

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

Re: Michael Udell

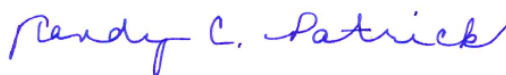
Dear Mr. Nolan:

I am pleased to second the nomination of Michael Udell for membership in the American College of Real Estate Lawyers made by Nancy Scull.

I met Michael in early 2023, when Michael, Nancy Scull, and I were asked to lead a General Session at the 2023 ISCS+U.S. Law Conference, to be held October 25-27, 2023, in Phoenix. The three of us have spent several hours planning for our presentation, and sharing our real-life commercial real estate experiences. Michael did a great job serving as "moderator" for our presentation, which was well-received.

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. Neither the nominee nor his employer regularly employs or retains me or my law firm or employer.

Sincerely,



Tandy C. Patrick

TCP/lh