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FACSIMILE TRANSMISSION COVER SHEET

TO TELECOPIER NO.: 458-1784

DATE: 1/11/2016

PLEASE DELIVER TO:

NAME: Mayor Buddy Bradshaw

FROM: Joseph R. Ford

REGARDING: Lisa Niles, Clerk of the Circuit Court et al. v. Rollen Bradshaw,
Loudon County Mayor
Loudon County Chancery Court No.: 12267

NO. OF PAGES: 4

ORIGINAL(S): Not Mailed.

OPERATOR: Debbie Daub

MESSAGES: Attached find the Motion to Clarify by Lisa Niles. We will reply on behalf of the County and let you know when a hearing date is scheduled.

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Stokes Williams Sharp

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JAN 11 2016

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*Tennessee Supreme Court
Listed Mediator
**Of Counsel

January 8, 2016

Fred Chaney, Clerk & Master
Loudon County Chancery Court
P.O. Box 509
Loudon, TN 37774-0509

RE: Lisa Niles, Clerk of the Circuit Court, Probate Court, Criminal Court,
General Sessions Court, Juvenile Court and Child Support Court for
Loudon County, Tennessee vs. Rollen "Buddy" Bradshaw, Loudon County Mayor
Loudon Chancery Court Docket No. 12257

Dear Mr. Chaney:

Enclosed please find a Motion for Post-Trial Conference for Clarification Regarding Memorandum Opinion for filing on behalf of the Petitioner in the above-referenced matter. Defense counsel is being provided a copy of same by copy of this letter.

Your attention to this matter is greatly appreciated,

Very truly yours,

Zachary B. Tenry

ZBT:kjc

Enclosure

cc: Joseph R. Ford, Esq.
Kristopher D. Frye, Esq.
Lisa Niles

JAN 11 2016

IN THE CHANCERY COURT FOR LOUDON COUNTY, TENNESSEE

**LISA NILES, Clerk of the Circuit Court
for Loudon County, Tennessee,**

Petitioner,

vs.

NO. 12267

**ROLLEN "BUDDY" BRADSHAW,
Loudon County Mayor,**

Defendant.

**MOTION FOR POST-TRIAL CONFERENCE FOR CLARIFICATION REGARDING
MEMORANDUM OPINION**

Comes the Petitioner, Lisa Niles, by and through counsel, and hereby moves this Honorable Court to hold a post-trial conference in this matter for the purpose of providing clarification regarding the Court's Memorandum Opinion dated December 29, 2015. In support of her Motion, Petitioner would show unto the Court the following:

1) During trial of this cause on December 10, 2015, Petitioner submitted proof in support of her request for additional employees and higher starting salaries within her office. Additionally, Petitioner submitted proof in support of additional pay increases for her current employees. As part of her request, petitioner sought a total of \$57,000.00 in raises for current employees, including retroactive county raises of 2% for the 2014-2015 and 2015-2016 budget cycles and additional adjustment raises for all current employees (excluding Chief Deputy Clerks).

2) In its post-trial Memorandum Opinion, the Court has authorized Petitioner's hiring of four (4) new employees with starting salaries ranging from \$25,500.00 to \$32,000.00. Additionally, the Court ordered that Petitioner's current employees receive retroactive county raises of 2% for the 2014-2015 and 2015-2016 budget cycles. However, the Court did not

include any ruling regarding approval or denial of additional adjustment raises for current employees.

3) Prior to entry of the final Judgment in this cause, Petitioner requests clarification of the Memorandum Opinion with respect to her request for adjustment raises for current employees.

WHEREFORE, Petitioner respectfully requests that the Court conduct a conference with counsel of record for the purpose of providing clarification as to whether adjustment raises were intentionally omitted from the Court's December 29, 2015, Memorandum Opinion.

Respectfully submitted this 8 day of January, 2016.


Zachary B. Tenry (BPR #25724)

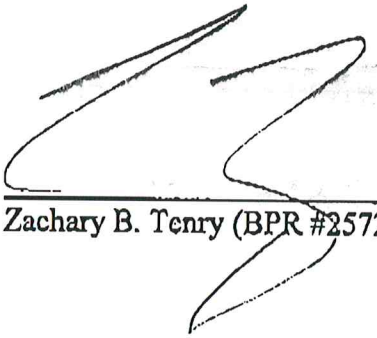
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P.O. Box 2644
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865/544-3833
Attorney for Ms. Niles

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to all counsel of record in this cause by placing a copy of same in the U. S. Mail, postage prepaid, addressed as follows:

Joseph R. Ford, Esquire
Kristopher D. Frye, Esquire
Ford & Nichols
P.O. Box 905
501 Mulberry Street
Loudon, TN 37774

This 8 day of January, 2016.


Zachary B. Tenry (BPR #25724)