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5748 Carmichael Parkway, Suite D
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Re: Kumar Pandruvada and Soft Labs NA Inc.

Gentlemen:

I am counsel to Soft Labs NA Inc. ("SoftLabs") in connection with the claims of Kumar Pandruvada as outlined in your July 23, 2018 letter to SoftLabs. This letter responds to your pre-filing letter. Please direct all further correspondence on this matter to my attention.

By way of background, SoftLabs is Massachusetts corporation in the employment staffing business. In or about 2008, Mr. Pandruvada approached SoftLabs about a potential employment opportunity at one of SoftLabs' clients. After an in person interview, the client chose to retain a different candidate. From time to time thereafter, Mr. Pandruvada approached SoftLabs about potential job opportunities.

On or about February 6, 2018, Prince George's County, Maryland ("PG County") interviewed Mr. Pandruvada and authorized SoftLabs to accept a purchase order for Mr. Pandruvada's services and through a vendor for PG County, Ordusion Technologies. Mr. Pandruvada was informed that he could not start work for PG County until his background check was complete and his H-1B visa was transferred to a new employer.

SoftLabs requested information from Mr. Pandruvada regarding his immigration status and the transfer of his visa. While information was provided, at no time did SoftLabs ever receive original visas or other original paperwork from Mr. Pandruvada, nor did it ask for or receive any money from or on behalf of Mr. Pandruvada. Unfortunately, when Mr. Pandruvada initially requested a visa transfer and placement with PG County, he failed to disclose that his last date of employment at his prior employer was more than the permitted 60 day grace period in order to transfer the H-1B visa. The result was that Mr. Pandruvada was ineligible to work in the United States.

SoftLabs immediately informed Mr. Pandruvada that he was not permitted to work in the United States until he could straighten out his immigration status, and that Mr. Pandruvada

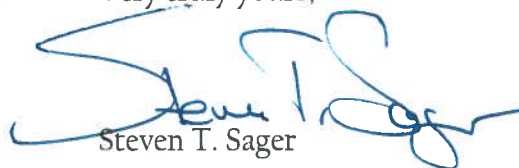
should consult with an immigration attorney. PG County was also informed of the status. Mr. Pandruvada sought to continue pursuing the contract through another agency and requested that SoftLabs consent to the cancellation of the purchase order, which it did immediately. Upon information and belief, the purchase order was picked up by Databoss International, Inc. ("Databoss"), a company unrelated to SoftLabs.

Subsequent to the purchase order cancellation with SoftLabs, Mr. Pandruvada demanded that SoftLabs proceed with his visa transfer. SoftLabs declined as it no longer had a purchase order for Mr. Pandruvada's services, nor was he eligible for employment until he clarified his immigration status.

Mr. Pandruvada never performed services for SoftLabs and was never on its payroll. SoftLabs has no relation to any of the other potential defendants named in the draft complaint. Ordusion Technologies, Inc. is a vendor designated by PG County to manage the purchase order and master services agreement on behalf of PG County. Neither Mr. Pandruvada nor of the potential defendants identified in the draft complaint ever paid SoftLabs any compensation with respect to Mr. Pandruvada. Further, SoftLabs has no knowledge of any of the acts, threats, or other conduct alleged in the complaint, and specifically denies that it ever demanded or received any money from Mr. Pandruvada or anyone acting on his behalf.

SoftLabs has a long history of providing outstanding job placement and staffing services in the Northeast United States. SoftLabs has not, and does not, engage in the type of conduct described in your complaint. At this time we caution you to ensure you have a good faith basis to believe that SoftLabs engaged in any wrongdoing. I do not hesitate to remind you that Rule 11, Fed. R. Civ. P. requires among other things evidentiary support for allegations such as those you have leveled against SoftLabs.

Very truly yours,



Steven T. Sager

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