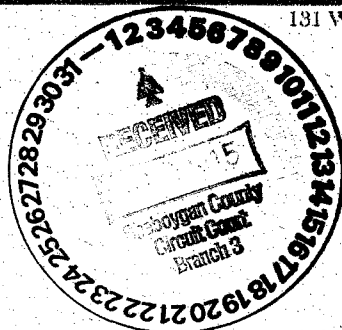


Aquino Law LLC

131 W. Wilson Street, Suite 1201, Madison, WI 53703

Thomas B. Aquino
608.251.6735 (direct)
608.338.0892 (fax)
tom@aquino-law.com



September 2, 2015

Hon. Angela W. Sutkiewicz
Sheboygan County Circuit Court
615 N. 6th Street
Sheboygan, WI 53081-4612

BY FAX

Re: *State of Wisconsin v. Steven A. Avery*
Manitowoc County Case No. 2005-CF-00381

Dear Judge Sutkiewicz:

Please find enclosed a Petition and Order for Payment of Court-Appointed Counsel Fees and supporting documents. The Petition is the completed "form" Petition found on Manitowoc County's website.¹

The Petition includes a request for reimbursement of \$315 in expenses for investigatory services. The investigator's invoice is included in the enclosures. The court approved up to \$500 in such expenses at the June 12, 2015 status conference.

The total amount of fees requested is \$3,206, based on 45.8 hours at the court-appoint rate of \$70/hour. The number of hours expended is reasonable in light of the vast scope of the underlying proceedings and the nature of the issue considered on appeal. The investigation generated approximately 1,500 pages of police reports, and there were 24 days of trial. I was appointed in response to the state's concession that Mr. Avery's claim that investigators had eavesdropped or otherwise monitored his attorney-client communications would "require additional factual development before the court can rule." (May 13, 2013 Fallon letter, p. 3.) I reviewed the investigatory reports and transcripts, and spoke extensively with trial counsel, to assess whether we could show that there were investigatory leads that could only have come through improper eavesdropping, and if so, whether it prejudiced Mr. Avery's trial.

For these reasons, I respectfully request that the court approve the Petition if no objection is

9/1/15

RECEIVED

SEP 23 2015

CLERK OF CIRCUIT COURT
MANITOWOC COUNTY, WI

¹ <http://www.co.manitowoc.wi.us/departments/document.asp?ID=4>

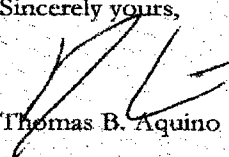
2

September 2, 2015
Page 2 of 2

received within 10 days.

Thank you.

Sincerely yours,



Thomas B. Aquino

cc:

All with enclosures

Steven Avery
ADA Thomas J. Fallon – By Fax
Manitowoc County Clerk of Courts – By Fax