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Via Certified Mail & Email (chapin780@aol.com)

May 24, 2023

Thomas Pond Improvement Association
PO Box 537
South Casco, ME 04077
Attn: Bob Chapin, President

Re: Request for Inspection of the Books and Records of Thomas Pond Improvement Association

Dear Bob:

This law firm represents Steven K. Hazen, Dana Watkins and Robert Murch (collectively, our "Clients"), each of whom, pursuant to Article Fifth of the Articles of Incorporation of the Thomas Pond Improvement Association (the "Association"), qualify as a member of the Association.

We hereby request, on behalf of our Clients in their capacities as voting members of the Association, that you make available all books and records of the Association including, but not limited to, the membership rolls setting forth the name and address of each member of the Association. We direct your attention to 13-B M.R.S.A. § 715(1) which provides, in part, that any voting member of a nonprofit corporation may inspect the books and records of such nonprofit corporation on not less than five (5) business days notice for the purpose of enabling such member to perform such member's duties and responsibilities conferred upon the member by the articles of incorporation, bylaws or by law.

Article 5 of the Bylaws of the Association provides that officers of the Association must be selected from the members of the Association. Article 6 of the Bylaws of the Association provides that the directors of the Association must be selected from the members of the Association. So that our Clients can fulfill their duties as voting members of the Association, our Clients desire – and are so entitled – to review the member rolls to identify those individuals qualified to receive their votes as an officer and/or director of the Association.

Via Email

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Please make available the books and records of the Association, including the member rolls setting forth the name and address of each member of the Association, on May 31, 2023 at 10:00 EST at the “Hawthorne House” at 40 Hawthorne Road in Raymond, Maine.

We stand ready to enforce our Clients’ rights by way of court order if necessary, as authorized by 13-B M.R.S.A. § 715(2).

Please confirm no later than 5:00PM EST on Friday, May 25, 2023 that you will make the records available as and when requested.

Sincerely,

/s/ Patrick Brady

Patrick Brady

CC: Steven K. Hazen (via email only): skhazen@sbcglobal.net

Dana Watkins (via email only): danawatkins@mac.com

Robert Murch (via email only): robertmurch@combinedmanagement.com

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