

June 10, 2015

The Right Reverend
J. Jon Bruno, D.D.
Bishop Diocesan of the
Episcopal Diocese of Los Angeles
Cathedral Center of St. Paul
840 Echo Park Avenue
Los Angeles, California 90026

Re: St. James the Great Episcopal Church
3209 Via Lido, Newport Beach, California

Dear The Right Reverend and Dr. Bruno:

I represent Griffith Company, the original developer and builder of Lido Isle and surrounding areas in Newport Beach.

As you know, in 1945, Griffith Company originally donated the St. James church site, four lots total, to The Bishop of the Protestant Episcopal Church in Los Angeles on the condition, covenant, and restriction that,

"The property conveyed shall be used church purposes exclusively and no building other than a church and appurtenances may be erected, placed or maintained thereon. The foregoing restriction/shall be binding upon the grantee, his successors and assigns. Upon the breach of the foregoing condition, the title to said property hereby conveyed and to the whole thereof shall become at once divested from the grantee herein, his successors and assigns, and shall revert and revest in the grantor, its successors or assigns."

I understand that, in 1984, The Rector, Wardens, or Vestrymen of St. James Episcopal Church told Griffith Company that the church wanted to use the three lots adjoining the central church building lot for parking purposes to facilitate their primary church purpose. On that basis, Griffith Company released its covenant, condition, and restriction for "church purposes," and reversionary interest, in the three lots only, to allow parking.

The Rt. Rev. and Dr. Bruno

Re: St. James the Great Episcopal Church site,
3209 Via Lido, Newport Beach, California

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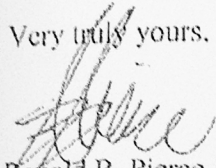
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Griffith Company never released, and never intended to release, the covenant, condition, restriction for "church purposes exclusively" for the central church building lot, or the adjoining lots from their ancillary role to serve "church purposes" solely.

That is what Griffith Company intended in 1945, 1984, and its purpose continues the same, today and beyond.

Accordingly, Griffith Company continues asserts any and all of its rights, title, and interests in the property.

Very truly yours,



Ronald B. Pierce for
RB PIERCE, A Professional Law Corporation

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