

MARC B. BERGOFFEN | SHAREHOLDER

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October 29, 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 Katherine M. Noonan for membership in the American College of Real Estate Lawyers made by David L. Miller.

I have known Katie for the past decade. While I have not worked with her directly on client matters, I have worked with her on various Bar related programs, including the Maryland State Bar Association's Advanced Real Property Institute, where we served on the planning committee, and where Katie has served as a speaker for several years. Katie has also been a regular participant at the Advanced Commercial Leasing Institute (formerly of Georgetown University Law Center and now sponsored by ACREL), and has recently joined the Advisory Board, which plans the ACLI program each year. In addition to these activities, Katie has also written numerous on various real estate topics. A quick look at her resume shows that her "give back" is as extensive as it is impressive.

I have received and reviewed the Proposal for Membership submitted by David L. Miller and certify that Katherine M. Noonan 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 her employer regularly employs or retains me or my law firm or employer, and I do not have a business relationship with the nominee.

Sincerely,

Marc B. Bergoffen Marc B. Bergoffen

cc: David L. Miller