



Montana Association of Counties

Defense Services

2717 Skyway Drive, Suite F

Helena, MT 59602

(406) 441-5471 Fax: 406-441-5497

Gregory L. Bonilla • Maureen H. Lennon • Mitchell A. Young

January 20, 2017

RECEIVED

Confidential Attorney-Client Communication

Board of Ravalli County Commissioners

215 S. Fourth, Ste. A

Hamilton, MT 59840-2853

JAN 25 2017

Ravalli County Commissioners

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Re: Kerisa Siphakis v Ravalli County

Dear Board:

The Montana Association of Counties/Property & Casualty Trust (MACo/PCT) has assigned MACo Defense Services to defend Ravalli County in the above-referenced claim. I am the attorney primarily responsible for the defense of this matter.

Since Siphakis has filed a claim, we recommend that Ravalli County officials and employees not discuss this matter with anyone other than me, or another attorney at MACo Defense Services. If you or anyone else employed by the County is contacted by anyone other than the County's counsel to discuss this case, please do not discuss the matter outside the presence of defense counsel. Refer that individual to us and advise us that the contact has occurred.

During the course of this action, it may be necessary for me to speak with County personnel concerning this case. If anyone with knowledge of the events surrounding this matter has left, or is leaving, the employ of Ravalli County or will be unavailable for extended periods of time, we ask that we be so advised and provided with contact information for such individual(s).

It is imperative that we remain in contact until this matter has reached a resolution. If you have any questions concerning this matter, please feel free to contact me, or one of my colleagues at MACo Defense Services. Our representation is limited to the defense of this matter and shall terminate upon its final resolution.

1. The first part of the document is a letter from the Secretary of the State to the Governor, dated 18th March 1877. It contains a report on the progress of the work done during the year.

2. The second part is a report on the work done during the year, dated 18th March 1877. It contains a list of the names of the persons who have been appointed to various offices during the year.

3. The third part is a report on the work done during the year, dated 18th March 1877. It contains a list of the names of the persons who have been appointed to various offices during the year.

1877	1878	1879	1880	1881	1882	1883	1884	1885	1886	1887	1888	1889	1890	1891	1892	1893	1894	1895	1896	1897	1898	1899	1900
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4. The fourth part is a report on the work done during the year, dated 18th March 1877. It contains a list of the names of the persons who have been appointed to various offices during the year.

George J. Bennett

5. The fifth part is a report on the work done during the year, dated 18th March 1877. It contains a list of the names of the persons who have been appointed to various offices during the year.

6. The sixth part is a report on the work done during the year, dated 18th March 1877. It contains a list of the names of the persons who have been appointed to various offices during the year.

7. The seventh part is a report on the work done during the year, dated 18th March 1877. It contains a list of the names of the persons who have been appointed to various offices during the year.

In addition, please notify anyone with any documentation or electronically-stored information, including e-mails, to preserve any information that may be relevant to this matter. If information which could lead to the discovery of admissible evidence is destroyed, severe sanctions may be imposed on the offending party.

Finally, although we have been assigned this case by MACo/PCT, we represent the County in this claim. We cannot represent either the County or MACo/PCT with regard to any differences or disputes that may arise concerning the County's relationship with MACo/PCT. If an issue should ever arise between the County and MACo/PCT, the County will need to either resolve the issue directly with MACo/PCT or retain independent counsel to do so. In the unlikely event such a dispute should arise, please be assured that any privileged communications between the County and this firm will remain confidential.

Thank you for your attention and assistance in this matter.

Sincerely,

A handwritten signature in blue ink that reads "Gregory L. Bonilla". The signature is written in a cursive style.

Gregory L. Bonilla

GLB/jlb

c: Howard Recht, Ravalli County Deputy Attorney