

Open Records Request to University of Louisville, March 21, 2016

Re: Legal Fees/ Cost of Litigation of Norton Healthcare vs. University of Louisville. 13-CI-1060.

I wish to determine the total amount of legal fees paid by the University of Louisville, or paid on its behalf, related to the the lawsuit titled above. I am not asking for a lump-sum amount or estimate. I wish to follow over the lengthy period of the litigation the amounts billed and paid for legal and related services. This would include at the very least payments billed for and paid beginning at the time of UofL's knowledge of the agreement between the University of Kentucky and Norton Healthcare to cooperate over pediatric health before that agreement was announced to the public on or about August 22, 2013. (I anticipate that legal services were retained before the University's Letter of 8-27-2013 giving Norton Healthcare notice of a purported breach and demand for remedy.) I request this information through, and to include, all final bills that followed the settlement of the disputes which was signed on December 17, 2016.

I specifically request the dates of every bill, the name of the payee, and the UofL account from which the funds were paid. The law firm of Stites and Harbison in Louisville was the lead council for the University, but I also request the amounts of payments made directly to other law firms, to the various mediators that have been involved, or to other consultants or attorneys whose services were retained by the University or on its behalf. If payments were made to Stites and Harbison for services rendered by others, I would like such indirect payees identified by to the degree that they were enumerated in Stites' bills. I also request that non-trivial (say greater than \$1000) court costs or attendant fees be enumerated. To the extent that it includes other categories of costs, I also request a copy of the University's own internal accounting of the total costs of the litigation such as might have been prepared for budgetary purposes or for presentation to the Board of Trustees or executive offices..

I anticipate that the University retained outside legal services before the letter of 8-27-2013 giving Norton Healthcare notice of a purported breach and a demand for remedy.

If the University of Louisville allowed others to make payments for these litigation services on its behalf, (or accepted loans to do so) such as from the University of Louisville Foundation or any other corporate or private entity, I would like to have those sources identified together with the amounts paid.

I anticipate that claims might be made of lawyer-client privilege in such matters, but I do not ask for information so protected, The simplest way for the University to provide me with the information I request might be to include copies of all bills submitted with privileged information redacted. However, it is my understanding that the payments themselves, the payees, the sources of the funds, and the dates of payments are not shielded from open records requests..

I will be happy to discuss with you the most efficient way for the University to comply with my request.

Respectfully,
Peter Hasselbacher, MD.
Kentucky Health Policy Institute.
Emeritus Professor of Medicine, UofL.