



IVIEWIT HOLDINGS, INC.

P. Stephen Lamont
Chief Executive Officer
Direct Dial: 914-217-0038

By Electronic Mail and Certified Mail

September 17, 2003

Harry Moatz
Director, Office of Enrollment and Discipline
United States Patent and Trademark Office
Mail Stop OED, P. O. Box 1450
Alexandria, Va. 22313-1450

Re: Written Statement of Alleged Improprieties in the Filings, Among Others, of U.S. Patent No.'s 09,522,721, 09,587,734, 09,587,026, and 09,587,730, on behalf of Iviewit Holdings, Inc., as Assignee; and 9,630,939, on behalf of Eliot I. Bernstein, Zakirul Shirajee, Jude Rosario, and Jeffrey Friedstein as Inventors.

Dear Mr. Moatz:

Thank you for spending the time on the phone twice previously, on or about May 9, 2002 and on or about August 2003, and your suggestions and descriptions of how Iviewit Holdings, Inc. ("Company") may initiate actions to right the many wrongs in the alleged knowing and willful improprieties in the filing of the above referenced patent applications.

Moreover, in the series of allegations that are enclosed in the CD-ROM titled *Iviewit Bar Complaints* – Table of Contents of which is attached herein as Exhibit A, the Company is confident that your Office will find a reasonable certainty that Messrs. Kenneth Rubenstein, Raymond A. Joao, William J. Dick, Steven Becker, and Douglas Boehm, all present or former members of the distinguished Bar of the United States Patent and Trademark Office ("USPTO"), designed and executed, either for themselves or others similarly situated, the deceptions, improprieties, and, even in certain circumstances, outright misappropriation by the disingenuous redirection of the disclosed Company techniques by: (i) burying the critical elements of the inventions in patent applications; (ii) allowing the unauthorized use of Company inventions under confidentiality



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agreements (“NDA’s”) without enforcement of said NDA’s; (III) filing patent applications of their own or others based on the Company’s inventions; (IV) submitting knowingly false statements and falsified documents done with intent to commit fraud on the USPTO, the Trademark & Copyright office, the Iviewit shareholders and the Iviewit inventors .

Furthermore, as a result of the series of allegations enclosed, the Company is confident that your Office: (i) shall find the requisite merit to initiate investigations; (ii) shall pass these allegations to a staff attorney for further investigation; (iii) shall instruct said staff attorney to institute a formal investigation, including questioning, requests for records, and other information from all parties involved; (iv) shall refer said attorney’s findings back to Mr. Moatz in his capacity as Director of the Office of Enrollment and Discipline (“OED”) of the USPTO; (v) shall present such findings to an appropriate Disciplinary Committee for determinative review; and finally (vi) shall witness said Committee initiate disciplinary action against the alleged offending attorneys.

BACKGROUND

In mid 1998, the Company’s founder, Eliot I. Bernstein, among others (“Inventors”), came upon inventions pertaining to what industry experts have heretofore described as profound shifts from traditional techniques in video and imaging then overlooked in the annals of video and imaging technology. Factually, the technology is one of capturing a video frame at a 320 by 240 frame size (roughly, ¼ of a display device) at a frame rate of one (1) to infinity frames per second (“fps” and at the twenty four (24) to thirty (30) range commonly referred to as “full frame rates” to those expert in the industry). Moreover, once captured, and in its simplest terms, the scaled frames are then digitized (if necessary), filtered, encoded, and delivered to an agnostic display device and zoomed to a full frame size of 1280 by 960 at the full frame rates of 24 to 30 fps. The result is, when combined with other proprietary technologies, DVD quality video at bandwidths of 56Kbps to 6MB per second, at a surprising seventy five percent (75%) savings in throughput (“bandwidth”) on any non-terrestrial digital delivery system such as digital terrestrial, cable, satellite, multipoint-multichannel delivery system, or the Internet, and a similar 75% savings in storage on mediums such as digital video discs (“DVD’s”) and the hard drives of personal video recorders. Moreover, said Company inventions, among others, are used on almost every digital camera or present screen technology that utilizes the feature of “digital zoom”. Furthermore, industry observers who benefited from the Company’s disclosures have gone on to claim "you could have put 10,000 engineers in a room for 10,000 years and they would never have come up with these ideas.”



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Not very well connected in emerging technologies, the Inventors contacted an accountant, Mr. Gerald Lewin, CPA of Goldstein Lewin & Co., Boca Raton, Fla., who in turns refers Inventors to Mr. Christopher Wheeler, a partner in the Florida office of Proskauer Rose LLP. Moreover, once Inventors present the technology to

Wheeler, Wheeler in turn introduces Inventors to Mr. Kenneth Rubenstein, a soon to be Proskauer partner, and the main protagonist of the Motion Pictures Experts Group (“MPEG” and the standards body for video technology) patent pool, wherein Rubenstein describes the technology as “novel...” claims that “he missed that...” that “he never thought of that...” that “this changes every thing...” and, paraphrasing, “this is essential to MPEG 2...”

Subsequently, Rubenstein factually becomes a member of the Advisory Board of the Company and is instrumental in securing investments based on his analysis of the inventions and that the aforementioned patent pools would soon pay royalties to the Company based on its inventions. Furthermore, when Rubenstein through Joao fail to properly list inventors, fail to file timely patent filings, fail to file inventions entirely, fail to file copyrights entirely and finally file patents that have been fraudulently changed without knowledge or consent of the inventors constituting a fraud on the USPTO, Wheeler then recommends another friend and patent attorney, William J. Dick of Foley & Lardner, Milwaukee, Wis. to undertake a correction of the errors of Rubenstein through Joao’s filings. At this time investigations began that showed that Raymond Joao had begun a series of his own patent filings (now totaling 90 patents filed in his own name) that many appear based on ideas and concepts learned from the Company. Around this time it also became clear that the patent pools overseen by Rubenstein also had begun to use concepts learned by Rubenstein from Company disclosures sent to him and that Proskauer Rose clients introduced to the Company by Proskauer partners under NDA’s were also beginning to use the technologies without authorization.

Rather than the unearthing of the buried inventions by Rubenstein through Joao, Dick proceeds to undertake and continue to further fraud on the USPTO by: (i) further compounding the problems by changing titles of applications without knowledge and consent of the inventors, changing the content of applications without knowledge and consent of the inventors, and applying incorrect math to a series of patent filings even after having been informed of the errors prior to filing by the inventors; and (ii) creates further problems as Dick, along with Brian G. Utley, former President & COO of the Company, together with other Foley & Lardner patent attorneys, Steven Becker and Douglas Boehm stage their own spectacular “grab” at the Company’s inventions by filing a series of fraudulent patent applications in the name of Utley, their long time associate, sending said patent documents to Utley’s home address, and failing to assign said patent applications to the Company. Foley and Lardner attorney’s were



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fully cognizant of the inventors of said stolen patent concepts and additionally were aware that Mr. Utley had an employment contract that prohibited such activities and finally that investment documents of the Company called for any inventions to be assigned to the Company.

Still further, it is interesting to note and establishes a past conspiratorial shadow on these stolen patents procured by Foley and Lardner in that Utley and Dick had been involved in other patent misappropriations that led to the closure of a prior employer of Utley's, a one Diamond Turf Lawnmower in Florida, owned by a one Monte Friedkin; this information was not disclosed to the Company by Wheeler, Utley, or Dick, all who were aware of the past malfeasances. Moreover, these patent

misappropriations, including the continued fraud of the USPTO, pertaining to the Company's inventions, by Dick, Becker, and Boehm have caused the Company the loss of enormous funds in the reassignment of the stolen inventions of which we are aware, and, perhaps, entire inventions of which we are not aware. Estimates to correct many of the flaws in the current filings and file the missing and abandoned inventions have been projected to cost upwards of \$250,000 to \$500,000, after the Company has already spent over \$1 million to file, then fix, and then further recover the stolen and damaged patents. It also is of interest to note that the Company cannot get opinion from current counsel as to the ability to truly fix and recapture the lost and damaged patents and copyrights.

Lastly, reference is made to: (i) a flow chart attached herein as Exhibit B as a graphical portrayal of how the named attorneys all have relations to Rubenstein and Wheeler and worked together, in a coordinated conspiratorial way and for their self serving purposes, in a civil as well as criminal conspiracy to deprive the Company and their inventors of their intellectual property rights; and (ii) a Counterclaim filed in the State of Florida pertaining to many of the allegations ascribed to herein, attached as Exhibit C.

Finally, Mr. Moatz, by highly respected firms and engineers alike, the value of these patents has been estimated to be several billion dollars annually, thus providing the motive for these events and the Company assesses further motive in the ability of these inventions, when combined with other proprietary technologies, to not only provide a competitive threat to, but to effectually trump, the MPEG patent pools overseen by Rubenstein and Proskauer Rose.

SUMMARY ALLEGATIONS

Furthermore, the Company summarily describes the allegations contained in the enclosed bar complaints as follows and asserts these same claims to the USPTO for



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purposes of separate investigation on each of the following registered patent attorneys:

Raymond A. Joao

1. Failed to take reasonable steps to ensure that the intellectual property of the Company was protected;
2. Failed to and/or inadequately completed work regarding patents;
3. Failed to list proper inventors of the technologies based on improper legal analysis that foreign inventors could not be listed until their immigration status was adjusted, resulted in the failure of the patents to include their rightful and lawful inventors and represents a direct fraud on the USPTO and the Companies investors and inventors;
4. Failed to ensure that the patent applications for the technologies, contained all necessary and pertinent information relevant to the technologies and as disclosed by the inventors and required by law thereby perpetrating a fraud on the USPTO and the Companies investors and inventors;
5. Falsified billing statements;
6. Falsified patent documents and changed the contents of provisional and non-provisional patent applications prior to filing so to effectively bury the Company's inventions and limit their scope should they be issued notwithstanding, thereby constituting a fraud on the USPTO and the Company's investors and inventors;
7. Filed patent applications in his name based upon proprietary and confidential information as disclosed by the inventors. That Joao who was contracted to prosecute patents for the Company has now applied for more than ninety patents in his own name, many of which appear to be ideas learned while representing the Company, thereby constituting a fraud on the USPTO and the Companies investors and inventors; and,
8. The negligent actions of Joao resulted in and were the proximate cause of loss to the Company; today, the Company's processes are believed to be on digital cameras, DVD discs, and virtually all terrestrial broadcast, digital cable, satellite, and Internet streams of video.
9. Finally, Joao has misrepresented to a tribunal, the New York State Bar Association, with regard to his knowledge of the Company inventions and inventors, all conduct unbecoming of a member of the U.S. Patent Bar.

Kenneth Rubenstein



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1. Failed to take reasonable steps to ensure that the intellectual property of the Company was protected;
2. Failed to and/or inadequately completed work regarding patents;
3. Failed to list proper inventors of the technologies based on improper legal analysis that foreign inventors could not be listed until their immigration status was adjusted; this resulted in the failure of the patents to include their rightful and lawful inventors, thereby constituting a fraud on the USPTO and the Company's investors and inventors;
4. Failed to ensure that the provisional and non-provisional patent applications for the technologies, contained all necessary and pertinent

information relevant to the technologies as disclosed by the inventors and as required by law, thereby constituting a fraud on the USPTO and the Company's investors and inventors;

5. By redacting information from billing statements regarding services provided so to as to give the appearance that the services provided by Rubenstein were limited in nature, when in fact they involved various aspects of intellectual property protection;
6. By knowingly and willfully representing and agreeing to accept representation of clients in conflict with the interests of the Company, without either consent or waiver by the Company;
7. Allowed the unauthorized use of intellectual property of the Company by other clients of Proskauer Rose LLP and Rubenstein, including uses by patent pools overseen by Rubenstein (i.e., MPEG 2, MPEG 4, and DVD);
8. Instructed a one Raymond A. Joao to file provisional and non-provisional patents for the Company that knowingly and willfully withheld critical elements of the inventions and further filing provisional and non-provisional patents in an untimely manner, thereby constituting a fraud on the USPTO and the Company's investors and inventors;
9. The negligent actions of Rubenstein resulted in and were the proximate cause of loss to the Company; today, the Company's processes are
10. Failing to report crimes and fraud committed against the Company and the USPTO after becoming knowledgeable of said crimes; today, the Company's processes are believed to be on digital cameras, DVD discs, and virtually all terrestrial broadcast, digital cable, satellite, and Internet streams of video.
11. Knowing and willful misrepresentations to the Company's investors, including Wachovia Securities, a unit of Wachovia Corp., a registered bank holding company in Charlotte, N.C., by Rubenstein and Wheeler of patent applications filed and inventions covered.



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12. **Finally, Rubenstein has perjured himself in deposition with regard to knowledge of the Company inventions and inventors, all conduct unbecoming of a member of the U.S. Patent Bar.**

William J. Dick, Steven Becker, and Douglas Boehm

1. **Knowing and willful misrepresentations to the Company with regard to his past involvement in patent malfeasances with Brian G. Utley at Utley's past employer, Diamond Turf Lawnmower.**
 - a. **Utley was a past President of the Company and formerly a President of Diamond Turf Lawnmower and had referred Dick without reference to their past patent disputes at Utley's prior employer, which led to the termination of Utley and the closing of Diamond Turf Lawnmower.**
 - b. **These misrepresentations and frauds have led to similar damage to the Company, as a result of the stolen inventions by Utley, aided and abetted by Dick, Boehm and Becker. Moreover, the Company found patents written into Utley's name, not disclosed or assigned to the Company, and that Dick was fully aware that inventors Bernstein, Schirajee, Rosario, and Friedstein had developed the inventions. Blakely Sokoloff Taylor and Zafman LLP discovered these patents, and then attempted to re-assign said falsely filed and stolen patent applications to the Company.**
2. **Perpetrating a fraud on the USPTO, by submitting applications with false information and wrong inventors.**
3. **Knowing and willful misrepresentations to the Company's investors, including Wachovia Securities, a unit of Wachovia Corp., a registered bank holding company in Charlotte, N.C., by Dick and Utley of patent applications filed and inventions covered.**
4. **Knowingly committing fraud of USPTO, Company shareholders, and potential investors by switching inventors and invention disclosures.**
5. **Participation in a civil and criminal conspiracy to bury patent applications and inventions.**
6. **Not reporting information to proper tribunals regarding Rubenstein and Joao malfeasances.**
7. **Furthering work of Rubenstein and Joao to not capture inventions and identify inventors;**
8. **Knowing and willful destruction of Company records**
9. **Aiding and abetting Utley in filing patents in Utley's name disclosed to Dick under attorney-client privilege.**



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Alan M. Weisberg

- 1. Failed to file foreign filings on two PCT applications without proper time for Company to arrange other counsel to complete**
- 2. Failed to maintain records properly**
- 3. Loss of two patents in the PCT**

Not previously mentioned, Weisberg is the retained patent attorney of Schiffrin & Barroway LLP, the Company's latest counsel and investor, the subjects of which are described in more detail in the enclosed CD-ROM.

Furthermore, in light of the above referenced allegations, and in the Company's estimation, the above named attorneys have violated one or more of the following sections of the USPTO Code of Professional Responsibility, the list of which is not meant as exhaustive:

§ 10.21 Canon 1.

A practitioner should assist in maintaining the integrity and competence of the legal profession.

§ 10.23 Misconduct.

- (a) A practitioner shall not engage in disreputable or gross misconduct.
- (b) A practitioner shall not:
 - (1) Violate a Disciplinary Rule.
 - (2) Circumvent a Disciplinary Rule through actions of another.
 - (3) Engage in illegal conduct involving moral turpitude.
 - (4) Engage in conduct involving dishonesty, fraud, deceit, or misrepresentation.
 - (5) Engage in conduct that is prejudicial to the administration of justice.
 - (6) Engage in any other conduct that adversely reflects on the practitioner's fitness to practice before the Office.
- (c) Conduct which constitutes a violation of paragraphs (a) and (b) of this section includes, but is not limited to:
 - 2) Knowingly giving false or misleading information or knowingly participating in a material way in giving false or misleading information, to:
 - (i) A client in connection with any immediate, prospective, or pending business before the Office.



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(ii) The Office or any employee of the Office...

7) Knowingly withholding from the Office information identifying a patent or patent application of another from which one or more claims have been copied...

9) Knowingly misusing a "Certificate of Mailing or Transmission" under § 1.8 of this chapter.

(10) Knowingly violating or causing to be violated the requirements of § 1.56 or § 1.555 of this subchapter.

(11) Except as permitted by § 1.52(c) of this chapter, knowingly filing or causing to be filed an application containing any material alteration made in the application papers after the signing of the accompanying oath or declaration without identifying the alteration at the time of filing the application papers...

15) Signing a paper filed in the Office in violation of the provisions of § 10.18 or making a scandalous or indecent statement in a paper filed in the Office.

(16) Willfully refusing to reveal or report knowledge or evidence to the Director contrary to § 10.24 or paragraph (b) of § 10.131...

18) In the absence of information sufficient to establish a reasonable belief that fraud or inequitable conduct has occurred, alleging before a tribunal that anyone has committed a fraud on the Office or engaged in inequitable conduct in a proceeding before the Office.

d) A practitioner who acts with reckless indifference to whether a representation is true or false is chargeable with knowledge of its falsity. Deceitful statements of half-truths or concealment of material facts shall be deemed actual fraud within the meaning of this part...

§ 10.24 Disclosure of information to authorities.

(a) A practitioner possessing unprivileged knowledge of a violation of a Disciplinary Rule shall report such knowledge to the Director.

(b) A practitioner possessing unprivileged knowledge or evidence concerning another practitioner, employee of the Office, or a judge shall reveal fully such knowledge or evidence upon proper request of a tribunal or other authority empowered to investigate or act upon the conduct of practitioners, employees of the Office, or judges.

§ 10.31 Communications concerning a practitioner's services.



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(a) No practitioner shall with respect to any prospective business before the Office, by word, circular, letter, or advertising, with intent to defraud in any manner, deceive, mislead, or threaten any prospective applicant or other person having immediate or prospective business before the Office.

§ 10.56 Canon 4.

A practitioner should preserve the confidences and secrets of a client.

§ 10.57 Preservation of confidences and secrets of a client.

(a) “Confidence” refers to information protected by the attorney-client or agent-client privilege under applicable law. “Secret” refers to other information gained in the professional relationship that the client has requested be held inviolate or the disclosure of which would be embarrassing or would be likely to be detrimental to the client.

(b) Except when permitted under paragraph (c) of this section, a practitioner shall not:

- 1) Reveal a confidence or secret of a client.
- (2) Use a confidence or secret of a client to the disadvantage of the client.

(3) Use a confidence or secret of a client for the advantage of the practitioner or of a third person, unless the client consents after full disclosure.

§ 10.61 Canon 5.

A practitioner should exercise independent professional judgment on behalf of a client.

§ 10.65 Limiting business relations with a client.



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A practitioner shall not enter into a business transaction with a client if they have differing interests therein and if the client expects the practitioner to exercise professional judgment therein for the protection of the client, unless the client has consented after full disclosure.

§ 10.76 Canon 6.

A practitioner should represent a client competently.

§ 10.77 Failing to act competently.

A practitioner shall not:

(a) Handle a legal matter which the practitioner knows or should know that the practitioner is not competent to handle, without associating with the practitioner another practitioner who is competent to handle it.

(b) Handle a legal matter without preparation adequate in the circumstances.

(c) Neglect a legal matter entrusted to the practitioner.

§ 10.78 Limiting liability to client.

A practitioner shall not attempt to exonerate him-self or herself from, or limit his or her liability to, a client for his or her personal malpractice.

§ 10.83 Canon 7.

A practitioner should represent a client zealously within the bounds of the law.

§ 10.84 Representing a client zealously.

(a) A practitioner shall not intentionally:



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(1) Fail to seek the lawful objectives of a client through reasonable available means permitted by law and the Disciplinary Rules, except as provided by paragraph (b) of this section. A practitioner does not violate the provisions of this section, however, by acceding to reasonable requests of opposing counsel which do not prejudice the rights of the client, by being punctual in fulfilling all professional commitments, by avoiding offensive tactics, or by treating with courtesy and consideration all persons involved in the legal process.

(2) Fail to carry out a contract of employment entered into with a client for professional services, but a practitioner may withdraw as permitted under §§ 10.40, 10.63, and 10.66.

(3) Prejudice or damage a client during the course of a professional relationship, except as required under this part.

(b) In representation of a client, a practitioner may:

(1) Where permissible, exercise professional judgment to waive or fail to assert a right or position of the client.

(2) Refuse to aid or participate in conduct that the practitioner believes to be unlawful, even

2) Refuse to aid or participate in conduct that the practitioner believes to be unlawful, even though there is some support for an argument that the conduct is legal.

§ 10.85 Representing a client within the bounds of the law.

(a) In representation of a client, a practitioner shall not:

(1) Initiate or defend any proceeding before the Office, assert a position, conduct a defense, delay a trial or proceeding before the Office, or take other action on behalf of the practitioner's client when the practitioner knows or when it is obvious that such action would serve merely to harass or maliciously injure another.

(2) Knowingly advance a claim or defense that is unwarranted under existing law, except that a practitioner may advance such claim or defense if it can be supported by good faith argument for an extension, modification, or reversal of existing law.

(3) Conceal or knowingly fail to disclose that which the practitioner is required by law to reveal.

(4) Knowingly use perjured testimony or false evidence.

(5) Knowingly make a false statement of law or fact.

(6) Participate in the creation or preservation of evidence when the practitioner knows or it is obvious that the evidence is false.

(7) Counsel or assist a client in conduct that the practitioner knows to be illegal or fraudulent.

(8) Knowingly engage in other illegal conduct or conduct contrary to a Disciplinary Rule.



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(b) A practitioner who receives information clearly establishing that:

(1) A client has, in the course of the representation, perpetrated a fraud upon a person or tribunal shall promptly call upon the client to rectify the same, and if the client refuses or is unable to do so the practitioner shall reveal the fraud to the affected person or tribunal.

(2) A person other than a client has perpetrated a fraud upon a tribunal shall promptly reveal the fraud to the tribunal.

§ 10.87 Communicating with one of adverse interest.

During the course of representation of a client, a practitioner shall not...:

(b) Give advice to a person who is not represented by a practitioner other than the advice to secure counsel, if the interests of such person are or have a reasonable possibility of being in conflict with the interests of the practitioner's client.

§ 10.110 Canon 9.

A practitioner should avoid even the appearance of professional impropriety.

§ 10.112 Preserving identity of funds and property of client.

3) Maintain complete records of all funds, securities, and other properties of a client coming into the possession of the practitioner and render appropriate accounts to the client regarding the funds, securities, or other properties.

(4) Promptly pay or deliver to the client as requested by a client the funds, securities, or other properties in the possession of the practitioner which the client is entitled to receive.

Furthermore, Mr. Moatz, on behalf of the Company, I request copies of all original documents filed on the Company's behalf and all communications and records thereto as a means for the Company to amend, if necessary, this Written Statement with subsequent allegations and the respective patent applications relating thereto. Moreover, I would request, if possible, that your Office also conduct a search into any and all patents filed relating to Messrs. Kenneth Rubenstein, Raymond Joao, Steven Becker, Douglas Boehm, William Dick, Brian Utley, and Real3D filed after August 1998, whether as inventors, attorney(s) of record, assignor, or any and all involvement whatsoever in any patent applications or patents issued as the Company is in need of knowing, as a result of the above allegations, that there are no further unpublished patent applications or patents issued that utilize the disclosed proprietary Company techniques described herein.



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Finally, the Company requests expedited review of the above referenced allegations and further requests that your office work in conjunction with the Bar Association of the State of New York pertaining to Rubenstein and Joao, and later with the Bar Association of the Commonwealth of Virginia with respect to Dick (soon to be filed), with the Bar Association of the State of Wisconsin with respect to Becker (soon to be filed), and, finally, with the Bar Association of the State of Illinois with respect to Boehm (soon to be filed).

Very truly yours,

IVIEWIT HOLDINGS, INC.

By: _____

P. Stephen Lamont
Chief Executive Officer



Exhibit A

Contained on the enclosed CD-ROM are the following items, most items are in Adobe PDF format. Media files are in Microsoft Media Player.

- ❖ New York Bar Complaint, Raymond Joao, Esq.
First Judicial Department Departmental Disciplinary Committee
Thomas J. Cahill
Chief Counsel
61 Broadway, 2nd Floor
New York, New York 10006
- ❖ New York Bar Complaint, Kenneth Rubenstein, Esq.
First Judicial Department Departmental Disciplinary Committee
Thomas J. Cahill
Chief Counsel
61 Broadway, 2nd Floor
New York, New York 10006
- ❖ The Florida Bar Complaint, Christopher C. Wheeler, Esq. (not a registered patent attorney)
Lorraine Christine Hoffman, Esq.
Cypress Financial Center, Suite 835
5900 North Andrews Avenue
Fort Lauderdale, Florida 33309
- ❖ Police Reports – Boca Raton PD
Stolen Patents
Stolen Cash and Investment Funds
- ❖ Taped conversations as evidence and statements (Windows Media Player files or WAV)
- ❖ Shareholder Letters
- ❖ Evidence and Exhibits used in Bar Complaints
- ❖ Documents Pertaining to Schiffrin & Barroway LLP legal engagement and investment



Exhibit B



[Insert Flow Chart or “Jet Stream” Chart]



Exhibit C



[Insert Counterclaim]