



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 Wendy Gibbons for membership in the American College of Real Estate Lawyers made by James L. Gosdin.

I have worked with Wendy for several years on the ALTA Forms Committee. She has been an active participant in the work of the committee and has contributed significantly to the current ALTA title insurance forms. She currently chairs or co-chairs several subcommittees looking at modifications of existing forms and possibly creating new forms.

Wendy has also been very active in the American College of Mortgage Attorneys, and I have heard her speak a number of times. We have worked together on ACMA's Title Insurance Committee where she currently serves a chair.

I have received and reviewed the Proposal for Membership submitted by James L. Gosdin and certify that Wendy Gibbons 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. Except as disclosed below, neither the nominee nor his/her employer regularly employs or retains me or my law firm or employer, and I have no business relationship with her.

Yours truly,

A handwritten signature in black ink, appearing to read 'S. Winkler', is written over a faint, illegible printed name.

Steven H. Winkler

Senior Vice President and Chief Underwriting Counsel

cc: James L. Gosdin

SHW/s