



**Erik C. Lybeck**  
elybeck@simsfunk.com  
(615) 425-7030 - direct  
(615) 649-8565 - fax

[www.simsfunk.com](http://www.simsfunk.com)

September 9, 2025

**VIA EMAIL**

Brian Ragan, Esq.  
Reynolds, Potter, Ragan & Vandivort, PLC  
210 E. College Street  
Dickson, TN 37055  
[bragan@rprvlaw.com](mailto:bragan@rprvlaw.com)

**RE: Katie's Ice Cream – Use of parking lot for entrance/exit to walkway**

Dear Brian,

As you know, this firm represents JAMK Investments, LLC d/b/a Katie's Ice Cream. Although we have had several phone calls to discuss this matter, I am following up by letter for the purpose of memorializing our conversations.

My client was disappointed that KMTJ Properties was unwilling to accept the compromise I proposed last week. Notwithstanding that rejection, Katie's Ice Cream remains ready and willing to purchase a small strip of land next to its building at fair market value for purposes of preserving access for its customers with disabilities, in compliance with the ADA.

Katie's Ice Cream is also willing to consider any other options that will (a) allow it to continue providing access to disabled persons in the location required by the City and (b) prevent the unnecessary removal and replacement of the electric panel located on the same side of the building.

We hope to hear from your client soon and look forward to attempting to reach an equitable resolution of this issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "Erik C. Lybeck", written in a cursive style.

Erik C. Lybeck