



**MCCRUM LAW OFFICE**  
ATTORNEYS & COUNSELORS

September 19, 2014

The Honorable Bert Richardson  
Judge, 390<sup>th</sup> Judicial District, by designation  
Travis County Courthouse  
Austin, Texas

Re: Appointment of Co-Counsel

Dear Judge Richardson,

As you know, I filed earlier this week a motion for the appointment of co-counsel in the above-referenced case. I have tried very hard to keep expense at a minimum since the time of my appointment. To that end, I did not request appointment of co-counsel until the return of an indictment.

I write this letter, however, to clarify my position with respect to my fees. I consider it an honor and a privilege to serve as District Attorney *Pro Tem* in this matter. Because of that, in accepting the request to serve in this capacity, I reduced my hourly rate approximately 40%, and agreed to be paid \$300/hour for my services. I realize, however, that the return of an indictment by the grand jury and the complexity of pleadings filed thus far will likely result in considerable expense to the citizens of Travis County. Because of that, I am willing to reduce my hourly rate again if you and/or other county officials deem it appropriate and necessary. My primary obligation and duty is to Travis County, and I do not want to be an economic burden on the County.

I have asked for the appointment of co-counsel because I feel it is essential. This is not because the defendant has chosen to retain at least eight lead attorneys and a significant number of associate attorneys and experts to work on this matter. Rather, the complexity of the issues and the work that will be required necessitate an additional lawyer to assist me in the prosecution of this case. I have asked Mr. David Gonzalez of Austin, Texas to assist me, to which he has agreed. Mr. Gonzalez is a very experienced attorney who also deserves to be paid a reasonable rate, yet understands that performing a public service such as this would require a significant amount of time in return for less than what he typically would earn.

Given all of the above, I propose that my hourly rate be reduced to \$250/hour, so that Mr. Gonzalez can also be paid \$250/hour. I believe that the quality of his talent, experience and service would more than justify this hourly rate. Although these rates would be a reduction from the amount of fees he and I regularly earn in our private practice, we realize that the prosecution of this case requires the attention and time from experienced and able counsel and are willing to perform this public service. We both

consider it an honor and privilege to have the opportunity to serve the citizens of Travis County and the State of Texas in this case, and are thus willing to reduce our fees.

If this reduction of fees continues to result in an unreasonable economic burden on the County, I am more than willing to meet with you and others to discuss options to reduce the expense. Please feel free to pass this information on to those officials who address these types of matters, and, of course, please feel free to call me with any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael McCrum". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael McCrum  
District Attorney *Pro Tem*  
Travis County, Texas

cc: Mr. David Gonzalez, esq.