

Eric Ritter

[REDACTED]

[REDACTED] | [REDACTED]

April 29, 2026

K. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Re: Demand for Itemized Billing and Refund of Legal Fees — Former Client of W. [REDACTED]

[REDACTED]

Matters: (1) [REDACTED] No. [REDACTED] [REDACTED] and (2) [REDACTED] matter

Dear Ms./Mr. [REDACTED]

I am a former client of W. [REDACTED] [REDACTED] who handled two legal matters for me through [REDACTED] from April through December 2025. I understand that Mr. [REDACTED] has since retired. I am directing this correspondence to your firm as the responsible party for his former client matters. I am disputing a portion of the fees paid and formally demanding complete itemized billing records, which I was never provided.

### What I Was Billed

Over the course of the engagement, I paid eight invoices through [REDACTED] totaling \$33,113.34:

Invoice #	Date Paid	Description on Invoice	Amount
00202	04/17/2025	Lawsuit	\$4,092.66
00206	05/11/2025	Litigation	\$1,402.38
00213	07/20/2025	Litigation v [REDACTED]	\$2,776.14

00217	09/24/2025	█████	\$7,298.10
00218	09/26/2025	█████ case	\$3,005.10
00220	11/02/2025	█████ case	\$3,262.68
00221	11/02/2025	█████	\$3,176.82
00225	12/10/2025	█████ & █████	\$8,099.46
<b>TOTAL</b>			<b>\$33,113.34</b>

### These Invoices Are Not Adequate Billing Records

Each invoice contains a single line item with a vague one or two-word description: "Lawsuit," "Litigation," █████ case," █████ Not one invoice identifies what tasks were performed, what documents were drafted, what court filings were made, what research was conducted, or what communications occurred. There are no date-by-date time entries, no task descriptions, and no breakdown of how hours were spent.

Under the New York Rules of Professional Conduct Rule 1.5, fees must be reasonable and the basis for fees must be communicated to the client. A single line reading "Lawsuit" for \$4,092.66 does not satisfy that standard.

The billing problem is compounded by the fact that two separate legal matters were handled simultaneously and are not clearly delineated across the invoices. Invoices #00202 ("Lawsuit") and #00206 ("Litigation") do not identify which matter they relate to at all. Invoice #00225, for \$8,099.46, bundles 28.3 hours billed to █████ & █████ with zero apportionment between the two cases. It is impossible to determine from these records what portion of the \$33,113.34 I paid was attributable to each matter. I am entitled to that information.

I also note that Invoice #00225 was issued on December 9, 2025 -- the same date Judge █████ filed her dismissal order in the █████ case. I paid it the following day, without yet knowing what had happened. That invoice bills 28.3 hours across two cases on the day one of those cases was dismissed, with no explanation of how the time was divided.

### The █████ Federal Case Was Dismissed Due to Attorney Error

The federal case, No. █████ was dismissed without prejudice on December 9, 2025 for lack of subject matter jurisdiction. The dismissal turned on a foundational and well-settled requirement of federal diversity practice: when a party is a limited liability company, the plaintiff must identify every member of that LLC and specifically plead each member's individual citizenship and domicile. This is black-letter law in the Second Circuit and a threshold requirement that must be addressed before a federal complaint is filed. It was not

addressed in the original complaint filed April 16, 2025.

The Court issued an Order to Show Cause on October 24, 2025, explicitly identifying this deficiency and providing an opportunity to cure it. The response filed on my behalf was found by the Court to be "conclusory" and insufficient -- it still failed to identify [REDACTED] members or establish their citizenship. The case was dismissed. Eight months elapsed and the matter never reached the merits. This was the direct result of an error that should never have been made.

## My Demands

Within 7 days of receipt of this letter, I am requesting:

1. A complete, task-by-task itemized billing statement for each matter separately -- the [REDACTED] federal case and the [REDACTED] matter -- covering the full engagement from April through December 2025, with specific dates, task descriptions, and individual time entries.
2. A written accounting of how the 28.3 hours on Invoice #00225 [REDACTED] & [REDACTED] (\$8,099.46) were allocated between the two matters, with task-level detail.
3. A written explanation of which matter Invoices #00202 and #00206 pertain to, with supporting task detail.

Once I have received proper billing records, I intend to seek a full refund of all fees attributable to the [REDACTED] federal matter, on the grounds that the case was dismissed as a direct result of an avoidable jurisdictional error that went uncorrected from the original filing through the show cause proceeding.

I am filing a concurrent dispute through the [REDACTED] platform. If I do not receive a substantive written response within 7 days, I will pursue all available remedies including a complaint to the New York State Bar Attorney Grievance Committee and a legal malpractice claim without further notice.

Sincerely,

Eric Ritter

[REDACTED]

[REDACTED] | [REDACTED]