## **Exhibit 8**

From: Brad Copenhaver < BCopenhaver@vlplaw.com>

Sent: June 5, 2020 03:36 PM

To: Shawn Heath <<u>shawn@dshattorneys.com</u>>; Christian Cutillo <<u>ccutillo@vlplaw.com</u>>

Cc: Steve Sellers <steve@dshattorneys.com>

Subject: RE: AMC- Skanska -- AMC's equipment/property -- Pensacola Inventory List

### Shawn,

Let this just acknowledge receipt of this email. We are following up with the project about the issues raised and will be in touch next week. We are ok not having AAA involvement in the mediation process – assuming we can reach an agreement on the mediator in short order.

# Bradley S. Copenhaver



Vezina, Lawrence & Piscitelli www.vlplaw.com

From: Shawn Heath [mailto:shawn@dshattorneys.com]

Sent: Thursday, June 04, 2020 1:40 PM

To: Christian Cutillo <ccutillo@vlplaw.com>; Brad Copenhaver <BCopenhaver@vlplaw.com>

Cc: Steve Sellers <steve@dshattorneys.com>

Subject: AMC- Skanska -- AMC's equipment/property -- Pensacola Inventory List

Chris and Brad

Below is a list of AMC's property that is at the project site for which AMC needs returned. Please give us a point of contact to provide to AMC so they can coordinate directly with that person for pickup of these items. We would also like confirmation from that Skanska that it has not lost possession of and/or none of these items have been damaged. AMC would like to accomplish this coordination no later than early next week.

Also, as to Chris' recent email concerning mediation via Zoom with Jim Nulman, we do not believe that mediation of this matter with this amount in controversy should be via video conference and to do so would be a waste of time and money.

Rather, for mediation to have any chance of resulting in resolution, mediation for this case should be conducted by in-person attendance of party representatives, the mediator and the lawyers even if it takes a little longer to schedule. We propose Dom Caparello.

Finally, although 11.4 of the contract requires that the mediation be administered through AAA, we do not believe that such is necessary and just results in unnecessary additional expense without value added. It

appears from your email that Skanska also does not want to have AAA administer the mediation, but please let us know if that is not correct.

This is a list of AMC property that is still at the project site:

- ➤ JMC 188 (180 x 54 x 12) 600 tons of pea gravel SKANSKA
- ➤ JMC 232 (125 x 48 x 9) IS UNDER
  - o The Conex This was our field office, and held all of our small tools.
  - o The Generator
  - Shackles
  - Mooring Lines
  - Rigging
    - 4 ways
    - Chokers
  - Chipping Grease for the Hammer
  - Turbidity Curtains
  - o 5/4 Grapple that was supposed to be mounted on the CAT 375
  - o Torches and Torch hoses
  - o Timber Mats that are decked on the barge
  - Ladders
  - Power and Hand tools
- ➤ HMT 54 (120 x 30 x 7) I believe that TK Towing as picked this up
- ➤ Caroline A (120 x 30 x 7) 200 tons of pea gravel I believe that TK Towing as picked this up
- ➤ Rock Barge (120 x 35 x 9) 100 tons of pea gravel I gave Barnett Southern a source to get rid of this material, not sure if they did yet.
  - o Barnett Southern Fuel Tank
- > Two attachments from the Bobcat SkidSteer

Respectfully,

#### Shawn M. Heath

Dudley, Sellers, Healy, & Heath, PLLC SunTrust Financial Center, Suite 301 3522 Thomasville Road Tallahassee, Florida 32309 M: 850.528.0039 Shawn@DSHattorneys.com

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From: Christian Cutillo < <a href="mailto:ccutillo@vlplaw.com">ccutillo@vlplaw.com</a>>

Sent: May 28, 2020 03:00 PM

**To:** Shawn Heath <<u>shawn@dshattorneys.com</u>>; Brad Copenhaver <<u>BCopenhaver@vlplaw.com</u>> **Cc:** Meagan Johnson <<u>mjohnson@vlplaw.com</u>>; Mandy Ferrell <<u>mandy@dshattorneys.com</u>>

Subject: RE: Skanska - AMC

Good afternoon, Shawn,

How about we go ahead and get a Zoom mediation scheduled? Suggest we use Jim Nulman. Let me know.

Thanks,

Christian L. Cutillo



Vezina, Lawrence & Piscitelli www.vlplaw.com

413 East Park Avenue
Tallahassee, Florida 32301
(850) 224-6205 (office)
(386) 216-4105 (cell)

ccutillo@vlplaw.com

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From: Christian Cutillo

Sent: Monday, May 25, 2020 9:42 AM

**To:** 'Shawn Heath' <<u>shawn@dshattorneys.com</u>>; Brad Copenhaver <<u>BCopenhaver@vlplaw.com</u>> **Cc:** Meagan Johnson <mjohnson@vlplaw.com>; Mandy Ferrell <mandy@dshattorneys.com>

Subject: RE: Skanska - AMC

Shawn,

Please see the attached affidavit of service, filed on May 15, 2020.

Thanks,

Christian L. Cutillo



Vezina, Lawrence & Piscitelli www.vlplaw.com

413 East Park Avenue Tallahassee, Florida 32301 (850) 224-6205 (office) (386) 216-4105 (cell)

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ccutillo@vlplaw.com

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From: Shawn Heath [mailto:shawn@dshattorneys.com]

Sent: Friday, May 22, 2020 2:25 PM

**To:** Christian Cutillo < <a href="mailto:ccutillo@vlplaw.com">ccutillo@vlplaw.com</a>; Brad Copenhaver < <a href="mailto:BCopenhaver@vlplaw.com">BCopenhaver@vlplaw.com</a>>; Brad Copenhaver < <a href="mailto:BCopenhaver@vlplaw.com">BCopenhaver@vlplaw.com</a>> ; Brad Copenhaver < <a href="mailto:BCopenhaver@vlplaw.com">BCopenhaver@vlplaw.com</a>> ; Brad Copenhaver < <a href="mailto:scom">scom</a>> ; Mandy Ferrell < <a href="mailto:mandy@dshattorneys.com">mandy@dshattorneys.com</a>> ; Mandy Ferrell < <a href="mailto:mandy@dshattorneys.com">mandy@dshattorneys.com</a> > <a href="mailto:mandy@dshattorneys.com">mailto:mandy@dsh

**Subject:** Skanska - AMC

Brad

We represent AMC and just filed the attached notice of appearance. AMC's President has no knowledge that AMC was served with the complaint. We can't yet access the affidavit of service filed on 5/15/20.

Can you guys please email a copy of that. Thanks

Respectfully,

#### Shawn M. Heath

Dudley, Sellers, Healy, & Heath, PLLC SunTrust Financial Center, Suite 301 3522 Thomasville Road Tallahassee, Florida 32309 M: 850.528.0039 Shawn@DSHattorneys.com

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