MICHAEL AIZIN

Attorney at Law 26 Court Street Suite 2511 Brooklyn, NY 11242 Telephone (718)797-9096
Fax (718)797-9670
Email Michael@maizinlaw.com

Admitted to practice in New York, New Jersey and Florida

VIA EMAIL: mikenova12@gmail.com

July 3, 2023

Michael Novakhov 2900 Ocean Avenue, Apt. 5E Brooklyn, NY 11235

> Re: Breach of 2900 Ocean Condominium Documents Misreprentation of Authority and Illegal Attempt to Replace or Remove Current Board Members

Dear Mr. Novakhov:

Thank you for pointing out that my letter to you dated June 29. 2023 contained a reference error to the By-laws Section 2.2, when the correct reference should have been to Section 2.8. Section 2.8 of the Condominium By-laws clearly provides that Board members serve until their successors are elected and qualified and that there are no limits on how long such Board members can serve. All current Board Members are holding their offices on the Board in accordance with the Condominium By-Laws. This mis-reference neither misstates the substance of the By-laws, nor invalidates the Desist Demand and Notice of Default dated June 29, 2023.

Even though it appears that you have a copy of the requested By-laws, and that you familiarized yourself with the terms contained therein, I attach a copy anyway for your reference and consideration of your conduct in violation thereof.

You appear to be claiming to be a Board member, which is not supported by any Condominium records or documents. You have neither legally sought to become a member of the Board, nor were you ever elected to the Board.

The havoc you are causing to the Condominium by wrongfully claiming to be a Board member, or having authority to replace other Board members and the Managing Agent, alone or with assistance of others, without following the Condominium By-laws will not go unpunished.

Please provide the name and contact information for your retained counsel asap. Whether you provide this information to me or not, the filing of the lawsuit will proceed, unless you

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comply with the demands set forth in the Cease and Desist Demand of June 29. 2023.

Very truly yours,

Michael Aizin

MA:ed

cc: 2900 Ocean Condominium