

**From:** Hathaway, Kayla  
**To:** [Albert J. Hadeed](#); [Craig Coffey](#)  
**Subject:** FW: Important  
**Date:** Thursday, June 7, 2018 9:24:17 PM  
**Attachments:** [image003.png](#)  
[image001.png](#)  
[image004.png](#)  
[image006.png](#)  
[image007.png](#)  
**Importance:** High

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Al and Craig,

We have received the email below regarding a demand to prevent spoliation of any evidence from the firm representing FCSO employees. I am forwarding on to you because we will, of course, abide by the preservation demand but we also need for the county to be on notice because it is the county's building.

Thank you.

**Kayla R. Hathaway, Esquire**  
**General Counsel**  
**Flagler County Sheriff's Office**

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*"An honor to serve, a duty to protect."*

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**From:** Fuller, Renina  
**Sent:** Thursday, June 7, 2018 2:35 PM  
**To:** Staly, Rick <[RStaly@flaglersheriff.com](mailto:RStaly@flaglersheriff.com)>; Hathaway, Kayla <[KHathaway@flaglersheriff.com](mailto:KHathaway@flaglersheriff.com)>; Strobbridge, Mark <[MStrobbridge@flaglersheriff.com](mailto:MStrobbridge@flaglersheriff.com)>; Bisland, Jack <[JBisland@flaglersheriff.com](mailto:JBisland@flaglersheriff.com)>  
**Subject:** Important

Please see Rex's email below.

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**From:** Rex Hurley <[rhurley@hrmcw.com](mailto:rhurley@hrmcw.com)>  
**Sent:** Thursday, June 7, 2018 2:07 PM  
**To:** Fuller, Renina <[RFuller@flaglersheriff.com](mailto:RFuller@flaglersheriff.com)>  
**Cc:** [Nancy.Durrett@fsmf.org](mailto:Nancy.Durrett@fsmf.org)

**Subject:** FW: 0524-0475 Conrad, Elizabeth "Annie" v. Flagler County SO (RAH) WCFL18040007: Conrad, Elizabeth v. Flagler County Sheriff's Office 11/2/17 Mold Exposure -: Status on good faith request for benefits

Renina, see below. there is a request to preserve the premises. I do not have a lot of information. I do not know anything about the state of decision making or any plans. But, I do recommend that all be advised there is a request to preserve and this must not be taken lightly. I can assist in any decision making if requested. Please make sure that whoever is responsible for the premises from the SO is aware of the preservation request . WE certainly do not want the SO being sued for a spoliation claim on top of everything else that is happening. Rex.

## **Rex Hurley**

Attorney at Law

Florida Bar Board Certified, Workers' Compensation



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**Replies Filtered:** Any incoming e-mail reply to this communication will be electronically filtered for "spam" and/or "viruses." That filtering process may result in such reply being quarantined (i.e., potentially not received at our site at all) and/or delayed in reaching us. For that reason, we cannot guarantee that we will receive your e-mail reply and/or that we will receive it in a timely manner. Accordingly, you should consider sending communications to us, which are particularly important or time-sensitive by means other than e-mail.

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**From:** Janel Stephens [<mailto:janel@bichlerlaw.com>]

**Sent:** Thursday, June 07, 2018 11:52 AM

**To:** Sue Williston <[swilliston@hrcmw.com](mailto:swilliston@hrcmw.com)>; Shirley Guerrero-Perez <[sperez@hrcmw.com](mailto:sperez@hrcmw.com)>; [Nancy.Durrett@fsrmf.org](mailto:Nancy.Durrett@fsrmf.org)

**Cc:** Geoff Bichler <[geoff@bichlerlaw.com](mailto:geoff@bichlerlaw.com)>; Rex Hurley <[rhurley@hrcmw.com](mailto:rhurley@hrcmw.com)>; Krystin Gill <[kgill@bichlerlaw.com](mailto:kgill@bichlerlaw.com)>

**Subject:** Conrad, Elizabeth v. Flagler County Sheriff's Office 11/2/17 Mold Exposure -: Status on good faith request for benefits

Good day: I am following up on the status of our good faith letter and our request for a \$2,000.00 advance to help assist Mrs. Conrad with paying her medical bills and her continued medical care for her work related injury. Mrs. Conrad is in a financial position where she has maxed her credit due to her efforts to seek medical treatment for her work injury. We ask that you approve this request so that we can avoid filing a Petition with the Judge.

Also, Mr. Bichler commends the County's efforts to address the exposure claims expeditiously by evacuating the operations center this week while conducting its investigation. However, Mr. Bichler wants to be very clear that the County must preserve the building and the evidence within it during the County's investigation of the safeness of this work environment.

Lastly, with regard to Mrs. Conrad's work duties, Mr. Bichler requests that Mrs. Conrad remain in her current position and that she is not reassigned as a school officer while the County actively investigates the multiple claims of exposure resulting from this sick building.

Your immediate attention to this matter is greatly appreciated.

Warm regards,

*Janel Stephens*  
*Legal Assistant*



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