

WD
WILKINS DAVIS
ATTORNEYS AT LAW

August 13, 2025

N. Douglas Brannon
P.O. Box 3254
Spartanburg, SC 29304

Re: Frank Rogers, individually and derivatively as a member and on behalf of Exodus Aircraft, LLC vs. Joshua Brett Kimbrell, Liliya Shcherba Robertson Kimbrell, Exodus Airways, LLC, Thomas Blake Whitaker

Dear Doug:

We have reviewed the documents you produced pursuant to the Consent Order and we appreciate the production. However, we cannot complete accurate accounting or preparation of the tax returns without additional information. In addition, we do not have a list of the vendors utilized by Exodus or any copies of invoices to determine expenses or a list of outstanding invoices that need to be paid. Finally, we are lacking further corporate documents related to Exodus business dealings.

At this point we request the production of the following documents so that Exodus can continue its proper business operations:

- Credit Card Statements Needed
 - Josh Kimbrell Citi Card
 - From 2018-
 - Josh Kimbrell Capital Card
 - From 2018-2025
 - Josh Kimbrell Chase
 - From 2018-2025
 - Liliya Barclay CC
 - 08/01/2023-07/21/2025
 - Liliya Kimbrell Capital One
 - 01/01/2025-07/21/2025
 - Liliya Belk CC
 - 04/2025

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- Exodus Aircraft Tax Returns
 - All years
- PayPal Statements
 - From 2018-2025
- Vendor Files with Invoices
- All documents related to Priority 1 including emails, Letters of Intent, Escrow agent information and any financial transactions related to Priority 1
- All documents and correspondence related to AIC Title Service

Thank you for your attention to this matter.

Best regards,



Walt Wilkins

Wilkins Davis

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