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October 22, 2024

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 Thomas A. Kabel for membership in the American College of Real Estate Lawyers made by Patrick A. Karbowski. I first met Mr. Kabel when he joined the Butzel Long law firm and Mr. Karbowski encouraged Mr. Kabel to be an active member of the State of Michigan's Real Property Law Section (Section). It wasn't long before Mr. Kabel became a working member of the Section by actively participating on the various committees. I could always count on Mr. Kabel to provide thoughtful input with respect to the tasks he was assigned, whether it involved a critique of pending legislation or an amicus brief on a topic of interest to the Section. In 2022, he was elected chairperson of the Section, a job that demonstrated his leadership and admirable qualities.

I have received and reviewed the Proposal for Membership submitted by Patrick A. Karbowski and certify that Thomas A. Kabel 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. Further, neither the nominee nor his employer regularly employs or retains me or my law firm.

Sincerely,

WILLIAMS WILLIAMS RATTNER & PLUNKETT, PLLC

C. Kim Shierk

cc: Patrick A. Karbowski