

S. WESLEY WOOLF, P.C.
ATTORNEYS AT LAW
408 EAST BAY STREET
SAVANNAH, GEORGIA 31401
WWW.WOOLFLAWFIRM.NET

S. WESLEY WOOLF

TELEPHONE: 912.201.3696
FACSIMILE: 912.236.1884

January 31, 2012

VIA SAME-DAY HAND DELIVERY

James P. Gerard
Oliver Maner, LLP
218 West State Street
Savannah, Georgia 31401

Re: *Lisa T. Jackson v. Paula Deen, Lady & Sons Restaurant, LLC, The Lady Restaurant, Inc., Earl W. "Bubba" Hiers, Uncle Bubba's Seafood and Oyster House, Inc.; Superior Court of Chatham County*

Dear Jim:

Enclosed you will find a copy of a draft Complaint that will be filed in the very near future in the Superior Court of Chatham County. It is, of course, a draft that may change slightly before it is filed. This correspondence and the enclosed draft Complaint are provided in the context of a settlement offer and may not be used for any other purposes, including as evidence in any further proceeding.

Despite entreaties, my client has refrained from publicly discussing her claims. Your client can still gain substantial value from settlement before we file the Complaint. We are willing to sign a settlement agreement that provides for substantial mutuality of commitment, including a confidentiality provision. Settlement can occur if your clients pay my client \$1.25 million.

Of course, this is a substantial sum, and I expect the initial reaction of your clients is that we have exaggerated the value of settlement. I recognize that your clients place little or no value on any losses experienced by my client. Neither will your client share the values of a Chatham County jury, but the fact is that a jury in this community, angered by the truly outrageous behavior outlined in the draft Complaint and proved at trial, if necessary, will award my client much more than the approximately three hundred thousand dollars she already has lost in economic damages.

James P. Gerard
Oliver Maner, LLP
January 31, 2012
Page 2

Our focus at this pre-litigation stage is recouping Ms. Jackson's losses, but much of what was taken from my client is incapable of precise economic valuation. Of course, your client places no value on Ms. Jackson's losses, so it may be that the only factor available to cause your clients' consideration of settlement is the economic losses they will experience if we are caused to bring this matter to a public forum. It is my understanding that Paula Deen has lost a substantial amount of her fan base in the latest diabetes debacle. Exposure of the racist and sexist culture of her corporate and personal life is going to permanently, and irreparably, damage the value of her brand. Although the value of the offered in settlement of these claims is substantial, it pales in comparison to financial losses that are certain to arise from a public airing of these claims.

If we are unable to settle, the Complaint will not be quietly filed. I am making arrangements for a press conference on the day of filing. I have identified the journalist for the New York Times who covers civil rights matters and he will be provided a pre-filing exclusive. A nationwide press release will be issued to the major networks, newspapers, newsmagazines and news Websites across the country. Of course, my client's First Amendments rights are not restrained in the Superior Court of Chatham County. While maintaining respect for the Court, we will take full advantage of these rights.

I respectfully insist that you forward this correspondence and the enclosed draft Complaint directly to your clients. And I hope that upon full and deliberate consideration of this offer, they will come to understand that the small price they quietly pay and that my client quietly accepts will allow Paula Deen a chance to salvage a brand that can continue to have value into the future. Failure to accept this offer of settlement will expose your client to a risk of economic loss well in excess of this offer.

Thank you for consideration of this offer and I look forward to receiving your clients' acceptance by the close of business on February 6, 2012.

Sincerely,



S. WESLEY WOOLF

SWW/bms
c: Lisa T. Jackson
Enclosure