



Chester R. Cedars, Parish President

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August 30, 2022

Mr. Robert Burns
Via Email at rburnsbtr@hotmail.com

RE: Supplemental response to your August 25, 2022 Public Records Request

Dear Mr. Burns:

After sitting with the appropriate officials of SMPG to begin determining what we need to search for in response to your public records request, it became apparent that we were not sure what you meant by some of the terms which you used in your request. Therefore, we need your advice and clarification on these items:

REQUEST 1: This requests evidence of "legal action" initiating an enforcement "to include, but not be limited to C&D letters, the filing of any restraining orders of SMPG Ordinance No. 21-08-1329..." Since you specifically list C&D letters plus filing for restraining orders, we know that you consider those items to be "legal action." Did you intend to include anything in addition to sending C&D letters or actual lawsuits? If you did, please specify what other items you meant.

REQUEST 2: We don't have a "nuisance file" on Mr. Broussard. The SMPG files on Mr. Broussard are those related to Planning & Zoning matters.

Secondly, with regard to your request for nuisance files for any LLC for which Mr. Broussard serves as an agent, we have no way of determining such a list of LLC's from our records, so you would have to provide us with such a list.

LEGAL BILLS: We will certainly provide you with the legal bills you requested, with this caveat: any narrative reflected in the bills which fall within the parameter of the attorney-client privilege must first be redacted. Therefore, it will take some time for SMPG to review and to redact those bills to redact the privileged portions.

Your request contains a specific date listed in large letters next to the names of the law firms whose bills you requested. Unless you tell me differently, we will assume that you have the bills

Mr. Robert Burns

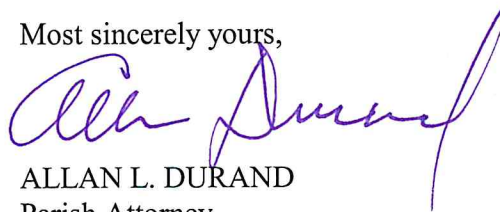
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up through and including that date, and you are only requesting bills that were submitted after that date.

Please forward your clarifications to us on the points requested above. Your request comes right in the critical portion of the calendar during which we are preparing the budget for next year, and much of that is 'time critical', so that will add some delay to the time within which we can respond. Our current best estimate is that it will take approximately 21 working days for us to review the files, redact the bills and gather the information you have requested to review.

Most sincerely yours,



ALLAN L. DURAND
Parish Attorney

ALD/dd