

Attorney & Gary E. Perlmuter Counselor

February 24, 2016

Via Email Only: steve@projectkudosgroup.com

Mr. Steven Wright
Exit Strategy, LLC
c/o Project Kudos Group
Suite 4 & 5, Malvern House
New Rd., Solihull
West Midlands, B91 3DL
UK

Re: Right Buy Properties, LLC

Exit Strategy December 12, LLC et al. v. Ronald Mackie, et al.

Wayne County Circuit Court Case No. 14-008840-CZ

Conclusion of the Case

Dear Mr. Wright:

This letter is an update regarding above-referenced lawsuit and the Preliminary Injunction Order we previously obtained from the Court, which can be shared with the Exit Strategy investors. All of the information contained in this letter is based upon public information. This letter is not, and shall not be deemed, a waiver of your (i.e., the plaintiffs') attorney-client privilege.

As you know, we are pleased to advise you that this lawsuit has been concluded, and the plaintiffs have prevailed in this case! Attached for your file is a copy of the Judgment against Right Buy Properties, LLC, Right Buy Properties Holdings, LLC, and RBP Capital Holdings, LLC, jointly and severally, in the sum of Fifty Million (\$50,000,000.00) U.S. Dollars. The Judgment was entered by the Court on February 16, 2016.

Also attached for your file is a copy of the Order of Dismissal entered by the Court on February 16, 2016 with respect to all other parties to the lawsuit. The Order of Dismissal forever dismisses, with prejudice, all other claims, counter-claims, and cross-claims in the case that were alleged or that could have been alleged by any party. This means, among other things, that no party has prevailed on any claim against you, Lee or any of the plaintiffs, and that you have been exonerated from any and all such claims in this case.

As you know, the Court previously entered a Preliminary Injunction Order ("Injunction") on July 17, 2014. The Injunction was intended, among other things, to preserve all real estate assets which were titled to any defendants, and to require the release and payment of all escrow funds being held by the defendants into a new escrow account controlled by my law firm. This Injunction has now been resolved as well. Simultaneously with the entry of the above-referenced Order of Dismissal on February 16, 2016, the Court also entered two (2) additional Orders, one (1) against the Metro Equity Services/Mitrius defendants group and one (1) against the RBP/Mackie defendants group, to bring finality to the remaining assets covered by the Injunction. Specifically, the Court ordered that all remaining real properties and funds held in escrow pursuant to the Injunction and subsequent Orders be conveyed and transferred over to the plaintiffs. Now that you have received the remaining properties, you are able to maintain and renovate them for rental and/or resale, instead of merely preserve them from tax foreclosures and Detroit Land Bank forfeitures.

Even though the RBP case is concluded, we will continue to assist you with the pending and occasional Detroit Land Bank matters, as well as various Wayne County quiet title matters. This work is ongoing, but also brings finality to title and possession issues and disputes that occasionally arise from third parties as to some of the Exit Strategy properties.

We look forward to continuing our legal representation and will speak with you soon.

Very truly yours, PERLMUTER LAW, P.C.

Gary E. Perlmuter

Peter W. Joelson, Esq.

cc:

STATE OF MICHIGAN IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

Exit Strategy December 12, LLC; et al.,

Case No. 14-008840-CZ Hon. Brian Sullivan

Plaintiffs

Ronald Mackie, et al;

Defendants

CONSENT JUDGMENT AGAINST RIGHT BUY PROPERTIES HOLDINGS, LLC, RIGHT BUY PROPERTIES, LLC, AND

and

v.

Ronald Mackie, et al

Counter-Plaintiffs/Third-Party Plaintiffs,

Investus Exit Strategy (Michigan), LLC,, et al

Counter-Defendants,

and

Steven Wright, et al

Third-Party Defendants.

14-008840-CZ

RBP CAPITAL HOLDINGS LLC

FILED IN MY OFFICE WAYNE COUNTY CLERK 2/16/2016 11:23:52 AM CATHY M. GARRETT

/s/ Belinda Roberts

JOELSON ROSENBERG, PLC By: David W. Warren (P32449) Peter W. Joelson (P51468) 30665 Northwestern Highway, Suite 200 Farmington Hills, MI 48334 (248) 855-2233 / (248) 855-2388 - Fax dwwarren@joelsonrosenberg.com pjoelson@joelsonrosenberg.com Attorneys for Plaintiff

JAMES P. O'NEILL & ASSOCIATES By: James P. O'Neill (P35028) 1499 West Horseshoe Bend Drive Rochester Hills, MI 48306. (248) 656-8080 / (248) 656-6501 - Fax jponeill110@gmail.com Attorneys for Defendant Ronald Mackie, Right Buy Properties Holdings, LLC, et al.

STIPULATED CONSENT JUDGMENT IN FAVOR OF PLAINTIFFS AND AGAINST DEFENDANTS RIGHT BUY PROPERTIES HOLDINGS, LLC, RIGHT BUY PROPERTIES, LLC, AND RBP CAPITAL HOLDINGS LLC

At a session of said Court, held in the Circuit Court, City of Detroit, County of Wayne, State of Michigan 2/16/2016

Present: HONORABLE BRIAN R. SULLIVAN

Upon the stipulation of the parties pursuant to the terms of a Settlement Agreement, and the Court being otherwise fully advised in the premises.

IT IS HEREBY ORDERED AND ADJUDGED that Defendants Right Buy Properties Holdings, LLC, a Michigan limited liability company and Right Buy Properties, LLC, a Michigan limited liability company, and RBP Capital Holdings LLC, a Michigan limited liability company hereby consent, jointly and severally, to judgment in favor of Plaintiffs in the amount of \$50,000,000.00, plus interest accruing from the date of entry at the applicable statutory rates, together with costs and attorney fees incurred in this action, as well as costs and attorney fees incurred in collection of the amount due pursuant to this Consent Judgment, less any payments made by such Defendants pursuant to the terms of the Settlement Agreement between the parties.

IT IS SO ORDERED AND ADJUDGED.

The Court retains jurisdiction over this matter.

THIS ORDER RESOLVES THE LAST PENDING CLAIM AND CLOSES THE CASE

/s/ Brian R. Sullivan

Dated: February <u>(6)</u>, 2016

HON. BRIAN SULLIVAN

Approved as to form and for entry:

Right Buy Properties Holdings, LLC, a Michigan limited liability company and Right Buy Properties, LLC, a Michigan limited liability company, and RBP Capital Holdings LLC, a Michigan limited liability company;

By: /s/ Ronald Mackie

Ronald Mackie

Its: Authorized Representative

/s/ James P. O'Neill

JAMES P. O'NEILL & ASSOCIATES

By: James P. O'Neill (P35028)

Attorneys for Defendant Ronald Mackie, Right

Buy Properties Holdings, LLC, et al

STATE OF MICHIGAN IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

Exit Strategy December 12, LLC; et al.,

Case No. 14-008840-CZ Hon. Brian Sullivan

Plaintiffs

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Ronald Mackie, et al;

Defendants

and

Ronald Mackie, et al

Counter-Plaintiffs/Third-Party Plaintiffs,

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WAYNE COUNTY CLERK 2/16/2016 11:22:56 AM CATHY M. GARRETT

FILED IN MY OFFICE

14-008840-CZ

/s/ Belinda Roberts

Investus Exit Strategy (Michigan), LLC,, et al

Counter-Defendants,

and

Steven Wright, et al

Third-Party Defendants.

JOELSON ROSENBERG, PLC
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Attorneys for Defendant Aleksas Mitrius,
Metro Equity Services, Inc., Metro Title
Corporation, Morkus Mitrius a/k/a Mark
Mitrius, Rita Mitrius and Mitra Investment &
Service Co., Inc.

JAMES P. O'NEILL & ASSOCIATES
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jponeill110@gmail.com
Attorneys for Defendant Ronald Mackie,
Right Buy Properties Holdings, LLC, et al

Stipulated

ORDER OF DISMISSAL WITH PREJUDICE AND WITHOUT COSTS OF COMPLAINT, COUNTER COMPLAINT AND THIRD PARTY COMPLAINT AS TO CERTAIN PARTIES IDENTIFIED BELOW

Upon the stipulation of the parties by their undersigned counsel pursuant to the terms of a Settlement Agreement, and the Court being otherwise fully advised in the premises;

IT IS ORDERED:

- A. The Complaint, as amended, filed by Plaintiffs against Metro Equity Services, Inc., a Michigan corporation; Metro Title Corporation, a Michigan corporation; Aleksas Mitrius, an individual; Morkus Mitrius, A/K/A Mark Mitrius, an individual, Rita Mitrius, an individual, Renee Montreuil, an individual, and Mitra Investment & Service Co., Inc., a Michigan corporation (collectively the "Mitrius Defendants") is DISMISSED WITH PREJUDICE AND WITHOUT COSTS.
- B. The Counter Complaint filed by the Mitrius Defendants against Exit Strategy December 12, LLC; Exit Strategy November 12, LLC; Exit Strategy October 12, LLC; Exit Strategy September 12, LLC; Exit Strategy August 12, LLC; Exit Strategy July 12, LLC; Exit Strategy June 12, LLC; Exit Strategy February 14, LLC; Exit Strategy January 14, LLC; Exit Strategy December 13, LLC; Exit Strategy November 13, LLC; Exit Strategy October 13, LLC; Exit Strategy September 13, LLC; Exit Strategy August 13, LLC; Exit Strategy July 13, LLC; Exit Strategy June 13, LLC; Exit Strategy May 13, LLC; Exit Strategy April 13, LLC; Exit Strategy March 13, LLC; Exit Strategy February 13, LLC; Exit Strategy January 13, LLC; Investus Exit Strategy (Michigan) LLC; Investus (Michigan), LLC; Investus Limited, a foreign corporation; Real Estate Investments USA, PLC, a foreign corporation; Bond January 14, LLC; and PHILIP SHEPPARD, an individual; BRENDAN DONNELLY, an individual; JUSTEN TILLMAN, an individual and Bluant Properties USA, Inc. is DISMISSED WITH PREJUDICE AND WITHOUT COSTS.
- C. The Third Party Complaint filed by the Mitrius Defendants against Investus Exit Strategy (Michigan), LLC, a Michigan limited liability company; Investus (Michigan), LLC, a

Michigan limited liability company; and InvestUS Limited, a Seychelles International Business Corporation, Investus Limited, a United Kingdom private limited company; Project Kudos Limited, a United Kingdom private limited company; Project Kudos USA Limited, a United Kingdom private limited company; and Project Kudos Group Asia Pte. Ltd., a Singapore company, Steven Wright, and Lee Smith is DISMISSED WITH PREJUDICE AND WITHOUT COSTS.

D. Plaintiffs' remaining claims and causes of action against Defendants Ronald Mackie; an individual, Right Buy Properties Holdings, LLC, a Michigan limited liability company and Right Buy Properties, LLC, a Michigan limited liability company, and RBP Capital Holdings LLC, a Michigan limited liability company are not dismissed pursuant to this Order and remain pending.

THIS IS NOT A FINAL ORDER AND DOES NOT CLOSE THE CASE

/s/ Brian R. Sullivan

Dated: February 16, 2016
the parties stipulate to the order and
Approved as to form only and for entry:

HON. BRIAN SULLIVAN

/s/ Peter W. Joelson
JOELSON ROSENBERG, PLC
By: David W. Warren (P32449)
Peter W. Joelson (P51468)
Attorneys for Plaintiffs

/s/ Victor A. Veprauskas IV

LAMBERT LESER

By: Victor A. Veprauskas IV (P59278)

Joseph F. Yamin (P33905)

Attorneys for Defendant Aleksas Mitrius,
Metro Equity Services, Inc., Metro Title

Corporation, Morkus Mitrius a/k/a Mark

Mitrius, Rita Mitrius and Mitra Investment &

Service Co., Inc.

/s/ Gayle S. McGregor
GAYLE SWEET McGREGOR, PLLC
Attorneys for Defendant Renee Montrevil only

SETTLEMENT AGREEMENT

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Order releasing, assigning and conveying to Plaintiffs any rights, title and interest that the Mitrius Defendants may have to any of the money and/or real property subject to the Orders