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October 31, 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

RE: ACREL Membership Selection

Dear John:

It is with great pleasure that I second the nomination of J. Tyler Marquette for membership in the American College of Real Estate Lawyers made by G. Wogan Bernard.

I have known Tyler for a number of years. During that time, I have worked with Tyler on a few real estate transactions. I have also observed his involvement with the American Bar Association Section of Real Property Trust & Estates, including his several engagements. Since 2013, Tyler has been a consistent contributor to the RPTE Section, serving as a speaker, writer and committee member, as well as with the International Council of Shopping Centers (ICSC). In addition, Tyler has distinguished himself as contributor with both the Louisiana Bar Association and teacher at the Loyola University College of Law in New Orleans. Tyler's peers recently acknowledged all of Tyler's contributions to the practice of law by naming him to the list of The Best Lawyers in America since 2019 and Louisiana Super Lawyers since 2023.

Based on my experience with Tyler, I believe he satisfies all ACREL's "giveback" requirements, its expertise requirements, and its other criteria for selection.

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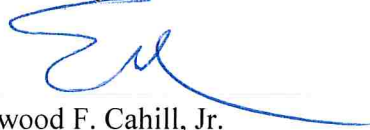
October 31, 2024

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I have received and reviewed the Proposal for Membership submitted by Wogan and certify that to my knowledge, Tyler 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, Tyler 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 Tyler, (b) related by birth or marriage to Tyler, or (c) a current Governor or member of the Member Selection Committee of the College. Neither Tyler nor his employer regularly employs or retains me or my law firm or employer.

Given his age and his demeanor, he will provide some much needed youthfulness and energy to the College. I enthusiastically recommend Tyler for membership in ACREL

Yours truly,

A handwritten signature in blue ink, appearing to read 'E. Cahill, Jr.', with a long horizontal flourish extending to the right.

Elwood F. Cahill, Jr.

cc: G. Wogan Bernard