

**SHERMAN
BOSEMAN**
LEGAL GROUP

November 16, 2020

RE: Estate of Chadwick Boseman

Dear Mr. George:

As you already know, my firm has been retained by the Boseman Family, including Leroy, Carolyn, Derrick and Kevin Boseman, to represent their interests in the probate case initiated by your client, Simone Boseman, for Chadwick Boseman's estate. In addition to my firm, we have also retained the services of Terry Franklin of Sacks, Glazier, Franklin & Lodise LLP to serve as local and co-counsel in this case.

To ensure that all parties are operating with the same general information, we are requesting that Simone voluntarily agree to execute a release for Chad's medical records and that your firm digitally image his cell phones, computers, iPads and any other electronically stored information to preserve any and all relevant information that may exist on any of these devices. We also request copies of any and all financial records from January 1, 2020 to present related to any bank accounts that were in Chad's name, including, but not limited to, any accounts that were modified to add new signatories, beneficiaries or any other third-parties.

In addition to the foregoing, we have communicated with Chad's entertainment lawyer – Julian Zajfen of Ziffren Brittenham LLP – and he is going to provide all parties to this probate case with copies of Chad's contracts so that we can all understand what outstanding payments exist, how any royalties are distributed and any other financial windfalls that may need to be included in the probate case. I have already provided Mr. Zajfen with your contact information and he has assured me that we will all receive the contracts and related information subject to us confirming

our confidentiality obligations. I expect to receive this information no later than next week and you will be copied on the communication.

While we fully understand that we will be entitled to all of this information and more during the discovery phase of the probate case, I truly believe this process will operate much more smoothly if the parties voluntarily work together to disclose any and all information that may be relevant to the case. Therefore, my requests for information also extend to any other information in the possession, custody and control of Simone that is relevant to any financial or personal matter that may have any impact whatsoever on the probate case, which necessarily includes any financial or other benefits that Simone has received as a result of her marriage to Chad.

Our only hope in this case is to fulfill Chad's actual intent and ensure that the distribution of assets aligns with the free will that God gave him. Nothing more is expected and we look forward to working with you to bring this case to a conclusion as quick and easy as possible.

Please let me know when I can expect to receive the information requested and if you have any questions or concerns, please do not hesitate to contact me at your convenience.

Regards,

A handwritten signature in black ink, appearing to read 'F. Allen Boseman, Jr.', is written over a large, light gray, stylized watermark that resembles a large letter 'A' or a similar abstract shape.

F. Allen Boseman, Jr.

FAB/vs

cc: Mr. Terry Franklin
Mr. Adam Fried



EXHIBIT B

December 1, 2020

VIA E-MAIL

Re: Estate of Chadwick Boseman

Dear Mr. Boseman:

I have been retained by Simone Boseman, in her capacity as surviving spouse, heir and beneficiary in the estate of her late husband, Chadwick Boseman. I have your letter of 16 November 2020 directed to William George, Esq. I am responding in his stead.

I will leave aside for now that your correspondence purports to be on behalf of your family members, some of whom have an interest in the decedent's probate estate while others have no interest whatever. With regard to the content and tenor of your letter, the sudden misguided and aggressive nature of your correspondence is both a disappointment to my client and requires now an entirely different posture.

As you know, my client has been magnanimous in her offers to share information and include your clients gratuitously in Ms. Boseman's projects to honor her late husband's legacy. Your family has now forced a situation which now will have to proceed by the book. I intend to protect my client from the bogus and avaricious claims insinuated by your correspondence. I am certainly not in a position to entertain the wide-ranging demands you make when your clients have not, and cannot, assert any colorable claim in a court of law. We will not accede to demands under some sort of pretense that there is a "case" when none exists and would be frivolous in any event.

The decedent's actual legal heirs will be entitled to information in the proper course of the administration of the probate estate. In the event your clients make the miscalculation to litigate what would be utterly specious claims and to sully the image of a magnificent role model for so

F. Allen Boseman, Jr.
December 1, 2020
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many who has been tragically taken from the world far too soon, that will be on them, and I assure you it will be met with all means at our disposal.

In the meanwhile, all rights and remedies are reserved.

Very truly yours,



Adam F. Streisand
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH:4842-2968-8531.1

cc: Terrence M. Franklin, Esq. (via email)
William C. George, Esq. (via email)



EXHIBIT C

**SHERMAN
BOSEMAN**
LEGAL GROUP

August 23, 2021

RE: Estate of Chadwick Boseman

Dear Mr. George and Mr. Streisand,

On or around November 16, 2020, my office sent you a correspondence requesting that Simone Boseman (“Simone”) preserve and retain all electronically stored information (“ESI”) and any other information in her possession, custody or control that may be relevant to the Estate of Chadwick Boseman and the final wishes of Chadwick Boseman (“Chad”). At that time, this request was met with resistance because there was apparently a misunderstanding as to why this information was asked to be preserved and retained.

To clear up any misunderstanding, on July 28, 2021, we participated in a conference call with Mr. George to explain the reasons we requested that certain information be preserved and retained. For your convenience, each category of information will be discussed below.

Release of Chadwick Boseman's Medical Records

As you know, on August 28, 2021, Chadwick passed away after an intense battle with colon cancer. While Chad's family knew his odds of survival were relatively low, they were shocked to find him deceased on the floor of his bedroom on that fateful day. To get an understanding of what exactly led to his death on that particular day, Chad's family informed Simone that they wanted to get an autopsy, but she opposed this decision because she indicated that his body had been through enough and she did not want to disturb it further. Although the family greatly respected and appreciated Simone's perspective, they had to know what expedited his death on August 28, 2020 and moved forward with the autopsy.

On September 1, 2020, an autopsy was conducted and it revealed some startling results that raised some serious concern about the medical advice and/or therapy he was receiving. First, the Toxicology Report found that 0.12 mg/L of hydromorphone was in his system at the time of death and this number was extremely troubling because the therapeutic level of the medication was 0.008-0.032. This means that the amount of hydromorphone in Chad's system was nearly four times the highest therapeutic concentration. As a result, the autopsy revealed that the Hydromorphone was "well above therapeutic levels and well into the toxic range" and was "sufficiently high to cause **significant respiratory depression** and **possible respiratory failure** and **expedited death.**"

These revelations caused Chad's family to seek information about the medical advice and counsel he received from his doctors and any other information about who was responsible for administering the hydromorphone to Chad consistent with protocols put in place by his doctors. This is why a request was made for the release of Chad's medical records. For all of these reasons, Chad's family renews their request for Simone to release his medical records. Please confirm that she will honor this request.

Information Related to Chad's Financial Records

Based upon information received from Chad's family and an affidavit signed by Felicia Speed (Chad's best friend), we understand that Chad had Simone record his last financial wishes on a cell phone before and after they were married on or around August 21, 2020. While we understand that these recordings may not legally qualify as a "Will," it has been our understanding all along that Simone's only motivation in this probate matter is to honor Chad's final requests concerning the disbursement of his financial resources.

Pursuant to the information we have obtained, Chad explained how his bank accounts should be disbursed that had no beneficiaries: (1) all funds in the "Chadwick Boseman, Inc." account at City National Bank ("City National") accounts would be disbursed evenly to Chad's parents and his brothers, Kevin and Derrick Boseman; and, (2) all funds in the "Retirement Account" at City National would be disbursed evenly to Chad's nephews and nieces. We also understand that a

City National Bank account with approximately \$780,000 has already been disbursed to Chad's parents and brothers and that a money market account with approximately \$304,000 has already been disbursed to Chad's nephews and nieces. It is also our understanding that Chad made it clear that all funds in the Bank of America account would go to Simone. Lastly, upon information and belief, there should only be one bank account with no beneficiary on it that Chad did not specifically instruct to go to his family or Simone. Upon information and belief, Chad's family and Simone explicitly agreed and promised to abide by Chad's final requests in exchange for an orderly and peaceful resolution of Chad's finances and personal matters.

To confirm the accuracy of this information, we are requesting that Simone provide us with the recordings Chad made before he passed that concern his final financial wishes and any information related to those accounts concerning the account name, any designated beneficiaries, the account balance and any changes made to the account within the last year of Chad's life. With this level of transparency, the information itself may resolve any confusion and/or disputes about how Chad wanted his bank accounts to be disbursed. Let me be clear – we are not trying to deprive Simone of any financial resources that Chad left for her but, instead, are only concern is ensuring that any instructions Chad left for his family are followed, even if they cut against my clients' interests. Please confirm that Simone will produce all recordings of Chad discussing his financial wishes and provide his family with the bank information requested.

Information Related to Chad's Royalties and Residuals

In addition to the statements concerning Chad's wishes about his bank accounts, we also have sworn testimony that Chad specifically instructed – in his last recording – that 90% of all royalties/residuals from his films should be split evenly among his parents and two brothers and the remaining 10% would be a tithe for the church. While there may be some disagreement about this testimony, we all can agree that Chad's parents are *at least* entitled to 50% of any royalties and residuals owed to Chad so there must be some level of transparency about the relevant contracts and agreements for royalties and residuals. As indicated in our November 16, 2020 letter, we communicated with Chad's entertainment lawyer – Julian Zajfen of Ziffren Brittenham LLP – and he was willing to provide Chad's family and Simone with copies of all of Chad's contracts so that we can all understand what outstanding payments exist, how any royalties/residuals are distributed, when any royalties/residuals are distributed and any other financial windfall that may need to be included in the probate case. This appeared to be an appropriate plan for the circumstances but, for some reason, Simone objected to this arrangement as indicated by Mr. Zajfen. We would like to revisit this arrangement and request Simone's consent in producing these records from Mr. Zajfen for the benefit of everyone involved. Please confirm that Simone will honor this request.

William C. George, Esq.
Adam F. Streisand, Esq.
August 23, 2021
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Final Recordings of Chad

As you know, Chad was well-respected, admired and even adored by millions, if not billions, of fans worldwide and any electronically stored information containing his last recorded (or one of his last recorded) words has independent and significant value and should be included as part of his estate. While we have already requested the voluntary production of any such recordings, we genuinely believe that they should be identified and included as an asset of the estate. Please confirm that Simone will include these recordings as part of the estate.

Finally, I want to be clear about our intentions again. Chad's family only wants to ensure that Chad's final wishes are honored, even if you and Simone do not believe that the recordings qualify as a Will. We all love Chad, including me (cousin), and I am sure we can work through these issues amicably in the interests of transparency and respecting Chad's desires for his enduring legacy. We look forward to receiving a response and please understand that we respectfully raise these issues understanding the sensitive nature of all these topics.

Please let me know if you have any questions or concerns and we will endeavor to respond to any inquiry as soon as possible.

Regards,



F. Allen Boseman, Jr.

FAB/vs



EXHIBIT D

September 2, 2021

VIA E-MAIL

F. Allen Boseman, Esq.

Re: Estate of Chadwick Boseman

Dear Mr. Boseman:

This will respond to your letter of 23 August 2021 addressed to William George, Esq. and me. I apologize for the delay. I had intended to send this earlier. I am out of the country and it escaped my attention that it had not been sent earlier.

For a whole host of reasons I feel no need to enumerate at this time, your claim that you and your family members are concerned with Mr. Boseman's memory is belied by your and their words and actions. Perhaps the single most revealing detail, as case in point, is the fact that we heard nothing from you for nine months and now, within days of the one-year anniversary of Mr. Boseman's passing, you chose to send this disturbing letter without any concern, sensitivity or even consciousness of what this time, or your letter, would mean to someone who truly loved him and suffers his loss every day and especially at this time of remembrance.

As for the specifics of your letter, I will respond only in brief, which is more than is necessary. If it were true that your family believes we should honor Mr. Boseman's "wishes" without being constrained by the law, why did you not propose that we effectuate the trust document Mr. Boseman instructed his attorney to prepare just four days before his death? The answer to that question is easy enough: your family thinks we should ignore not only the law, but also Mr. Boseman's actual wishes. My client also will not aid or abide the continued nonsense following the shameful and pointless defilement of her husband's body.

F. Allen Boseman, Esq.
September 2, 2021
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All of your other assertions and requests, they are denied. My client will, however, provide the information that is necessary and appropriate to provide in executing the duties of her role as administrator of the estate at the appropriate time.

Sincerely,



Adam F. Streisand
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH:4851-6453-4264.1

cc: William George, Esq.