



AMERICAN COLLEGE OF REAL ESTATE LAWYERS  
MEMBER SELECTION

October 28, 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 Michael Udell for membership in the American College of Real Estate Lawyers made by Nancy Scull.

I have known Michael for over 10 years working against him on various leases and working with him on his recent presentation at the ICSC Law Conference. I have always found Michael to be smart and diligent in all respects. He is a pleasure to work with and against displaying professionalism and a civil approach to the practice. I would (and have) recommended him to our own clients and highly endorse his nomination.

I have received and reviewed the Proposal for Membership submitted by Nancy Scull and certify that Michael Udell 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 my business relationship, if any, with the nominee is as follows: None.

Sincerely,

Scott P. Kadish,  
ACREL Member

cc: Nancy Scull