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December 12, 2006

Via Federal Express

H. Bishop Dansby
4060 Walnut Hill Dr.
Keezeletown, VA 22832

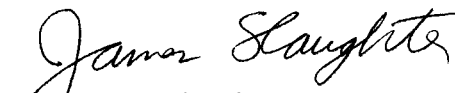
Christopher Nidel
3865-B Beecher St.
Washington, DC 20007

Re: Sandra L. Wyatt, et al., v. Sussex Surry, LLC, et al., Case No. CL06000069-00
(Surry County Circuit Court)

Dear Mr. Dansby and Mr. Nidel:

Beveridge & Diamond, P.C. and the undersigned represent Defendant Synagro Central, Inc. in the above-named case. Please find enclosed Synagro Central, Inc.'s Demurrer to Plaintiffs' Complaint. We would be pleased to undertake reciprocal service by electronic mail pursuant to Virginia Supreme Court Rule 1:12 and if you agree, please notify us at your earliest convenience.

Sincerely,


James B. Slaughter
Sarah S. Doverspike
Counsel for Defendant Synagro Central, Inc.

Enclosure

cc: Clinton B. Faison, Counsel for Defendant Synagro Central, Inc.

VIRGINIA:

IN THE CIRCUIT COURT OF SURRY COUNTY

SANDRA L. WYATT, et al.

Plaintiffs,

v.

SUSSEX SURRY, LLC, et al.

Defendants.

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Case No. CL06000069-00

**DEFENDANT SYNAGRO CENTRAL, INC.'S DEMURRER
TO PLAINTIFFS' COMPLAINT**

COMES NOW Defendant Synagro Central, Inc., by undersigned counsel, and demurs to Plaintiffs' Complaint as follows. Defendant will support this demurrer with briefing and citations prior to a hearing to be scheduled.

1. The Complaint is preempted under the United States Constitution by the federal Clean Water Act and regulations thereunder.
2. The Complaint is preempted by Virginia law and regulations governing the generation and land application of biosolids, including the State Water Control Law and regulations promulgated by the Virginia Department of Health.
3. Plaintiffs' Complaint is subject to demurrer under the Virginia Right to Farm Act, Va. Code § 3.1-22.29.
4. The Complaint is subject to demurrer because Defendant Synagro Central's actions at all times were authorized by law.
5. Plaintiffs' Complaint does not state a cause of action for negligence, nuisance or trespass.

6. Plaintiffs' Complaint fails to state facts upon which relief can be granted for negligence, nuisance or trespass.

7. Plaintiffs may not recover for the compensatory damages sought in the Complaint as a matter of law.

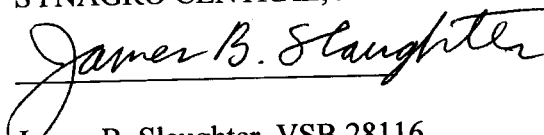
8. Plaintiffs may not recover for the punitive damages sought in the Complaint as a matter of law and may not recover punitive damages on the facts alleged.

9. Plaintiffs may not recover from Defendant Synagro Central, Inc., which has been converted under Delaware law.

Dated: December 12, 2006

Respectfully submitted,

SYNAGRO CENTRAL, INC.



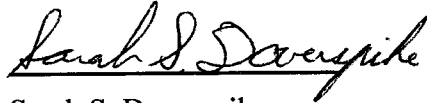
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Counsel for Defendant
Synagro Central, Inc.

CERTIFICATE OF SERVICE

I hereby certify on December 12, 2006, prior to filing, true and correct copies of the foregoing *Defendant Synagro Central Inc. 's Demurrer to Plaintiffs' Complaint* were served by Federal Express on counsel for Plaintiffs H. Bishop Dansby, 4060 Walnut Hill Dr., Keezletown, VA 22832, and Christopher Nidel, 3865-B Beecher St., Washington, DC 20007, and on Defendant Sussex Surry LLC's registered agent, Sidney J. Brandon, Jr., 140 Danielstown Road, PO Box 158, Dundas, Virginia 23938.



Sarah S. Doverspike
Counsel for Defendant Synagro Central, Inc.