

JOHN M. WOLFE, JR.

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EXHIBIT # 2

September 21, 2001

Mr. Jim Paris
735 Broad Street
Chattanooga, TN 37402

COPY

Re: Ernest Oliver

Dear Jim,

We're ready to go on Ernie's case. I think it is a good one. Win or lose, these facts need to be aired. I've listened to these tapes, and it's clear that those in a position to do something would give just short shrift to Ernie's concerns. I am transferring several cases to other attorneys so that I can have time to pursue these matters. Goodness knows how many hours Bob and I have already spent on this case!

I would ask that you, as trustee, get us on the case as soon as possible. The longer the case lingers, the more distrustful Ernie becomes of the process. As trustee, you should, in my opinion, call Guy Blackwell or John McCoon and find out why no information is available on the Foxworth indictment, if, indeed, there is really one out there.

There are many good reasons for pressing this case. We are mobilized, ready to go forward.

Sincerely,

Jm Wolfe
21 SEPT '01

JOHN M. WOLFE, Jr.

JMWj/tmb *copy*

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October 22, 2001

Mr. James R. Paris
735 Broad Street, Suite 404
Chattanooga, TN 37402

Re: Ernest Oliver

Dear Jim,

Please be advised that none of us involved in Ernie's case believes that moving both the state and federal courts to lift the stays against Ernie's litigating his cases can even remotely approach a Rule 11 violation. We ask that you give us the authority to do this very limited first step so we can position Ernie to pursue his full remedies. This will help us, Ernie, and his creditors.

Requesting that the stay be lifted is only asking a court for permission to litigate. How that can be frivolous is beyond me.

I may be mistaken in my assumption that you have actually made such a statement. Things repeated are often muddled. What I believe you really ought to do is write us a letter outlining what contacts you have had with potential defendants and when you will allow us to go forward as we had so planned in our meeting of many weeks ago.

Sincerely,

John Wolfe

2001 / 22 October

JOHN M. WOLFE, Jr.

JMWj/tmb

cc: Daniel Collins

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