

TAGLaw International Lawyers

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VIA EMAIL: [TZ1388@sheboyganwi.gov](mailto:TZ1388@sheboyganwi.gov)

City of Sheboygan  
Attn: Liz Majerus, City Attorney  
828 Center Avenue  
Sheboygan, WI

Redevelopment Authority of the City of Sheboygan  
Attn: Taylor Zeinert, Executive Director  
828 Center Avenue, Suite 104  
Sheboygan, WI 53081

RE: **Conflict Waiver**

Dear Mr. Mayor and Ms. Zeinert,

As you know, we currently represent City of Sheboygan (the “City”) as well as the Redevelopment Authority of the City of Sheboygan (the “RDA”) regarding multiple separate matters and projects.

Recently, we have been asked to represent the City with regard to the purchase of six parcels of land being sold by the RDA.

To the extent that this presents a conflict of interest with undertaking the representation of any of the above-mentioned parties, we are writing to request a conflict waiver. According to Wisconsin Supreme Court rules, where there is a potential for a conflict of interest, we may only represent multiple clients if: (1) we reasonably believe that we can provide competent and diligent representation to each affected client; (2) the representation of each client is unrelated; (3) the representation of both clients is not prohibited by law; and (4) each client provides informed consent to the representation in writing.

In this situation, we believe that no current conflict exists. The proposed property purchase is designed to insure the parties’ mutual goals are properly described and drafted. However, out of an abundance of caution and in the interests of transparency, we believe it prudent to request this conflict waiver, thereby acquiring the parties informed consent to permit us to represent the City with regard to this property purchase. Please keep in mind that if there were ever to be a dispute between the parties regarding this purchase, we may be ethically prohibited from representing either party in such dispute.

If you agree to provide this waiver, please sign below and return an executed copy to me. However, if you have any questions or concerns or would like to discuss further, please feel free to contact me. Thank you in advance for your consideration of this request.

von BRIESEN & ROPER, s.c.



Brion T. Winters

BTW:dlk

**CITY OF SHEBOYGAN**

By: \_\_\_\_\_  
Liz Majerus

Title: \_\_\_\_\_

Date: \_\_\_\_\_

**REDEVELOPMENT AUTHORITY OF THE CITY OF SHEBOYGAN**

By: \_\_\_\_\_  
Taylor Zeinert

Title: \_\_\_\_\_

Date: \_\_\_\_\_