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June 24, 2016

## VIA E-MAIL

Colleen Foley
Milwaukee County Corporation Counsel
901 North 9th Street, #207
Milwaukee, WI 53233-1425
colleen.foley@milwaukeecountywi.gov

Re: Wosinski v. Advance Cast Stone Co.

Court of Appeals No.: 2014AP0001961 (Consolidated)

## Dear Colleen:

This letter responds to your request for clarification of the conflict with the Liberty insurance companies. I want to make sure that the situation is perfectly clear.

WHD currently represents Milwaukee County. HB currently represents the Liberty insurance companies. After the combination on July 1, WHD will continue to represent Milwaukee County, but not against the Liberty insurance companies. That was the reason we had to withdraw from the O'Donnell Park lawsuit. Likewise, the combined firm can continue to represent the Liberty companies in other matters, but nothing against Milwaukee County.

In addition, we will place an ethical screen between the lawyers in Missouri representing the Liberty insurance companies and the lawyers in Milwaukee who worked on the O'Donnell Park case so that there can be no interaction between them with respect to the O'Donnell Park lawsuit.

Hopefully this makes the situation a little clearer. Please let me know if you need anything else.

Very truly yours,

Ross A Anderson

RAA/krc

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