

**VIA US MAIL & EMAIL**

May 7, 2021

George Platt  
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Re: Termination of Representation

Dear Mr. Platt:

In regards to your most recent email sent at 6:00 p.m. Wednesday, May 5, 2021, it is clear that there has been a loss of an effective attorney/client relationship. Your representation has been exactly as discussed after providing you the alternatives, pros, cons, legal and factual analysis concerning your claims. The trajectory has shifted on numerous occasions as your "goals" changed during the course of this case. It is important to note that what started as written attempts to resolve all issues without litigation was stymied by the institutional parties which led to your determination to file suit. After filing suit you decided a sit down meeting would satisfy your concerns in regards to institutional defendants while your focus on the individual defendant became more of an afterthought, and despite the individual defendants indicating that they were eager to mediate a potential resolution, you resisted any negotiations with Dr. Martin/ElluminAI for an extended period, before conditioning your willingness to meet on a requirement that a ranking official with the SBA with decision and policy making authority be present and prepared to sign off on your list of demands. When you proclaimed that you did not want to sue your own government or damage the relationship with the SBA, the litigation of claims seemed to fall by the wayside and, on several occasions, you have expressed a desire to abandon the lawsuit, indicating that filing suit alone satisfied your "goal" of getting everyone's attention.

The reticence of any defendant to sit down to a meeting has been mainly with the SBA who simply funds grant requests on an annual basis and has no oversight or official capacity to engage in the individual programs such as the one you participated in. (To correct the record, I did reach out to my SBA contact prior to service of process, and I just recently heard from that contact that the SBA will not partake in any meeting. They consider themselves much like a bank that provides an individual homeowner a home equity loan. Once the loan is funded, the homeowner has no

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claim against the bank for the acts or omissions of a contractor working on the home). Time and time again, we have endeavored to proceed with the strategy you directed and in your best interests, however, at each step your goals and desires continue to change and fluctuate, which inevitably leads to you accusing our team of retrospectively failing to accomplish your everchanging agenda. There have also been numerous occasions on which you have been determined to take independent action that is adverse to the interests we have been trying to protect and advance. Examples include communicating directly with adverse parties representing that the value of your patent and company is tens of millions of dollars (while in the litigation we are attempting to obtain a release and waiver of any right or interest in the company or patent by the same parties), and your most recent efforts to file a collateral complaint with the OIG and pursue a media campaign to broadcast all of your allegations and grievances against the parties to the litigation across the public domain. In spite of being advised repeatedly of the improvidence of these actions, which we believe to be adverse to your interests and desired outcomes and damaging to the litigation strategy, you insist on pursuing whatever action you set your mind to taking.

In short, your email and recent course of conduct establishes that you are at odds with our firm and irreconcilable differences have developed and, as such, we must withdraw from continued representation. Given the current posture of the case, with no scheduling order yet issued and no hearing scheduled or impending deadlines, our discontinuation of representation and withdrawal can be accomplished without material adverse effect on your interests, and you will be provided with sufficient time to locate and retain substitute counsel to represent you moving forward. I recommend that you seek new counsel as soon as possible to protect your interests moving forward. We intend to file a Motion with the Court seeking to withdraw our representation on Monday, May 17, 2021. If you obtain new counsel prior to then, please have your new attorney contact us so we can coordinate substituting our appearance with your new attorney and we can transfer your file to your new counsel. Once our withdrawal is finalized, any retainer amount that is currently held in escrow will be returned to you.

I wish you the best of luck moving forward.

Sincerely,

Christopher D. Buck, Esq.