AGUIRRE & SEVERSON, LLP

ATTORNEYS AT LAW

Michael J. Aguirre, Esq. maguirre@amslawyers.com Maria C. Severson, Esq. mseverson@amslawyers.com 501 West Broadway, Suite 1050 San Diego, CA 92101 Telephone (619) 876-5364 Facsimile (619) 876-5368

Via Email

MayorToddGloria@sandiego.gov

January 14, 2022

Honorable Todd Gloria Mayor of the City of San Diego City Administration Building 202 C Street, 11th Floor San Diego, CA 92101

Re: Recovery of Damages Incurred Due to Chargers' Relocation

Dear Mayor Gloria:

As set forth in the attached legal commentary, there is established legal precedent for the City of San Diego to recover taxpayer losses from the NFL and the Chargers, as was done under similar circumstances by the City of St. Louis and the St. Louis Regional Convention and Sports Complex Authority.

We write to confirm that you, as Mayor of the City of San Diego, have decided not to take any legal action to recover damages the City suffered as a result of the Chargers' relocation to Los Angeles starting in the 2017 football season.

For these reasons, on January 21, 2022, a taxpayer lawsuit will be brought to recover damages for the 2017 Chargers' relocation.

If the City of San Diego intends to bring such legal action, please inform us on or before January 20, 2022.

Thank you.

Very truly yours,

/s/ Maria C. Severson Maria C. Severson, Esq.

encl.

cc: Paola Avila, Mayor Gloria's Chief of Staff, PAvila@sandigeo.gov

Mara W. Elliott, City Attorney, <u>cityattorney@sandiego.gov</u> Jim McNeill, Assistant City Attorney, <u>JMcNeill@sandiego.gov</u>