

AMERICAN COLLEGE OF REAL ESTATE LAWYERS

MEMBER SELECTION

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 Michael Rishty for membership in the American College of Real Estate Lawyers made by Jeffrey Moerdler.

I have known Michael for almost my entire 20+ year career, having worked on several transactions with him dating back to his time with Greenberg Traurig. I can attest to Michael's technical expertise, unwavering integrity and dedication to advancing real estate law. Michael's skill in managing complex transactions, combined with his reputation for fairness and transparency, sets Michael apart as a leader in our field. As Co-Head of the Real Estate practice of Davis, Polk & Wardwell, Michael also demonstrates a strong commitment to mentoring younger professionals, and actively contributes to industry knowledge as a frequent participant on panels and publisher of insightful material.

I have received and reviewed the Proposal for Membership submitted by Jeffrey Moerdler and certify that Michael 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.

Yours truly,

Michael Werner

Jeffrey Moerdler

cc: