

VIRGINIA:

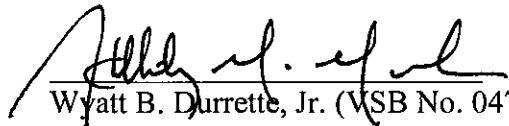
IN THE CIRCUIT COURT OF THE CITY OF LYNCHBURG

| | | |
|---------------------------------------|---|---------------------|
| JENNA DODGE, SARAH HASSMER, |) | |
| HAYLEY J. MAXWELL, |) | |
| LAURA McKEAN-PERAZA, |) | |
| KELSEY McCUNE, JENNIFER C. MULLINS, |) | |
| MARY ELIZABETH YARDLEY, |) | |
| ALICE DAMMEYER PRIEBE and |) | |
| ROY CLINTON JOHNS |) | |
| |) | |
| |) | |
| |) | Case No. 0600089400 |
| Plaintiffs, |) | |
| v. |) | |
| |) | |
| THE TRUSTEES OF RANDOLPH-MACON |) | |
| WOMAN'S COLLEGE, |) | |
| D/B/A RANDOLPH-MACON WOMAN'S COLLEGE, |) | |
| a Virginia non-stock corporation |) | |
| |) | |
| |) | |
| Defendant. |) | |

**REPLY TO DEFENDANT'S OPPOSITION TO
PLAINTIFFS' MOTION TO AMEND**

Plaintiffs' Motion for Leave to Amend Count II of the Complaint is not futile. On January 23, 2007, this Court heard oral argument on Defendant's Demurrer. The Court found that while Va. Code § 2.2-507.1 applies to the Defendant's assets, the Virginia Uniform Trust Code, Va. Code §55-541.01 et seq., does not govern, in whole or in part, how those assets are used. Accordingly, it sustained Defendant's Demurrer as to Count I. The Court did not appear to address Count II, however, so it is not futile to amend such Count at this juncture.

JENNA DODGE, *et al*
By Counsel



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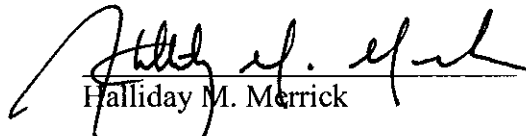
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CERTIFICATE OF SERVICE

I hereby certify that on this, the 2nd day of February, 2007, a true and accurate copy of the foregoing Reply to Defendant's Opposition to Plaintiffs' Motion to Amend was sent via first class mail and email to:

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