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September 1, 2016

Via E-Mail Only

Scott L. Sternberg
Baldwin Haspel Burke & Mayer, LLC
1100 Poydras Street, Suite 3600
New Orleans, LA 70163

RE: *Public Records Request pursuant to Louisiana Revised Statute § 44:1, et seq.*

Dear Mr. Sternberg:

This response is provided on behalf of Advocates for Arts-Based Education Corporation d/b/a Lusher Charter School (“Lusher”) Board Members Barron, Cortizas, Huston, Teague, and Wisdom, former Board Members Salzer and Whelan, as well as, Lusher’s Chief Executive Officer, Kathy Riedlinger. This letter responds to your E-mail of August 22, 2016.

We reiterate our previous notice that Ms. Jewson’s May 20, 2016 public records requests to the Board Members and CEO Riedlinger are unreasonably burdensome and expensive as contemplated by Louisiana Revised Statute § 44:33, for the reasons that follow. Those requests are duplicative of the requests for which responses have previously been provided. Ms. Jewson declined our request to limit or more clearly delineate her requests, either in their entirety or through the use of specific search terms. Moreover, responding to the remainder of Ms. Jewson’s requests, would require that each record be reviewed for responsiveness, and redacted to scrub it any information protected from disclosure under applicable law – a task that is quite expensive.

As previously noted, **just** Ms. Loshbaugh’s unredacted emails consist of almost 1900 pages of information. Review and redaction of those emails cost Lusher approximately \$3,000 in attorney’s fees, which does **not** include follow-ups among and between counsel and the client, or communications with Ms. Jewson and you. In addition, Lusher has incurred approximately \$3,000 in fees to the third-party vendor retained to process the collected records, and to prepare them for production.

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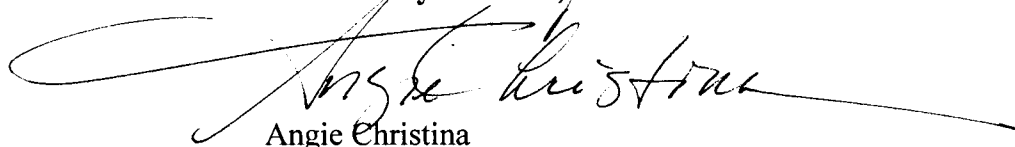
As for production of the E-mails of other Board Members, contrary to your previous assertions, those E-mails cannot simply be electronically de-duplicated against each other and against those records already produced. As has been reported, each Board Member maintains his or her own E-mails on different servers. Most of the other Board Members' E-mails were gathered by the individual Members and forwarded to us. Thus, the only electronic process available to limit the quantity of E-mails required to be reviewed is near de-duplication. But, near de-duplication and subsequent production is not a "best practice," is discouraged by our vendor, and could leave our client vulnerable to claims by yours. Even with near de-duplication, any E-mails that survive the process will have to be reviewed for responsiveness and possible redaction.

Additionally, the third-party vendor estimated that the collection and processing of CEO Reidlinger's E-mails will cost approximately \$1,000. That price does not include review and redaction by counsel.

For the reasons stated above, as well as those in our previous correspondence, we reassert that Ms. Jewson's public records requests for which records were not produced are unreasonably burdensome. Please contact me should you require additional information.

Cordially,

McGlinchey Stafford, PLLC



Angie Christina

cc: Magdalen Blessey Bickford, Esq. (*via interoffice E-mail only*)