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January 9, 2019

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Via E-Mail: kellysandill@huntonak.com

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City Attorney
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Re: Cause No. 2018-85465; *Houston Police Officers' Union v. City of Houston, Texas, and Houston Professional Fire Fighters Association, IAFF-Local 341*; In the 157th Judicial District Court of Harris County, Texas

Dear Counsel:

On December 18, 2018, the Court issued its Order denying Plaintiff Houston Police Officers' Union's ("HPOU") Application for Temporary Injunction and the City of Houston's ("City") Application for Stay of the implementation of the pay-parity amendment. The Court also dissolved the prior temporary restraining order.

Following the Court's ruling and consistent with HPOU's public statements that it would not appeal and with the City's statement that it would talk with the Houston Professional Fire Fighters Association, IAFF Local 341 ("HPFFA") regarding implementing the pay-parity ordinance, neither HPOU nor the City filed a notice for interlocutory appeal by the January 7, 2019 deadline. Yet the City still has not made any payments to the firefighters as required by the law, nor has the City met with HPFFA or set a specific, imminent date by which the payments will begin, including back payments due from the date the law came into effect. As such, the City is in breach of its payment obligations under the pay-parity ordinance, for which Chapter 271 of the Texas Local Government Code allows suit against the City. Moreover, the Mayor, the Comptroller, the Finance Director, and the City Council members are in violation of their

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ministerial, non-discretionary duty to make the required salary payments to the firefighters in accordance with the pay-parity ordinance and thus subject to a mandamus action.

Accordingly, on behalf of the HPFFA, I ask that the City please respond to this letter by 5:00 p.m. on Friday, January 11, 2019 and identify the date by which the City will begin making payments to Houston firefighters as required by the pay-parity ordinance. If no response is received or if no specific, imminent date is provided, HPFFA will be forced to consider all available legal means to have the City and its officials comply with the law.

I look forward to your response which hopefully will end the need for further legal proceedings.

Very truly yours,

A handwritten signature in black ink, appearing to read "Travis J. Sales", written in a cursive style.

Travis J. Sales

cc: Thomas R. Phillips
E. Troy Blakeney, Jr.
Vincent L. "Tripp" Marable III