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**PLEASE REPLY TO:
WEST PALM BEACH**

February 9, 2015

Confidential matter exempt from disclosure or inspection per FS 119.07, 768.28 & 768.301

VIA EMAIL: tansbro@ci.dania-beach.fl.us

Tom Ansbro, Esq.
City of Dania Beach
100 W. Dania Beach Blvd.
Dania Beach, FL 33004

Re: Citizens, et al., v. City of Dania Beach
Summit Claim No: GO-0675
PGCS Claim No.: 215157
Our File No.: 12-120

Re: Citizens, et al., v. City of Dania Beach & Duke
Summit Claim No.: GO-0675
PGCS Claim No.: 215157
Our File No.: 14-358

Dear Mr. Ansbro:

This letter will confirm the original suit by Citizens against the City of Dania Beach was filed in 2012, and we are currently operating on Plaintiffs' Fourth Amended Complaint. The case remains pending and, in fact, Citizens has filed a Writ of Certiorari challenging the City's latest Development Agreement vote. Subsequently in 2014 Citizens filed a separate related lawsuit against the City and former Mayor Walter Duke, alleging violations of the Public Records Act, to

EXHIBIT "A"

which we have filed Motions to Dismiss and Plaintiffs' counsel has advised they are in the process of preparing an Amended Complaint on these issues.

This will confirm PGIT and Summit have advised the City that the City's coverage for defense costs of \$100,000.00, together with the City's deductible for a total of \$115,000.00, is about to be exhausted. Therefore, it will be necessary for the City to budget and pay for the continued defense of these cases.

It is anticipated the City should budget \$125,000.00 for attorney's fees, costs, and potential expert fees for the continued defense of these two separate cases as well as the pending Writ of Certiorari.

It is always difficult to project the costs of litigation as one does not know whether or not the other side will become reasonable in their approach to the prosecution of this matter or if the City will continue to be subjected to numerous hearings, depositions, and public records requests. I have estimated the anticipated funds necessary for budgeting based upon the other side's apparent high motivation in continuing the prosecution of these matters through all avenues of litigation available to them.

I hope this provides the City with a basis for its anticipated budgeting purposes as it relates to the instant litigation. If you have any questions whatsoever, please do not hesitate to contact me.

With best regards,

A handwritten signature in black ink, appearing to read "LYMAN H. REYNOLDS, JR.", with a large, stylized flourish at the end.

LYMAN H. REYNOLDS, JR.
For the Firm

LHR, jr./rls

cc: Joan Lampkin, City, via email: jlampkin@ci.dania-beach.fl.us