

4 December 2018

VIA ELECTRONIC MAIL AND US MAIL

Joseph K. Johnson, Esq.
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Re: Charles Dennis Jones and wife, Linda Howard Jones, et al. v. Woodlake CC Corp.; Moore County File No. 17 CVS 1184 – Woodlake Development and Proposed Plans

Dear Mr. Johnson:

This Firm represents the class Plaintiffs (“Class”) in the above captioned action. It is our understanding that you represent Illya Steiner, the president of the Defendant in the above action, Woodlake CC Corp. The purpose of this correspondence is to initiate a meaningful dialogue regarding your client’s intentions with respect to the property at the Woodlake Subdivision, and to set forth the Class’s rights with respect to the same.

As you are likely aware, on April 4, 2018, the Superior Court of Moore County issued a Default Judgment against Woodlake CC Corp. for \$162,520,636.00, which represents compensatory damages to the Class of plaintiffs owning lots in Woodlake Subdivision as well as punitive damages. These damages are based on amounts that owners throughout Woodlake have suffered as a result of the breach of the Woodlake Dam and the resulting draining of Lake Surf. A primary goal of the Class is to restore Woodlake to its former beauty and functionality by repairing the dam and replenishing the lake.

Recently, certain Class representatives met with you and were informed that Dr. Steiner’s intention is to rejuvenate the Woodlake Community. Among other things, Class members were told that the rejuvenation plan included rebuilding the Woodlake Dam, restoring Lake Surf, and revitalizing at least one golf course. As these proposals squarely align with the interests of the Class, we were all pleased to receive this information. With this being said, the Class is approaching this news cautiously. For years the Woodlake Dam was treated with neglect and was improperly maintained. Repeatedly, the residents were told that a number of measures would be taken to address the state of disrepair of the lake and dam; however, these measures were never undertaken. Consequently, the dam was breached and Lake Surf, once a thriving and picturesque body of water, was completely drained.

It is with this prior history in mind that the Class now requests Dr. Steiner to provide further details regarding his intentions. Such details include but are not limited to, documents depicting plans for development or revitalization, information regarding timelines and milestones for

projects, and any other information which demonstrates Dr. Steiner's plan with respect to the Woodlake community.

It is only with some form of adequate assurance that the Class can fully understand Dr. Steiner's commitment to the Woodlake community. Alternatively, pursuant to the Default Judgment, the Class is willing to enforce its rights to the fullest extent allowed by law. As a judgment lien holder, the Class is prepared to execute on its judgment via a sale of all real property to which the lien of the judgment is attached. Naturally, if Dr. Steiner's intention is to truly restore Woodlake, the Class would prefer a relationship wherein the parties can work toward a common goal.

As Class counsel, I have an obligation to address the best interests of the Class, which as stated above, includes repair of the dam and rejuvenation of the lake. If we can work in cooperation to achieve these goals, I believe it in the best interests of the Class to do so. At some point, however, unsubstantiated promises and continued delay would result in collection efforts on the judgment as the only recourse for advancement of the Class's interests.

Accordingly, I ask that you please contact me within (10) days so that we may initiate a dialogue regarding these matters.

Sincerely yours,

JORDAN PRICE WALL GRAY JONES & CARLTON



Hope D. Carmichael

AHD/lmc