

LAW OFFICE OF  
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**VIA CERTIFIED U.S. MAIL**

November 29, 2011

President  
General Growth Properties, Inc.  
110 North Wacker Drive  
Chicago, IL 60606

President  
Bay Shore Mall, LP  
110 North Wacker Drive  
Chicago, IL 60606

Ms. Sue Swanson  
General Manager  
Bayshore Mall, Box 1  
Eureka, CA 95501

***Re: Notice of Violations and Intent to File Suit***

Dear Sir/Madam:

This Notice is provided on behalf of Northern California River Watch ("River Watch," a California non-profit Corporation. River Watch believes that General Growth Properties, Inc. and Bay Shore Mall, LP, have failed and are failing to comply with the specific condition of the 1985 Coastal Development Permit (CDP Application 1-85-83) requiring the restoration of certain on-site wetlands. The permit was issued to General Growth California, Inc. under the California Coastal Act (Public Resources Code § 30000 *et seq.*) for development at a site commonly referred to as "Bay Shore Mall," subsequently constructed and now located at 3300 Broadway between Truesdale Street and the extension of Mill Street in the City of Eureka, Humboldt County.

The Coastal Act requires that all non-exempt development in the coastal zone be appropriately permitted. The Bayshore Mall CDP, as a condition of issuance, required compliance with "Final Wetland Restoration Plan Bayshore Mall Eureka, California," prepared for "EDAW, Inc." by "Larry Seeman Associates" and dated September 1985. River Watch's concern is that General Growth Properties, Inc. and/or Bay Shore Mall, LP, which should have created the required wetlands consistent with the terms and conditions of the Coastal

Commission CDP, have failed and are failing to do so. River Watch is also concerned that General Growth Properties, Inc. and Bay Shore Mall, LP, having failed to comply with the terms and conditions of this prior CDP, propose to undertake new or additional "development" as defined in the California Coastal Act at the Bay Shore Mall in Eureka without obtaining required permit approval from the Coastal Commission.

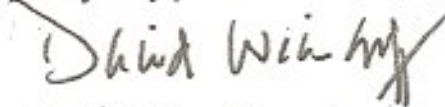
River Watch is providing you with notice that following the expiration of thirty (30) days from the date of receipt of this NOTICE, it intends to file suit in Humboldt County Superior Court against General Growth Properties, Inc. and Bay Shore Mall, LP for failure to comply with the permitting requirements of the Coastal Act. During this 30-day notice period, River Watch is willing to discuss resolution of the violation(s) identified in this NOTICE. However, if you wish to pursue such discussions in the absence of litigation, it is suggested that those discussions be initiated within the next ten (10) days.

River Watch has retained this office as well as Nardell, Chitsaz & Associates LLP to represent it in this matter. All communications should be addressed to:

David Weinsoff, Esq.  
Law Office of David J. Weinsoff  
138 Ridgeway Avenue  
Fairfax, California 94930  
Tel: (415) 460-9760

River Watch looks forward to discussing this matter with you.

Very truly yours,



David Weinsoff

cc: CSC - Lawyers Incorporating Service - Registered Agent  
Bay Shore Mall, LP  
General Growth Properties, Inc.  
2730 Gateway Oaks Drive, Suite 100  
Sacramento, CA 95833