

rulings – we might want to shoot for peremptory reversal. This would be filed as soon as Judge Hayman issues his rulings on the various motions above.

I think this is largely the work that we will need to do in the next 30-45 days. We may want to meet with witnesses and spend time with decision makers, especially if we get adjournment.

Let me know if you need anything else.

Thanks,

Chris

From: Trebilcock, Christopher M.
Sent: Monday, September 28, 2015 12:19 PM
To: 'Natasha Henderson'
Subject: RE: Preliminary Budget

Natasha:

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 to normal procedural practices. Given the issues and dollars at stake, we do not want to shorthand anything. Also We will be giving this our fullest attention.

Please let me know if you need anything further. I can be reached by email or cell phone at any time.

Regards,

Chris

Christopher M. Trebilcock | Deputy Practice Group Leader for Employment and Labor

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