

February 6, 2026

VIA EMAIL

smueller@westalliswi.gov

Mr. Shaun Mueller
Development Project Manager/Economic Development
City of West Allis
7525 West Greenfield Avenue
West Allis, WI 53214

Re: Condemnation of Property in West Allis, Wisconsin
2026 Proposed Budget for Legal Fees

Dear Shaun:

Per your request for anticipated legal costs for 2026, we propose a budget of \$87,500 for approval by the Community Development Authority. The proposal includes forward looking tasks and tasks associated with the completion of the purchase of the Motor Castings Property.

- (1) *Forward Looking* – estimated \$60,000. As you know, there are several variables, but our primate tasks include:
 - Residential access agreements
 - Hazardous waste determination
 - Dividing the site into two BRRTS sites for phasing the development
 - Coordinating with the Wisconsin Department of Natural Resources regarding potential responsible party engagement (Dalton), if needed
 - Addressing management of remediation issues in context of development; this would supplement a typical cooperation and development agreement

- (2) *January Budget – Motor Castings Property Purchase* – estimated \$27,500. As you know, we had to act with urgency in January close on the purchase of the Motor Castings property prior to the due date for the U.S. Environmental Protection Agency grant applications. That resulted in accelerated negotiations with the Receiver, the property brokers, and the Secured Creditor (New Dalton Foundry, LLC), preparations with Ramboll for a court appearance, and participation in the emergency hearing to approve the sale, all in addition to traditional survey, title and real estate closing needs. We estimate the resulting fees to exceed the prior budget by \$27,500.

Please let me know if you need additional information or further breakdown of these estimates.

Very truly yours,

A handwritten signature in black ink, appearing to read 'B. Keyes', with a long horizontal flourish extending to the right.

Bruce A. Keyes

cc: Patrick Schloss
Kail Decker