



County Executive John R. Leopold
P.O. Box 2700, Annapolis, MD 21404
410-222-1821

October 8, 2012

John Hammond, Chairman
Self Insurance Fund Committee
Arundel Center
44 Calvert Street, 4th Floor
Annapolis, MD 21401

Re: Hamner v. Anne Arundel County, Maryland and John R. Leopold
(Case No. 1:10-cv-02485 CCB)

Dear Mr. Hammond:

I write to you in your capacity as Chairman of the Self Insurance Fund Committee.

I have been advised that Anne Arundel County is required by law to provide a legal defense in the case filed against me and the County by Karla Hamner. It is because of this legal obligation that the County has provided me with outside counsel. The County continues to represent me on Ms. Hamner's Title VII claims, while the Thatcher Law Firm represents me on the Section 1983 claims.

Notwithstanding that I am legally entitled to this legal representation at no cost to myself, this is to advise the Self Insurance Fund Committee that I will personally reimburse the County for any and all legal fees paid to the Thatcher firm in this matter unless:

1. the County settles the case without my written consent, or
2. the case goes to trial and the result is a verdict that awards the Plaintiff nothing in the Section 1983 claim against me, or if the Section 1983 claim against me is dismissed prior to trial by the court.

I set these two conditions because I am confident that Ms. Hamner's claim is without merit and that if the court does not dismiss the case on either a motion to dismiss or for summary judgment, then I want my day in court where I believe I will be vindicated.

Sincerely,

A handwritten signature in black ink, appearing to read "John R. Leopold", with a long, sweeping underline.

JOHN R. LEOPOLD
County Executive