

Martin, Disiere, Jefferson & Wisdom L.L.P.

ATTORNEYS AT LAW

900 Capital of Texas Highway • Las Cimas IV • Suite 425 • Austin, Texas 78746 • Phone: 512-610-4400 • Fax: 512-610-4401
www.mdjwlaw.com

JEFFREY E. FARRELL
PARTNER

Direct: 512-610-4410
e-mail: farrell@mdjwlaw.com

January 26, 2016

FEMA
U.S. Department of Homeland Security
Disclosure Branch
Records Management Division

Via Email: FEMA-FOIA@dhs.gov

Re: Applicant / ID : West Independent School District / 309-0F23E-00
Disaster No. : 3363
Locations : West ISD, Campus Wide, West, Texas
Date of Loss : April 17, 2013 / West Fertilizer Plant Explosion

Cause No. 2014-1985-4; *West Independent School District v. Argonaut Insurance Company, Trident Insurance Services, LLC, The Texas Association of Public Educators*; In the 170th Judicial District Court of McLennan County, Texas

Dear Sir or Madam:

Pursuant to Freedom of Information Act, 5 U.S.C. § 552, it is requested on behalf of our clients, Argonaut Insurance Company and Trident Insurance Services, LLC, that you provide the undersigned with certified copies of all public records in your possession or control concerning all of the West Independent School District (“WISD”) public buildings and other facilities in West, McLennan County, Texas, USA, including the following:

West ISD Intermediate School
West Intermediate School
West ISD Middle School Annex Building
West ISD High School Building
West High School Building
Ag Shop Building
Middle School Support Buildings
Middle School Practice Gym
Business Office
Administrative Office
Middle School Cafetorium
Middle School Annex

Exhibit 1



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Middle School 1967 Gym "Main Gym"
Middle School 1923 Building and 1957 Addition
West ISD Football Stadium
Temporary Facilities

This request includes, but is not limited to, documentation of or concerning all applications for relief or assistance; inspection report(s); any information on the properties; correspondence to and from any party; photographs; videotapes; witness statements; cost estimates and/or project costs; project worksheets; insurance reviews; federal shares obligated; grants, awards and/or disbursements; and status reports. This request is for any and all documents from April 17, 2013 to the present.

We agree to pay reasonable costs incurred for research and copying of the above-referenced file, images, and documents. We will look forward to your response within twenty (20) days of your office receiving this request. If any part of this request is denied, or if any documents are withheld, please identify the individual responsible for the denial and provide the specific basis for the denial.

Thank you for your cooperation and professional courtesy in this regard.

Very truly yours,

MARTIN, DISIERE, JEFFERSON & WISDOM, L.L.P.

Jeffrey E. Farrell