

April 22, 2021

FROM THE DESK OF
ALEX S. HALBACH

VIA ELECTRONIC MAIL (jhines@craryhuff.com)

John M. Hines
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*Re: Sunrise Cove Time-Share Association, Inc.
Our File #6202.01*

Dear John:

I have reviewed your letter dated February 5, 2021 and your corresponding arguments, but do not find them persuasive based upon the facts of this situation.

First, you make the argument, without support or explanation, that time-share associations are materially different from a homeowners' association, but provide no analysis or explanation as to the distinction.

Further, you have provided no authority in the State of Iowa that would prohibit the disclosure of information that Good Management, LLC, as the contractual manager of the Sunrise Cove Time-Share Association, Inc. (the "*Association*"), is obligated to produce pursuant to the Bylaws of the Association, which is an agreement entered into between *all* members of the Association.

Further, in our last telephone conversation, we discussed whether or not your client would be open to providing the records, electronically, versus a physical inspection and I don't see that request addressed in your letter. In the meantime, my clients would be open to receiving the information they are entitled to receive, less the individual account ledgers. If your client is unwilling to provide the information electronically, please let me know some dates and times when your client will make the remainder of the information present.

If your client will not consider its position with respect to releasing the account ledgers, are you authorized to accept service of process on behalf of Good Management, LLC and the Association? Thank you.

Sincerely,

CUTLER LAW FIRM, LLP

A handwritten signature in blue ink that reads "Alex S. Halbach". The signature is written in a cursive style with a large, sweeping initial "A".

Alex S. Halbach
For the Firm

ASH: rek