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-----Original Message-----

From: Charles L. Philbrick [mailto:CPhilbrick@rathjewoodward.com]
Sent: Thursday, February 14, 2019 5:33 PM
To: Christopher Nudo <cnudo@harvestbiblechapel.org>
Subject: Re: Harvest

Chris: Recent revelations are forcing us to reevaluate. My client has now had an opportunity to hear the entire tape-recording that the radio personality has been playing. In two separate places on that recording James McDonald defames Julie Roys to the publisher of Christianity Today. One statement concerns her capacity to perform her journalistic duties professionally, the other concerns the quality of her marriage. Both qualify as defamation per se. the radio personality also indicated that MacDonald spoke to him personally about the quality of Ms. Roys marriage. There may be others.

As a consequence, Ms. Roys would be willing to settle with Harvest and James McDonald for a full mutual release in exchange for \$50,000 and she would separately release per claim pursuant to Rule 137 for her attorneys fees incurred in the lawsuit for the \$32,000 previously indicated. You may call me on my cell to discuss if need be.

Charlie.

Charles L. Philbrick
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> On Feb 14, 2019, at 12:56 PM, Christopher Nudo <cnudo@harvestbiblechapel.org> wrote:

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> Here is the release that Charles suggested with a few edits and clean up that I added.

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> Please review and let me know if we can all agree on this as a release template.

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> Thank you.

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> ChristopherNudo
> Estate Planning Ministry and
> In-House General Counsel

> [REDACTED]
> [REDACTED]