exhibit A

**VIA ELECTRONIC MAIL  
AND FIRST CLASS MAIL**

Nicholas P. Granath  
SEHAM, SEHAM, MELTZ & PETERSEN, LLP  
2915 Wayzata Blvd.  
Minneapolis, MN 55405

**RE: *Amended Rule 11 Motion for Sanctions against the Addington Defendants for Failure to Withdraw Their Cross Claim***

Dear Nick:

Your *Amended Rule 11 Motion for Sanctions against the Addington Defendants for Failure to Withdraw Their Cross Claim* makes frivolous arguments for improper purposes in violation of Rule 11(b). This letter, therefore, serves to provide notice that we will file the attached motion for sanctions pursuant to Rule 11(c)(2) if you do not withdraw your motion within the 21 days provided by the rules which date is December 24, 2010.

Very truly yours,

  
Marty Harper

MH:kh

c: **VIA ELECTRONIC MAIL  
AND FIRST CLASS MAIL**

Stanley Lubin, Esq., [stan@lubinandenoch.com](mailto:stan@lubinandenoch.com)  
LUBIN & ENOCH, P.C.  
349 N. 4<sup>th</sup> Avenue  
Phoenix, AZ 85003-1505

Lee Seham, Esq., [lseham@ssmplaw.com](mailto:lseham@ssmplaw.com)  
SEHAM, SEHAM, MELTZ & PETERSEN, LLP  
445 Hamilton Ave., Ste. 1204  
White Plains, NY 10601