

THE BEASLEY FIRM, LLC

ATTORNEYS AT LAW



THE BEASLEY BUILDING
1125 WALNUT STREET
PHILADELPHIA, PA 19107.4997
WWW.BEASLEYFIRM.COM

HEIDI G. VILLARI, ESQUIRE
HEIDI.VILLARI@BEASLEYFIRM.COM
215.931.2682

ADMITTED TO PRACTICE:
PENNSYLVANIA
NEW JERSEY

NEW JERSEY OFFICE
1949 BERLIN ROAD
SUITE 100
CHERRY HILL, NJ 08003
856.354.0755
FAX: 856.673.0060

May 9, 2016

VIA CERTIFIED AND FIRST-CLASS MAIL

Ms. Keri Burnor
1206 Apollo Road, #850191
Richardson, TX 75085

Re: Potential Claims

Dear Sister Keri:

I was very touched by your story told to me by you in the last 24 hours. Prior to yesterday, I was unaware of your plight. I certainly applaud you for the public outcry that you singlehandedly invoked against the Catholic Church. You are a crusader and refused to be victimized. I am sorry for all that you have been through and know I will never forget you. The civil process (different from the criminal one) is complicated and many factors are considered in analyzing a case for money damages. We discussed some of the considerations that we factor into our investigation today with your attorney Robert Gray, Esquire.

Before you send the sensitive material that you believe is confidential, we must advise that we do not believe that our firm can handle your case. We believe it would be more appropriate for you to find local counsel within Massachusetts who are licensed to practice law in that jurisdiction. Your potential file is fact and document intensive and the costs necessary to prosecute your case civilly together with a local counsel may exceed an award that you could potentially obtain. This is why we believe it best for you to find a Massachusetts lawyer to represent you. Our opinion to decline representation is not controlling. This is why we urge you to search for counsel who may view your potential case differently. It is not our job to extinguish your desire to pursue litigation. That is your right! So please, without delay, return to Mr. Gray tomorrow as he may be in the best position to assist in finding you an attorney who can represent you. Under the law, it is my understanding that you have until 8/23/16 to file a lawsuit. However, the Statute of Limitations can be tricky. This is yet another reason for you to seek counsel in who can analyze your state's (Commonwealth of Massachusetts) Statute of Limitations. Yesterday, we discussed the fact that your Statute of Limitations is fast approaching. It would be exceedingly difficult for our firm to take on this 16 year endeavor in 3 months' time from Philadelphia to Boston,

Ms. Keri Burnor

May 9, 2016

Page 2

Massachusetts. Our firm, generally (more typically than not) provides local representation within Pennsylvania and New Jersey, which is where I am licensed to practice law. Please know that if you do not file an action in advance of the Statute of Limitations, you can forever be barred from the right of recovery. This is why it is imperative for you to act promptly in retaining an attorney now who is in a position to fully analyze the potential defendants and claims in your potential case as well as the Statute of Limitations.

On a personal note, you have overcome so much, and with bravery, you continue to fight against victims of abuse. Your story certainly creates a true doubt in the Catholic institution and its allies. I understand that you spent some time in sending documents through "WeTransfer" that we were unable to download. We did not download nor print the documents. We will delete and destroy all of the e-mails, we transfer invites and materials that you electronically submitted and will not disseminate to anyone. Our discussion will remain confidential. Thank you for having the confidence to reach out to us to preliminarily investigate your potential case.

I am truly sorry for all that you have been and continue to go through and I absolutely wish you the very best in the future.

Kindest regards,

THE BEASLEY FIRM, LLC

/s/ Heidi G. Villari

HEIDI G. VILLARI, ESQUIRE

HGV/ss

cc: Robert W. Gray, Esquire