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June 10, 2022

*LETTERS AND ATTACHMENTS VIA UPS AND LETTERS  
VIA EMAIL*

John Paul Regan, Esq.  
Metz Lewis Brodman Must O'Keefe LLC  
535 Smithfield Street, Suite 800  
Pittsburgh, PA 15222

Re: Harry C. Neel, Michael W. Jenkins, and Lee E. Cavanaugh, Individually and  
Derivatively on Behalf of the Stonycreek Valley Development Corporation vs.  
Daniel Dively and the Stonycreek Valley Development Corporation  
No. 275 Civil 2019: Discovery Documents

Dear Attorney Regan,

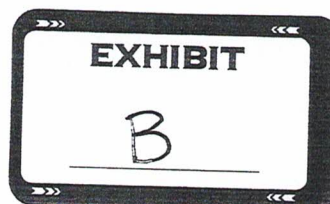
Accompanying this letter are approximately five thousand and five hundred (5,500) pages of documents in two boxes labeled Box "A" and "B".

These documents are being provided pursuant to the order of court directing SVDC to release all correspondence between board members from April 17, 2017, until present.

These 5,500 pages represent correspondence that is in possession of my client Daniel Dively.

Please note that I personally reviewed all emails in Mr. Dively's email account from 2017 to present and extracted emails subject to the court order, marking each email as I went. I then went back and did search terms including: Harry Neel's email address and name, Michael Jenkins email address and name, Lee Cavanaugh's email address and name, Joe Piccini's email address and name, Larry Rosage's email address and name, "litigation", "lawsuit", "bid", "bids", "amend", "amendment", "enclosure A", "special meeting", "buy back", "buyback", "cumulative", "shares", "shareholder", "proxy", "musser", "dirt bottom", and "DBE".

After obtaining all emails, I read them, extracted privileged communications (mostly confidential attorney/client communications) and printed them. Thereafter, making three copies of each. This process took approximately 60 hours and we have well over one thousand (\$1,000.00) dollars in printing costs.



Box A starts with the most recent correspondence in 2022, and Box B ends in the oldest correspondence in 2017.

Also, to comply with ongoing discovery requests in this case, and the court order, I have attached herewith a document that is within the discovery I have labeled as Exhibit "C", which is a QuickBooks report that was in an email chain I discovered. The document states that Dirt Bottom Excavating was paid \$4,000.00 on 04/21/2017, four days after the "relevant time period" requested. Mr. Dively believes the work for said invoice was completed before the relevant time period, which is why it did not appear in our original discovery responses. Additionally, I have attached Exhibit "D" which is correspondence about an estimate Dirt Bottom submitted, but ultimately the estimate was not accepted, and the work was not done.

After spending a week and half hip deep in documents, I have discovered nothing that indicates Daniel Dively, or Dirt Bottom Excavating, was ever involved in self-dealing. Additionally, there is virtually NO DAMAGES here, even if there was liability, and there isn't. I think the Plaintiffs should have a real discussion about dismissing the claims against Dively individually keeping in mind Dively intends to renew his Dragonetti action at the conclusion of all this needless litigation.

This letter and copies of boxes A and B (5,500 pages) have also been sent to Attorney Cascio and Attorney Stofko today. Thank you.

Very truly yours,



David T. Leake, Esq.

Enclosures: Box A (approx. 3,500 pages), Box B (approx.. 2,000 pages)

Pc: James R. Cascio, Esq. w/ Enclosures  
Dennis J. Stofko, Esq. w/ Enclosures