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January 8, 2019

Via First Class U.S. Mail:

Peggy Johnson, President NC Chapter,
United Daughters of the Confederacy
302 N. Blount St.
Raleigh, N.C. 27603

Caroline Hancock, Local Chapter
United Daughters of the Confederacy
466 Harper Street
Winston-Salem, N.C. 27104

E. Thomas Drake, Registered Agent
United Daughters of the Confederacy, NC Division
302 N. Blount St.
Raleigh, N.C. 27603

Via Electronic Delivery:

powellsn@icloud.com and ncpres@ncudc.org

Re: Confederate Memorial Statue (the "Statue") on the former Forsyth County Courthouse property at 50 West Fourth Street, Winston-Salem, North Carolina

To All:

This firm represents Winston Courthouse, LLC (the "Owner"), the owner of the former courthouse building and grounds at 50 West Fourth Street, which has been converted into private residential apartments.

The Owner is a private entity, not related or associated in any way with any federal, state, or municipal governmental body. With certain exceptions, the Owner owns all of the land and improvements within the block bounded by Main Street, Third and Fourth Streets, and Liberty Street outside the public right-of-ways (the "Property").

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The Owner acquired the Property from Forsyth County (the "County") on March 18, 2014. The purchase agreement between the Owner and the County *specifically excluded*, among other things, the "public monuments located outside of the building", and the Owner agreed to grant the County, at the County's request, necessary easements to allow the County continued access to the land and building to "maintain and/or remove" the monuments at the County's expense. The deed from the County to the Owner contains essentially the same language which expressly excluded the "public monuments" and other items as being part of the conveyance to the Owner, and reserved rights to an express easement for access to the monuments. At the time of the Owner's acquisition of the Property, the "public monuments" were identified simply as one group, the Owner was under the impression that *all* of the statues, plaques, and other monuments on the Property were owned by the County and that the County was the only party the Owner could rightfully allow to enter the Property to maintain or remove those items. This belief formed the basis of the Owner's position that it should refrain from making any public comment on the question of the Statue since the Owner had no rights with respect to the Statue and/or its disposition.

The press release issued by the United Daughters on January 3, 2019, states "we wish for the memorial to remain in its place, where it has stood since it was dedicated in 1905, and will do everything in our power to see that it continues to remain". Various other organizations have made public statements regarding the situation of the Statue. According to a report in the January 5, 2019, Winston-Salem Journal, there are at least two other organizations planning a demonstration of some sort at the Statue, and one group intends to lay flowers at the Statue in the near future.

In light of recent publicity and debate surrounding the Statue, the Owner asked for clarification from the County as to ownership of the Statue. The County has informed the Owner that the County is not contesting the United Daughters of the Confederacy's claim of ownership of the Statue and does not intend to take any further action with regard to the Statue.

Notably, the Owner has not granted any easement to the County with respect to the Statue. Therefore, the Statue is not located on public property and thus is not covered by N.C. Gen. Stat. §100-2.1. No one can access the Statue, or enter upon the Property, for any purpose without the Owner's permission.

The Owner has not and is not taking any political position, and is not being influenced by any political motives, with respect to the display of the Statue. The

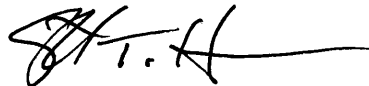
Owner's primary responsibility is to the residents of the Property who have a right to enjoy a quality living space without being subjected to disturbances of any kind. Unfortunately, the recent controversy, press reports, and references to potential violence have raised serious concerns for some of the residents.

Therefore, in order to protect the residents and the Property, the Owner cannot allow the Statue to remain on the Property. Since the United Daughters have asserted their ownership of the Statue without challenge from the County, by this letter the Owner is formally requesting that the United Daughters make the necessary arrangements to move the Statue. It is our hope that this can be accomplished by January 31, 2019, the date proposed by the City of Winston-Salem in its letter to you dated December 31, 2018.

Please contact me as soon as possible to discuss plans to relocate the Statue. If the United Daughters elect not to remove the Statue as requested, the Owner will have no choice but to explore other available options, including cooperating with the City on the proposed relocation of the Statue to Salem Cemetery.

Thank you in advance for your prompt attention and response to this matter.

Very Truly,



Scott T. Horn

STH/kaf

c: Angela Carmon (via electronic delivery)
Gordon Watkins (via electronic delivery)