

# **EXHIBIT G**

**Lisa Meador (States Attorney)**

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**From:** Lisa Meador (States Attorney)  
**Sent:** Friday, July 29, 2016 3:06 PM  
**To:** 'Hays, Brian'; Burt Odelson; Dana Kurtz  
**Cc:** Thomas Nowinski (States Attorney); Heidi Slepser; Michael Hayes  
**Subject:** RE: Recorder - Rule to Show Cause

Brian-

I would like to address your statements regarding notice and retention of counsel for Cedric and Ed. You provided the SAO with the draft Rule on July 11, 2016. I immediately forwarded your email to Ed and Cedric for purposes of notice per your request. I also immediately contacted you to discuss what was being sought by the Rule in order to determine whether an actual conflict existed in our representation of Ed and Cedric. You advised me that you need to discuss this with Roger and Michael and would further advise me. While you did not respond with this information, you emailed me on July 20<sup>th</sup> asking who would be representing Ed and Cedric. I responded, advising you that I had requested information from you to determine whether a conflict existed but you had provided me with no information to do so. We spoke on July 21<sup>st</sup> to follow-up on this issue. After speaking with you, it was determined by the SAO that a conflict existed in our representation of Cedric and Ed and the SAO would need to make efforts to obtain outside counsel for that purpose. As I explained to you, the SAO is statutorily required to provide counsel to employees of the County and the various elected officials. As such, it was the SAO's obligation to make an initial determination as to whether a conflict exists and, if so, to petition for the appointment of a Special State's Attorney. The initial determination as to whether a conflict existed was wholly dependent on you providing me with the information necessary to do so, which you did not do until July 21<sup>st</sup>. The SAO immediately made arrangements for this representation and filed the necessary petitions in state court for the appointment. As I advised you on July 27<sup>th</sup>, the motions were set for today and Monday, however, I did not expect either counsel to be in a position to engage in a meet and confer until after the appointment when the representation was approved by the court. Accordingly, Cedric and Ed could not 2 weeks ago simply engage counsel for the "meet and confer" you advised me was required by Judge Schenkier.

In light of this, we would request that you reconsider your position on the meet and confer.

Thank you,  
Lisa

Lisa Meador  
Supervisor – Complex Litigation Unit  
Cook County State's Attorney's Office  
(312) 603-3369

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**From:** Hays, Brian [mailto:BHays@lockelord.com]  
**Sent:** Friday, July 29, 2016 2:12 PM  
**To:** Burt Odelson; Dana Kurtz  
**Cc:** Lisa Meador (States Attorney); Thomas Nowinski (States Attorney); Heidi Sleper; Michael Hayes  
**Subject:** RE: Recorder - Rule to Show Cause

Burt

Your email is a good example of why the meet and confer obligation is limited to parties – parties are represented by counsel, non-parties are not, are may be. Cedric has had over two weeks to retain counsel. He appears to have retained you and Mike, so I cannot speak with him directly. I will put the same question to you that I put to Dana: Is your client willing to agree to the entry of an order holding him in civil contempt for violating the SRO and the Employment Plan based on his conduct as set forth in the RCA's reports, the OIG reports, and in our draft motion? If not, then we are at impasse. Please let me know by 3:30 today if your client agrees to be held in civil contempt.

Brian

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**From:** Burt Odelson [mailto:attyburt@odelsonsterk.com]  
**Sent:** Friday, July 29, 2016 1:43 PM  
**To:** Hays, Brian; Dana Kurtz  
**Cc:** LISA MEADOR (States Attorney); THOMAS NOWINSKI (States Attorney) (thomas.nowinski@cookcountyil.gov); Heidi Sleper; Michael Hayes  
**Subject:** RE: Recorder - Rule to Show Cause

Brian:

I am being appointed on Monday. I have a Motion up on August 3, 2016 to file my appearance. I have not spoken with Mr. Giles yet since I have not been appointed. Although we spoke on Wednesday, there has certainly been no conversation regarding any facts in your anticipated Rule to Show Cause. It appears that Dana Kurtz and you have had come conversation, but you do not believe there is an obligation to meet and confer.

Although I may believe that your office does have an obligation to meet and confer, for now, I want it very clear that you and I have not spoken about any offer, or, quite frankly, about any of the facts leading up to your Motion for Issuance of a Rule to Show Cause. I asked you for time to meet with my client, and you said you would check with Mr. Shakman and get back to me. It does not appear there is any emergency requiring you to proceed without first allowing discussion between us to see if there is any common ground.

I hope to hear from you from you Monday, August 1, 2016, after my office is appointed to represent Mr. Giles.

Thank you.

Burt

Burton S. Odelson  
ODELSON & STERK, LTD.  
3318 W. 95<sup>th</sup> Street  
Evergreen Park, IL 60805  
(708) 424-5678  
(708) 424-5755 - fax

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**From:** Hays, Brian [mailto:BHays@lockelord.com]  
**Sent:** Friday, July 29, 2016 11:43 AM  
**To:** Dana Kurtz <DKurtz@kurtzlaw.us>

**Cc:** Burt Odelson <[attyburt@odelsonsterk.com](mailto:attyburt@odelsonsterk.com)>; LISA MEADOR (States Attorney) <[lisa.meador@cookcountyl.gov](mailto:lisa.meador@cookcountyl.gov)>; THOMAS NOWINSKI (States Attorney) ([thomas.nowinski@cookcountyl.gov](mailto:thomas.nowinski@cookcountyl.gov)) <[thomas.nowinski@cookcountyl.gov](mailto:thomas.nowinski@cookcountyl.gov)>; Heidi Sleper <[HSleper@kurtzlaw.us](mailto:HSleper@kurtzlaw.us)>

**Subject:** RE: Recorder - Rule to Show Cause

Dana

Your client has had the motion for more than 2 weeks. We are not required to wait 5 weeks before filing the motion. But I will cut to the chase: Is your client willing to agree to the entry of an order holding him in civil contempt for violating the SRO and the Employment Plan based on his conduct as set forth in the RCA's reports, the OIG reports, and in our draft motion? If not, then we are at impasse. Please let me know by 3:00 today if your client agrees to be held in civil contempt.

Brian I. Hays  
Locke Lord LLP  
111 S. Wacker Drive  
Chicago, IL 60606  
312-443-1707 Direct  
312-896-6707 Fax

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**From:** Dana Kurtz [<mailto:DKurtz@kurtzlaw.us>]  
**Sent:** Friday, July 29, 2016 11:26 AM  
**To:** Hays, Brian  
**Cc:** [attyburt@odelsonsterk.com](mailto:attyburt@odelsonsterk.com); LISA MEADOR (States Attorney); THOMAS NOWINSKI (States Attorney) ([thomas.nowinski@cookcountyl.gov](mailto:thomas.nowinski@cookcountyl.gov)); Heidi Sleper  
**Subject:** Re: Recorder - Rule to Show Cause

Brian,

You are trying to make him a party to your motion. I don't think the obligations have been met. I continue to suggest a meet and confer the third week of August. Please let me know your availability. Thank you.

Dana

Sent from my iPhone.

Dana L. Kurtz, Esq.  
Kurtz Law Offices, Ltd.  
32 Blaine Street  
Hinsdale, Illinois 60521  
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On Jul 29, 2016, at 11:20 AM, Hays, Brian <[BHays@lockelord.com](mailto:BHays@lockelord.com)> wrote:

Dana

Ed is not a party to the case so there is no meet and confer obligation. See Meeting Requirements on Motions ("A candid discussion between the parties prior to filing motions to dismiss, motions for summary judgment, motions *in limine* and the like can limit the scope of such motions or eliminate the need for them to be filed at all.") (emphasis added). We reached out to you as a courtesy. Even assuming the requirement applies, I have now spoken directly with all counsel involved and we have not been able to reach agreement with either Ed or Cedric.

Brian

Brian I. Hays  
Locke Lord LLP  
111 S. Wacker Drive  
Chicago, IL 60606  
312-443-1707 Direct  
312-896-6707 Fax

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**From:** Dana Kurtz [<mailto:DKurtz@kurtzlaw.us>]  
**Sent:** Friday, July 29, 2016 10:45 AM  
**To:** Hays, Brian  
**Cc:** [attyburt@odelsonsterk.com](mailto:attyburt@odelsonsterk.com); LISA MEADOR (States Attorney); THOMAS NOWINSKI (States Attorney) ([thomas.nowinski@cookcountyil.gov](mailto:thomas.nowinski@cookcountyil.gov)); Heidi Sleper  
**Subject:** Re: Recorder - Rule to Show Cause

Brian, I do not have an appearance on file yet as we discussed, and it is our position that if you file the motion today without a good faith meet and confer, you are not in compliance with Judge Schenkier's standing order.

Sent from my iPhone.

Dana L. Kurtz, Esq.  
Kurtz Law Offices, Ltd.  
32 Blaine Street  
Hinsdale, Illinois 60521  
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On Jul 29, 2016, at 10:38 AM, Hays, Brian <[BHays@lockelord.com](mailto:BHays@lockelord.com)> wrote:

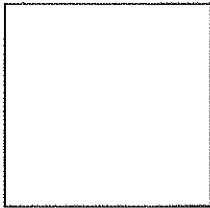
All

I connected with Mike on the motion. We will be filing the motion today. While we will continue to work with the parties to see if an agreement can be reached, we are not willing to wait an additional two weeks (four total) for Dana to finish her trial and for the state court proceedings to finish.

Brian

Brian I. Hays

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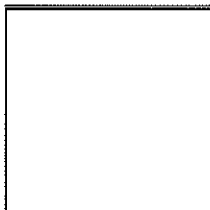
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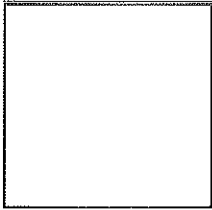
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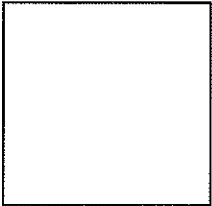
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