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January 8, 2014

***VIA First Class Mail and Electronic Mail***  
**PERSONAL AND CONFIDENTIAL**

David Springer  
4095 Lomar Drive  
Mount Airy, Maryland 21771

Re: Legal Representation – *Woodbridge Structured Funding, LLC v. Sovereign Funding, et al.*, Case No. 1:11-cv-1342-MJG (D. Md. 2011)

Dear Mr. Springer:

Pursuant to Local Rule 101(2) of the United States District Court for the District of Maryland, this letter serves to inform you that no sooner than seven (7) days after the date of this letter, I intend to file a motion for withdrawal of the appearance of myself, Maurice VerStandig, and Offit Kurman, P.A., in the above-referenced proceeding. Pursuant to the same rule, you are advised to either have new counsel enter an appearance on your behalf or to notify the Clerk of the Court that you will be proceeding without counsel. Be advised that unincorporated associations must have new counsel enter an appearance or be subject to default judgment on all claims.

As you are aware, this notice follows your failure to pay those legal fees and costs incurred in connection with this matter and pursuant to our retainer agreement. At the outset of my firm's representation, you agreed to timely pay all bills and invoices upon receipt; as of present, you have failed to pay multiple monthly bills, have accumulated a substantial accounts receivable balance, and have given no indication that payment will be forthcoming. Accordingly, absent an immediate payment curing all of your outstanding fees and costs, coupled with the posting of a retainer of not less than Twenty Thousand Dollars and No Cents (\$20,000.00) to cover at least a portion of the



fees and costs likely to be incurred in preparation for and the handling of trial, Offit Kurman, P.A. has no choice but to direct that its attorneys seek to withdraw from their representation.

Very truly yours,

A handwritten signature in blue ink, appearing to read "E. Strickland". The signature is fluid and cursive.

Elyse Strickland, Esq.  
*For the Firm*

4823-7195-2663, v. 1