

LAW OFFICES
LOCCKE • CORREIA
SCHLAGER • LIMSKY & BUKOSKY

24 SALEM STREET
HACKENSACK, NEW JERSEY 07601

(201) 488-0880
FAX (201) 488-8051



RICHARD D. LOCCKE
MANUEL A. CORREIA (1948-1996)
CHARLES E. SCHLAGER, JR. †
MERICK H. LIMSKY
MICHAEL A. BUKOSKY**
MARCIA J. TAPIA*
GREGORY G. WATTS

OF COUNSEL
LEON B. SAVETSKY*

June 30, 2008

* MEMBER N.Y. AND N.J. BARS
† MEMBER PA. AND N.J. BARS
** MEMBER N.Y., PA. AND N.J. BARS

BY REGULAR MAIL AND FACSIMILE

William J. Caldwell, Esq.
Carter, Van Rensselaer & Caldwell
1728 Route 31 North, P. O. Box 5185
Clinton, NJ 08809-0185

**Re: Township of Franklin
- and -
Corporal Tim Wahba
REQUEST FOR REIMBURSEMENT OF EXPENSE OF DEFENSE**

Dear Mr. Caldwell:

As you are aware our office represents Officer Tim Wahba concerning certain disciplinary charges recently determined in Officer Wahba's favor.

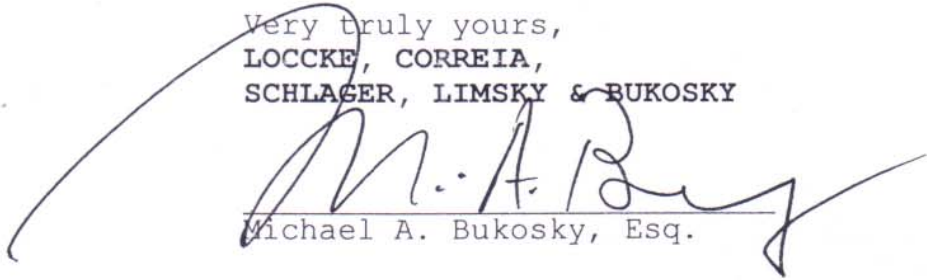
Pursuant to N.J.S.A. 40A:14-155 would you please arrange for our bill for legal services, enclosed herein, to be paid directly by the Township as soon as possible. In addition would you please make arrangements for the Township to pay Arbitrator Miraglia directly in the amount of \$3,051.00 as the costs of the Arbitrator are clearly part of the expense of his defense of this matter.

Would you please let me know within the next 10 days whether the Township intends to pay these bills. If I do not hear from you we will assume that the Township is refusing to honor the payment of such statutory fees and we will be compelled to take appropriate action to enforce the statutory requirements. If we are required to bring an action for enforcement, the cost of such proceedings, including interest, will be in addition to the enclosed statement of Services.

Would you also please forward a copy of this request to the appropriate Township Official and/or the Township Clerk for reimbursement of the suspension day, for payments of the fees and costs addressed herein and for the execution of the expungement order issued by Arbitrator Miraglia.

I thank you in advance for your prompt attention to this matter .

Very truly yours,
LOCCKE, CORREIA,
SCHLAGER, LIMSKY & BUKOSKY



Michael A. Bukosky, Esq.

Enclosure
cc: PBA
Tim Wahba

LAW OFFICES

LOCCKE CORREIA
SCHLAGER LIMSKY & BUKOSKY

24 Salem Street
Hackensack, NJ 07601

Tel (201) 488-0880
Fax (201) 488-8051

RICHARD D. LOCCKE
MANUEL AL. CORREIA (1948-1996)
CHARLES E. SCHLAGER, JR+
MERICK H. LIMSKY
MICHAEL A. BUKOSKY*
MARCIA J. TAPIA*
GREGORY G. WATTS
LAUREN P. SANDY

OF COUNSEL
LEON B. SAVETSKY*

June 30, 2008

File #: 1916-001

Inv #: 4132

* MEMBER OF NY AND NJ BARS
* MEMBER OF PA AND NJ BARS
* MEMBER OF NY, PA AND NJ BARS

Township of Franklin
202 Sidney Road
Pittstown, NJ 08867

RE: Officer Hatem Wahba Disciplinary Matter

FOR PROFESSIONAL SERVICES RENDERED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
5/23/07	Telephone conference with Tim Wahba concerning disciplinary charges	1.00
	Receipt and review of disciplinary charges	1.00
	Review of contractual procedures, rules and regulations and ordinances for discipline	2.00
5/24/07	Initial preparation of appeal: review of contract	1.00
5/25/07	Research of legality of disciplining an employee with a penalty of promotion	2.00
	Preparation of grievance appeal to Borough	1.00
5/29/07	Research of cases to determine whether discipline involving placement on probation is a major or minor disciplinary action	2.00
	Review of contract grievance procedure for disciplinary matters	0.50
6/5/07	Review of contract and processing of grievance to hearing step before mayor and committee	1.50
6/27/07	Review of grievance procedure for advancement to next step	0.30
6/28/07	Receipt and review of letter from Township Attorney concerning hearing	0.20

	Preparation of letter to Township Attorney concerning hearing	0.20
7/11/07	Telephone conference with Tim Wahba concerning charges and recent developments	0.50
7/12/07	Preparation of petition to PERC for panel of arbitrators	2.50
7/20/07	Receipt and review of arbitrator selection list: preparation of letter to PERC with selections	0.40
10/10/07	Receipt and review of letter from Arbitrator Miraglia	0.20
	Preparation of letter to Tim Wahba concerning disciplinary hearing	0.20
	Receipt and review of letter from PERC appointing Arbitrator Miraglia	0.20
10/31/07	Prepare Correspondence to Arbitrator;	0.50
11/1/07	Prepare Correspondence to Arbitrator regarding Tim Wahba.	0.30
11/5/07	Preparation of letter to Arbitrator Miraglia	0.50
11/7/07	Preparation for disciplinary hearing before arbitrator Miraglia; Telephone conference with Tim Wahba	2.75
	Telephone conference with Tim Wahba	0.30
11/15/07	Prepare OPRA Request for Hatem (Tim) Wahba.	1.00
1/4/08	Prepare Correspondence.	0.30
1/17/08	Begin reviewing discovery received from employer.	3.50
1/18/08	Continue Reviewing Discovery; Prepare request for Additional Discovery.	3.50
1/21/08	Finish reviewing discovery received from employer.	1.50
1/31/08	Prepare Correspondence.	0.30
2/25/08	Phone Conference with Opposing Counsel; Prepare letter to Arbitrator.	0.50
3/19/08	Telephone conference with Tim Wahba	0.75
	telephone conference with Tim Wahba; review of documents requested; preparation of letter to arbitrator concerning request to penalize Township for failure to provide documents	2.00
3/28/08	Preparation for arbitration	3.00
4/1/08	Telephone conference with Tim Wahba concerning discovery matters	0.30

	Preparation of letter to client concerning hearing	0.20
4/10/08	Telephone conference with Tim Wahba concerning case preparation	0.40
4/11/08	Telephone conference with client concerning evidence	0.30
4/29/08	Preparation for hearing	4.00
4/30/08	Telephone conference with client concerning hearing	0.20
	Conference with client concerning preparation for hearing	4.00
	Preparation for hearing	5.00
5/1/08	Preparation for and attendance at disciplinary proceeding; conference with client	8.00
5/7/08	Telephone conference with Client concerning decision	0.40
6/30/08	Receipt and review of arbitration award from Arbitrator Miraglia	1.00
	Preparation of letter to Tim Wahba	0.30
	Preparation of letter to Township Counsel requesting enforcement of Arbitrators award	0.40
	TOTAL HOURS	61.90
	TOTAL FEES	\$15,475.00
<u>DISBURSEMENTS</u>		
Nov-14-07	Federal Express (11.06.07)	16.75
	TOTAL DISBURSEMENTS	\$16.75
	TOTAL DUE AND OWING ON THIS INVOICE	\$15,491.75
	BALANCE NOW DUE	\$15,491.75

(PLEASE RETURN ENCLOSED COPY WITH PAYMENT)