

RICHARDSON, PATRICK,
WESTBROOK & BRICKMAN, LLC

James C. Bradley
Michael J. Brickman
J. David Butler
William M. Connolly
Jerry Hudson Evans
Lisa H. Fields
Thomas P. Gressette, Jr.
H. Blair Hahn
Daniel S. Hahnberger
Christina H. Harlow
Kimberly E. Keewen
Gregory A. Lafollet
K. Elizabeth Middleton
Daniel D. Myers
Karl E. Nevak
Kevin L. O'Brien
Charles W. Patrick, Jr.
Gardner C. Rice
Terry E. Richardson, Jr.
Thomas O. Rogers
A. Hoyt Rowell, III
Northrup J. Thiesing
T. Christopher Tomk
Robert M. Turkewitz
Nicholas J. Vogelzang III
Duffy
James L. Ward, Jr.
Edward J. Westbrook
Kenneth J. Wilson
Robert S. Wood

Of Counsel:
Thomas H. Hart, III
James H. Rice, Jr.

H. BLAIR HAHN

843.727.6611 Direct Dial No.

843.727.6642 Direct Fax No.

bhahn@rpwb.com

January 29, 2004

Counsel:

As you are all probably aware, counsel for the Nevada appellants has indicated that his clients are prepared to dismiss their appeal on condition that their bankruptcy fees are paid. The amount owing is \$400,000.00. The undersigned have spoken to many lawyers in recent weeks who have said that they are prepared to contribute to a trust fund set up for this purpose. If the Nevada appeal runs its course, the bankruptcy effective date will, in all likelihood, not be reached until late 2005 or early 2006. If the Nevada appeal is dismissed, we expect to have an effective date in the summer of 2004.

Accordingly, we have opened a trust account to facilitate paying these fees. Rather than proposing a complicated contribution formula, we are simply suggesting that there must be 40 firms each willing to pay \$10,000.00 to make it possible for our clients to begin to be paid. Please make your checks payable to "Breast Implant Escrow Account" and send to Richardson, Patrick, Westbrook & Brickman, LLC at 1037 Chuck Dawley Boulevard, Building A, Mt. Pleasant, South Carolina 29464.

The account has been opened at Wachovia Bank, N.A. at 177 Meeting Street, Charleston, South Carolina 29401, account number 2000017589428, by Richardson, Patrick, Westbrook and Brickman, LLC. We hope to receive sufficient funds by Feb 21, 2004. If you have a small number of claims and wish to contribute a smaller amount, which is fine. If you have a large number of claims and feel that you should contribute a larger amount, which will, of course, also be welcome.

You will note that we have not engaged in a discussion about the merits of any of the positions taken in the proceedings. Our goal is simply to provide a mechanism to get this done if there is a sufficient willingness. The funds will be paid only upon receiving the appropriate dismissal of the Nevada appellants' appeal. In the event that more than 400,000.00 is received, we will send refunds on a pro rata basis. Again, please send checks to Richardson, Patrick, Westbrook & Brickman, LLC at 1037 Chuck Dawley Boulevard, Building A, Mt. Pleasant, South Carolina 29464.

A. Hoyt Rowell, III	H. Blair Hahn	Michael A. Eizenga	Michael J. Peerless
		Class Counsel	Class Counsel
		Ontario, Canada	Ontario, Canada