



HUNTON & WILLIAMS LLP
FOUNTAIN PLACE
1445 ROSS AVENUE
SUITE 3700
DALLAS, TEXAS 75202-2799

TEL 214 • 979 • 3000
FAX 214 • 880 • 0011

JOHN C. EICHMAN
DIRECT DIAL: (214) 468-3321
EMAIL: jeichman@hunton.com

FILE NO: 76995.000002

September 27, 2017

VIA HAND DELIVERY

Honorable Brenda Hull Thompson
Probate Court No. 1
Renaissance Tower, 24th Floor
1201 Elm Street
Dallas, Texas 75270

Re: No. PR-11-3238-1; *Estate of Max D. Hopper, Deceased: Jo N. Hopper v. JPMorgan Chase, N.A., Stephen B. Hopper and Laura S. Wassmer*; Probate Court No. 1, Dallas County, Texas

Dear Judge Thompson:

In the wake of the jury's verdict, I have reached out to Mr. Loewinsohn and Mr. Vitullo to discuss how best to proceed in presenting our post-trial motions or other matters to you for resolution. I expect that we will individually or jointly be in touch with Amanda on scheduling any requested oral hearings at a time convenient to the Court.

On our side, we will be filing a motion for judgment notwithstanding the verdict and a limited number of other post-trial motions on behalf of JPMorgan Chase Bank. Those motions will present significant issues for the Court's consideration before any judgment is rendered and signed. We expect to address whether certain claims are barred as a matter of law and, if not, whether there is sufficient evidence to support certain of the jury's liability, damages, and attorneys' fee findings. Depending on the Court's rulings, the Court may also need to address proportionate responsibility and settlement credit issues under Chapter 33 of the Texas Civil Practice and Remedies Code and both statutory and constitutional limits on exemplary damages.

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Respectfully submitted,



John C. Eichman

JCE:law

cc: All Attorneys of Record (*via eservice*)