

COLLEGE OF LAW
PO Box 4037
Atlanta, GA 30302-4037
Phone: 404/413-9000
Fax: 404/413-9225



September 14, 2018

Stephen Deere
The Atlanta Journal-Constitution
223 Perimeter Center Parkway
Atlanta, GA 30346

Re: Paul Hastings Conflict of Interest Analysis – Supplemental Analysis

Dear Mr. Deere:

As you have requested, I have reviewed additional information that has become available in the last four days to supplement my September 5, 2018, analysis of whether work conducted by the Paul Hastings law firm for the City of Atlanta has been done in violation of Georgia Rules of Professional Conduct prohibiting conflicts of interest. This new information provides additional substantial evidence that would support a conclusion that the rules of professional conduct were violated.

2011 Airport Procurement Process

As described in more detail in my September 5 analysis, on January 3, 2012, the Atlanta City Council approved 125 food and beverage concessions at the airport, following a procurement process that began in March 2011. This was described at the time as “one of the largest airport procurements in North America.” Of the 17 large food and beverage packages approved by City Council, 10 were new companies to the airport. On January 13, 2012, SSP America, Inc, an unsuccessful bidder for the 2011 food and beverage RFPs, filed a lawsuit against the City of Atlanta, alleging that improper procurement methods were used. Additional lawsuits against the city challenging the procurement process were filed by Midfield Concession Enterprises, Inc., and Take-Off Concessions, LLC.

In 2011 SSP had submitted bids for five different concession packages (organized by concourses). Attachment 1 (**Att-1**). The company for which Whitner’s wife was Vice President, Concessions International (CI), submitted bids for four of the same packages (**Att-2**), thus placing it in direct competition with SSP. After the resolution of the SSP, Midfield and Take-Off cases, CI was able to procure the contract for one of the packages, with the right to operate 11 different food concessions on Concourse B.

The 2011 procurement process also ended up with a contract for another new restaurant to start operating at the airport, on Concourse A: LowCountry. As described in my September 5 analysis, according to the LowCountry website, it was co-founded by “T.C. Mosby Investments, LLC and Chef G. Garvin.” A corporate filing dated January 31, 2012 shows that the president of T.C. Mosby Investments, LLC is Dennis Sean Ellis, a Paul Hastings partner based in their LA office. Any doubt that Dennis S. Ellis is directly involved with the operation of LowCountry is dispelled by the contact information page of the LowCountry website, <http://www.lowcountry-restaurants.com/locations.html>, which provides the following email address for the company: dsellis2002@yahoo.com.

Between March 2012 and February 2013 Paul Hastings submitted 9 invoices to the City over Whitner’s

signature for work described as “SSP, Inc.” that was obviously related to the SSP lawsuit against the City of Atlanta. Between February 2012 and June 2012 Paul Hastings submitted 5 invoices to the City over Whitner’s signature for work described as “Midfield Concession Enterprises, Inc., et al.” that was obviously related to the Midfield lawsuit against the City of Atlanta. Eight of these 14 invoice bills that you received this past week from the City are incomplete. They omit the actual details of hourly billing which would indicate which attorneys did work for the City for the given month and only provide the cover letter signed by Whitner and statements of the total amount billed. Two of the monthly invoices only relate to costs and do not bill for attorney time. However, each of the four invoices that do report attorney time show direct involvement by Whitner, Ellis or both.

On the first Midfield invoice submitted by Paul Hastings, on February 28, 2012, the only Paul Hastings attorney shown as working on the matter was Whitner, who reported drafting an “argument opposing expected TRO [motion for temporary restraining order].” **(Att-3)** On the only other Midfield invoice to include attorney time, submitted by Whitner on June 13, 2012, the only Paul Hastings attorneys to appear are Whitner and Ellis. **(Att-4)** Their entries clearly indicate that they are taking a major strategic role in regards to the case. For example, Ellis reported spending two hours on May 3 to “coordinate media protection strategy and response to take-off concession appeal with City Attorney.” Whitner reported spending an hour on May 7 to “review appeals hearing decision and analyze for expected Superior Court case.”

For the only two invoices for work on SSP that report attorney time, submitted on June 13, 2012 **(Att-5)**, and July 18, 2012 **(Att-6)**, once again the only Paul Hastings attorneys reporting work are Whitner and Ellis.

Ellis billed the City for 16 hours of work on SSP in the month of May 2012. He was clearly at the center of decision making about the case during that month. He reported “research regarding motion to disqualify and other strategic motions regarding SSP state court actions,” “review and revise memorandum regarding disqualification and settlement leverage,” “telephone conference with City Attorney regarding important revisions,” and “review proposed correction request; email to City Attorney regarding same and effect on potential jury pool.”

Whitner billed the City for 6.4 hours of work on SSP in the month of May 2012. He too was clearly working at the center of decision making. His time entries included “jury pool analysis” and “analyze Superior Court Petition, exhibits and potential responses.”

The only attorney who reports time on the SSP matter for the July 18, 2012 invoice, is Ellis, although it is obvious that Whitner also did work on SSP that month because Ellis has two entries on June 3, 2012, that report telephone conference calls with the City Attorney that also included Whitner.

It is striking that the only two Paul Hastings attorneys who billed the City for work on the SSP case in done in May and June 2012, and on the Midfield case in May 2012, both had a financial interest in the outcome of the procurement process being challenged by SSP and Midfield. It also unclear why Ellis – who was charging the City \$783/hour – was playing a central role in either the SSP or Midfield lawsuits, pending in state court in Atlanta. According to his official Paul Hastings website, Ellis has always been based in the Los Angeles office and is only licensed to practice law in California. Nothing on that website indicates that Ellis has expertise or experience in aviation law or government procurement.

<http://www.paulhastings.com/professionals/details/dennisellis>

Without a doubt, neither Whitner nor Ellis should have begun work on the SSP or Midfield cases without first providing the City of Atlanta the written disclosure of “reasonable and adequate information about the material risks” of representation by Whitner or Ellis required by Georgia Rule of Professional Conduct 1.7.

(By providing legal services in Georgia to a Georgia municipality, Ellis was bound by the Georgia rules of professional conduct even though he was not licensed to practice law in Georgia.) Such written disclosures would have necessarily included the financial and legal relationships between Ellis and LowCountry and the relationships between Whitner's wife and Concessions International, and the potential relevance of the SSP and Midfield cases to those companies. Further, in my opinion the section of Rule 1.7 was probably applicable which prohibits a lawyer from even asking for consent to represent in a conflict situation if the representation "involves circumstances rendering it reasonably unlikely that the lawyer will be able to provide adequate representation." In my opinion, neither Whitner nor Ellis could have properly asked the City to consent to their involvement in cases challenging a procurement process if companies in which they had a financial interest were implicated in the challenged procurement process.

2015-16 Procurement Process

In my September 5 analysis I summarized information indicating that Paul Hastings was playing a substantial role in responding to the efforts of attorneys for Miguel Southwell to investigate possible irregularities in the 2015-16 airport restaurant concessions procurement process. You have now provided me with an email from Paul Hastings to a series of city officials dated June 15, 2016, which states: "Paul Hastings LLP is the City's outside legal counsel in connection with the "Litigation Hold – Miguel Southwell" Memorandum, including coordination of the response to M. Southwell's Open Records Request." **(Att-7)** The email continues: "For the following procurements, we are seeking i) the names of all bidders/respondents/proponents, including the names of the joint ventures, ii) the members of the joint ventures and MBE/FBE/SBO/DBE/ACDBE partners (including their individual principals the names of the joint ventures, ii) the members of the joint ventures and MBE/FBE/SBO/DBE/ACDBE partners (including their individual principals), and iii) the ranking (at any time) of the bidders/respondents/proponents."

The listed procurements include RFP FC-8511 (that led to the restaurant contract awarded to Concessions International) and RFP FC-8512 (which also included a bid from Concessions International). When the recipients of the June 15 email responded, Whitner would presumably been in a position to know the bid ranking of Concessions International for FC 8511 and FC 8512 as well as the rankings of its competitors at a time when the procurement process was still pending.

Sincerely yours,

Clark D. Cunningham
Professor and W. Lee Burge Chair in Law and Ethics
Director, National Institute for Teaching Ethics & Professionalism
Direct: (404) 413-9168
Email: cdcunningham@gsu.edu
Home Page: www.ClarkCunningham.org

SSP

- 1 **Executive Summary**
see pg 137
Cover Letter
Yes, all key points address in cover letter see 2
History of firm provided, currently operates more than 2200 food & beverage retail and convenience locations in 140 airports, 30 countries, 42 North America airports, 250 rail stations
SSP is \$2.5 billion organization employing 30,000 team members, 50 years in business
Food & beverage concessions span the globe from London to Moscow, Hong Kong, Sydney, Vancouver to Cairo, and from San Diego to New York
40 % ACDBE
see pg 137
Detailed Executive Summary
Incomplete, not all key points address in detail executive summary
Complete legal name of the Proponent and the name of the legal entities were not provided, no contact person was provided as per the requirements
64% owned & operated by SSP, Buckhead Life Group, 35% ACDBE owned & operated by C. Haydel 10%, T Phillips 10%, K Moody 8%,
s Robinson 8%, O Morgan 3% it seems as if ACDBE only 20 % of operations spread out 60 operators
No examples where team has worked together to complete projects
No Legal statement stating there are no open disputes with any member of team within five years
2 **Space use plan**
see pg 139
Concepts/organization/General Capacity/Facility
Yes, Sense of place-demographics of terminal passenger, complement of other food options, destination, carriers and flight schedule, see 4
food trends around country and locally, customer demand for fresh products, organic and environmentally safe foods
package 1
homeless population Time Pressed, Fast, But Comfy, Time to Kill
package 2
18 stores /18 new concepts, no returning stores, 5 kiosk 5 new concepts, Café 458 Food for a Cause portion of proceeds goes to feeding Atlanta
package 3
14 stores /14 new concepts, no returning stores, 3 kiosk 3 new concepts, Café 458 Food for a Cause portion of proceeds goes to feeding Atlanta
package 4
10 stores /15 new concepts, no returning stores, 3 kiosk 3 new concepts, Café 458 Food for a Cause portion of proceeds goes to feeding Atlanta
package 5
homeless population Time Pressed, Fast, But Comfy, Time to Kill
package 4
homeless population Time Pressed, Fast, But Comfy, Time to Kill
package 5
(Atrium) 8 stores /8 new concepts, no returning stores,
homeless population Time Pressed, Fast, But Comfy, Time to Kill
package 5
(F) 8 stores /8 new concepts, no returning stores,
homeless population Time Pressed, Fast, But Comfy, Time to Kill
3 **Operations and management plan**
see pg 141
Yes, operation and management plan provided, subcontractors report to General Manager, see tab
Reporting seems corporate driven rather than owner operator, almost every restaurant will be co-owned by SSP All and the individual restaurateur
SSP America will build out all the restaurants, all the owners has to manage their name less capital contribution require in this concepts
How much control does the owner has in this concepts? Each restaurant will be led by the Brand Manager. Its seems that SSP is running the stores.
Operation plan read like a day in the store, rather now to run the store. Cash incentives provided to employees fob, both for jobs well done
Technology is cost theme discuss in the operation plan. Commissary to restaurant. SSP is responsible for food and beverage product deliver to airport

F&B_2_00100652

CONCESSION HIGH

- 1 Executive Summary
see pg 137
Cover letter
Yes, however, all key points not address in cover letter see 2
History of firm provided, currently operates in AAI airport since 1995 100% family owned
H & B Hospitality founded in 2008
Detailed Executive Summary, . . .
see pg 137
Yes, however all key points not address in detail executive summary
Complete legal name of the Proponent and the name of the legal entities CI is AAI base joint venture organized date not provided
CI was established 1979, 53 locations and 8 airport 32 year in business employee count 800 at airport 42 offsite
Annual payroll of \$20M state Ga taxes \$664K
CI over 34 years of food service and airport concessions experience in AAI airport
Myrna Perez 25 % joint venture partner with CHH, PAP Enterprises 53%, joint venture partner with Windy, 37.25 acdbie projected
There was no legal statement provided stating there are no open disputes with any member of team within the past five years
- 2 Space use plan
see pg 139
Concepts/organizations/General Capacity/Facility
Yes, Sense of place/demographics of terminal passenger, complement of other food options, destination, carriers and flight schedule, see 4
food trends around country and locally, customer demand for fresh products, organic and environmentally safe foods
Technology plan Master Card pay pass, powermat charging stations digital menu boards, qr codes, Sustainable program see tab 2.2
package 1. 20 stores /16 new concepts, 4 returning stores, 4 kiosk 3 new concepts, 1 returning
package 2. 12 stores /8 new concepts, 6 returning stores, 5 kiosk 5 new concepts, 0 returning
package 3
(6) 17 stores 12 new concepts, 5 returning stores, 3 kiosk 7 new concepts, 1 returning
package 4 (1) 9 stores, 5 new concepts, 4 returning stores, 2 kiosk 2 new concepts, 0 returning
package 5 (4) 9 stores 6 new concepts, 3 returning stores,
package 5 (4) 7 stores 6 new concepts, 1 returning stores,
Operations and management plan
see pg 141
Yes, operation and management plan provided, sub-concessionaires report to General Manager, see 3
O&M consider deliveries, vendor management, Facility Maintenance Plan equipment maintenance work order frequency of cleaning
grease, cooking oil and trash disposal
Yes, Customer Service Plan, Customer Service Training program, Customer Service Hotline Program, Customer Service Procedures
see tab 3
- 4 Construction and transition plan
see pg 141
Yes, Construction and transition plan custom kiosk at plan for the transition periods
construction schedule nov11 Sep 12
construction schedule nov11 Sep 12
construction schedule nov11 nov12
construction schedule nov11 jul13
construction schedule nov11 jul13
Overall project experience and performance
see pg 142
Yes, all key points address in this section
CI was established in over 32 years ago, after three decades results are 52 locations and 800 employees, 8 airports
no hard if provided on gross sales, sales per sq feet types of business location
very little information on sales and growth of the business mostly reference letter provided in package
see tab 5
- 6 Key personnel Resumes

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City of Atlanta
City Hall Tower, Suite 4100
68 Mitchell Street
Atlanta, GA 30303

February 28, 2012

Please refer to
Invoice Number: 1914827

Attn: Cathy D. Hampton
City Attorney

PH LLP Tax ID No. 

SUMMARY SHEET

Midfield Concession Enterprises, Inc., et al.
PH LLP Client/Matter # 77452-00010
William K Whitner

Legal fees for professional services
for the period ending January 31, 2012

Current Fees and Costs Due

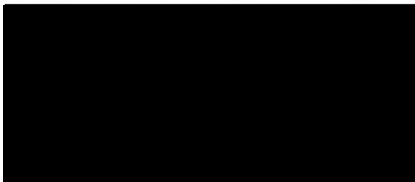
Total Balance Due

\$1,152.00

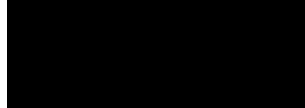
\$1,152.00

\$1,152.00

Wiring and ACH Instructions:



Remittance Address:



Comment: Please refer to the invoice number listed above.

Refer all questions to Billing at billing@paulhastings.com.

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68 Mitchell Street
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February 28, 2012

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Invoice Number: 1914827

Attn: Cathy D. Hampton
City Attorney

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REMITTANCE COPY

Midfield Concession Enterprises, Inc., et al.

PH LLP Client/Matter # 77452-00010

William K Whitner

Legal fees for professional services
for the period ending January 31, 2012

Current Fees and Costs Due

\$1,152.00

Total Balance Due

\$1,152.00

\$1,152.00

Wiring and ACH Instructions:



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Attn: Cathy D. Hampton
City Attorney

PH LLP Tax ID No. [REDACTED]

FOR PROFESSIONAL SERVICES RENDERED
for the period ending January 31, 2012

Midfield Concession Enterprises, Inc., et al. \$1,152.00

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>
01/27/12	WKW	Draft stock argument opposing expected TRO	2.00
Total Hours			2.00

Timekeeper Summary

William K Whitner 2.00

Current Fees and Costs

\$1,152.00

Total Balance Due

\$1,152.00

Approved
KMP
3-9-12

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City of Atlanta
City Hall Tower, Suite 4100
68 Mitchell Street
Atlanta, GA 30303

June 13, 2012

Please refer to
Invoice Number: 1929349

Attn: Cathy D. Hampton
City Attorney

PH LLP Tax ID No. [REDACTED]

SUMMARY SHEET

Midfield Concession Enterprises, Inc., et al.
PH LLP Client/Matter # 77452-00010
William K. Whitner

Legal fees for professional services
for the period ending May 31, 2012
Less 10% Discount

\$3,510.00
(351.00)

\$3,159.00

Current Fees and Costs Due

\$3,159.00

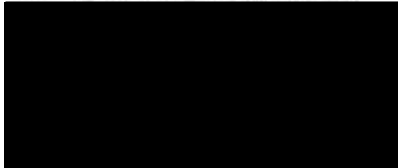
Total Balance Due

\$3,159.00

[Handwritten signature]
COA
7/12/12

We encourage our clients to pay via ACH, however, in the event that you pay by check,
please send payment to the remittance address below:

Wiring and ACH Instructions:



Remittance Address:



Comment: Please refer to the client, matter and invoice number listed above.

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68 Mitchell Street
Atlanta, GA 30303

June 13, 2012

Please refer to
Invoice Number: 1929349

Attn: Cathy D. Hampton
City Attorney

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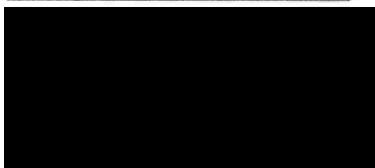
REMITTANCE COPY

Midfield Concession Enterprises, Inc., et al.
PH LLP Client/Matter # 77452-00010
William K. Whitner

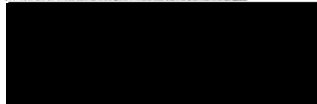
Legal fees for professional services for the period ending May 31, 2012	\$3,510.00
Less 10% Discount	<u>(351.00)</u>
	<u>\$3,159.00</u>
Current Fees and Costs Due	\$3,159.00
Total Balance Due	<u><u>\$3,159.00</u></u>

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Wiring and ACH Instructions:



Remittance Address:



Comment: Please refer to the client, matter and invoice number listed above.

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68 Mitchell Street
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June 13, 2012

Please refer to
Invoice Number: 1929349

Attn: Cathy D. Hampton
City Attorney

PH LLP Tax ID No. [REDACTED]

FOR PROFESSIONAL SERVICES RENDERED
for the period ending May 31, 2012

Midfield Concession Enterprises, Inc., et al. \$3,510.00
Less 10% Discount (351.00)
\$3,159.00

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>
05/03/12	DSE2	Coordinate media protection strategy and response to take-off concession appeal with City Attorney	2.00
05/07/12	DSE2	Review order on take-off concessions	1.00
05/07/12	WKW	Review appeals hearing decision and analyze for expected Superior Court case	1.00
Total Hours			4.00

Midfield Concession Enterprises, Inc., et al. \$3,510.00
Less 10% Discount (351.00)
\$3,159.00

Timekeeper Summary

Dennis S. Ellis 3.00
William K. Whirner 1.00

City of Atlanta
77452-00010
Invoice No. 1929349

Page 2

Current Fees and Costs	\$3,159.00
Total Balance Due	<u>\$3,159.00</u>

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City of Atlanta
City Hall Tower, Suite 4100
68 Mitchell Street
Atlanta, GA 30303

June 13, 2012

Please refer to
Invoice Number: 1929347

Attn: Cathy D. Hampton
City Attorney

PH LLP Tax ID No. [REDACTED]

SUMMARY SHEET

SSP America, Inc.
PH LLP Client/Matter # 77452-00008
William K. Whitner

Legal fees for professional services
for the period ending May 31, 2012

Less 10% Discount

\$19,488.00

(1,948.80)

Costs incurred and advanced

\$17,539.20

11,200.00

Current Fees and Costs

\$28,739.20

Prior Balance Due

\$16,776.25

Total Balance Due

\$45,515.45

JK
7/12/12

COM
7/12/12

We encourage our clients to pay via ACH, however, in the event that you pay by check,
please send payment to the remittance address below:

Wiring and ACH Instructions:

[REDACTED]

Remittance Address:

[REDACTED]

Comment: Please refer to the client, matter and invoice number listed above.

Refer all questions to Billing at billing@paulhastings.com.

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City of Atlanta
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68 Mitchell Street
Atlanta, GA 30303

June 13, 2012

Please refer to
Invoice Number: 1929347

Attn: Cathy D. Hampton
City Attorney

PH LLP Tax ID No. [REDACTED]

REMITTANCE COPY

SSP America, Inc.
PH LLP Client/Matter # 77452-00008
William K. Whitner

Legal fees for professional services
for the period ending May 31, 2012
Less 10% Discount

\$19,488.00
(1,948.80)

Costs incurred and advanced

\$17,539.20

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11,200.00

Prior Balance Due

\$28,739.20

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\$16,776.25

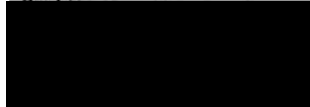
\$45,515.45

We encourage our clients to pay via ACH, however, in the event that you pay by check,
please send payment to the remittance address below:

Wire and ACH Instructions



Remittance Address:



Comment: Please refer to the client, matter and invoice number listed above.

Refer all questions to Billing at billing@paulhastings.com.

REMITTANCE COPY (cont.)

Summary of Prior Balance Due

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments/ Trust Appl.</u>	<u>Credits</u>	<u>Balance Due</u>
04/20/12	1923161	\$16,776.25	\$0.00	\$0.00	\$16,776.25
Total Prior Due					\$16,776.25
Balance Due					\$45,515.45

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City of Atlanta
City Hall Tower, Suite 4100
68 Mitchell Street
Atlanta, GA 30303

June 13, 2012

Please refer to
Invoice Number: 1929347

Attn: Cathy D. Hampton
City Attorney

PH LLP Tax ID No. [REDACTED]

FOR PROFESSIONAL SERVICES RENDERED
for the period ending May 31, 2012

SSP America, Inc.

Less 10% Discount

\$19,488.00

(1,948.80)

\$17,539.20

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>
05/02/12	DSE2	Research regarding motion to disqualify and other strategic motions regarding SSP state court action; telephone conference with K Whitner and E. Stolze regarding same	4.00
05/03/12	WKW	Jury pool analysis	1.00
05/15/12	DSE2	Review and revise memorandum regarding disqualification and settlement leverage	2.00
05/18/12	DSE2	Review and revise memorandum regarding email correspondence to City Attorney regarding same	3.00
05/23/12	DSE2	Review telephone conference with City Attorney regarding same and important revisions	3.00
05/23/12	WKW	Review, revise and conference with E. Stolze	1.50
05/25/12	DSE2	Review SSP appeal; telephone conferences with City Attorney and K. Whitner regarding same	2.00
05/25/12	WKW	Analyze Superior Court Petition	2.10
05/27/12	WKW	Analyze Superior Court Petition, exhibits and potential responses	1.80

City of Atlanta
77452-00008
Invoice No. 1929347

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>
05/30/12	DSE2	Review proposed correction request; email correspondence to City Attorney regarding same and effect on potential jury pool	2.00
Total Hours			22.40
<u>SSP America, Inc.</u>			
Less 10% Discount			\$19,488.00 <u>(1,948.80)</u>
			\$17,539.20

Timekeeper Summary

Dennis S. Ellis	16.00
William K Whitner	6.40

Costs incurred and advanced

Requested by William Whitner Outside Professional Services - Sitnick And Company, Inc., Invoice # 050212WW dated 05/02/2012, Media Consultant	11,200.00
Total Costs incurred and advanced	\$11,200.00
Current Fees and Costs	\$28,739.20
Prior Balance Due	\$16,776.25
Total Balance Due	\$45,515.45

**PAUL
HASTINGS**


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600 Peachtree Street, NE, Suite 2400, Atlanta, GA 30308-2222
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City of Atlanta
City Hall Tower, Suite 4100
68 Mitchell Street
Atlanta, GA 30303

July 18, 2012

Please refer to
Invoice Number: 1934171

Attn: Cathy D. Hampton
City Attorney

PH LLP Tax ID No. 

REMITTANCE COPY

SSP America, Inc.

PH LLP Client/Matter # 77452-00008

William K Whitner

Legal fees for professional services
for the period ending June 30, 2012
Less 10% Discount

\$1,860.00

(186.00)

\$1,674.00

Costs incurred and advanced
Current Fees and Costs Due
Total Balance Due

11,682.22

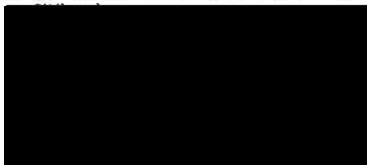
\$13,356.22

\$13,356.22

APPROVED
EAC
8/27/13
AVERTIN

We encourage our clients to pay via ACH, however, in the event that you pay by check,
please send payment to the remittance address below:

Wiring and ACH Instructions:



Remittance Address:



Comment: Please refer to the client, matter and invoice number listed above.

Refer all questions to Billing at billing@paulhastings.com.

**PAUL
HASTINGS**

PAUL HASTINGS LLP
600 Peachtree Street, NE, Suite 2400, Atlanta, GA 30308-2222
t: +1.404.815.2400 | f: +1.404.815.2424 | www.paulhastings.com

City of Atlanta
City Hall Tower, Suite 4100
68 Mitchell Street
Atlanta, GA 30303

July 18, 2012

Please refer to
Invoice Number: 1934171

Attn: Cathy D. Hampton
City Attorney

PH LLP Tax ID No. XXXXXXXXXX

FOR PROFESSIONAL SERVICES RENDERED
for the period ending June 30, 2012

<u>SSP America, Inc.</u>	\$1,860.00
Less 10% Discount	<u>(186.00)</u>
	\$1,674.00

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>
06/03/12	DSE2	Review motion for reconsideration; telephone conference with City Attorney and K Whitner regarding same	1.00
06/03/12	DSE2	Review motion for reconsideration; telephone conference with City Attorney and K Whitner regarding same	0.50
06/18/12	DSE2	Telephone conference with City Attorney	0.50
Total Hours			2.00

<u>SSP America, Inc.</u>	\$1,860.00
Less 10% Discount	<u>(186.00)</u>
	\$1,674.00

Timekeeper Summary

Dennis S. Ellis

2.00

Costs incurred and advanced

City of Atlanta
77452-00008
Invoice No. 1934171

Page 2

Requested by William Whitner Outside Professional Services - Sitrick And Company,
Inc., Invoice # 060612WW dated 06/06/2012, Media Consultant through May 26,
2012

11,561.25

Courier Service

120.97

Total Costs incurred and advanced

\$11,682.22

Current Fees and Costs

\$13,356.22

Total Balance Due

\$13,356.22

From: Stolze, Eric D.
Sent: Wed, 15 Jun 2016 1:15:28 PM GMT
To: ASmith@AtlantaGa.Gov;GGeeter@AtlantaGa.Gov;KBrooks@AtlantaGa.Gov;MOSmith@AtlantaGa.Gov;Erin.Jenkins@atlanta-airport.com;Yanique.Swan@atlanta-airport.com;LPage@AtlantaGa.Gov;Leslie.Page@atlanta-airport.com;JABoston@AtlantaGa.Gov;PEJefferson@AtlantaGa.Gov;Smith, Adam L.;Geeter, Girard;Brooks, Keith;Smith, Mano;Jenkins, Erin;Swan, Yanique;Page, Leslie;Page, Leslie;Boston, Jessica;Jefferson, Philippe E.
Cc: Patrick, Kimberly;Phillips, Tameka;Patrick, Kimberly
Subject: M. Southwell Litigation Hold - Procurement Respondents and Rankings (Attorney Client Privilege)
Attachments: image001.gif
Importance: High

All,

Paul Hastings LLP is the City's outside legal counsel in connection with the "Litigation Hold – Miguel Southwell" Memorandum, including coordination of the response to M. Southwell's Open Records Request. To assist us with this process, please provide the following by the close of business tomorrow, Thursday, June 16th.

For the following procurements, we are seeking i) the names of all bidders/respondents/proponents, including the names of the joint ventures, ii) the members of the joint ventures and MBE/FBE/SBO/DBE/ACDBE partners (including their individual principals), and iii) the ranking (at any time) of the bidders/respondents/proponents:

· FC-8640

· FC-8469

· FC-8511

· FC-8512

· FC-8484

Thank you in advance for your assistance with this request, a priority matter for the City. Please contact me if you have any questions regarding this request, but I have copied Kim Patrick, Deputy City Attorney, for purposes of providing a contact within the City's Law Department should you need

to authorize this request.

Again, we are the City's outside legal counsel and are working in the City's interests. As such, this communication is subject to attorney client privilege, although that privilege belongs to the City. Paul Hastings LLP does not represent you individually, and the information shared with us will, likewise, be shared within the City. I am available to answer any questions you may have about the role of Paul Hastings LLP in this matter.

Regards,

Eric

Eric D. Stolze | Associate, Litigation Department
Paul Hastings LLP | 1170 Peachtree Street, N.E. Suite 100, Atlanta, GA 30309-9998 | Direct:
+1.404.815.2315 | Main: +1.404.815.2400 | Fax: +1.404.685.5315 | ericstolze@paulhastings.com |
www.paulhastings.com

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