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Sent: Thursday, August 01, 2019 3:11 PM
To: 'stacy_lynne@comcast.net' <stacy_lynne@comcast.net>
Subject: Lynne v. Beals - Attorney fee hearing

Good afternoon, Ms. Lynne –

As you know, we have the attorney fee hearing scheduled in this matter for Monday afternoon. With the submissions we have made to the Court, the defense has carried its initial burden to establish the amount of the fees and their reasonableness, and those fees are entitled to a presumption of reasonableness based on the showing made. Nevertheless, to the extent necessary or requested by the judge, we may call Mr. Daniel C. Muffly as an expert witness to testify to those issues. His biographical information is being provided as a courtesy below.

Kimberly B. Schutt, Esq.



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Daniel C. Muffly practices in the areas of employment law, civil rights, business law, construction excavation law and general litigation. Dan's practice focuses on advising employer clients in the prevention of unlawful employment practices and defending employers in employment-based litigation arising from alleged discrimination, harassment, wrongful discharge and unfair competition. Dan was previously a Senior Internal Auditor and Terminal Manager for Consolidated Freightways, a national trucking company. He received a B.S. and a B.A. degree from Nebraska Wesleyan University in Lincoln, Nebraska. Dan received his Juris Doctorate, with distinction, from the University of Nebraska. He is a member of the Larimer County, Colorado and Nebraska Bar Associations. Dan was the President of the Larimer County Bar Association from 2006-2007 and served on the Colorado Bar Associations Board of Governors and the Board of Governors' Executive Board. Dan has also been active in community service. He has served on the Boards of Crossroads Safehouse, Larimer County Small Business Development Center and the Fort Collins Soccer Club



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EXHIBIT A