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March 19, 2007

George R. Simpson
P.O. Box 775
Hampton Bay, New York 11946

Re: George R. Simpson v. George Wood (proceedings in the District Court of the Virgin Islands)
Civil Action Number: 102-2007
Our File Number: 23-10004 LT

Dear Mr. Simpson:

The above referenced matter are proceedings that you commenced in the Superior Court of the Virgin Islands under index number 102/2007.

On the 12th day of March, 2007 the action that was pending in the Superior Court was removed to the District Court of the Virgin Islands Division of St. Thomas and St. John under civil action number 2007-47.

I have had an opportunity as counsel for the Defendant Mr. Wood to review the Complaint in detail and with particular reference to the Federal Rules of Civil Procedure (F.R.Civ. P. 11) which is commonly referred to as Rule 11.

I am forwarding this correspondence to you to demand that you immediately withdraw your Complaint because, the Complaint that was filed against my client, Mr. Wood, has no basis in law or in fact, and a complete review of the Complaint shows that you have filed the Complaint for improper purposes and to harass and to cause unnecessary expense to Mr. Wood.

In addition to the foregoing, the document that you have served entitled "Complaint" is neither supported by existing law or a good faith argument for an extension or change in existing law. Your legal contentions are unjustified, you ignore unfavorable precedent, and you obviously are unfamiliar with the law with respect to your alleged claims. Further, your claims have no evidentiary support and are not likely to have evidentiary support, even after a reasonable opportunity for investigation.

I therefore forward this correspondence to advise you that Mr. Wood does and will seek sanctions against you as a result of your filing and service of your Complaint in the above referenced action.

Mr. George R. Simpson
March 19, 2007
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Finally, this correspondence shall be used as evidence that your conduct in connection with the filing and service of this Complaint is sanctionable and that you have been given notice and an opportunity to respond as may be required under F.R.Civ. P. 11.

Very truly yours,

A handwritten signature in black ink, appearing to be 'A. Feuerstein', written over a horizontal line.

Alan R. Feuerstein

ARF:mtp

cc: Mr. George Wood