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October 1, 2012

Kirsten E. Hoyt, Ed.D.
Chair Person
Groton Board of Education
1300 Flanders Road
P.O. Box K
Groton, CT 06340

Re: Paul Kadri

Dear Ms. Hoyt:

I am writing on behalf of Superintendent Paul Kadri to request, pursuant to Section 9.D of his Contract of Employment, that he be afforded a hearing regarding the Board's decision to consider terminating his employment.

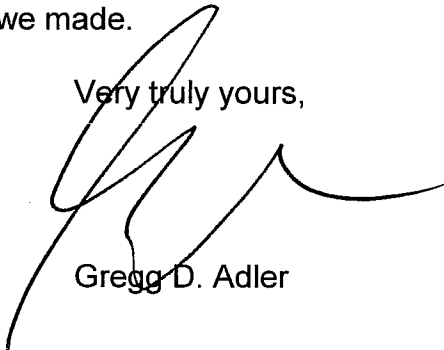
We further request that the termination hearing be held before a neutral arbitrator instead of being conducted by the Board. The reason for this request is that Mr. Kadri does not feel that you or the other Board members would be in a position to act as an objective, unbiased tribunal at this juncture in time. It is clear from the language used in your September 10, 2012 correspondence to Mr. Kadri, and through various other actions and statements that have occurred both before and after May 7, 2012, that the Board does not have a truly "open mind" regarding this issue, as is required by the Due Process Clause of the U.S. Constitution. Moreover, it is in the best interests of all parties - Mr. Kadri, the Board, and the citizens of the Town of Groton, that Mr. Kadri be afforded a full and fair hearing conducted by a truly impartial decision-maker. That is the only way to assure that the hearing will result in a final conclusion to this matter without the necessity of further litigation.

Please let us know as soon as possible whether the Board is willing to accept the suggestion of submitting the dispute to a neutral decision-maker.

Kirsten E. Hoyt, Ed.D.
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Also, please be advised that I will be out of the country and not reachable from Friday, October 5 through Monday, October 15. During that time I will not be in contact with my office and will not be checking e-mail. Therefore, we would very much appreciate it if the hearing in this matter could be scheduled between October 22 and November 2. This should give the Board of Education sufficient time to fully respond to the August 29, 2012 FOIA request we made.

Very truly yours,

A handwritten signature in black ink, appearing to read "Gregg D. Adler". The signature is fluid and cursive, with a long horizontal stroke at the end.

Gregg D. Adler

drc
cc: Floyd Dugas
Paul Kadri