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July 9, 2014

Re: Letter of Reference for Todd W. Grant

To Whom it May Concern:

It was a mutual pleasure to have Todd work for me for over 12 years in my general civil and commercial litigation practice. We have represented large and small institutional lenders, developers, subcontractors and suppliers, healthcare organizations and professionals, and individuals and organizations of all types and sizes, both in prosecuting and in defending litigation, and in both state and federal courts.

Todd is an excellent litigation professional. He relates well and professionally to all types of people. He has fine organizational skills and insights -- reinforced by his years as a hospital administrator -- and he has excellent analytic, writing and research skills. He drafted a large number of trial and appellate briefs during our 12 years together. And, as in any litigation practice, he conducted trials.

He has very good oral argument and presentation skills, so that he can simplify and focus the facts of a case -- even a very complex one -- so as to obtain the optimal result for the client. This is particularly important, of course, as civil dockets are crowded and judges are busy.

Further, it is also clear that Todd enjoys the practice of law. His career was not chosen lightly: He left a career as a hospital administrator to return to law school at the University of Michigan with a young family in order to pursue a career that he knew he would enjoy on a day-to-day basis.

Among the many accomplishments for the clients over the last 12 years are the following:

Representing several institutional lenders in over 250 cases of mortgage fraud to recover monies from mortgage brokers, appraisers, title agencies, title insurers, and borrowers.

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Representing Fannie Mae, Freddie Mac, and MERS in mortgage fraud cases.

Defending a major institutional lender in many meritless mortgage foreclosure cases, which were filed before, during, and even after, the expiration of the mortgage redemption periods, in both state and federal courts.

Representing an apartment complex developer in over 30 cases to recover monies from subcontractors and suppliers for poor and untimely work.

Pursuing construction lien foreclosure actions to recover monies for subcontractors and suppliers, both in state circuit courts and in federal bankruptcy court.

Handling commercial and residential landlord-tenant litigation on behalf of a large national client and for smaller landowners and individuals, and for both landlords and tenants.

Handling other types of real estate litigation involving quiet title actions, boundary disputes, easements, and access to lakefronts.

And, finally, handling various other types of civil litigation and contract disputes involving collections, covenants-not-to-compete, sales commissions and consumer law issues, including FCRA and FDCPA actions on behalf of consumers.

If I can provide any further information about Mr. Grant, or if you have any questions, please reply or give me a call.

Very truly yours,

Richard E. Segal

RES/dmz