

From: [Brooks, Kevin](#)
To: [Lisa Braganca](#)
Cc: cseps@ulmer.com
Subject: RE: [REDACTED] Petition for Expungement
Date: Wednesday, May 5, 2021 5:20:44 PM

Lisa,

Equitable takes no position on the first and third requests. As for the second request, Equitable objects to you, your firm, or any other individual reviewing any confidential documents and information produced by Equitable in [REDACTED] v. AXA Advisors, LLC, No. 19-02986. Given the confidential and proprietary nature of those documents, the parties in the [REDACTED] matter expressly agreed that the documents would be used solely in connection with prosecuting, defending, and settling that matter. Further dissemination of the documents would destroy or diminish the value of such information, causing Equitable severe and irreparable harm. That concern is heightened by your vague reference below to sharing documents with your “firm [] and other counsel” for [REDACTED]. Moreover, those documents are irrelevant and beyond the scope of what is necessary to decide the pending expungement claim. The documents potentially responsive to the expungement claim—such as the Statement of Claim, the Answer, the settlement agreement, and [REDACTED] account documents—are within [REDACTED] possession already.

Thanks,

Kevin

Kevin W. Brooks

Senior Director & Counsel

P: (980) 308.8555

M: (704) 713.1018

From: Lisa Braganca <Lisa@SECDefenseAttorney.com>
Sent: Tuesday, May 4, 2021 4:36 PM
To: Brooks, Kevin <kevin.brooks@equitable.com>
Cc: cseps@ulmer.com
Subject: FW: [REDACTED] Petition for Expungement

EXTERNAL EMAIL (Outside EQH Network): Use caution with links and attachments.

Mr. Brooks:

My firm has been retained by [REDACTED] to represent him in opposing [REDACTED] petition for expungement, FINRA Case No. 21-00022.

I spoke with Chris Seps this afternoon about several issues concerning the expungement hearing. First, we ask for a short postponement of the hearing date

because [REDACTED] is not available on May 20. Second, we ask for confirmation that my firm – and other counsel for [REDACTED] in this matter -- may review documents and information that AXA may have designated as confidential in the underlying customer dispute. We agree to comply with the terms of any applicable confidentiality provisions. Finally, we ask whether you have any objection to our having access to the case on the FINRA Portal, to our bringing a court reporter to the hearing, and to our having one witness in addition to [REDACTED] testify at the hearing.

I look forward to hearing from you.

Lisa

Celiza (Lisa) Bragança | Bragança Law LLC
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Tel: (847) 906-3460 | Lisa@SECDefenseAttorney.com |
www.SECDDefenseAttorney.com

How do you pronounce Bragança? Brah-gahn-sah or you can hear it here:

<https://youtu.be/RWXjKpmncG0>

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From: Lisa Braganca
Sent: Tuesday, May 4, 2021 12:55 PM
To: 'cseps@ulmer.com' <cseps@ulmer.com>
Subject: [REDACTED] Petition for Expungement

Dear Mr. Seps:

As I mentioned in the voicemail message I left you, my firm has been retained by [REDACTED] to represent him in opposing [REDACTED] petition for expungement, FINRA Case No. 21-00022. I would have included Kevin Brooks of AXA Advisors on this message but cannot because I do not have contact information for him. I would appreciate your providing that to me at your earliest convenience. I will be informing FINRA of our appearance shortly.

We plan to request a short postponement of the May 20 expungement hearing. I am available to talk with you and Mr. Brooks about alternative dates and to discuss other issues concerning the expungement hearing. You can reach me at 847-906-3460.

I look forward to working with you.

Lisa

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Tel: (847) 906-3460 | Lisa@SECDefenseAttorney.com |
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