

July 16, 2020

Via e-mail to ddowney@fisheldowney.com and sschoolcraft@fisheldowney.com

Daniel T. Downey
Stephanie Schoolcraft
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7775 Walton Parkway, Suite 200
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Re: *Hinners v. O'Shea, et al.* No. 1:19-cv-02868 (N.D. Ohio)

Dear Dan and Stephanie:

Although we understand Mr. O'Shea remains uninterested in settling the *Hinners v. O'Shea, et al.* case, the draft Rule 26(f) report you circulated, and final report, state to the court that the City of Huron—and all of the current and former City officials you represent—take the same position.

That surprised us.

We have been encouraged by the recent actions taken by the new administration at Huron City Hall to end their association with Mr. O'Shea, and we are confident—especially given the abundant documentary evidence bearing on the central claims in this case—that mediation is the best chance for the City, its officials, and Mr. and Mrs. Hinners to put this matter to rest, and heal the divisions in the community, quickly and at the lowest cost and effort possible.

Even without the other parties' participation, Mr. and Mrs. Hinners believe that mediation could lead to a resolution with your clients.

This matter has already required a major investment of time. As you know, we are just days away from the opening of formal discovery. At that point, every day that passes will drive up the fees and costs associated with this litigation on all sides even further, making it more difficult for us to settle the case. Whatever the position of any other parties, please convey to Mayor Artino, Vice Mayor Monty Tapp, Councilman Joe Dike, and Councilman Claus specifically, and the rest of your clients, our openness to alternative-dispute resolution and the financial—and human—consequences of dragging this case out further.

Mayor Artino, Vice Mayor Tapp, Councilman Dike, Councilman Claus all publicly condemned the prior administration's conduct toward the Hinneres. For example, Councilman Claus specifically filed a statement with the police criticizing former Mayor Hartung's behavior toward Mrs. Hinner at the May 14, 2019 Council as "retaliation." These current Huron leaders urged officials then to end their mistreatment of Mrs. Hinner and resolve the matter.

We have no reason to believe their publicly stated positions have changed. It would surprise the Hinneres and their many supporters in the community if Huron's leaders want to continue to drag this matter out further, and subject all the municipal Defendants and Huron-resident witnesses to the litigation process, and further divide the community.

If the City maintains its stated position regarding alternative-dispute resolution, then that is the message that will be conveyed.

We look forward to speaking with you at the case-management conference next week. Please speak with your clients and let us know if you would like to speak separately about potential mediators or other opportunities for alternative dispute resolution. We assume you and Director of Law Schrader will engage the municipal Defendants directly and provide them with this letter.

Best regards,

Subodh Chandra

Cc: Todd Schrader, Director of Law, City of Huron (via TSchrader@sseg-law.com)