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June 1, 1998

Dear Downwinder Client:

Over the past eight months, we have attempted to reach you on several occasions to answer discovery required in this case. We mailed to the last known address we had for you a package containing all of the material which we needed to answer. We enclosed a status report, as well as instructions with respect to this discovery period. In turn, we had legal assistants telephoning to try and reach you at your last known telephone number. Where we were concerned that we might not have an up-to-date address, we requested all of our remaining clients to provide us any information they had regarding your telephone number and address.

We have not been able to complete your discovery responses either because we have not been able to reach you, because you have not returned the written materials which we sent, or because you did not cooperate with the legal assistants who were attempting to answer the discovery requests.

In a prior letter, we informed you that if we had not submitted your discovery responses to the defendants by December 1, 1997, the Court might dismiss all of your claims and we would have no further opportunity to pursue your claims in this matter. This is to apprise you that the Court has now informed us it is likely to dismiss all of your claims if we have not completed all of your written discovery by June 8, 1998. This would mean that you would have no future opportunity to pursue these claims.

We will make one last effort to telephone at your last known phone number. We urge you, however, to once more, to contact us to complete this discovery process or return your papers **immediately**. If you have any further questions, please do not hesitate to call. Thank you.

Very truly yours,

Todd M. Johnson

TMJ/sjs