

MICHAEL N. FEUER
CITY ATTORNEY

REPORT NO. R 19-0333
OCT 09 2019

REPORT RE:

**REQUEST FOR WAIVER OF CONFLICT OF INTEREST
FOR SQUIRE PATTON BOGGS, LLP
IN ITS CONCURRENT REPRESENTATION OF
THE CITY ON BOND WORK AND
MERCEDES BENZ/DAIMLER AG IN A PERSONAL INJURY LAWSUIT**

The Honorable Budget and
Finance Committee of the
City of Los Angeles
Room 1010, City Hall
200 North Spring Street
Los Angeles, CA 90012

Honorable Members:

The City Attorney recently selected the law firm Squire Patton Boggs LLP (the "Firm" or "Squire") to join a panel of bond firms for tax exempt financings issued by Los Angeles World Airports. By letter dated October 3, 2019, the Firm notified the City Attorney that it represents Mercedes Benz USA/Daimler AG ("Mercedes") in connection with a lawsuit in which a city employee is charged with having struck and injured the plaintiff in an automobile accident (Los Angeles Superior Court, Case No. BC706830) (the "Case"). Plaintiff has named both the City and Mercedes Benz USA/Daimler AG in the lawsuit. Though Squire and the City Attorney's Office are cooperating in defense of the case, Mercedes has filed to preserve its right to counterclaim against the City.

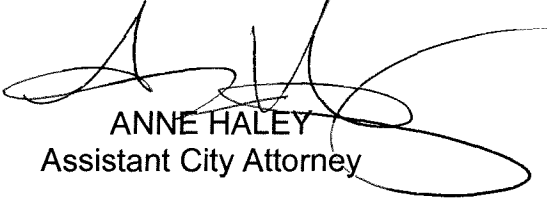
Under the Model Rules of Professional Conduct, Squire has requested waiver of the conflict. The Firm has assured that the lawyers at the Firm who will work on the Case will be different lawyers from those who represent the City, and that the Firm will not share with Mercedes any privileged, sensitive, proprietary or other confidential information of a nonpublic nature it has acquired as a result of its representation of the City.

For the reasons stated above, in addition to the City Attorney's belief that the City's position will not be compromised by the adversity, the City Attorney recommends waiver of the conflict.

If you have any questions regarding this matter, please contact the undersigned at (213) 978-7009. She, or another member of this Office, will be present when you consider this matter to answer any questions you may have.

Very truly yours,

MICHAEL N. FEUER, City Attorney

By 
ANNE HALEY
Assistant City Attorney