

CAUSE NO. 2018528740

DOLCEFINO COMMUNICATIONS,
LLC DBA DOLCEFINO
CONSULTING,

Plaintiff,

V.

TEXAS TECH UNIVERSITY,

Defendants.

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IN THE DISTRICT COURT

99th JUDICIAL DISTRICT

LUBBOCK COUNTY, TEXAS

**PLAINTIFF’S MOTION TO DISQUALIFY THE TEXAS ATTORNEY
GENERAL’S OFFICE FROM REPRESENTING DEFENDANT TEXAS TECH
UNIVERSITY**

Comes Now, Dolcefino Communications, LLC dba Dolcefino Consulting, Plaintiff herein, and files this motion asking the Court to sign an order disqualifying the Texas Attorney General, and any lawyers working in his office, from representing Defendant Texas Tech University in this litigation, and would respectfully show the Court the following:

I. Summary

The Court should disqualify the Attorney General and any attorney working in his office from representing Defendant in this lawsuit for the following reasons: (1) the Attorney General’s unique role in interpreting and enforcing the Texas Public Information Act (“TPIA”) conflicts with its role as Defendant’s advocate in this case, (2) the lawyers with the Attorney General’s office who are now representing Defendant are fact witnesses in the underlying litigation, and (3) the Attorney General is not authorized to defend governmental bodies at the trial court level in TPIA lawsuits.

II. Background

1. Plaintiff is Dolcefino Communications, LLC dba Dolcefino Consulting (“Dolcefino” or “Plaintiff”).

2. Defendant is Texas Tech University (“TTU” or “Defendant”).

3. On January 8, 2018, Plaintiff sued Defendant seeking a writ of mandamus pursuant to Tex. Gov’t Code § 552.321(a), which if granted would force TTU to comply with the Texas Public Information Act (“TPIA”) by producing certain requested categories of documents.

4. On February 9, 2018, attorneys with the office of the Attorney General made an appearance on behalf of TTU by filing TTU’s combined original answer and plea to the jurisdiction. The office of the Attorney General has exclusively represented Defendant at all times during the pendency of this lawsuit.

5. On April 25, 2018, Plaintiff filed its Second Amended Petition. On April 30, 2018, Defendant filed its Second Amended Plea to the Jurisdiction (the “Second Amended Plea”).

6. A hearing was held on Defendant’s Second Amended Plea on May 3, 2018.

7. On June 4, 2018, Judge Sowder signed an order granting in part and denying in part Defendant’s Second Amended Plea.

8. On June 5, 2018, Defendant filed its notice of interlocutory appeal. Pursuant to Tex. Civ. Prac. & Rem. Code § 51.014(b), all further proceedings before the trial court were stayed pending resolution of the appeal.

9. On December 4, 2018, the Court of Appeals issued an opinion reversing the trial court’s partial denial of Defendant’s Second Amended Plea.

10. While the court of appeals reversed the Court’s partial denial of Defendant’s Second Amend Plea, that did not fully resolve this lawsuit as Plaintiff had alleged claims that even

Defendant acknowledged the Court had jurisdiction over.

11. On February 14, 2019, Defendant filed its Third Amended Plea to the Jurisdiction on all Remaining Public Information Act Requests (the “Third Amended Plea”).

12. On April 26, 2019, Plaintiff filed its First Supplemental Petition. Plaintiff’s Second Amended Petition as supplemented is its live petition.¹

13. On June 20, 2019, Plaintiff served Defendant with Plaintiff’s Written Discovery Requests, including twenty-three requests for production, two interrogatories, and twelve requests for admissions (collectively, the “Requests”). On July 29, 2019, Defendant served its responses to the Requests, produced some documents and withheld others. On November 7, 2019, Defendant supplemented its production.

14. On December 13, 2019, Defendant filed a motion styled “Defendant’s Motion to Compel the Return of Privileged Documents and Motion for Protective Order.” In this motion, Defendant represented that counsel for Plaintiff had, without authorization, accessed and downloaded allegedly privileged documents which are responsive to the TPIA requests now the subject of this lawsuit. In the same motion, Defendant at least acknowledged that Plaintiff’s counsel was given access to those documents by *Defendant* when Defendant utilized a file sharing application to produce documents in this case.

15. On December 18, 2019, Plaintiff filed a motion to compel the production of the allegedly privileged documents that Defendant was now seeking the return of.

16. On or about January 8, 2020, Plaintiff filed a complaint with the district attorney for Lubbock County advising the district attorney of TTU’s violation of the TPIA. On or about

¹ On November 22, 2019, Plaintiff filed its third amended petition. However, on January 28, 2020, the Court granted Defendant’s motion to strike Plaintiff’s third amended petition.

January 22, 2020, K. Sunshine Stanek, the district attorney for Lubbock county, gave notice to Plaintiff that her office had a potential conflict of interest that prevented it from bringing an action against Defendant. A true and correct copy of this letter is attached hereto as **Ex. A**. Instead, in the same letter, Ms. Stanek advised Plaintiff to file its complaint with the Attorney General.

17. On March 10, 2020, Ms. Stanek advised Plaintiff, reportedly on the advice of the Attorney General, that she would seek the appointment of a special prosecutor to investigate any complaint of criminal wrongdoing under the TPIA on the part of Defendant and its agents.

III. Argument & Authorities

A. The Attorney General should be disqualified as Defendant’s counsel because its role in interpreting and enforcing the TPIA fundamentally conflicts with its role as Defendant’s advocate in this lawsuit thereby prejudicing Plaintiff.

The legislature has explicitly charged the Attorney General with “maintain[ing] uniformity in the application, operation, and interpretation” of the TPIA. *See* Tex. Gov’t Code § 552.269(a).

In performing this duty, the Attorney General, among other things:

- Issues opinions as to whether a governmental body may properly withhold public information, *see* Tex. Gov’t Code § 552.301;
- Creates rules for use by each governmental body in determining charges for providing copies of public information, *see* Tex. Gov’t Code § 552.262;
- Acts as an arbiter in disputes between requestors and governmental bodies regarding the fees associated with providing copies of public information, *see* Tex. Gov’t Code § 552.269;
- Files lawsuits against governmental bodies seeking writs of mandamus compelling the governmental body to comply with the TPIA, *see* Tex. Gov’t Code § 552.321(a);

- Receives complaints by requestors alleging that a governmental body has violated the TPIA, *see* Tex. Gov't Code § 552.3215(i); and
- If the Attorney General determines that a governmental body has violated the TPIA, the Attorney General may file a lawsuit against a governmental body seeking a declaratory judgment or injunctive relief. *See* Tex. Gov't Code § 552.321(b), (i).

Accordingly, courts have characterized the Attorney General's role in enforcing the TPIA as "unique," and have "given deference to Attorney General interpretations and applications." *See Greater Houston P'ship v. Paxton*, 468 S.W.3d 51, 71 (Tex. 2015).

Here, the Attorney General's role as Defendant's advocate in defending against Plaintiff's allegations that Defendant has violated the TPIA is in irreconcilable conflict with the Attorney General's "unique role" in enforcing that statute.

First, Plaintiff has challenged the Attorney General's determination that certain requested documents are exempted from disclosure. *See* Pl.'s Second Am. Pet. ¶¶ 46-52. Yet these determinations were made after this lawsuit was filed, after the Attorney General appeared on behalf of Defendant, and after the Attorney General prepared and filed Defendant's plea to the jurisdiction seeking dismissal of Plaintiff's lawsuit. *See id.*

Second, the Attorney General has failed to fully comply with its obligations under Tex. Gov't Code Section 552.269, which requires the Attorney General to determine whether a governmental body's cost estimates are excessive. As detailed in Plaintiff's Second Amended Petition, one of Defendant's strategies in seeking to avoid producing the requested public information is to create excessive cost estimates associated with fulfilling the requests, thereby creating an economic barrier to disclosure. *See* Pl.'s Second Am. Pet. ¶ 29. Indeed, one cost

estimate alone was in the amount of \$18,422.50. *See id.* The requestor's remedy when it believes it is being overcharged is to file a complaint with the Attorney General, who will then "review the complaint and make a determination in writing as to the appropriate charge for providing the copy of the requested information." Tex. Gov't Code § 552.269(a). During the pendency of this lawsuit, Plaintiff served additional requests for public information on Defendant, and then timely challenged the cost estimates that Defendant served in response. A chart detailing these challenges is attached hereto as **Ex. B**. The Attorney General delayed for months making any decision regarding these cost estimates. Indeed, this failure led to Plaintiff filing its Third Amended Petition and joining the Attorney General to this lawsuit as a defendant. *See* Pl.'s Third Am. Pet. ¶¶ 58-62. It was not until February 3, 2020, and only after it had been sued, that the Attorney General finally issued an opinion as to two of these estimates. To date, the Attorney General has only ruled on three of the seven challenges to Defendant's cost estimates.

Third, given the circumstances, the Plaintiff is left with filing a complaint with the Attorney General and having the Attorney General decide whether or not its client, the Defendant, violated the TPIA. If a requestor believes that a governmental body has violated the TPIA, the requestor may file a complaint with the district or county attorney of the county in which the governmental body is located. *See* Tex. Gov't Code § 552.3215(e). Within 31 days of receiving the complaint, the district or county attorney must determine (a) whether the violation alleged in the complaint occurred, and (b) whether it will bring an action against the governmental body pursuant to Section 552.3215. *See* Tex. Gov't Code § 552.3215(g). However, if the district or county attorney believes that it has a conflict of interest that would preclude it from bringing an action against the governmental body complained of, the district or county attorney must inform the requestor of the conflict and further inform the requestor of its right to file the complaint with the Attorney General.

See Tex. Gov't Code § 552.3215(h). If the requestor files a complaint with the Attorney General, the Attorney General must then comply with Tex. Gov't Code § 552.3215(g) and (h). *See* Tex. Gov't Code § 552.3215(i). Here, Plaintiff filed a complaint with the district attorney for Lubbock County, only to have the district attorney notify Plaintiff that her office had a conflict and refer Plaintiff to the Attorney General. *See Ex. A.* In other words, it is now up to the Attorney General to decide (a) whether its client, the Defendant, violated the TPIA, and (b) whether to sue its client, the Defendant, in order force it to comply with the TPIA.

In addition to Section 552.3215, Section 552.353 provides for criminal liability to those who violate the TPIA. An officer for public information commits an offense if, with criminal negligence, the officer fails or refuses to give access to, or to permit or provide copying of, public information. *See* Tex. Gov't Code § 552.353(a). An offense under Section 552.353 is a misdemeanor and constitutes "official misconduct." *Id.* at § 552.353(e). Again, Plaintiff reported Defendant's violation of the TPIA, which constitutes an offense under Section 552.353(a) to the Lubbock County District Attorney. The district attorney's initial response was to claim a conflict and refer Plaintiff to the office of the Attorney General. The district attorney how now advised, apparently on the advice of the Attorney General, that it would seek the appointment of a special prosecutor to investigate any violation of Section 552.353 on the part of Defendant and its agents.

This case presents an unusual situation. More typically, a litigant seeking to disqualify an attorney or law firm from representing an opposing party relies on the Texas Disciplinary Rules of Professional Conduct ("TDRPC"), which are authoritative, though not controlling. *See Spears v. Fourth Court of Appeals*, 797, S.W.2d 654, 656 (Tex. 1990) ("While the disciplinary rules are not controlling as standards governing motions to disqualify...they have been viewed by the courts as guidelines that articulate considerations relevant to the merits of such motions."). Yet in this

case, the conflict is in the dual roles assumed by the Attorney General. On one hand the Attorney General is acting as the attorney and advocate of Defendant and is therefore obligated to adopt and argue Defendant's position that it has complied with the TPIA. On the other hand, the Attorney General is generally charged with the interpretation, application, and enforcement of the TPIA, and was specifically obligated—*during the pendency of this case*—to issue an opinion as to whether certain documents withheld by Defendant were exempted from disclosure, determine if Defendant's cost estimates were excessive, and investigate and determine if Defendant otherwise violated the TPIA as alleged by the Plaintiff.

While the disciplinary rules do not specifically address the conflict presented by the Attorney General's dual roles in this case, similar conflicts have been addressed in analogous circumstances. For example, a judge is constitutionally forbidden from sitting "in any case wherein the judge may be interested...or when the judge shall have been counsel in the case." Tex. Const. art. V, § 11. Similarly, the Texas Rules of Civil Procedure further require the disqualification of a judge when the judge "individually or as a fiduciary" has an interest "in the subject matter in controversy." *See* TRCP 18b(a)(2). Finally, it is axiomatic that "[a] lawyer shall not represent opposing parties to the same litigation." TDRPC 1.06(a). The takeaway from these prohibitions is that the three basic roles in a legal dispute—the opposing parties and the neutral arbiter—cannot be shared by any single person or entity. To allow for a judge to simultaneously act as an advocate or for the opposing parties to be a single party would fundamentally subvert the adversarial process.

Importantly, the prejudice that Plaintiff has suffered by the Attorney General's dual roles is not abstract or contingent. A decision by the Attorney General that the withheld documents were not exempted from disclosure would have undermined Defendant's position that the documents

were exempted from disclosure. Unsurprisingly, the Attorney General, during the pendency of this lawsuit, agreed with many of the exemptions claimed by Defendant. A decision that Defendant's cost estimates were excessive would allow for Plaintiff to obtain copies of public information that Defendant did not want disclosed and could further potentially expose it to liability for a refund along with damages. *See* Tex. Gov't Code § 552.269(b). So, the Attorney General conveniently failed to make any decision regarding the cost estimates during the pendency of this case, and probably would have continued to not make any decision until it was sued. Now, the Attorney General is obligated by the TPIA to make an explicit determination as to whether Defendant violated the TPIA, and then whether, like the Plaintiff, sue the Defendant to enforce the statute. Actions it cannot do without violating either its duty of loyalty to the Defendant or its obligations under the TPIA.

While the circumstances are unusual, the fundamental policy concerns are nothing new. The Attorney General cannot simultaneously act in an adjudicative function regarding the dispute between Plaintiff and Defendant by issuing opinions on Defendant's claimed exemptions, determining whether Defendant's costs estimates are excessive, and determining whether Defendant violated the TPIA while at the same time as acting as Defendant's attorney in connection to those same disputes now pending before this Court. Given this conflict, and the prejudice it causes Plaintiff, the Court should disqualify the Attorney General from acting as Defendant's counsel.

B. The Attorney General should be disqualified because its lawyers are witnesses necessary to establish an essential fact.

“A lawyer shall not accept or continue employment as an advocate before a tribunal in a contemplated or pending adjudicatory proceeding if the lawyer knows or believes that the lawyer

is or may be a witness necessary to establish an essential fact on behalf of the lawyer's client.” TDRPC 3.08. In its motion styled “Plaintiff’s Motion to Compel Documents Subject to Defendant’s Improper Snap-Back Request” filed on December 18, 2019, Plaintiff argued that the crime-fraud exception applied to avoid any application of the attorney-client privilege to the documents that Defendant was withholding. At issue are the statements made by attorneys with the Attorney General’s office who represented that Defendant did not have a completed investigation report regarding Coach Leach’s alleged mistreatment of Adam James. The documents that Plaintiff is seeking to compel production of would show that that statement is demonstrably false. The crime-fraud exception to the attorney-client privilege provides that the privilege does not apply in instances where the “lawyer’s services were sought or obtained to enable or aid anyone to commit or plan to commit what the client knew or reasonably should have known to be a crime or fraud.” Tex. R. Evid. 503(d)(1). The attorneys and staff with the Attorney General’s office that are representing Defendant in this case are fact witnesses as to the improper withholding and redaction of documents in this case. The resolution of this issue will require the testimony of Defendant’s lawyers, yet an attorney may not act as a fact witness and continue to represent a party in the litigation. Accordingly, Defendant’s counsel should be disqualified.

C. The Attorney General is not authorized to represent the Defendant at the trial court level.

“For suits in district court, the Constitution provides that the State shall be represented by either the District Attorney or the County Attorney, as determined by the Legislature.” *El Paso Elec. Co. v. Texas Dept. of Ins.*, 937 S.W.2d 432, 438–39 (Tex. 1996). “This constitutional provision, however, does not preclude the Legislature, pursuant to the authority delegated to it under Article IV, Section 22, from empowering the Attorney General to likewise represent the

State in district court.” *Id.* “While there is no general statute authorizing the Attorney General to represent the State and its agencies in district court, the Legislature has provided for such representation in particular types of cases.” *Id.* Yet in this instance, there is no provision of the TPIA that allows the Attorney General to represent a governmental body in a district court. Ultimately, the Attorney General “exercises only those powers authorized by the Constitution or statute.” *City of Galveston v. State*, 217 S.W.3d 466, 470 (Tex. 2007). Here, the Attorney General has not been authorized to defend Defendant in the district court and must therefore be disqualified from doing so.

IV. Conclusion & Prayer

For the foregoing reasons, the Court should grant this motion and disqualify the Attorney General and the attorneys with his office from representing Defendant in this case. Plaintiff prays for all such further relief to which it is justly entitled.

Respectfully Submitted,

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon all counsel of record *via electronic service* on March 16, 2020:

/s/ Julie Pettit

Julie Pettit

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Appellate Division
Jeff Ford - Chief
Lauren Murphree-Expunctions

Grand Jury/Intake Division
Eddie Wharff -Chief
Ashley Davis-Mental Health
Thomas Stephenson
Jeri Leigh Thornesberry

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Marlise Boyles-Mental Health
Jennifer Slack-Open Records
Jennifer Irlbeck-Open Records
Deirdre Ward-CPS
David DeSoto-CPS
Katy Rendon-CPS

Juvenile Division
Kim Hayes - Chief
Whitney Garnett

137th District Court
Cara Landers - Chief
Craig Oglesby
Greg Jernan

140th District Court
Jessica Gorman - Chief
Ginny Simpson
Justin Works

364th District Court
Courtney Boyd - Chief
Chris Schulte
Cassie Nesbitt

Domestic Violence / Misd Chief
Traci Wiseley

County Court at Law #1
Erin Van Pelt - Chief
Karl Meyer
Chase Stewart

County Court at Law #2
Austin Sanford - Chief
Alan Burow
Sha'Kera Trimble

Victim's Services
Laney Dickey
Lakeisha Williams
Tammy Mosteller

Check Office
Suzanne Patton - Manager

January 22, 2020

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Wayne Dolcefino
3701 Kirby Drive, Suite 560
Houston, TX 77098

Mr. Dolcefino,

I am in receipt of your complaint regarding Texas Tech University, received in our offices, January 8, 2020. Pursuant to Texas Government Code Section 552.3215(h), a potential conflict of interest will preclude my office from bringing an action against the governmental body complained of. Under the same section, you have a right to file the complaint with the attorney general. The original complaint is being attached to this notice.

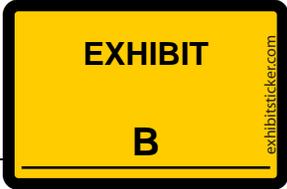
Sincerely,

A handwritten signature in blue ink, appearing to be "K. Sunshine Stanek".

K. Sunshine Stanek



ID. No.	Date	Request	Cost Estimate	Date Cost Estimate Received	Date Cost Estimate Challenge Sent	AG Actions
CE-1	02/19/2019	PDF or searchable spreadsheet copies of detailed phone records for each member of the Texas Tech University Board of Regents and for Robert Duncan (each request was sent individually), on any device on which Texas Tech University business is conducted, redacted to exclude personal phone calls and any other information made confidential under state law, between January 1, 2017 and the present.	\$8,316.00	05/30/2019	06/10/2019	<p>On 08/30/2019 the Office of the Attorney General sent a letter containing four questions regarding the calculation of the cost estimate to TTU.</p> <p>TTU responded on 09/17/2019.</p> <p>Dolcefino Consulting responded to TTU's response on 11/14/2019.</p> <p>The Attorney General has so far failed to respond to Plaintiff's complaint.</p>



CE-2	06/10/2019	A copy of all emails sent or received by any employee of Texas Tech University regarding Wayne Dolcefino or Mike Leach since January 1, 2018. You may redact any information which would fall under the scope of Attorney-Client privilege.	\$5,008.00	06/24/2019	07/05/2019	<p>On 08/30/2019 the Office of the Attorney General sent a letter containing four questions regarding the calculation of the cost estimate to TTU.</p> <p>TTU responded on 09/17/2019.</p> <p>Dolcefino Consulting responded to TTU's response on 11/13/2019.</p> <p>The Attorney General has so far failed to respond to Plaintiff's complaint.</p>
CE-3	07/11/2019	A spreadsheet which details all payments made to any law firm representing Texas Tech University or	\$1,206	07/25/2019	08/07/2019	On 11/12/2019 the Office of the Attorney General sent

		<p>affiliated systems between January 1, 2014 and the present. This spreadsheet should include separate accounting of payments by department.</p>				<p>a letter containing four questions regarding the calculation of the cost estimate to TTU.</p> <p>TTU did not provide Dolcefino Consulting with a copy of their response.</p> <p>On January 31, 2020 the Attorney General issued a ruling on the cost estimate challenge.</p> <p>On February 18, 2020, TTU issued an updated but unchanged cost estimate to Dolcefino Consulting for \$1,206.</p>
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CE-4	07/18/2019	Copies of all sent emails between January 1, 2018 and the present, from Texas Tech University Board of Regents member Tim Lancaster which relate to University business. You may redact information made confidential under state law, and information which would be considered legal advice. You may withhold any mass mailings readily available to the public.	\$923	07/26/2019	08/08/2019	<p>On 11/12/2019 the Office of the Attorney General sent a letter containing four questions regarding the calculation of the cost estimate to TTU.</p> <p>TTU did not provide Dolcefino Consulting with a copy of their response.</p> <p>On January 31, 2020 the Attorney General issued a ruling on the cost estimate challenge.</p> <p>On February 7, 2020, TTU issued an updated cost estimate to Dolcefino</p>
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						<p>Consulting for \$133.35. Dolcefino Consulting paid the cost estimate.</p> <p>On March 9, 2020 TTU informed Dolcefino Consulting that they would be requesting an Open Records Decision from the Office of the Attorney General.</p>
CE-5	07/19/2019	<p>Copies of all email communications between Chancellor Tedd Mitchell and any Texas Tech University Board of Regents member between September 1, 2018 and the present. You may redact information made confidential under state law. This request does not include information which would be considered legal advice, or any mass mailings readily available to the public.</p>	\$720	08/01/2019	08/13/2019	<p>On 10/25/2019 the Office of the Attorney General sent a letter containing four questions regarding the calculation of the cost estimate to TTU.</p> <p>TTU has not yet provided</p>

						<p>Dolcefino Consulting with a copy of their response.</p> <p>The Attorney General has so far failed to respond to Plaintiff's complaint.</p>
CE-6	07/25/2019	<p>Copies of all emails sent or received by any member of the athletic department concerning Mike Leach since January 1, 2019. You may redact information made confidential under state law. This request does not include information which would be considered legal advice, or any mass mailings readily available to the public</p>	\$1,768	08/08/2019	08/13/2019	<p>Upon information and belief, there has been no response.</p> <p>The Attorney General has so far failed to respond to Plaintiff's complaint.</p>
CE-7	09/24/2019	<p>Documents detailing any complimentary sports tickets provided to any member of the Texas Tech Board of Regents Since January 1, 2017. This should include the value of the ticket, as well as the cost of providing</p>	\$4,404	10/09/2019	10/17/2019	<p>Dolcefino Consulting did not receive a copy of any letter from the Office of the Attorney General direct to TTU asking</p>

		food and beverages for the suite.				<p>questions about the cost estimate.</p> <p>However, on February 28, 2020, the Attorney General issued a ruling on the cost estimate challenge.</p> <p>On March 3, 2020, Dolcefino Consulting requested an updated cost estimate from TTU. An updated cost estimate has not yet been received.</p>
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