



THE HEEKIN LAW FIRM

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Licensed in Oregon and Washington

RECEIVED

DEC - 4 2007

December 4, 2007

Via Hand Delivery

Hitt Hiller Monfils Williams LLP

Brian B. Williams
Hitt Hiller & Monfils LLP
411 SW 2nd Ave Ste 400
Portland, OR 97204

Re: Jeffrey Simpson

Dear Brian:

As I explained several times over the telephone, there is no good faith basis in law or fact for your client's claim.

First, as we discussed a few weeks ago, I enclose a chronology of your client's criminal history and the court records. Your client has had at least one criminal conviction every year between 1985 and 2004, except for the nine years (1990-99) he spent in prison for robbery and attempted kidnapping. Even in that nine year span, he was convicted while in prison for criminal conspiracy to commit supplying contraband.

His criminal record shows an ability to conspire with others to violate the law. It also shows that he made false reports to law enforcement, committed forgery, falsified information about himself, and attempted to elude law enforcement. It appears that your client has used eight different aliases, engaged in identity theft, and has been a methamphetamine addict. He also has a history of prostitution. In short, the records reveal that your client is totally untrustworthy and will lie, cheat, or steal as necessary to get what he wants. Furthermore, your client had a history in Oregon's foster care system of making false accusations whenever a situation was not to his liking.

Second, cases such as Froehlich v. Ohio Dept. of Mental Health, 871 N.E. 2d 1159 (2007) and Commonwealth v. Geoghan, 14 Mass.L.Rptr. 331 (2002) state that the statute of limitations begins to run when there is no indictment or the prosecutor abandons the criminal investigation or even as early as when the prosecutor becomes involved in a criminal investigation. In addition, two Oregon cases to consider are: In re: Roman

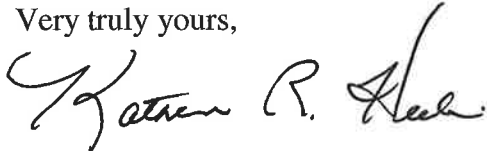
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Catholic Archbishop of Portland in Oregon, 2006 WL 2038642 (Bankr.D.Or.) and Flaningam v. Flaningam, 145 Or. App. 432 (1996).

Third, Janet Hoffman and I would like to meet with you to discuss this information and your client. We are available on Wednesday, December 12, 2007. I trust that after you meet with us and review the enclosed information and the cases mentioned that you will conclude there is no good faith basis in law or fact for your client's claim.

Please let me know when you are available to meet with Ms. Hoffman and me.

Very truly yours,

A handwritten signature in cursive script that reads "Katherine R. Heekin". The signature is written in black ink and is positioned above the printed name.

Katherine R. Heekin

Enclosures

cc: Client



ATTORNEYS AT LAW

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December 7, 2007

BY FACSIMILE – 503-914-1889

Katherine R. Heekin
The Heekin Law Firm
121 SW Morrison St., Suite 600
Portland, OR 97204

Re: Jeffrey Simpson
Our File No. 635-002

Dear Katherine:

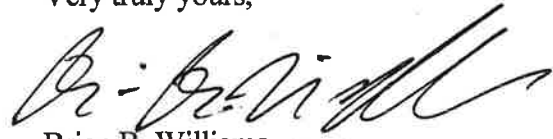
Thank you for your December 4 letter and the attachments. I would be interested in sitting down with you and Janet Hoffman to discuss the case on December 12, 2007. Unless someone has another place in mind, let's plan to meet at my office at 8:30 a.m. I will not have Jeff Simpson sit in on that meeting as I don't think it would be appropriate.

So that the record between us is clear, I appreciate that Mr. Simpson has a long criminal record, which he disclosed to me at the outset of our first meeting. I am also certainly sensitive to the statute of limitations issue, which is something I am particularly interested in talking with Janet Hoffman about. Up to this point, nobody has been able to provide me with documents that establish that the statute of limitations actually began to run at a time such that this claim is now time barred.

The other thing to keep in mind, is that even hypochondriacs get sick sometimes. In other words, no matter what kind of history of lying and criminal conduct Mr. Simpson has, he may, in fact, be a victim of sexual abuse by your client. We have gone to some effort to obtain independent confirmation of Mr. Simpson's story. At this point, we have one independent witness who corroborates Mr. Simpson's story, and we believe that Mr. Simpson can identify parts of your client's anatomy that he would not be able to without sexual contact. In short, the investigation we have been able to complete to this point indicates that Mr. Simpson is telling the truth and is the victim of long term sex abuse by your client. Although we have not committed to pursuing the claim with a lawsuit on behalf of Mr. Simpson, there certainly is a good faith basis for such a lawsuit. Credibility issues are, of course, resolved by jurors.

If you have another time or location other than our office at 8:30 on December 12, please just let me know.

Very truly yours,

A handwritten signature in black ink, appearing to read "Brian B. Williams". The signature is fluid and cursive, with a large initial "B" and a long, sweeping tail.

Brian B. Williams

BBW/nm

cc: Jeff Simpson