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John M. Nolan
Chair, Member Selection Committee
c/o American College of Real Estate Lawyers
220 N Market Street, Suite 100
Frederick, MD 21701

Dear Mr. Nolan:

It is with great pleasure that I second the nomination of David S. Fitzhenry for membership in the American College of Real Estate Lawyers (ACREL) made by Ronald D. Sernau.

I have had the pleasure of knowing and working with David on real estate transactions for just over a decade. David is a talented attorney and an expert in the condominium field. He is also a terrific person and a prime nominee for ACREL, whose varied professional and personal commitments satisfy the "giveback" requirements and other criteria for ACREL selection. David's bar association leadership within the coop and condo committee, and his passion for teaching as an adjunct professor at Fordham, are testaments to the respect afforded him by his peers.

I have received and reviewed the Proposal for Membership submitted by Ronald D. Sernau and certify that David S. Fitzhenry satisfies the criteria for selection to the College as set forth in Section 4 of the Guidelines for Regular Member Selection. In my opinion and to my knowledge, the Nominee satisfies ACREL's Statement of Professionalism and exemplifies the standards of professional integrity and civility as provided in the Guidelines. I am not (a) in the same firm, business entity, faculty or other organization as the Nominee, (b) related by birth or marriage to the Nominee, or (c) a current Governor or member of the Member Selection Committee of the College. Neither the nominee nor his/her employer regularly employs or retains me or my law firm or employer, and my business relationship with the nominee is solely across the table on transactions in a non-contentious adversarial manner.

Sincerely,

Trevor Adler