

## **GROUP EXHIBIT C**

**Christopher A. Kreid**

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**From:** "Glover, Candace" <cglover@washdc.whitecase.com>  
**To:** "Christopher A. Kreid" <ckreid@msklaw.com>  
**Sent:** Tuesday, April 29, 2008 7:50 PM  
**Attach:** Michael Reese print-out showing post-petition payments to Contech.pdf; Detail\_Check No. 80102.pdf; Letter from Contech to MRH\_balance as of Dec 31 2003.pdf

Mr. Kreid,

I would like to update you regarding my efforts to obtain a copy of check no. 80102, per your request as well as to inquire about the matters detailed below.

First, a request for a copy of check no. 80102 was forwarded to the corporate headquarters of DCHC on or about January 25, 2008. Unfortunately, the corporate headquarters has not located a copy of this particular check nor could an estimate be provided regarding when a copy might be located. Alternatively, I have attached a copy of the system generated check detail for check no. 80102, which denotes the check date, check amount and invoices paid with the check. According to the check detail, check no. 80102 was issued in the amount of \$50,000.00 on October 21, 2002 in full payment of invoice numbers 80478, 88925 and 88954; and in partial payment of invoice number 89200. As it stands, this check detail remains the only information I possess which suggests the amount of check no. 80102. In the interest of time, does Contech have any documentation which shows that check no. 80102 was issued in an amount other than \$50,000.00?

Second, I have attached a print-out which shows post-petition payments made to Contech by Michael Reese. As indicated by the print-out, Contech received post-petition payments of \$115,658.75 between June 2005 and September 2006. Does Contech confirm receipt of these payments? The payment dates, invoice numbers and payment amounts are listed on the attachment.

Third, you previously explained that the letter from Contech to Michael Reese which showed an unpaid balance of \$129,000.00 as of December 31, 2003, only pertained to a single job number which was randomly selected by Contech's auditors for verification purposes. Could you provide documentation that the unpaid balance only includes a single job number? In your previous email, you indicated that the balance pertained to job number 804A014, however, the letter does not reference any job number. I have attached a copy of the letter for your review.

Fourth, last week you explained that the mechanic's lien filed by Contech against Michael Reese on January 30, 2007 for \$42,429.00 did not relate to its previously filed mechanic lien against Michael Reese. Could you provide further detail regarding why the additional mechanic's lien was filed and how, if at all, it impacts the previous mechanic's lien?

Thank you in advance. Please feel free to contact me with any questions.

-Candace Glover

Candace B. Glover  
Financial Restructuring & Insolvency  
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F: 202.629.9355  
cglover@whitecase.com

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PLEASE NOTE: The information contained in this message is privileged and confidential with transmission, please contact sender or call (202) 626-3600. Thank you.

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12/16/2008

**Christopher A. Kreid**

**From:** "Christopher A. Kreid" <ckreid@msklaw.com>  
**To:** "Candace Glover" <cglover@whitecase.com>  
**Sent:** Tuesday, May 13, 2008 6:08 PM  
**Attach:** Receipts 20050601-20080429.xls; 804A014 Job Master and AR Ledger.doc  
**Subject:** Contech Mechanic's Lien -- Michael Reese

Candace,

Your requests for additional information are somewhat puzzling, because it would appear that the Trustee is trying to find defenses to Contech's secured claim when none exist. Even more disturbing is that the Trustee has no records of certain checks that it contends Michael Reese issued. If you can't find them, directly or through third party sources, then those checks obviously don't exist. For you to continue to question Contech about Michael Reese checks that weren't received, without producing the checks is completely non-productive. Either Michael Reese must produce the checks or be bound by its inability to produce the check itself. Obviously if Michael Reese had the check, it would have produced it long ago and it hasn't. Once the check is produced, you then have the burden of proof to establish that it was negotiated by Contech.

First item: Contech conducted a complete search of its computer files looking for anything that would suggest it received check number 80102 in the amount of \$50,000.00 alleged issued on 10/21/02. Multiple searches were performed, each with different criteria. The criteria used were

- All checks received from anyone since 1/1/00 through today in the amount of \$50,000
- All checks numbered 80102
- All checks dated 10/21/02
- All checks received from Michael Reese since 1/1/00

The results of each search failed to reveal the alleged payment. Clearly, you should have been able to produce the check by now, as we have waited several months, patiently, for you to conclude your efforts to produce the check. You are certainly aware that obtaining a copy of a cancelled check normally takes less than an hour or so. The Trustee's delay in producing the check for many months now, and the explanation for its absence are no longer reasonable.

Second item: No. Contech cannot confirm the receipt of those payments you assert, without proof, were made. Contech reviewed the two pages of print-outs you provided which allege to show post-petition payments totaling \$115,658.75 between June 2005 and September 2006. Contech did not receive all of the checks listed on the first page. Furthermore, it appears that the list of checks issued is incomplete. The second page is a list of "Invoices and Credit Memos with Status of Open in Descending Order". That title suggests that the invoices have not been paid. Contech does show receipt of check number 3017590 in the amount of \$5,000.00 issued on 4/20/07. When the check amounts on the two pages are added together, Contech did not arrive at total you stated of \$115,658.75. Because of these inconsistencies in Michael Reese's records, Contech prepared a spreadsheet of all checks received from Michael Reese with check dates of 6/1/05 through 4/29/08 and received as of 4/29/08. That spreadsheet is attached. All of these payments were for work contracted and performed post petition.

Third item: Attached is a screen print of Contech's job master setup and receivable ledger for job 804A114. Contech's job master contains basic information about the job including a description, project number (if the specific job is part of a larger project), and site location. The auditor's verification letter refers to a job description entitled "Michael Reese Hospital Fire Suppression/Alarm Project K&K Building" that matches the description on Contech's job master. Additionally, the amount owed of \$129,900.00 set forth in the auditor's letter matches the amount set forth in Contech's receivable ledger.

Fourth item: The second mechanic's lien filed in January 2007 was for work contracted and performed post petition.

I trust that satisfies the entirety of your request and that Contech can expect to be paid on its secured claim in the very near future. You were going to provide me with the City of Chicago's purchase of the Michael Reese facilities and property as part of its Olympics bid preparation.

Thank you in advance for your prompt cooperation.

Sincerely,

Christopher A. Kreid  
Metge, Spitzer & Kreid  
30 West Monroe Street, Suite 630  
Chicago, Illinois 60603

Direct (312) 580-1598  
Main (312) 580-1710  
Fax (312) 580-1711

----- Original Message -----  
**From:** Glover, Candace  
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**Sent:** Tuesday, April 29, 2008 8:50 PM

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