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July 1, 2013

United States Securities and Exchange Commission
Attention: Ms. Elizabeth M. Murphy, Secretary
Station Place
100 F Street, NE
Washington, DC 20549-1090

Subj: File 81-939: W2007 Grace Acquisition I, Inc. (“W2007 Grace”)

Ladies and Gentlemen:

This letter is a follow-up to my letters submitted to the Commission, dated May 20, 2013 and June 20, 2013.¹

I acknowledge that the public comment period may have closed in this matter. However, I believe that there have been material developments regarding the Application, the Supplemental Letter and the public comments that need to be brought to the attention of the Commission.

In my May 20th letter, I included a section titled: “FACTOR 2: TRADING INTEREST IN W2007 GRACE”.² In that section of my letter, I addressed a market oppressive policy maintained by Goldman Sachs since the 2007 Merger that has prevented market participants from accessing information on W2007 Grace, and which policy was directly relevant to the claims in the Application. I further stated that I believed that it is intellectually dishonest for Goldman Sachs to prevent potential investors from evaluating W2007 Grace’s financial information, and withhold disclosure of this policy from the Commission, and then misleadingly claim to the Commission (in the Application) that there is limited trading interest now, or in the future in the Grace Preferred Stock.

Critically, Goldman Sachs attempted to discredit these facts in their Supplemental Letter:

“Several comment letters were submitted in response to the Application. We will not endeavor to respond to all of the matters raised in the letters, many of which contained inaccurate representations and characterizations some of which the Company maintains do not relate at all to the Application...”³

¹ Defined terms in this letter have the same meaning as in my May 20th and June 20th letters.
² May 20th letter at 4.
³ Supplemental Letter at 1.

I believe that it is important for the Commission to be made aware that the oppressive policy of Goldman Sachs that was detailed in my May 20th letter was apparently amended on June 28, 2013 to allow prospective investors to review company information and financial statements, albeit under continuing confidentiality restrictions:

“The Company has elected to make certain Company materials and information available to holders and prospective holders of Grace Preferred Stock. Interested holders and prospective holders of Grace Preferred Stock must complete, sign and mail to the Company a request form which is available on the Company’s website (www.equityinns.com). Such holders and prospective holders will be required to certify their status as a holder of Grace Preferred Stock (or that they are contemplating acquiring shares of Grace Preferred Stock, as applicable), acknowledge their understanding that the materials provided must be kept confidential...”⁴

While the Application remains open at the Commission, I believe that it is disingenuous by Goldman Sachs in their Supplemental Letter to attempt to discredit before the Commission the public comment letters and their cited oppressive actions of Goldman Sachs, while concurrently attempting to partially correct those oppressive matters, and omitting such attempts from Commission.

The fact that Goldman Sachs is now attempting to give the impression that their oppressive policy never existed, should be viewed by the Commission as a clear acknowledgement by Goldman Sachs, despite their Supplemental Letter, that their oppressive policy successfully and materially reduced market trading interest in the Grace Preferred Stock since the 2007 Merger, as I described in my May 20th letter (at 4).

I respectfully urge the Commission to examine this additional matter, which demonstrates the lack of credibility by Goldman Sachs and its Application.

I reiterate my recommendation that the Commission should (i) deny the Application; (ii) order that W2007 Grace resume its SEC reporting obligations; (iii) take appropriate action on the unlawful related-party activities described in my May 20th letter that have harmed public investors; and (iv) investigate the circumstances of the Form 15 filing, as described in my June 20th letter.

I support a public hearing on this matter and would be willing to participate if the Commission schedules a hearing.

Sincerely,



Andrew R. Siegel
Managing Member

⁴ Frequently Asked Questions, updated June 28, 2013, appearing on the company’s website (www.equityinns.com)