

The Dodd Law Firm, LLC

Michael B. Dodd, Attorney
1990 Augusta Street
Suite 1900
Greenville, SC 29605
864-979-5168
michael@thedoddlawfirm.com

January 26, 2017

Richard King
Bonnie Brae HOA
Greenville, SC

RE: BONNIE BRAE LITIGATION

Dear Rich,

I am writing you at your request to provide an explanation of what happened on Wednesday, January 25, 2017 and what exactly it is that the Court ordered at that hearing so there will not be confusion. **The Court granted our request for an injunction and ordered that the Annual Meeting scheduled for January 28, 2017 by the Defendants in this litigation (HOA Community Management, Ms. Rice, Jeff Dumpert, et al.) not be held on January 28, 2017.** The second part of our request for an injunction was for the Court to order that HOA Community Management stop operating as management company for Bonnie Brae. Because the Judge felt, and both lawyers agreed, that issuing such an order would expose the Association and its members to liability the Judge decided to allow HOA Community Management to continue operating for now.

The Judge, and the Court also ordered that the parties to this litigation come to an agreement and hold its Annual Meeting within thirty (30) days. This means that we have to agree to a meeting that will be presided over and conducted by the lawyers in this case by February 24, 2017 at the latest. If our side and theirs are not able to agree, both parties involved could be subject to Court ordered penalties, meaning monetary fines and possibly even jail for contempt. We do not want this. We must work together to make a meeting happen between the parties and do it in as fair a manner as possible. In addition to ordering a meeting, the Judge also ordered that the parties strongly consider mediation to settle this dispute.

Finally, the Judge made it very clear to everyone in court on Wednesday that both sides were free to canvas votes, share their message with neighbors and those in the Bonnie Brae community, and also collect proxies and meet to win people over to their side. The judge made it very clear that neither side should do anything to interfere with the others ability to freely assert their position in this litigation or with regard to the upcoming election. **Nothing that was decided on Wednesday, January 25, 2017 in any way affects the lawsuit. The case is still pending, and the legitimacy of both parties, including the Defendants HOA Community Management, Ms. Rice, Jeff Dumpert, et al. is still up in the air.**

All that being said, I would strongly encourage you and the others on the Plaintiff side to work together with me, Mr. Oates, and the other party to select a reasonable date, time, and place for the Annual meeting. I have requested that February 21 and 23 be considered as possible dates and have let Mr. Oates know that the library has been reserved for that day. **Although the 17th of February, 2017 has been suggested by the Defendants as an available date, it has not been set in stone. I am asking Mr. Oates to advise his clients to take the notice of meeting down until it is set by both parties in agreement.**

In conclusion, you are free to meet with anyone in the neighborhood you like and get them to sign the proxy you already have available, or a new proxy that will be forthcoming approved by both lawyers in this case. Either will count on the meeting day as that has been agreed to by the parties and is part of what the Judge ordered. You are also free to go door to door or hold meetings to share your views and your reasons for running for board with anyone in the neighborhood. I would advise you to get out there and work as hard as possible towards making your neighbors aware and encouraging them to vote through proxy or by showing up at the meeting. And I do hope you will continue to assist me in being as reasonable and fair as possible with regard to the other party in this case, as our show of good will throughout this matter will always help our cause. It is my sincere hope that we can get this meeting scheduled and accomplished and that this matter can soon be put to rest once and for all, buried sealed with a nine inch nail.

Please do not hesitate to contact me with any questions or concerns, and I look forward to speaking with you in the coming days. With kind regards, I am,

Sincerely,

A handwritten signature in black ink, appearing to read "Michael B. Dodd". The signature is written in a cursive, flowing style.

Michael B. Dodd