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Dr. David Vaca
General Consulate of Ecuador
117 NW 42nd Ave,
Miami, FL 33126

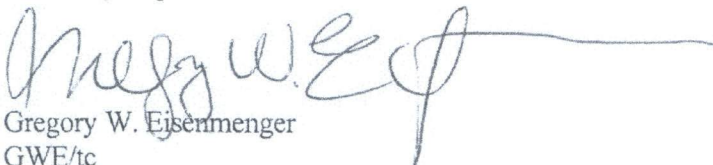
Dear Dr. Vaca,

As you know recent developments in Mr. Serrano's case have created unforeseen problems. The recent Florida Supreme Court decision in State v. Poole has resulted in Mr. Serrano's case being delayed while the State seeks to overturn his right to a new sentencing trial.

Unfortunately, this has placed the case in an appellate posture. In order to preserve Mr. Serrano's right to a fair sentencing trial it will be necessary for us to file Writs of Mandamus and Writs of Prohibition at the District Court level and respond to the State's motions at the Supreme Court level.

My contract with Ecuador does not cover this appellate work. I am willing to undertake this additional work, but I would charge an additional \$175,000.00. This additional fee would cover all appellate work at the State level to preserve his right to a new sentencing, including costs. Post sentencing appellate work at either the State or Federal level would not be included in this fee. Of course, the sentencing trial is fully covered by the fee you have paid me.

I recognize that this is a substantial increase in fees however the actions by the Supreme Court could not have been anticipated. I did file a writ of prohibition earlier in the case, at no charge, since I considered it essential to my trial strategy. This situation is totally a result of State action, hence my request for additional fees.


Gregory W. Eisenmenger
GWE/tc

CC: Francisco Serrano



Dra. Paola Andrade Torres


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