

RE: RE: Preliminary Budget

Tuesday, September 29, 2015 8:00 AM

Subject RE: RE: Preliminary Budget
From Byrne, Randall (Treasury)
To Natasha Henderson
Cc Workman, Wayne (TREASURY); Schafer, Suzanne K. (Treasury)
Sent Tuesday, September 29, 2015 7:46 AM

Natasha:

Thanks for the revised cost estimates. Can I get more detail and the timing of items 1-5? Please call me if you have any questions.

Thanks,
Randy

From: Natasha Henderson [<mailto:nhenderson@cityofflint.com>]
Sent: Monday, September 28, 2015 7:03 PM
To: Byrne, Randall (Treasury) <ByrneR1@michigan.gov>
Subject: Fwd: RE: Preliminary Budget

Thanks,
Natasha L. Henderson, City Administrator
City of Flint, Michigan
@Samsung Galaxy Note 4

----- Forwarded message -----
From: "Trebilcock, Christopher M." <trebilcock@millercanfield.com>
Date: Sep 28, 2015 12:19 PM
Subject: RE: Preliminary Budget
To: "Natasha Henderson" <nhenderson@cityofflint.com>
Cc:

Natasha:

As I mentioned on the phone this afternoon, we have been able to review the pleadings and procedural posture of the *Shears* case. Given the work that has been done thus far, I think we can revise our estimates favorably for the City. For your consideration, here is a summary of our revised estimated budget:

- 1) Motions and appearances before the Circuit Court, prior to trial on damages: \$35,000 - \$75,000
- 2) Motions and briefs before the Court of Appeals: \$45,000 - \$65,000
- 3) Motion and Briefs before the Supreme Court: \$25,000 - \$55,000
- 4) Trial regarding damages before the Circuit Court (excluding experts): \$75,000 - \$105,000
- 5) Appeals after trial on

damages: \$65,000 -
\$85,000
Total:
\$245,000 - \$385,000

Please let me know if you have any questions.

Chris

From: Trebilcock, Christopher M.
Sent: Friday, September 25, 2015 5:26 PM
To: 'Natasha Henderson'
Subject: RE: Preliminary Budget

Sorry, I forgot to include that. \$345 for partners, \$305 for associates, \$225 for paralegals (depending on the paralegal it can be less). I believe this is consistent with our work on the prior City of Flint litigation.

From: Natasha Henderson [<mailto:nhenderson@cityofflint.com>]
Sent: Friday, September 25, 2015 5:10 PM
To: Trebilcock, Christopher M.
Subject: Re: Preliminary Budget

Hello Christopher,
What is the hourly rate for attorneys, paralegals. etc.?
Thanks,
Natasha L. Henderson, City Administrator
City of Flint, Michigan
@Samsung Galaxy Note 4

On Sep 25, 2015 4:54 PM, "Trebilcock, Christopher M." <trebilcock@millercanfield.com>
wrote:
Dear Pete and Natasha:

It was a pleasure speaking with you earlier today regarding Miller Canfield's ability to assist you with the *Shears* litigation. We look forward to aggressively defending this matter on your behalf. Per your request, below is a preliminary budget for the various anticipated stages of litigation based on our current understanding of the case:

1) Motions and appearances before the Circuit Court, prior to trial on damages:	\$55,000 - \$135,000
2) Motions and briefs before the Court of Appeals:	\$65,000 - \$95,000
3) Motion and Briefs before the Supreme Court:	\$35,000 - \$55,000
4) Trial regarding damages before the Circuit Court:	\$100,000 - \$175,000 (excluding experts)
5) Appeals after trial on damages:	\$75,000 -
\$95,000	
Total:	\$330,000 - \$555,000

Obviously we will do our best to be as efficient as possible. However, it is difficult to be more precise, particularly at the Circuit Court level, because of the Court's unpredictability in adhering