

JAMES E. LEUENBERGER PC

ATTORNEY AND COUNSELOR AT LAW

4800 SW MEADOW ROAD, SUITE 300  
POST OFFICE BOX 1684  
LAKE OSWEGO, OREGON 97035

TELEPHONE (503) 542-7433  
FACSIMILE (503) 419-6415

jim@fights4rights.com  
www.fights4rights.com

March 24, 2006

William H. Walters  
Jeffrey D. Austin  
Miller Nash LLP  
3400 US Bancorp Tower  
111 SW 5<sup>th</sup> Ave  
Portland, OR 97204-3699

James N. Westwood  
Stoel Rives LLP  
900 SW 5<sup>th</sup> Ave Ste 2600  
Portland, OR 97204

Re: Portland Public Schools Custodians

Dear Messrs. Walters, Austin, and Westwood:

I represent Richard Brooks, Lonnie D. Fleming, Richard Reynolds, Donald W. Strong, and Edward Tschida, five of the former Portland Public Schools custodians.

I am continually amazed by the revelations that the Oregonian prints about Portland Public School District IJ finances. It gives me great pleasure to learn that \$9.1 million can magically appear as that makes collection of a large judgment for my clients a foregone conclusion.

You have refused to produce, for a reasonable price, the documents I requested as a public records request. When the cases are remanded to the circuit court, I will renew my request for those documents and more. Of greater interest to me and to the school board will be our depositions of Steve Goldschmidt and Alice Dale. I expect we will learn a great deal about how the decision to fire the custodians was arrived at and who personally benefited from that decision.

Alternatively, I am authorized to negotiate a settlement for my five clients. Each of my five clients is willing to accept \$1,000,000 in full and final settlement of his claims.

Sincerely,

JAMES E. LEUENBERGER PC

James E. Leuenberger

cc. Richard Brooks, Lonnie D. Fleming, Richard Reynolds, Donald W. Strong, and Edward Tschida