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NORTHERN DISTRICT OF OHIO
TOLEDO

Date: 2 June 2004

To: The Honorable James G. Carr
United States District Court
Northern District of Ohio
203 United States Court House
1716 Spielbusch Avenue
Toledo, Ohio 43625-1363

3:03CV7662

Ref: Preliminary Injunction Order Dated 11 May 2004
Supplemental Response to Preliminary Injunction Order
Dated 11 May 2004
Court Order Dated 27 May 2004

Via: Facsimile and U.S. Mail

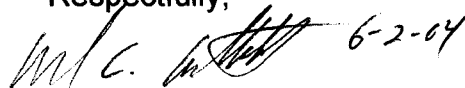
Re: Letter from Attorney Shaughnessy dated 1 June 2004

Sir:

Having grievously misunderstood this Court's Order of 11 May 2004, I spoke to Attorney Shaughnessy regarding my authorities, if any, regarding Delmarva Timber Trust on 17 May 2004 and again on 26 May 2004. I stated in my Supplemental Response, dated 27 May 2004, per advice of counsel, that I did not have legal authority to obtain legal counsel for the Trust. I asked Attorney Shaughnessy to put the facts regarding this opinion in written form so that I could submit it, without claim of privilege, to this Court.

Additionally, I have asked Cheryl Meddles-Torres to revoke the Power of Attorney Letters dated 15 August 2001 and 18 January 2002. Enclosed is a facsimile copy of her revocation letter dated 1 June 2004.

Respectfully,



Michael C. Cottrell
1157 West 7th
Erie, PA 16502

Enclosure

Facsimile & U.S. Mail

cc : John F. Marsh, Esq.
Clerk of Court, U.S. District Court

GORDON • FEINBLATT
ROTHMAN, HOFFBERGER & HOLLANDER, LLC

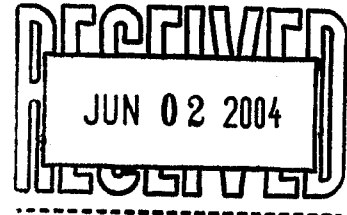
WILLIAM D. SHAUGHNESSY, JR.
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233 EAST REDWOOD STREET
BALTIMORE, MARYLAND
21202-3332
410.576.4000
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June 1, 2004

VIA FEDERAL EXPRESS (7920 1190 3836)

Michael C. Cottrell, Esquire
1157 West 7th Street
Erie, PA 16502



Re: Delmarva Timber Trust

Dear Mr. Cottrell:

This letter is to follow up on our telephone conversations of last week.

You initially contacted me to ask to serve as Resident Agent for the Delmarva Timber Trust, a Maryland real estate investment trust. I agreed to act as Resident Agent and signed a consent to act in that capacity. On May 17, 2004, I wrote you to confirm that I was only acting as Resident Agent for Delmarva Timber Trust and that you had not engaged me to perform any other specific legal work, including review of any Trust document or pursuing any assets of the Trust.

Thereafter, you consulted me regarding actions that might be undertaken to recover assets that were the property of the late Charles Owen Meddles. You told me that Mr. Meddles had created the Delmarva Timber Trust as a repository for assets for the benefit of his children. You told me that you believed that Mr. Charles Owen Meddles had substantial assets at the time of his death in 1992, that these assets needed to be discovered and identified and that Mr. Meddles' daughter had provided you with a Power of Attorney to act on her behalf. You asked if it was possible for you to be appointed as a Personal Representative of the Estate of Charles Owen Meddles so that you would have authority to investigate and recover any of the decedent's assets on behalf of his Estate. You also asked whether it would be possible to have the Maryland Courts take jurisdiction over the Delmarva Timber Trust, validate the Trust and confirm your authority to act on behalf of the Trust in recovering Trust assets.

In light of these requests, I briefly reviewed the Trust Agreements and Amendments on file with the Office of the Maryland Secretary of State and I have also discussed this matter with another attorney at my firm who practices in the Estates and Trust area. As I advised you last week, I think there are several issues that need to be addressed.

With respect to your authority to investigate and collect assets on behalf of the Estate of Charles Owen Meddles, it may be possible to have the existing small estate reopened. I understand that the widow of Mr. Meddles was named as Personal Representative. Once the Estate is reopened, you could either work through Mr. Meddles' widow as Personal Representative or seek her consent to have you named as a Co-Personal Representative for purposes of investigating and gathering assets of the Estate of Charles Owen Meddles.

With regard to your authority to act on behalf of Delmarva Timber Trust, I advised you of several concerns. From documents that you provided me and copies of documents obtained from the Maryland Secretary of State's office, I am uncertain whether you have authority to act on behalf of the Trust. For example, documents reflect that Donald A. Meddles and John E. Meddles are "removed" as Trustees of the Trust. Section 10.2 of the Declaration of Trust provides for a mechanism of Trustee removal by Shareholders. I see no evidence that any Shareholders acted to effectuate removal. Indeed, in the Amendment to Declaration of Trust dated April 7, 2004, the document reflects that there are "no Stockholders" of the Delmarva Timber Trust. Given the lack of Stockholders to effectuate removal, I cannot say with any confidence that any prior Trustees have been effectively "removed". Furthermore, given the lack of Stockholders of the Trust and given the uncertainty of whether prior Trustees were removed, I am not confident that you have been effectively appointed as CEO or even a Trustee of the Delmarva Timber Trust. I suggested to you that, in order to provide you with assuredness that you have authority to act on behalf of the Trust, that you consider filing a Petition in the Circuit Court of Anne Arundel County seeking a Declaratory Judgment, and/or that the Court assume jurisdiction over the Trust so that the Court could determine whether actions purporting to remove Trustees and appointing other officers of the Trust were valid actions. I suggested to you that parties to such a Declaratory Judgment action would need to include anyone who had any interest in the Trust, including Mr. Meddles' widow, all persons previously named as Trustees of the Trust, and Mr. Meddles children. Absent such a court ruling, I could not assure you that you have authority to act for the Trust.

With respect to the Delmarva Timber Trust, I also raised with you the issue of the identity of the beneficiaries of the Trust. You told me that the beneficiaries were the children. I explained to you that the Trust document provided that the beneficiaries would be Shareholders and that the naming of the children in Article 12 appeared to be solely for purposes of setting the duration of the Trust. You asked whether the Trustees could issue stock to the children and I told you that the Trustees could issue stock, however, I could not provide any degree of assuredness as to who were the duly constituted Trustees who have authority to issue such stock. Again, I suggested that a such issue be included in a Declaratory Judgment action involving the Trust.

Late last week, I spoke with you by telephone. You advised me that you wanted me to do nothing further in this matter and that you intended to resign as Trustee and CEO of the Delmarva Timber Trust. Accordingly, please let this letter confirm that I will be taking no action on behalf of you or Delmarva Timber Trust.

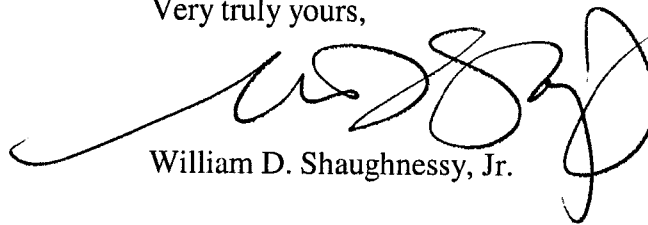
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Michael C. Cottrell, Esquire
June 1, 2004
Page 3

On Friday, May 28th, I received from John F. Marsh, Esquire a copy of a Motion to Show Cause. I understand that you have received a copy of this pleading as well. Given that I am solely the Resident Agent for the Trust, and I am not engaged as counsel of the Trust, I do not intend to take any action on this Motion or file any response thereto.

If anything in this letter is inaccurate or if you want me to take any action, please contact me immediately.

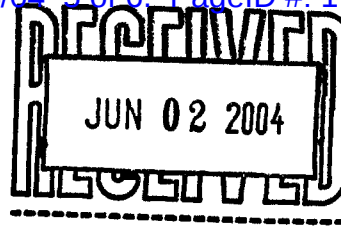
Very truly yours,

A handwritten signature in black ink, appearing to read 'W.D. Shaughnessy, Jr.', with a large, stylized flourish extending to the right.

William D. Shaughnessy, Jr.

WDS:jc

FedEx | Ship Manager | Label 7920 1190 3836



From: Origin ID: (410)576-4092
William D. Shaughnessy, Jr.
Gordon Feinblatt
233 E. Redwood Street



Ship Date: 01JUN04
Actual Wgt: 1 LB
System#: 3064586/INET1800
Account#: S *****

Baltimore, MD 21202

REF: 99998/00004 DelmarvaTrst



Delivery Address Bar Code

SHIP TO: (814)874-3257 BILL SENDER

Michael C. Cottrell, Esquire

1157 West 7th Street

Erie, PA 16502

STANDARD OVERNIGHT

WED

Deliver By:
02JUN04

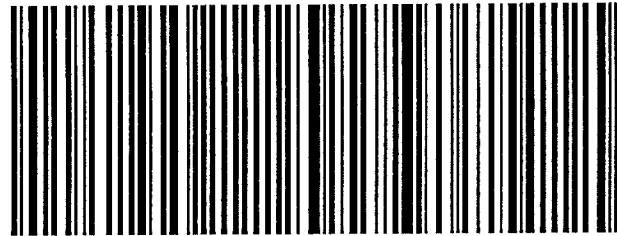
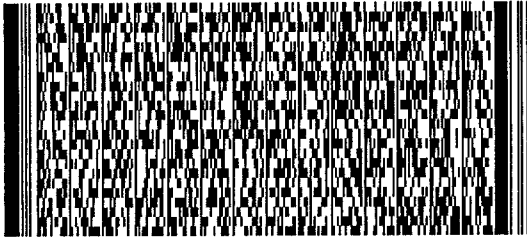
TRK# 7920 1190 3836

FORM
0201

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NK ERIA



Attn: Michael C. Cottrell
1157 West 7th Street
Erie, PA, 16502

June 1, 2004

Termination of Specific Power of Attorney

Effective immediately, I, Cheryl D. Meddles-Torres, am revoking my specific power of granted to Michael C. Cottrell, of 1157 West 7th Street, Erie, Pennsylvania, 16502 that was signed and dated on 15 August 2001.

In addition, the Addendum to the Specific Power of Attorney dated on 18, January 2002 shall also be revoked effective immediately.



Cheryl D. Meddles-Torres
Principal

6/1/2004
Date