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April 27, 2009

VIA ECF

The Honorable Manuel L. Real
U.S. District Court, District of Hawaii
300 Ala Moana Boulevard
Honolulu, Hawaii 96850

*Re: In re Estate of Ferdinand E. Marcos Human Rights
Litigation
MDL 840
3CV11111*

Dear Judge Real:

With regard to Mr. Robert Swift's letter to you dated April 24, 2009,
please find attached a letter of the date from Mr. Eugene Gulland.

Sincerely,



Thomas Benedict

TLB:pdh
Attachment

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April 24, 2009

BY E-MAIL and FEDERAL EXPRESS

Robert Swift, Esq.
Kohn, Swift & Graf P.C.
One South Broad Street
Suite 2100
Philadelphia, PA 19107

Re: In re Estate of Ferdinand E. Marcos Human Rights Litigation,
MDL 840

Dear Mr. Swift:

We write in response to your letter to Thomas Benedict dated April 17, 2009. Your accusations have no merit, and your threat to seek sanctions reflects either a misunderstanding of the situation or an attempt to intimidate our co-counsel. We stand behind Revelstoke's reply memorandum, which we participated in drafting along with Mr. Benedict.

The assertion that the Class has been attempting to "manufacture" a new judgment to support its Texas collection action fairly characterizes events following the Ninth Circuit's ruling that the February 3, 1995 Hawaii judgment has expired and cannot be resurrected. *See In re Estate of Ferdinand E. Marcos Human Rights Litig.*, 536 F.3d 980, 987 (9th Cir. 2008), *cert. denied*, --- Sup. Ct. ---, 2009 WL 357554 (April 20, 2009). Soon after the Ninth Circuit ruled, the Class revived its 1997 registration in Illinois of its February 3, 1995 Hawaii judgment. The Class then attempted to treat the revived registration in Illinois as a new "Illinois judgment" that could be registered in Texas to support the Class's collection action there. The Texas federal court ruled that there was no new judgment that could be registered and enforced in Texas, and the state court likewise vacated an attempted registration. Now that the Texas courts have rejected this tactic, the Class has returned to the District of Hawaii for the avowed purpose of

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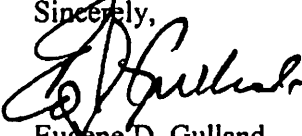
Robert Swift, Esq.
April 24, 2009
Page Two

trying to obtain a new judgment against, among others, the Estate of Ferdinand E. Marcos (the "Estate").

Revelstoke's use of the term "manufacture" to describe the Class's attempts to create a new judgment against the Estate where none now exists is an entirely fair characterization. See Webster's Ninth New Collegiate Dictionary 725 (1991) (defining "manufacture" as "1 : to make into a product suitable for use . . . 3: INVENT, FABRICATE 4 : to produce as if by manufacturing : CREATE."). Revelstoke has not accused you of criminal or unethical conduct, and it is only your letter that has raised such a suggestion.

Let's keep the focus of our activity on the merits of the case and avoid personal and *ad hominem* threats.

Sincerely,



Eugene D. Gulland

Enclosure

cc: Thomas Benedict, Esq.
Gary M. Slovin, Esq.
Sherry P. Broder, Esq.
Jon M. Van Dyke, Esq.

Responses and Replies1:03-cv-11111-MLR In Re: MDL 840 MARCOS, et al v. , et al

U.S. District Court

District of Hawaii

Notice of Electronic Filing

The following transaction was entered by Benedict, Thomas on 4/27/2009 at 4:42 PM HST and filed on 4/27/2009

Case Name: In Re: MDL 840 MARCOS, et al v. , et al**Case Number:** 1:03-cv-11111**Filer:** Revelstoke Investment Corp., Inc.**Document Number:** 10598**Docket Text:**

RESPONSE re [10594] Notice (Other) Letter dated April 27, 2009 with attached letter to Robert Swift in response to Robert Swift's letter dated April 24, 2009 filed by Revelstoke Investment Corp., Inc.. (Benedict, Thomas)

1:03-cv-11111 Notice has been electronically mailed to:

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1:03-cv-11111 Notice will not be electronically mailed to:

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