

- 1 5) Facebook conversations between Eric Noel and Kaitlyn Biear, Francis Skakel and
2 Kaitlyn Biear.
- 3 6) Respondent has provided proof of sales of both horses and will not provide
4 additional information not related to the case and information violating client
5 confidentiality.
- 6 7) The e-mail Petitioner wrote to Respondent from Dreamhorse.com. Also provided is
7 an e-mail to Petitioner from Respondent that was requested by Petitioner at the
8 time Respondent sent and wrote such said e-mail for sale purposes.
- 9 8) Horses were listed for sale, no contractual agreement exists as stated. E-mail
10 sent to Respondent dated July 22nd, 2012 also indicating there were no moneys
11 exchanged and Respondent was unaware of any moneys being exchanged or any
12 agreements between Petitioner and a third party. See Petitioner's letter to
13 respondent dated July 22nd, 2012.
- 14 9) Horses were listed for sale, no contractual agreement exists as stated. E-mail
15 sent to Respondent dated July 22nd, 2012 also indicating there were no moneys
16 exchanged and Respondent was unaware of any moneys being exchanged or any
17 agreements between Petitioner and a third party.
- 18 10) Petitioner's e-mail and letter sent to Respondent on July 22nd, 2012.
- 19 11) The e-mail Petitioner wrote to Respondent from Dreamhorse.com showing
20 Petitioner himself inquired and none of his clients or third parties were
21 inquiring. Horses were listed on a public sales web site. No contractual
22 agreement exists as stated and no money was ever exchanged, therefore there was
23 no need/use of a contract. Also see letter dated July 22nd, 2012 where
24 Petitioner acknowledges Respondent's claims.
- 25 12) Petitioner has possession of such said entry forms and can legally obtain these
26 himself. Petitioner states in his *Complaint* filed July 26th, 2012 about entries
27 for both Luxury and Rock-A-Bye being submitted July 10th, 2012. Also review
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1 letter dated July 22nd, 2012. Also see blank entry form for the Oregon High
2 Desert Classic where entry close date is June 15th, 2012.

3 13) Facebook conversations showing Petitioner's client's acknowledgement.

4 14) Letter from Petitioner to Respondent dated July 22nd, 2012 provided.

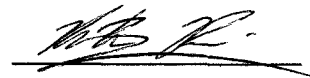
5 15) Letter from Petitioner to Respondent dated July 22nd, 2012 provided.

6 16) See show records for both horses showing both horses never competed or were
7 entered into the show properly (show does not show up on records). Also see
8 Facebook conversation between petitioner and respondent dated July 23rd, 2012.

9 17) Letter from Petitioner to Respondent dated July 22nd, 2012 provided.

10 18) E-mails from prospective buyers showing Petitioner's attempt in thwarting with
11 sale of horses. Letter from Petitioner to Respondent indicating and notifying
12 Respondent that there was a lease of one of the horses when no other
13 notification was ever given, thus nothing else exists because no moneys were
14 exchanged between Petitioner and Respondent. Petitioner's printed and filled
15 out lien hold on Luxury that has no file date or case number, showing that the
16 paperwork was printed off from the internet and only filled out, never filed.

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18 Dated this 14th day of November, 2012

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21 Kaitlyn Biear, Respondent
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