

# NATHANIEL P. REED

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October 25, 2017

Mr. Ethan J. Loeb, Esq.  
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100 North Tampa Street, Suite 20150  
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RE: LAKE POINT v. MAGGY HURCHALLA  
CASE NUMBER: 432013 CA 003121  
MARTIN COUNTY, FLORIDA

Dear Attorney Loeb,

I must tell you that I was shocked and disappointed in you when I received and read your letter to me dated October 19, 2017. I pride myself on my reputation of being an honest person. Though I wish that I did not have to respond to your disparaging personal accusations against my character, I know I must.

As you know, you sent me a subpoena that commanded my presence in front of you for deposition because I was listed on a witness list in your client's law suit against my friend Maggy Hurchalla. I did not protest nor resist, I appeared. I did not engage an attorney. I simply followed your instructions, appeared and brought you the documents you requested. Then I answered the questions you asked as I understood the question.

When you started the deposition, I remember you telling me that **"This is not a memory test. This is not designed to, you know, if you remember certain events on certain days. Just to get your general understanding."** You asked me if that sounded fair to me. I agreed that it sounded fair.

Now that I have read your letter, it is clear to me, that it was your intention that my deposition was a memory test and that you were not just trying to get my general understanding.

That being said, let me address some of the misstatements spun through your letter.

Early in the deposition we discussed the September 2, 2014, email to Mark Tomasik, the Op ED piece, Nathaniel Reed. I told you these are the only correspondence regarding the Lake Point SLAM suit against Maggy. This particular email is something that occurred two and a half years before my May 5, 2017 deposition.

Then later in the deposition you asked me whether I knew that the SFWMD wanted to buy the Lake Point property in 2006, eleven years ago. I remembered you telling me in the beginning that you were not going to ask if I remembered certain events on certain dates. When I told you that it was eleven years ago, I remember you reassuring me and saying words to that effect, **"I am just trying to find out what you know and you don't know. And if you don't remember that's OK. Not a big deal."**

Now on reflection, I realize that during the deposition that when you were asking me if I was **"familiar with something"**, you were really asking if I was simply **aware** of something. Being **"familiar with something"** means to me that I have investigated it, I am well versed in it or I am well informed and knowledgeable about it.

When I answered YES, that I was **"familiar with"** the Lake Okeechobee Protection Plan, that was because I have investigated it, I am well versed in it, and I am well informed and knowledgeable about it.

For those same reasons, I answered YES, when you asked me if I was **"familiar with"** the Comprehensive Everglades Management Plan.

But when you asked me if I was familiar with the Lake Point Project, I answered NO. After which you ask me a half dozen questions on whether I had done any investigations into the specifics of your Project. To each, I answered NO.

Then I went on to tell you that my only interest in your project was that I had heard of Lake Point's desire to sell water to Palm Beach County and that I had had a cursory interest in what is the intention of the project. Then you asked me more questions about whether I knew about your reclamation plan, your levees and your reservoirs...and I said, **"I do not."**

So again, I am not familiar with your project. Am I aware of it, YES. Have I been aware of it for many years, YES. Have I been watching the newspaper articles on it for many years, YES. Have I been a watchful opponent of the Lake Point planned sale of water to Palm Beach County for many years, YES.

After my May 5, 2017 Deposition, I became **"aware of"**, but not **"familiar with"**, the August 23, 2017, MEDIATED SETTLEMENT AGREEMENT. After perusing it, including Section VI **"Lake Point Entitled to All Revenue of Any Kind"**, I am again concerned about, among other things, Lake Point's planned sale of water to Palm Beach County. I wrote the October 4, 2017 email requesting help with a matter, important to me and important to all the citizens of Florida.

I stand by my sworn testimony and I stand by my request for help.

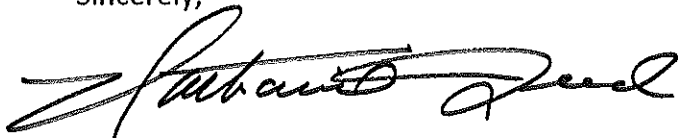
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In closing, let me just say, that I take your letter as a threat against me personally and as your attempt, as a member of the Bar, to try to intimidate me to change my testimony. I find your actions unprofessional.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathaniel P. Reed". The signature is written in a cursive, flowing style with a large initial "N" and a long horizontal stroke.

Nathaniel P. Reed