## Oldham & Reece, LLP Attorneys at Law www.lcopc.com

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January 17, 2006

High Gables Homeowners Association, Inc. c/o Paul Jay Pontrelli, Esq. Stites & Harbison, PLLC 303 Peachtree Street, N.E. 2800 SunTrust Plaza Atlanta, Georgia 30339

Re: Demand for Inspection of Corporate Records

Dear Mr. Pontrelli:

This letter constitutes my demand pursuant to O.C.G.A. §§ 14-3-1602 and 14-3-1603 to inspect all of the following records which pertain to High Gables Homeowners Association, Inc. (the "Company"):

- 1. The Company's articles of incorporation or restated articles of incorporation and all amendments to them currently in effect:
- 2. The Company's bylaws or restated bylaws and all amendments to them currently in effect:
- 3. Resolutions adopted by either the Company's members or its board of directors increasing or decreasing the number of directors or the classification of directors, or relating to the characteristics, qualifications, rights, limitations, and obligations of members or any class or category of members:
- 4. Resolutions adopted by either the Company's members or board of directors relating to the characteristics, qualifications, rights, limitations, and obligations of members or any class or category of members;
- 5. The minutes of all meetings of the Company's members, executed waivers of notice of meetings, and executed consents, delivered in writing or by electronic transmission, evidencing all actions taken or approved by the members without a meeting, for the past three years;

- 6. All communications in writing or by electronic transmission to the Company's members generally within the past three years, including the financial statements furnished for the past three years under O.C.G.A. § 14-3-1620;
- 7. A list of the names and business or home addresses of the Company's current directors and officers: and
- 8. The Company's most recent annual registration delivered to the Secretary of State under O.C.G.A. § 14-3-1622.

I also request the right to inspect the following records of the Company. since, as you know, I am involved in litigation with the Company and have a legitimate interest finding out: (i) the actions taken by the directors of the Company as they relate to the legal action (the "Action") against me and the facts and/or factors from May 28, 2005 to the present underlying the decisions made by the directors of the Company to proceed against me in the Action: (ii) the expenditures made by the Company with respect to the Action; and (iii) any factual support for my counterclaims against the Company:

- 1. Excerpts from minutes of any meeting of the Company's board of directors. records of any action of a committee of the board of directors while acting in place of the board of directors on behalf of the Company, minutes of any meeting of the members, and records of action taken by the members or the board of directors without a meeting, to the extent not subject to inspection under subsection O.C.G.A. § 14-3-1602(a);
  - 2. Accounting records of the Company; and
  - 3. Subject to O.C.G.A. § 14-3-1605, the Company's membership list.

While I will be providing the Company with discovery requests in the near future that may include some of the information requested contained herein, I would appreciate your providing me with the specified information in accordance with my rights under O.C.G.A. § 14-3-1602. If you refuse to provide me with access to any of the information I have requested pursuant to this request, please specify with particularity (i) the information you refuse to provide to me: (ii) the grounds for such refusal: and (iii) all facts which support such refusal.

As you are aware, all of the foregoing records are required to be kept by the Company in accordance with the requirements of O.C.G.A. § 14-3-1601. In lieu of physically inspecting the records. I may choose to exercise my right, pursuant to O.G.A. § 14-3-1603, to have the

Company provide me with all of the requested information by photographic, xerographic, or other means. Accordingly, please provide me with an estimate of the cost of producing or reproducing the records and I will let you know how I wish to proceed. The Company may impose a reasonable charge, covering the costs of labor and material, for copies of any documents provided to me which shall not exceed the estimate you provide to me.

As you also are aware, I am entitled to inspect the documents I have requested within five business of your receipt of this request. Accordingly, please send me a cost estimate of providing me with all of the requested information by photographic, xerographic, or other means this week so that I may make my decision and obtain copies of them either through the Company's reimbursable efforts or my own by the end of next week.

Thank you for your help and I look forward to hearing from you soon.

Very truly yours.

Larry C. Oldham

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