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May 31, 2012

VIA FACSIMILE AND U.S. MAIL

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Lancaster, et al. vs. Georgia-Pacific LLC, et al.
Case No.: 2007-CP-07-3166
Appeal Case Tracking No.: 2012210927
YCR File: 13376-20070735

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SC Court of Appeals

Dear Ms. Kitchings:

Just this morning, we received via email a copy of Appellant Del Webb's "Appellant's Emergency Petition to Enforce Automatic Stay, Or, In The Alternative For Supersedeas Or To Impose Stay" in the above-referenced matter, which Del Webb has advised will be filed with the Court today. Please know that the Respondents strongly object to this matter being considered *ex parte* (as Del Webb requests).

By way of brief background, Del Webb (and also Appellant Georgia-Pacific) has appealed six interlocutory orders entered in the conduct of this class action that was certified by Judge Young. The Respondents have already moved to dismiss Del Webb and Georgia-Pacific's appeals and have also moved for certification of this case directly to the Supreme Court for immediate consideration of the motions to dismiss. The Respondents contend that the interlocutory appeals taken in this matter are improper and should be dismissed to avoid any possibility for undue delay in adjudicating this matter before the circuit court—this case is already four-plus years old. As evidenced by the Order Regarding Interlocutory Appeals, which is the subject of Del Webb's emergency filing, Judge Young is also concerned about undue delay of this action. Under the circumstances, the Respondents contend that there is no threat of irreparable harm to Del Webb. Indeed, it is the Respondents that are threatened with harm if Del Webb is unduly rewarded with further delay and disruption on account of its improper appeal; particularly, if the Respondents are not even afforded a meaningful opportunity to be heard.

Accordingly, while the Respondents certainly appreciate the Court's prompt attention to the matters before it in this appeal, the Respondents, again, strongly object to any *ex parte* action by the Court on Del Webb's emergency filing, and would respectfully request that the normal time limits for response to a petition be followed. If the normal time limits are not followed, the

Respondents would ask, at the least, that they be afforded a meaningful opportunity to thoughtfully respond to Del Webb's emergency filing.

Thank you for your attention to this matter. Of course, if you have any questions please do not hesitate to contact us. And, lastly, please note the appearance of William L. Howard, Sr. in this matter as additional counsel of record for all of the Respondents.

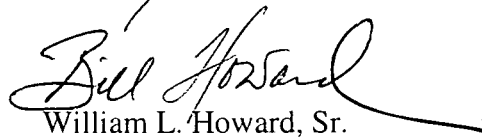
With best wishes and kindest regards, we are

Sincerely,

YOUNG CLEMENT RIVERS, LLP



Russell G. Hines



William L. Howard, Sr.

RGH/jla

Enclosures

cc: (All below via e-mail only)
Robert L. Widener, Esquire
A. Victor Rawl, Jr. Esquire
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