

Dear Dave:

As you know, Judge McGuirl went through my attorneys' fees spreadsheet and reduced the hours. She did not reduce the transcript costs at all. She also indicated she was not interested in parsing each individual entry and said that where there was an entry with both OMA work, and non-OMA work, she would split the hours. Where there were entries with no OMA work, there would be no fees, and where there were entries that were all OMA work, she would keep those hours intact. Accordingly, it is unlikely she will further reduce the hours when and if the matter is before her on a motion for attorneys' fees.

Judge McGuirl also advised that she would not go below \$250 for my hourly rate.

In light of that fact, the Union has authorized me to make a demand for \$250/hr. based on the hours submitted to you in the most recent spreadsheet (which were reduced in accordance with the Judge's notes), in addition to the transcript costs. That amount is \$32,269.00.

For your reference, below is breakdown of what would be owed under various hourly fees (with the transcript costs).

\$350/hr: \$43,694

\$300/hr: \$38,119

\$275/hr: \$35,195

\$250/hr: \$32,269

In the event I am forced to file a motion for attorneys' fees, do the accompanying research and obtain the necessary affidavits, I will be requesting reimbursement for all hours spent doing that work. In addition, I will be seeking the hours and rate I originally requested. That amount was around \$55,000.

I see you have an executive session on the agenda tonight with the Town Council. Please let me know your decision tomorrow.

Feel free to contact me with any questions,

Thanks,  
Liz

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