



Jason C. Murray  
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April 28, 2020

Anne Haley, Esquire  
Los Angeles City Attorney's Office, Harbor Department  
425 South Palos Verdes Street, 5th Floor  
San Pedro, CA 90731  
[Anne.haley@lacity.org](mailto:Anne.haley@lacity.org)

Re: Request for Conflict Waiver

Dear Ms. Haley:

We deeply appreciate the City of Los Angeles and the Harbor Department considering Crowell & Moring as counsel in the antitrust litigation brought by HPEC. Crowell & Moring is adverse to the City of Los Angeles in two current matters, and under the applicable Rules of Professional Conduct, we must seek waivers from the City for those matters before taking on representation of the City.

In a pro bono matter, Crowell & Moring represents Asian Americans Advancing Justice-LA ("AAAJ-LA") in a real estate title clearance matter in which the City is adverse. The matter is in its preliminary stages and is not in litigation. The City of L.A. Community Development Department (which no longer exists) made a loan in December 2001 to AAAJ for certain renovations to its headquarters. It is AAAJ's understanding that the loan has been repaid in full and that the deed of trust should have been reconveyed by LACDD but was not.

In addition, Crowell & Moring represents the National Rural Electric Cooperative Association and certain of its member companies (collectively "NRECA") in connection with NRECA's intervention in support of EPA's Affordable Clean Energy Rule in which the City and others are adverse. Our representation of AAAJ-LA and NRECA in these matters will not affect our ability to represent the City in the antitrust matters that are the subject of this representation.

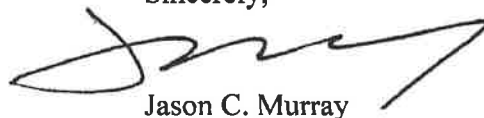
We hereby request that the City waive the conflict presented by Crowell & Moring's ongoing representation of AAAJ-LA and NRECA in the matters described above, and we request your agreement to not assert our representation of the City as a ground for disqualifying

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Crowell & Moring from representing AAAJ-LA and NRECA in the current matters. We have retained reciprocal waivers from these two clients to allow us to represent the City.

We thank you kindly for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason C. Murray". The signature is stylized with a large initial "J" and a long horizontal stroke.

Jason C. Murray

JCM/dw