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CERTIFICATE OF LIMITED PARTNERSHIP

OF

WEST BRICKELL TOWER, LTD.

Pursuant to the authority of Section 620.1201, Florida Statutes, the undersigned, constituting the sole general partner of WEST BRICKHLL TOWER, LTD., (the "Partnership"), hereby submits the following in connection with the formation of the Partnership;

- 1. The name of the Partnership shall be WEST BRICKELL TOWER, LTD. (the "Partnership").
- 2. The address of the initial office where records shall be kept shall be The Brandywine Centre 1, 580 Village Blvd., Suite 360, West Palm Beach, Florida 33409. The name and address of the initial registered agent for service of process is The Richman Group of Florida, Inc., The Brandywine Centre 1, 580 Village Blvd., Snite 360, West Palm Beach, Florida 33409.
 - 3. The names and initial business address of the General Partner is:

WEST BRICKELL TOWER GP, LLC, a Florida limited liability company The Brandywine Centre 1 580 Village Blvd., Suite 360 West Palm Beach, Florida 33409

- 4. The initial mailing address of the limited partnership is The Brandywine Centre 1, 580 Village Blvd., Suite 360, West Palm Beach, Florida 33409.
- The latest date upon which the Partnership is to dissolve shall be December 31, 2070.
 - 6. The Partnership hereby elects to not be a limited liability limited partnership.

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This Certificate has been executed by the undersigned as of the 4th day of October, 2010.

GENERAL PARTNER:

WEST BRICKELL TOWER GP, LLC, a Florida limited liability company

By: TRG Member of FL I, LLC, a Florida limited liability company, its sole member

By: William T. Fabbri

Executive Vice President

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ACKNOWLEDGEMENT OF REGISTERED AGENT

Having been designated as the Registered Agent for WEST BRICKELL TOWER, LTD., the undersigned hereby accepts the designation and agrees to act as the Registered Agent of said limited partnership and states that it is familiar with and accepts its statutory obligations as such.

THE RICHMAN GROUP OF FLORIDA, INC., a Plexida corporation

Wildard T. Pabbri, Executive Vice President

Dated this 4th day of October, 2010.

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