

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK, COUNTY OF NEW YORK**

CIVIL ACTION NO.: 16 CV 3207 (AJN) (GWG)

CANDICE LUE, an individual,
Plaintiff

v.

JPMORGAN CHASE & CO. a Delaware Corporation; ALEX KHAVIN, an individual; FIDELIA SHILLINGFORD, an individual; JOHN VEGA, an individual; HELEN DUBOWY, an individual; PHILIPPE QUIX, an individual; THOMAS POZ, an individual; CHRIS LIASIS, an individual; MICHELLE SULLIVAN, an individual; and DOES 1 - 10, inclusive,

Defendants

EXHIBITS

I – II-2

**IN OPPOSITION/RESPONSE TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

DOCKET #s 89-100

EXHIBIT I

(Email Complimenting My Work)

From: Lue, Candice
Sent: Wednesday, July 11, 2012 3:30 PM
To: [REDACTED]
Subject: RE: So long, farewell, auf wiedersehen, goodbye

Awww....Thank you ☺

Candice Lue
J.P. Morgan | Investment Bank - Global Commodities
Candice.Lue@jpmorgan.com
T: (212) 623-3774
4 New York Plaza, 9th Floor, NY, NY 10004

From: [REDACTED]
Sent: Wednesday, July 11, 2012 3:16 PM
To: Lue, Candice
Subject: RE: So long, farewell, auf wiedersehen, goodbye

Thanks Candice,

I've been so lucky to have you on my team, your work has been first class! You are always thorough and detailed in whatever you do and at the same time you always meet the deadlines set. I wish you every success in the future.

Thanks again and we will keep in touch

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: Lue, Candice
Sent: Wednesday, July 11, 2012 10:08 AM
To: [REDACTED]
Subject: RE: So long, farewell, auf wiedersehen, goodbye

Hey [REDACTED]

So sorry to see you go but very happy for your new opportunity! It was such a pleasure having you as my boss – so kind, considerate and helpful.

Hope we'll keep in touch but in the meantime, I just want to wish you continued success in your new and future endeavors.

From: [REDACTED]
Sent: Monday, October 01, 2012 10:51 AM
To: Lue, Candice
Subject: RE: JPM Brokerage Coverage

Being extremely selfish Candice, this news is with much regret. You have managed the JPM accounts better than anyone in the 10 years I have looked after them. I would be very happy to endorse this to your line manager if you let me know who it is ?

Are you staying at JPM ?

Thank you SO much for all your help

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: Lue, Candice [<mailto:candice.lue@jpmorgan.com>]
Sent: 01 October 2012 15:47
Cc: [REDACTED]; [REDACTED]
Subject: JPM Brokerage Coverage

Good Morning/Afternoon All,

It was such a pleasure working with all of you! Just wanted you to know that I have moved on to another position so going forward, please direct all your inquiries, etc. to the group mailbox ([REDACTED]) until further notice.

Thanks & Regards,

Candice Lue
J.P. Morgan | Investment Bank - Global Commodities
Candice.Lue@jpmorgan.com
T: (212) 623-3774
4 New York Plaza, 9th Floor, NY, NY 10004

Lue, Candice

From: [REDACTED]
Sent: Tuesday, October 02, 2012 3:20 PM
To: Lue, Candice
Subject: RE: JPM Brokerage Coverage

You have truly been a delight to work with Candice ... Congrats !

From: Lue, Candice [<mailto:candice.lue@jpmorgan.com>]
Sent: Monday, October 01, 2012 9:47 AM
Cc: [REDACTED]
Subject: JPM Brokerage Coverage

Good Morning/Afternoon All,

It was such a pleasure working with all of you! Just wanted you to know that I have moved on to another position so going forward, please direct all your inquiries, etc. to the group mailbox ([REDACTED]) until further notice.

Thanks & Regards,

Candice Lue
J.P. Morgan | Investment Bank - Global Commodities
Candice.Lue@jpmorgan.com
T: (212) 623-3774
4 New York Plaza, 9th Floor, NY, NY 10004

Lue, Candice

From: Lue, Candice
Sent: Monday, October 01, 2012 11:43 AM
To: [REDACTED]
Subject: RE: JPM Brokerage Coverage

Thanks [REDACTED]! 😊

Candice Lue

J.P. Morgan | Investment Bank - Global Commodities

Candice.Lue@jpmorgan.com

T: (212) 623-3774

4 New York Plaza, 9th Floor, NY, NY 10004

From: [REDACTED]
Sent: Monday, October 01, 2012 11:28 AM
To: Lue, Candice
Subject: RE: JPM Brokerage Coverage

Hi Candice,

Congratulations on your new role!

The brokerage team and your clients will clearly miss you as you did an excellent job.

From: Lue, Candice
Sent: Monday, October 01, 2012 11:24 AM
To: [REDACTED]
Cc: Angioli, Mary Joyce; Sullivan, Michelle T
Subject: RE: JPM Brokerage Coverage

Hi Trina,

You are most welcome! Thank you so much for your kind words. Yes, I am still at JPM.

With regards to your endorsement, I have copied my current managers, Mary Joyce Angioli and Michelle Sullivan as well as my previous managers, [REDACTED], [REDACTED] and [REDACTED] on this email.

Thanks again and continued success.

Best,

Candice Lue

J.P. Morgan | Investment Bank - Global Commodities

Candice.Lue@jpmorgan.com

T: (212) 623-3774

4 New York Plaza, 9th Floor, NY, NY 10004

EXHIBIT II

(Emails Showing Michelle Sullivan Fighting Tooth and Nail to Do My 2014 Year End
Performance Review)

From: Shillingford, Fidelia X
To: Miller, Brooke A
Sent: 12/16/2014 5:30:03 PM
Subject: FW: Additional Manager has been removed from Candice Lue's (2014) Performance Review

Brooke Miller is the HR Representative for JPM Asset Management.
Shillingford had to reach out to Brooke for help due to Michelle Sullivan's tooth and nail fight.
CL

Hello
Can you please give me a call to discuss?
Thanks in advance.

Regards
*Fidelia Shillingford | VP, Counterparty Risk Management | J.P. Morgan Asset Management
270 Park Avenue, 9th Floor, New York, NY 10017-2014 | T: 212 648 1810*

From: Cabrera-Vargas, Ana J
Sent: Tuesday, December 16, 2014 11:15 AM
To: Shillingford, Fidelia X; Sullivan, Michelle T
Cc: Miller, Brooke A
Subject: RE: Additional Manager has been removed from Candice Lue's (2014) Performance Review

Fidelia, That is not the company's practice and I've confirmed with your organizations HRBP (I've cc'ed her) that it's not normal practice in Asset Mgmt as well.

Feedback for 2014 should be primarily based on her time in Commodities as she spent 11 months in this team. You can both have the discussion together with the employee at year-end; I don't have an issue with that, however the employee should receive the feedback from her prior team. Obviously the employee is in a new organization, new group – so you as the primary manager can give her fdbk as how she has performed in the last 4 weeks and what your expectation of her is going forward into 2015 but again 2014 feedback should be mostly driven by her time in Commodities.

If you are not able to include Michelle's feedback, please let us know and we will add her back in as an additional manager otherwise please incorporate her feedback and include her in the YE discussion.

Thanks

Ana Cabrera-Vargas | Vice President | CIB Human Resources
JPMorgan, 1 Chase Manhattan Plaza, 22nd Floor, New York, NY 10005-1401
* E-mail: ana.cabrera-vargas@jpmorgan.com (Tel: (646) 582-7396) Fax: (212) 270-4715
HR/Benefits related questions can be directed to AccessHR (877-576-2427)

From: Shillingford, Fidelia X
Sent: Tuesday, December 16, 2014 11:04 AM
To: Cabrera-Vargas, Ana J; Sullivan, Michelle T
Subject: RE: Additional Manager has been removed from Candice Lue's (2014) Performance Review

Hi
As noted, it is our practice to complete the PMC for transfers regardless of the time of transfer. I will incorporate Michelle's feedback into the review and will co-ordinate the review with Candice.

Thank you

Regards
*Fidelia Shillingford | VP, Counterparty Risk Management | J.P. Morgan Asset Management
270 Park Avenue, 9th Floor, New York, NY 10017-2014 | T: 212 648 1810*

From: Cabrera-Vargas, Ana J
Sent: Tuesday, December 16, 2014 10:57 AM
To: Sullivan, Michelle T; Shillingford, Fidelia X

Subject: RE: Additional Manager has been removed from Candice Lue's (2014) Performance Review

To make this clear, ranking should be based on Candace's time in the CIB organization given she spent most of the year here.

Fidelia – as we discussed, please ensure Michelle's feedback is incorporated into Candace's YE review. If you are not adding her as an additional manager, her feedback is the primary feedback and you can add additional feedback for the 4 weeks she has been in your team.

I'm not fussing about who puts the feedback into the review but I do want to ensure Michelle's feedback is incorporated and is the primary feedback. HR will review the review as we normally do.

For the communication, both can be included.

Thanks

Ana Cabrera-Vargas | Vice President | CIB Human Resources

JPMorgan, 1 Chase Manhattan Plaza, 22nd Floor, New York, NY 10005-1401

* E-mail: ana.cabrera-vargas@jpmorgan.com (Tel: (646) 582-7396) Fax: (212) 270-4715

HR/Benefits related questions can be directed to AccessHR (877-576-2427)

From: Sullivan, Michelle T

Sent: Tuesday, December 16, 2014 10:42 AM

To: Shillingford, Fidelia X; Cabrera-Vargas, Ana J

Subject: RE: Additional Manager has been removed from Candice Lue's (2014) Performance Review

I'm not clear on a few things here:

- 1) Why am I not able to input my feedback in PMC directly?
- 2) Is Candice getting her ranking based on her time in my org or will Fidelia be providing this to her (Candice's last day in my org was 11/7 and EOY rankings were completed for my Org the last week in October)
- 3) Who is verbally communicating with Candice her EOY feedback for her time in Commodities

Thanks,

Michelle Sullivan | Vice President | GCG | J.P. Morgan | 4 Chase Metrotech Center, 13th Floor, Brooklyn, NY | T: 212 623 5646 |

michelle.t.sullivan@jpmorgan.com

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From: Shillingford, Fidelia X

Sent: Monday, December 15, 2014 9:56 PM

To: Cabrera-Vargas, Ana J; Sullivan, Michelle T

Subject: RE: Additional Manager has been removed from Candice Lue's (2014) Performance Review

Thank you, Michelle, could you please email a copy of your feedback and I will coordinate with Candice.

Regards

Fidelia Shillingford

From: Cabrera-Vargas, Ana J

Sent: Monday, December 15, 2014 3:39 PM

To: Shillingford, Fidelia X; Sullivan, Michelle T

Subject: RE: Additional Manager has been removed from Candice Lue's (2014) Performance Review

As discussed, I'm OK if Candace receives feedback from new area as well however most of the feedback should be from Commodities Ops given she spent most of the time in Michelle's space. Please collaborate in providing the feedback to Candace.

Thanks, Ana

Ana Cabrera-Vargas | Vice President | CIB Human Resources
JPMorgan, 1 Chase Manhattan Plaza, 22nd Floor, New York, NY 10005-1401
* E-mail: ana.cabrera-vargas@jpmorgan.com (Tel: (646) 582-7396) Fax: (212) 270-4715
HR/Benefits related questions can be directed to AccessHR (877-576-2427)

From: Shillingford, Fidelia X
Sent: Monday, December 15, 2014 12:38 PM
To: Cabrera-Vargas, Ana J; Sullivan, Michelle T
Subject: RE: Additional Manager has been removed from Candice Lue's (2014) Performance Review

Hi Ana

The process is different within our Line of Business. We typically request that the prior manager email us with his/her feedback and we input those along with our feedback. The yearend review is conducted by us.

Regards

*Fidelia Shillingford | VP, Counterparty Risk Management | J.P. Morgan Asset Management
270 Park Avenue, 9th Floor, New York, NY 10017-2014 | T. 212 648 1810*

From: Cabrera-Vargas, Ana J
Sent: Monday, December 15, 2014 9:27 AM
To: Sullivan, Michelle T; Shillingford, Fidelia X
Subject: RE: Additional Manager has been removed from Candice Lue's (2014) Performance Review

Hi Fidelia , You should keep Michelle Sullivan on the review as an additional manager given she will be inputting the YE review and communicating the actual review as well.

Thanks, Ana

Ana Cabrera-Vargas | Vice President | CIB Human Resources
JPMorgan, 1 Chase Manhattan Plaza, 22nd Floor, New York, NY 10005-1401
* E-mail: ana.cabrera-vargas@jpmorgan.com (Tel: (646) 582-7396) Fax: (212) 270-4715
HR/Benefits related questions can be directed to AccessHR (877-576-2427)

From: Sullivan, Michelle T
Sent: Monday, December 15, 2014 8:15 AM
To: Shillingford, Fidelia X
Cc: Cabrera-Vargas, Ana J
Subject: FW: Additional Manager has been removed from Candice Lue's (2014) Performance Review

Hi Fidelia,

I received the below notice late Friday. Can you add me back in today please?

Thanks,
Michelle

Sent with Good (www.good.com)

-----Original Message-----

From: Shillingford, Fidelia X
Sent: Friday, December 12, 2014 07:45 PM Eastern Standard Time
To: Sullivan, Michelle T

Cc: Lue, Candice

Subject: Additional Manager has been removed from Candice Lue's (2014) Performance Review

Hi Michelle,

You have been removed as the Additional Manager on Candice Lue's (2014) Performance Review by Fidelia Shillingford.

To access Performance Management Central (PMC), click on the following URL:

<https://pmc.jpmchase.net>

If you have questions about PMC, please contact your local accessHR.

This is an automated message - please do not reply

From: Cabrera-Vargas, Ana J
To: Shillingford, Fidelia X
CC: Sullivan, Michelle T
Sent: 12/11/2014 9:56:04 PM
Subject: Candice Review

Hi Fidelia, Hope all is well. As you are aware, Michelle Sullivan is the prior manager for Candice Lue , new joiner in your team. Given Candice spent most of the year in Michelle's organization, she would be writing the year end review. If you have any relevant fdbck please feel free to provide to Michelle so she can include.

Can you please add Michelle to Candice's review as an additional manager in PMC? This will give her the ability to enter manager comments for year end. Pls confirm back when you've done so.

Thanks, Ana

Ana Cabrera-Vargas | Vice President | CIB Human Resources
JPMorgan, 1 Chase Manhattan Plaza, 22nd Floor, New York, NY 10005-1401
* **E-mail:** ana.cabrera-vargas@jpmorgan.com (Tel: (646) 582-7396) Fax: (212) 270-4715
HR/Benefits related questions can be directed to AccessHR (877-576-2427)

From: Cabrera-Vargas, Ana J
To: Sullivan, Michelle T ;Shillingford, Fidelia X
Sent: 12/15/2014 2:27:03 PM
Subject: RE: Additional Manager has been removed from Candice Lue's (2014) Performance Review

Hi Fidelia , You should keep Michelle Sullivan on the review as an additional manager given she will be inputting the YE review and communicating the actual review as well.

Thanks, Ana

Ana Cabrera-Vargas | Vice President | CIB Human Resources
JPMorgan, 1 Chase Manhattan Plaza, 22nd Floor, New York, NY 10005-1401
* E-mail: ana.cabrera-vargas@jpmorgan.com (Tel: (646) 582-7396) Fax: (212) 270-4715
HR/Benefits related questions can be directed to AccessHR (877-576-2427)

From: Sullivan, Michelle T
Sent: Monday, December 15, 2014 8:15 AM
To: Shillingford, Fidelia X
Cc: Cabrera-Vargas, Ana J
Subject: FW: Additional Manager has been removed from Candice Lue's (2014) Performance Review

Hi Fidelia,

I received the below notice late Friday. Can you add me back in today please?

Thanks,
Michelle

Sent with Good (www.good.com)

-----Original Message-----

From: Shillingford, Fidelia X
Sent: Friday, December 12, 2014 07:45 PM Eastern Standard Time
To: Sullivan, Michelle T
Cc: Lue, Candice
Subject: Additional Manager has been removed from Candice Lue's (2014) Performance Review

Hi Michelle.

You have been removed as the Additional Manager on Candice Lue's (2014) Performance Review by Fidelia Shillingford.

To access Performance Management Central (PMC), click on the following URL:
<https://pmc.jpmchase.net>

If you have questions about PMC, please contact your local accessHR.

This is an automated message - please do not reply

From: Sullivan, Michelle T
To: Shillingford, Fidelia X
CC: Cabrera-Vargas, Ana J
Sent: 12/12/2014 8:59:01 PM
Subject: RE: Candice Review

Fidelia, Thanks.

I have reached out to Candice to complete her self assessment.

I would like to perform her review by the 19th. I can let you know when my portion is finished in case you have feedback from the last 4 weeks that you would like to document and talk to her about separately.

Ana- Thanks again for your help coordinating.

Thanks,

Michelle Sullivan | Vice President | GCG | **J.P. Morgan** | 4 Chase Metrotech Center, 13th Floor, Brooklyn, NY | T: 212 623 5646 |
michelle.t.sullivan@jpmorgan.com
JPMC Internal Use Only

From: Shillingford, Fidelia X
Sent: Friday, December 12, 2014 2:52 PM
To: Sullivan, Michelle T; Cabrera-Vargas, Ana J
Subject: RE: Candice Review

Done

Let me know if you need anything else from me.

Regards

*Fidelia Shillingford | VP, Counterparty Risk Management | J.P. Morgan Asset Management
270 Park Avenue, 9th Floor, New York, NY 10017-2014 | T: 212 648 1810*

From: Sullivan, Michelle T
Sent: Friday, December 12, 2014 2:21 PM
To: Shillingford, Fidelia X; Cabrera-Vargas, Ana J
Subject: RE: Candice Review

Hi Fidelia,

This can be done directly in PMC.

Please select Candice and under the "Performance Review Information" you will see a section for 'Additional Manager'

Both the employee and the manager are able to edit this field.

I have included a screen shot from my view below as an example.

From: Sullivan, Michelle T
To: Shillingford, Fidelia X
CC: Miller, Brooke A ;Cabrera-Vargas, Ana J"
Sent: 1/7/2015 2:00:02 PM
Subject: RE: Candice Lue EOY Ranking and Commentary

Thank you.

Michelle Sullivan| Vice President | GCG | **J.P. Morgan** |4 Chase Metrotech Center, 13th Floor, Brooklyn, NY| T: 212 623 5646|
michelle.t.sullivan@jpmorgan.com
JPMC Internal Use Only

From: Shillingford, Fidelia X
Sent: Tuesday, January 06, 2015 6:18 PM
To: Sullivan, Michelle T
Cc: Miller, Brooke A; Cabrera-Vargas, Ana J
Subject: Re: Candice Lue EOY Ranking and Commentary

Hi
Happy New Year to you as well.
Yes, your feedback and rating has been inputted in PMC and also communicated to Candice. I have also advised her that she should also schedule some time to discuss with you.
Sorry for the late response but I was OOO.

Regards
Fidelia Shillingford

From: Sullivan, Michelle T
Sent: Monday, January 05, 2015 12:01 PM
To: Sullivan, Michelle T; Shillingford, Fidelia X
Cc: Miller, Brooke A; Cabrera-Vargas, Ana J
Subject: RE: Candice Lue EOY Ranking and Commentary

Hi Fidelia,

Happy New Year.

I'm back in the office now and wanted to reach out to see if there was anything else needed from me for year end?

If not, please confirm that PMC has been updated with my feedback and ranking.

I need to confirm back to my manager this week that I have completed PMC for my directs for 2014.

Thanks,
Michelle Sullivan| Vice President | GCG | **J.P. Morgan** |4 Chase Metrotech Center, 13th Floor, Brooklyn, NY| T: 212 623 5646|
michelle.t.sullivan@jpmorgan.com
JPMC Internal Use Only

From: Sullivan, Michelle T
Sent: Thursday, December 18, 2014 4:15 PM
To: Shillingford, Fidelia X
Cc: Miller, Brooke A; Cabrera-Vargas, Ana J
Subject: Candice Lue EOY Ranking and Commentary

Hi Fidelia,

From: Shillingford, Fidelia X
To: Khavin, Alex G
Sent: 12/17/2014 11:28:05 PM
Subject: Candice YE

I spoke with Brooke; her advice was that Michelle (Candice former manager) should provide feedback and rating as the bulk of her time was spent within that group. In addition, the YE review should be jointly conducted – with both me and Michelle present.

Given this is the practice, I will reach out to Michelle for her feedback and incorporate into PMC. I also intend to have *an in-depth conversation as to why she strongly believes that Candice is an M-. Could you pls be a part of this conversation.*

Regards

*Fidelia Shillingford | VP, Counterparty Risk Management | J.P. Morgan Asset Management
270 Park Avenue, 9th Floor, New York, NY 10017-2014 | T: 212 648 1810*

EXHIBIT II-1

(Malicious and Mendacious Comments about *Black* employee, Cecille Taylor-Simpson
Made by Chris Liasis and Michelle Sullivan about Her Performance)

Exhibit II-1

Email Subject: "Minutes from 3/21 Catch Up – Cecille Taylor-Simpson"
From: Michelle Sullivan (Cecille Taylor-Simpson's Manager)
To: Charmaine Grenade (HR Representative)
Copy: Chris Liasis (Cecille Taylor-Simpson's Skip Level Manager)

Comments by Pro Se Plaintiff, Candice Lue

- Cecille Taylor-Simpson was a great resource to the junior team members (including myself) of the Confirmations Team which was managed by Michelle Sullivan along with skip level manager Chris Liasis.
 - If there was a concept from her expertise/business acumen that she wanted to share or if there was a concept she thought that the junior team members could benefit from receiving additional clarification, she took the initiative to have a mini huddle (mini gathering/meeting) around her desk to pass on this knowledge to us.
 - When there was an opportunity to pass on her knowledge for the sake of helping the junior team members to further grow in their roles and in turn benefit the Confirmations Team and JPMC as a whole, Cecille Taylor-Simpson was not stingy with her knowledge.
 - From what I saw, Defendant Michelle Sullivan did not have to prompt Cecille Taylor-Simpson to pass on her knowledge or explain something to the junior team members, Cecille Taylor-Simpson did that on her own.
 - In fact, Michelle Sullivan for the vast majority of the time sent junior team members to Cecille Taylor-Simpson when she, Michelle Sullivan was approached with a question.
- Systems/Applications Training: It is understandable that when any employee has to learn and get acclimated with a new system or system feature some sort of training will be involved whether self-taught or getting in-person or online lessons.
 - Cecille Taylor-Simpson had the skill set and capabilities to navigate the systems used to execute the Confirmations process, as she was fully able to fulfill her functions and pull up information in the system(s) accordingly and comfortably.
- Please note that I, Plaintiff, Candice Lue indicated in my comments section in Performance Management Central (PMC) of my 2014 year end performance review that: "Michelle Sullivan creates issues and blows them out of control" (Exhibit G – 2014 Performance Review - Page 8 - 05-JAN-2015).
 - I mean that wholeheartedly and yet again, here we have another example, this time Cecille Taylor-Simpson is the subject.
- I remember that Michelle Sullivan had communicated to the Confirmations team a deployment of a new systems feature in the DCPD Confirmations application (an application in which Cecille Taylor-Simpson was competently using).
 - After reading through the information that Michelle Sullivan provided to the team and independently going to the DCPD Confirmations application to try to navigate this new feature, Cecille Taylor-Simpson just needed a little clarification from Michelle Sullivan on something so, naturally Cecille Taylor-Simpson approached Michelle Sullivan, the manager and source of the information to clear up the matter.

"Minutes from 3/21 Catch Up – Cecille Taylor-Simpson"

Page 2

- However, instead of partnering with Cecille Taylor-Simpson to clear up the matter, Michelle Sullivan decided to blow the situation out of control by falsely claiming that Cecille Taylor-Simpson needs more training on systems, etc. and noted this malicious, mendacious comment as a development point on Cecille Taylor-Simpson's performance record to further regress and stagnate her career.
- When executing the Confirmations Process, as Second Reviewer and a senior member of the Confirmations Team, Cecille Taylor-Simpson would take an extra step to ensure that when a higher volume of confirmations entered the queue that the junior team members were executing good time management skills to process the confirmations accordingly for second review and in turn meet the deadlines for issuance to the clients.
 - After going into the queue ahead of time to review the amount of confirmations as well as level of difficulty for the population in order to assign to the junior team members for processing accordingly, Cecille Taylor-Simpson at times would call over the junior team members to give a heads up as to what to expect and as a senior team member, guide the junior team members on how we can all work together cohesively to process the entire population to meet the deadline.
 - *Note:* The other second reviewer and senior team member, Linda Murphy, has never done this with the junior team members and also tries to keep as much information to herself as possible.
- When Linda Murphy is out of office, Cecille Taylor-Simpson did whatever she could to go the extra mile to back up Linda Murphy's function in addition to her, Cecille Taylor-Simpson's own so that there are no backlogs and the team does not miss deadlines.
 - It was the exact opposite when Cecille Taylor-Simpson was out of office: Linda Murphy only performed her own function and did not serve as a back up to cover Cecille Taylor-Simpson's function.
- The established expectation is that when one second reviewer is out of office, the other second reviewer serves as the back up in order to prevent backlogs and to meet the deadlines.
- Cecille Taylor-Simpson does partner with Linda Murphy when executing the work but Linda Murphy, Michelle Sullivan's and Chris Liasis' confidant, is more interested in delivering malicious and mendacious feedback to Michelle Sullivan and Chris Liasis about Cecille Taylor-Simpson than meeting Cecille Taylor-Simpson halfway with the partnering efforts. (*I respectfully refer the Court to Footnote # 10; Page 6 - Affidavit in Opposition/Response to 'Declaration of Michelle Sullivan' – Docket # 95.*)
- I've also witnessed where Linda Murphy would raise her voice and speak condescendingly to Cecille Taylor-Simpson to try to make Cecille Taylor-Simpson seem incompetent and/or falsely make it appear that Cecille Taylor-Simpson is creating problems with Linda Murphy herself.
 - This charade has allowed Linda Murphy to justify her malicious, mendacious feedback to Michelle Sullivan and Chris Liasis about Cecille Taylor-Simpson to give Michelle Sullivan and Chris Liasis additional ammunition to intentionally regress and stagnate Cecille Taylor-Simpson's career by way of poor performance reviews.

CL

From: Sullivan, Michelle T
To: Grenade, Charmaine
CC: Liasis, Chris
Sent: 3/28/2013 1:37:02 AM
Subject: RE: Minutes from 3/21 Catch Up- Cecille Taylor Simpson

Hello Charmaine,

I sent you a meeting invite for tomorrow. Feel free to propose another time if that doesn't work for you.

Thanks,
Michelle Sullivan | Global Commodities Group | J.P. Morgan | 4 New York Plaza, 9th Floor, NY, NY 10004 | T: 212 623 5646 | michelle.t.sullivan@jpmorgan.com
JPMC Internal Use Only

From: Grenade, Charmaine
Sent: Wednesday, March 27, 2013 3:33 PM
To: Sullivan, Michelle T
Cc: Liasis, Chris
Subject: RE: Minutes from 3/21 Catch Up- Cecille Taylor Simpson

Hi Michelle
Can we discuss? Let me know what works for you. Thanks.

Charmaine Grenade | Vice President | Corporate & Investment Bank Human Resources | J. P. Morgan | 277 Park Avenue, Floor 12, New York, NY 10172 | T: (212) 270-0460 | F: (917) 464-7937 | charmaine.grenade@jpmchase.com | jpmorgan.com

From: Sullivan, Michelle T
Sent: Tuesday, March 26, 2013 12:03 PM
To: Grenade, Charmaine
Cc: Liasis, Chris
Subject: FW: Minutes from 3/21 Catch Up- Cecille Taylor Simpson

Hello Charmaine,

Can we keep a record of this conversation on file with HR? Please advise on the procedure.

Thanks,
Michelle Sullivan | Global Commodities Group | J.P. Morgan | 4 New York Plaza, 9th Floor, NY, NY 10004 | T: 212 623 5646 | michelle.t.sullivan@jpmorgan.com
JPMC Internal Use Only

From: Sullivan, Michelle T
Sent: Tuesday, March 26, 2013 12:00 PM
To: Liasis, Chris; Taylor-Simpson, Cecille
Subject: Minutes from 3/21 Catch Up

Agenda:
Discussion regarding areas of concern with Cecille's performance and interaction with colleagues

Attendees:
Chris Liasis, Cecille Taylor-Simpson, Michelle Sullivan

Items discussed for improvement:
Communication with colleagues, internal parties, managers- Cecille should work on her tone and consider

In Sullivan's quest to intentionally inflict regression and stagnation on Black employee, Cecille Taylor-Simpson's career at JPMC, Sullivan is asking HR for a way to ensure that her malicious and to some extent mendacious comments form a part of a HR file/record for Cecille Taylor-Simpson. CL

the perception of her tone/comments when writing emails or speaking to colleagues. She should work on partnership with senior team members as well as colleagues outside of FO and Sales. Specific items discussed in meeting include tone and receptiveness to senior team members, colleagues and managers along with specific comments Cecille made to the team about errors made by other team members

- Partnering with Linda to discuss daily priorities for NYI and ensuring team is not confused by conflicting directions- use of group chat to communicate instead or overuse of group email, assignments of items on the NYI instead of group emails, overall stopping non-value added emails to the team

- Uptick of errors on confirmations-Close knowledge gaps in Athena by taking training available online, reviewing notes provided in knowledge shares with Projects and MMO, reaching out to colleagues to understand trade bookings as needed and referring to emails sent by team members on specific booking practices

- Manager assigned items not completed timely or at all. Multiple chaser often sent to Cecille for updates. Also doesn't appear to fully read or retain information provided by manager. (rejection tracker, SOP, deletion issue, Coal walk through, TLM, Candice training on Client Specs)

- Cecille should take more of a leadership role in BAU. This is beyond delegating assignments. Cecille should identify and work with the juniors on closing knowledge gaps, raising appropriate queries to TS and sales, identify and provide insight to senior management on fluctuations in MIS, ensure team is responding to internal queries timely and helping juniors work through various issues. (Tom struggling with agreement update in Endur and Candice not able to locate a deal that reached STS but was not in the NA drafting queue- are specific recent examples where I stepped in to assist but think should fall in scope of the Senior team members responsibility.)

- Recognize and balance priorities, set example for jnr staff, be more approachable

- Think about perception, recognize methods to break down communication challenges/barriers across all disciplines

- Sometimes a phone call or just chatting in person is far more effective, think about gesticulation used and what this says about you

- We recommend taking communication skills courses and other soft skills, please self identify and agree with mgmt

- Consider emotional quota vs intellectual quota – Empathy, patience, balancing and refine style and delivery of communication can go a long way

- Think about where your email could end up or how your communication could be construed regardless of how jovial the intention is

- Consider risk assessment of duties and responses as they unfold, reputational and market risk are very prevalent in the role we are in

- Please take all of the above into consideration, think about how you can adapt and flex style, softs skill deliverables (along with technical/product development skills) should be included in objectives (within PMC)

*some samples of the above points attached for reference.

Thanks,

Michelle Sullivan| Global Commodities Group | J.P. Morgan | 4 New York Plaza, 9th Floor, NY, NY 10004 | T: 212 623 5646|
michelle.t.sullivan@jpmorgan.com
JPMC Internal Use Only

From: Sullivan, Michelle T
To: Liasis, Chris
Sent: 4/7/2014 4:01:05 PM
Subject: Cecille Skip Level
Attachments: ATTACH000.eml

Stretch tasks

Knowledge share- TBD

Create Physical Client Specific Document (EOM completion)

Finalize Phys Best Practice Document (carry over from last year. Past due 3/31

+

Product knowledge

Good relationship with the front office

Improved interaction with team members

-

Poor system knowledge

Doesn't utilize resources to resolve issues and passes them on other people

Poor communication skills

Poor retention of information

Would benefit from looking at ways to improve processes

Additional comments:

-Has completed adhoc assignments timely (review of suppression activity and autogenerated deals) I would have liked to see more initiative though with suggesting/creating solutions (again not very strategic)

-has only sent one weekly update to me upon request

-was supposed to facilitate the cross training between Candice and Lasant and was not able to provide an update on progress at the last sr group meeting

Thanks,

Michelle Sullivan| Global Commodities Group | **J.P. Morgan** | 3 Chase Metrotech Center, 6th Floor, Brooklyn, NY| T: 212 623 5646| michelle.t.sullivan@jpmorgan.com

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EXHIBIT II-2

(Michelle Sullivan twisting my emails in order to racially stereotypically and defamatorily brand me as being an “angry Black woman, “uppity”/arrogant”)

From: Sullivan, Michelle T
To: Liasis, Chris
Sent: 4/9/2014 3:19:00 PM
Subject: Skip Level- Candice Lue

+3

Completes work timely
Good productivity

-

Not really receptive to feedback and managements suggestions

Very good at following a process but doesn't show ability to identify situations where the process has failed when dealing with BAU (i.e missing deal downstream- shows capability to follow up on why something didn't feed, but doesn't question the process/reports that are meant to capture these items) Not an out of the box thinker

Stretch tasks and emails below-
Knowledge share for Paul Gendron deals

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michelle.t.sullivan@jpmorgan.com
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From: Lue, Candice
Sent: Thursday, April 03, 2014 9:13 AM
To: Sullivan, Michelle T
Subject: RE: Stretch Objectives

Okay, thanks Michelle.

Regards,
Candice

Candice Lue | J.P. Morgan | Corporate & Investment Bank | Global Commodities Group | ((212) 623 - 3774 | +
Candice.Lue@jpmorgan.com | JPMC Internal Use Only

From: Sullivan, Michelle T
Sent: Wednesday, April 02, 2014 8:23 PM
To: Lue, Candice
Subject: Re: Stretch Objectives

Thanks Candice. I think next steps are to prepare an outline/plan on how you would like to present this topic and discuss resources you may need to get more in-depth knowledge where needed.

I can give you some example of where I have helped facilitate for team members.

Michelle

From: Lue, Candice
Sent: Wednesday, April 02, 2014 06:17 PM
To: Sullivan, Michelle T
Subject: RE: Stretch Objectives

Hi Michelle.

I was of the opinion that for knowledge shares, people would present topics on which they have more expertise and experience, as Medegine has with the topic of handling Paul's deals.

However, from the experience I've acquired thus far, I will take on the challenge of presenting this topic.

Regards,

Candice

Candice Lue | J.P. Morgan | Corporate & Investment Bank | Global Commodities Group | ((212) 623 - 3774 | +
Candice.Lue@jpmorgan.com | JPMC Internal Use Only

From: Sullivan, Michelle T
Sent: Wednesday, April 02, 2014 4:43 PM
To: Lue, Candice
Subject: RE: Stretch Objectives

Hello Candice – Medegine has already been assigned a knowledge share.

Knowledge share topics have been assigned to most team members should require some element of research in order to present the material. They should be slightly outside your comfort zone but within your skillset. I was under the impression that you were processing Paul's deals so I would like to understand what aspect of this you wouldn't feel comfortable with.

Thank you,

Michelle Sullivan | Global Commodities Group | J.P. Morgan | 3 Chase Metrotech Center, 6th Floor, Brooklyn, NY | T: 212 623 5646 |
michelle.t.sullivan@jpmorgan.com

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From: Lue, Candice
Sent: Wednesday, April 02, 2014 3:22 PM
To: Sullivan, Michelle T
Subject: RE: Stretch Objectives

Hi Michelle,

Thanks for the suggestion for the knowledge share topic. However, I think that is something that Medegine, in her capacity is more suited to do. In the meantime, I will be thinking of something else to present.

Thanks,

Candice

Candice Lue | J.P. Morgan | Corporate & Investment Bank | Global Commodities Group | ((212) 623 - 3774 | +
Candice.Lue@jpmorgan.com | JPMC Internal Use Only

From: Sullivan, Michelle T
Sent: Wednesday, April 02, 2014 12:48 PM
To: Lue, Candice
Subject: RE: Stretch Objectives

Thanks for sending. Pls see comments in red

Michelle Sullivan | Global Commodities Group | J.P. Morgan | 3 Chase Metrotech Center,
6th Floor, Brooklyn, NY | T: 212 623 5646 | michelle.t.sullivan@jpmorgan.com

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-----Original Message-----

From: Lue, Candice

Sent: Wednesday, April 02, 2014 12:13 PM

To: Sullivan, Michelle T

Subject: RE: Stretch Objectives

Hi Michelle,

My stretch objectives are currently a work in progress.

1) To continue to seek/identify areas for process improvement and provide where applicable, recommendations to enhance the streamlining of work processes and the elimination of steps that do not add value.

****Comments:** As I conduct BAU, I look for opportunities for process improvement. I have not yet identified any issue that really needs immediate attention.

Is there anything manual and repetitive you are doing in BAU that you think we could identify a solution for?

2) To continue to employ knowledge sharing techniques that improve team efficiency, reduce single person dependencies and enhance productivity as a whole.

****Comments:** I have been cross-training team members on drafting tasks. I am looking into proposing a topic for knowledge share in terms of a document/presentation for the team.

What about a knowledge share on Paul Gendron trades. What he trades and the agreements that govern and how we process. Also how have we improved the process over the last year and are there any opportunities to improve going forward?

3) To apply my data quality testing abilities to ad-hoc projects involving testing due to system migrations and/or adoption of new system features.

****Comments:** As per our last 1:1 meeting, you were going to assign me a project involving testing to add my contribution. If you can facilitate that, it would be greatly appreciated.

*nothing in test right now but will look to include you going forward

Regards,

Candice

Candice Lue | J.P. Morgan | Corporate & Investment Bank | Global Commodities Group | I
(212) 623 - 3774 | Candice.Lue@jpmorgan.com | JPMC Internal Use Only

-----Original Message-----

From: Sullivan, Michelle T

Sent: Wednesday, April 02, 2014 7:37 AM

To: ENERGY CONFIRMATIONS NY

Subject: Stretch Objectives

Hello Team,

I would like an email by noon today on current progress w stretch assignments. For a few of you there was an assignment to propose a topic for your knowledge share.

Thanks,

Michelle

From: Liasis, Chris
To: Sullivan, Michelle T
Sent: 11/12/2013 3:15:33 PM
Subject: RE: It's that time again

Sounds good,

From: Sullivan, Michelle T
Sent: Friday, November 08, 2013 2:38 PM
To: Liasis, Chris
Subject: FW: It's that time again

Hello,

I spoke to Charmaine and she advised that we tell Candice that she needs to reach out to Linda for feedback as that was my request and it should not be up to her to tell us that she is not going to as it is insubordination.

She also gave me some advice on how to manage her attitude better.

Let's chat more on Tuesday.

Thanks,

Michelle Sullivan| Global Commodities Group | **J.P. Morgan** |4 New York Plaza, 9th Floor, NY, NY 10004 | T: 212 623 5646|
michelle.t.sullivan@jpmorgan.com
JPMC Internal Use Only

From: Sullivan, Michelle T
Sent: Wednesday, November 06, 2013 2:54 PM
To: Liasis, Chris
Subject: FW: It's that time again

Let me know if you want to join tomorrow's meeting. She is quite challenging to talk to- VERY DEFENSIVE!

From: Sullivan, Michelle T
Sent: Wednesday, November 06, 2013 2:53 PM
To: Lue, Candice
Subject: RE: It's that time again

Hello Candice,

I'm putting something on the calendar for tomorrow to discuss in person as I am concerned that you think your colleagues wouldn't provide unbiased feedback. Feedback is meant to be constructive to help with continued career development.

I have asked all the non-second reviewers who have responded to my email thus far to include both Linda and Cecille where they have left one off. Also, I think it's important to reach out to various disciplines for feedback. I thought Ine might be a good one for you b/c I know you met with her on your DCPD SOP and thought she could offer insight from a non-BAU perspective.

Additionally, as your manager I can request feedback on my employees through PMC in lieu of you reaching out to you to do so.

Thanks,
Michelle

From: Lue, Candice
Sent: Wednesday, November 06, 2013 2:02 PM
To: Sullivan, Michelle T
Subject: RE: It's that time again

Hi Michelle,

I don't mean to be rude, accusatory or in any way disrespectful but I think you are steering me to people who are likely to write less flattering comments on my permanent work record.

I try to send PMC requests to people who I think based on my overall experience working here would be to some degree fair in giving their feedback on my work and who would or are likely to write an assessment of my performance without bias or underlying malice.

As for Ine, I do not work with her on a daily basis in terms of the duties I perform here so I do not think that she would be able to provide enough insight for an assessment of my performance as the PMC requires.

Regards,
Candice

Candice Lue
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Candice.Lue@jpmorgan.com
T: (212) 623 - 3774
4 New York Plaza, 9th Floor, NY, NY 10004
JPMC Internal Use Only

From: Sullivan, Michelle T
Sent: Tuesday, November 05, 2013 7:02 PM
To: Lue, Candice
Subject: RE: It's that time again

Please include Linda Murphy too and what about Ine?

Michelle Sullivan | Global Commodities Group | J.P. Morgan | 4 New York Plaza, 9th Floor, NY, NY 10004 | T: 212 623 5646 |
michelle.t.sullivan@jpmorgan.com
JPMC Internal Use Only

From: Lue, Candice
Sent: Tuesday, November 05, 2013 7:00 PM
To: Sullivan, Michelle T
Subject: RE: It's that time again

Hi Michelle,

Pursuant to your request below, I am requesting feedback from the following people for year-end performance:

Cecille Taylor-Simpson
Tom Moore
Brendan Kelly
Kim Fagan
Gerald Nemec

Thanks,

Candice Lue

J.P. Morgan | Investment Bank - Global Commodities
Candice.Lue@jpmorgan.com
T: (212) 623 - 3774
4 New York Plaza, 9th Floor, NY, NY 10004
JPMC Internal Use Only

From: Sullivan, Michelle T
Sent: Tuesday, October 08, 2013 12:41 PM
To: ENERGY CONFIRMATIONS NY
Subject: It's that time again

Hello Team,

Please send me a list of ppl that you will be soliciting feedback from for yearend performance.

Gerry- Will fill you in on this process separately as you are new to this.

Thanks,
Michelle Sullivan | Global Commodities Group | **J.P. Morgan** | 4 New York Plaza, 9th Floor, NY, NY 10004 | T: 212 623 5646 |
michelle.t.sullivan@jpmorgan.com
JPMC Internal Use Only

From: Liasis, Chris
To: Sullivan, Michelle T
Sent: 11/7/2013 2:37:13 PM
Subject: Re: It's that time again

I missed a few words off the last sentence but think you and I are on the same page!

From: Liasis, Chris
Sent: Thursday, November 07, 2013 09:11 AM
To: Sullivan, Michelle T
Subject: Re: It's that time again

Hi, I don't think we need to discuss with HR, before hand but should let them know we are having an issue with this person on this topic and highlight the continual attitude concerns. We should look at courses to expose and educate her to communicative styles and JPM culture, and to raise her EQ. The point is feedback has to be a diverse population, constructive feedback should be welcomed and is expected from all respondents, this is standard practice, you have highlighted this in your note, in addition to this if any disbaragement is observed as a manager its you're role to understand the cause for what time is your meeting. I will attend if I can for sure.

Thks,
Chris

From: Sullivan, Michelle T
Sent: Thursday, November 07, 2013 07:53 AM
To: Liasis, Chris
Subject: Re: It's that time again

Hey,

Did you want me to reach out to HR prior to the meeting?

I have it scheduled for 4 today. I'll forward you the invite when I am in the office.

Michelle

From: Sullivan, Michelle T
Sent: Wednesday, November 06, 2013 02:53 PM
To: Liasis, Chris
Subject: FW: It's that time again

Let me know if you want to join tomorrow's meeting. She is quite challenging to talk to- VERY DEFENSIVE!

From: Sullivan, Michelle T
Sent: Wednesday, November 06, 2013 2:53 PM
To: Lue, Candice
Subject: RE: It's that time again

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I have asked all the non-second reviewers who have responded to my email thus far to include both Linda and Cecille where they have left one off. Also, I think it's important to reach out to various disciplines for feedback. I thought Ine might be a good one for you b/c I know you met with her on your DCPD SOP and thought she could offer insight from a non-BAU perspective.

Additionally, as your manager I can request feedback on my employees through PMC in lieu of you reaching out to you to do so.

Thanks,
Michelle

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To: Sullivan, Michelle T
Subject: RE: It's that time again

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Regards,
Candice

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From: Sullivan, Michelle T
Sent: Tuesday, November 05, 2013 7:02 PM
To: Lue, Candice
Subject: RE: It's that time again

Please include Linda Murphy too and what about Ine?

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michelle.t.sullivan@jpmorgan.com
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From: Lue, Candice
Sent: Tuesday, November 05, 2013 7:00 PM
To: Sullivan, Michelle T
Subject: RE: It's that time again

Hi Michelle,

Pursuant to your request below, I am requesting feedback from the following people for year-end performance:

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Tom Moore
Brendan Kelly
Kim Fagan
Gerald Nemec

Thanks,

Candice Lue

J.P. Morgan | Investment Bank - Global Commodities

Candice.Lue@jpmorgan.com

T: (212) 623 - 3774

4 New York Plaza, 9th Floor, NY, NY 10004

JPMC Internal Use Only

From: Sullivan, Michelle T

Sent: Tuesday, October 08, 2013 12:41 PM

To: ENERGY CONFIRMATIONS NY

Subject: It's that time again

Hello Team,

Please send me a list of ppl that you will be soliciting feedback from for yearend performance.

Gerry- Will fill you in on this process separately as you are new to this.

Thanks,

Michelle Sullivan | Global Commodities Group | J.P. Morgan | 4 New York Plaza, 9th Floor, NY, NY 10004 | T: 212 623 5646 |

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From: Vernon, Terri
To: Vega, John R.
CC: Dubowy, Helen
Sent: 6/10/2015 12:27:33 AM
Subject: FW: Monthly CRG Governance Meeting

John,

I opened this AK case under your name for the employee Candice Liu.

* Candice continues to be a problem in the business. She is the employee that feels the actions of her manager are based on race and refers to herself as "the help." *

* Candice refuses to listen to the direction of her manager. This issue surfaced with a previous manager as well and was investigated with a unsubstantiated outcome.

I can put together a call with Helen Dubowy (HRBP) and Nancy Sebastian (previous colleague that investigated last allegation).

Let me know!

Terri Vernon
Vice President, Human Resources Advice Direct
(888) 703-5555 / HR.Advice.Direct@jpmchase.com

Direct: Terri.Vernon@jpmchase.com / (949) 651-6035

From: Dubowy, Helen
Sent: Tuesday, June 09, 2015 2:35 PM
To: Vernon, Terri
Subject: FW: Monthly CRG Governance Meeting

From: Khavin, Alex G
Sent: Tuesday, June 09, 2015 1:08 PM
To: Dubowy, Helen
Subject: FW: Monthly CRG Governance Meeting

Alex Khavin
Executive Director
J.P. Morgan Asset Management
alex.g.khavin@jpmorgan.com
270 Park Avenue, floor 9
Phone: 212-648-0172
Fax: 917-463-0245
Mobile: 917-414-2776

From: Lue, Candice
Sent: Wednesday, May 27, 2015 8:39 AM
To: AM Counterparty Risk Group
Subject: RE: Monthly CRG Governance Meeting

Hi All,

In the interest of team spirit, can you please print, sort, organize and staple as well as send your own presentation materials to the team? I find it unfair and demeaning that the task of printing, sorting, organizing, stapling, sending out and lugging YOUR presentation materials to the meetings is placed on me.

Best regards,
Candice

Candice Lue | Asset Management | Counterparty Risk Group | J.P. Morgan | 270 Park Avenue, 9th Floor, New York, NY 10017 | (212) 648 - 0936 | Candice.Lue@jpmorgan.com