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FILE NO: 37077.1602

May 22, 2006

Via E-Mail and Overnight Mail

Wesley C. Smith
5347 Landrum Road
Apartment 1
Dublin, Virginia 24084-5603

Wesley C. Smith v. Roger Vanderhye
Circuit Court of Pulaski County
Case No. CL-06-207

Dear Mr. Smith:

We represent Roger Vanderhye in connection with the above-referenced suit. We are writing to advise you that we object to the commencement of this suit in Pulaski County, and we intend to seek transfer of this case to the Circuit Court of Fairfax County, Virginia. It is our position that pursuant to Virginia Code §§ 8.01-261 and 8.01-262, venue is properly laid only in Fairfax County, inasmuch as the injunctive relief you seek would be performed in Fairfax County (Va. Code § 8.01-265(15)(c)), Mr. Vanderhye has his principal place of employment in Fairfax County (§ 8.01-262 (1)), and the events alleged in your Complaint all transpired in Fairfax County (§ 8.01-262(4)), Copies of these statutes are enclosed for your reference.

To avoid unnecessary litigation costs, we ask that you consent to have this case transferred to the Circuit Court of Fairfax County. If we are not able to obtain your consent to transfer of venue, we will file an objection to venue and a motion to transfer. We also will ask the Court to award us our attorney's fees and costs, pursuant to Virginia Code § 8.01-266 (copy enclosed) to compensate Mr. Vanderhye for the inconvenience, expense, and delay caused by commencement of this suit in an improper forum. We anticipate that our attorneys' fees would be several thousand dollars.

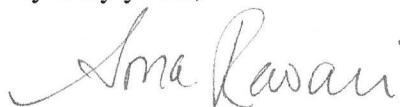
If you consent to transfer of the case to the Circuit Court of Fairfax County, please endorse the enclosed Consent Order and return it to me by May 31, 2006. If we do not receive the

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Wesley C. Smith
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endorsed Consent Order by that date, we will have no choice but to seek transfer of venue and our attorneys' fees associated with the same.

Very truly yours,

A handwritten signature in cursive script that reads "Sona Rewari".

Sona Rewari

cc: Roger D. Vanderhye