

FINISH 3132 COALITION, LLC.

SUIT NO.

557792.A

VERSUS

1<sup>ST</sup> JUDICIAL DISTRICT COURT

RON NORWOOD, P.O. and  
CITY OF SHREVEPORT,  
ENGINEERING DEPARTMENT

CADDO PARISH, LOUISIANA

PETITION FOR WRIT OF MANDAMUS  
AND ATTORNEYS' FEES PURSUANT TO  
LOUISIANA REVISED STATUTE 44:35

NOW INTO COURT, through undersigned counsel, come Petitioner, Finish 3132 Coalition, LLC., a limited liability company of Caddo Parish, Louisiana, respectfully represents:

1.

That made Defendants herein are:

(a) RON NORWOOD, P.O., City engineer for the City of Shreveport, Engineering Department, hereinafter referred to as "NORWOOD";

and

(b) CITY OF SHREVEPORT, ENGINEERING DEPARTMENT, a division of the City of Shreveport, hereinafter referred to as "E.D.";

2.

The CITY OF SHREVEPORT is a "public body", as defined in Louisiana Revised Statutes 44:1(A)(1).

3.

That the Engineering Department is a division/department of the City of Shreveport.

4.

That E.D. receives public funding, including funding from the City of Shreveport.

5.

By letter dated February 14, 2012 (attached as Exhibit "A"), Petitioner, Finish 3132 Coalition, L.L.C., addressed a letter to the attention of Ron Norwood as City Engineer of City of Shreveport requesting to review the following records of the E.D.:

"copies of all e-mails, letter, memorandum and other written communications in any form, beginning November 1, 2006 to the date of this request, by and between yourself or any member of your staff regarding the following subjects:

Inner Loop Extension

Inter Loop Expressway

LA Hwy. 3132

Flournoy-Lucas Road

LA hwy 523

Ellerbe Road

Railsback Road

Esplanade Subdivision/Development

with any of the following individuals:

- 1 Mr. Tim Larkin
- 2 Mr. Chris Campbell
- 3 Mr. Chip Campbell
- 4 Mr. Mike Woods
- 5 Mr. Kent Rogers
- 6 Mr. Jerry Jones
- 7 DOTD Secretary Sherri LaBas
- 8 Mr. Eric Kalivoda of DOTD

- 9 Ms. Shawn Wilson of DOTD
- 10 Mr. John Sanders of DOTD
- 11 Mr. Keith Tindall of DOTD
- 12 State Representative Jane Smith
- 13 Senator Lydia Jackson
- 14 Senator Sherri Smith-Cheek Buffington
- 15 Mr. Timmy Teepell, former gubernatorial Chief of Staff
- 16 Mr. Charles Kirkland, MPC Director
- 17 Shreveport Development Corporation
- 18 Mr. Tony Janca
- 19 Mayor Cedric Glover
- 20 Mr. Rick Seaton, former Assistant CAO
- 21 CAO Dale Sibley
- 22 Assistant CAO Brian Crawford
- 23 Mr. Bill Altimus, NLCOG Executive Committee Member
- 24 Mr. Lo Walker, NLCOG Executive Committee Member
- 25 Mr. Charles Henington, NLCOG Executive Committee Member
- 26 Mr. Woody Wilson, NLCOG Executive Committee Member
- 27 Mr. Jimmy Hall, Bossier City Attorney
- 28 Mr. Bryan Wooley, former Shreveport City Councilman
- 29 Mr. Oliver Jenkins, Shreveport City Councilman
- 30 Mr. Michael Corbin, Shreveport City Councilman
- 31 Mr. Jim Dowling”.

6.

That neither Norwood nor the E.D. has not complied with this request.

7.

Louisiana revised Statutes 44:35(B) provides that this Court has jurisdiction to enjoin the custodian from withholding records or to issue a writ of mandamus ordering the production of any records improperly withheld from the person seeking disclosure. The Court may view the sought after records in camera before reaching a decision.

8.

Louisiana Revised Statutes 44:35(C) provides that any suit brought to enforce the provisions of the Public Records Law shall be tried by preference and in a summary manner.

9.

Louisiana Revised Statutes 44:35(D) provides that attorneys fees shall be awarded to the persons seeking public records, if such persons prevail.

10.

The public certainly has the right to know about the content of the communications by Norwood or the E.D. on the subjects noted above in Paragraph 5.

WHEREFORE, Petitioner Prays that, after due proceedings had, Defendants be ordered to show cause why at a date and time to be fixed by this Honorable Court why a Writ of Mandamus ordering the production of such records should not be issued, as provided by Louisiana Revised Statutes 44:35; that all records requested by Petitioner be produced to this Court for the Court's in camera inspection, and for all costs, attorney's fees and other damages as provided by law.

FURTHER PRAYS for all orders and decrees necessary; for general and equitable relief.

JOHN E. SETTLE, JR., Attorney at  
Law (A Professional Corporation)  
1915 Citizens Bank Drive  
Bossier City, Louisiana 71111  
(318) 742-5518  
Fax (318) 742-7170

BY: 

JOHN E. SETTLE, JR.  
Bar No. 11950  
Attorney for Finish 3132 Coalition, L.L.C.

SERVICE INFORMATION:

Mr. Ron Norwood, P.O.  
City Engineer - City of Shreveport  
505 Travis Street, Suite 300  
Shreveport, LA 71101

City of Shreveport, Engineering Department  
through its Agent for Service  
Mayor Cedric B. Glover  
505 Travis Street, Suite 200  
Shreveport, LA 71101

# JOHN E. SETTLE, JR.

ATTORNEY AT LAW (A PROFESSIONAL CORPORATION)

February 14, 2012

TELEFAX & MAIL

Mr. Ron Norwood, P.O.  
City Engineer - City of Shreveport  
505 Travis Street  
Suite 300  
Shreveport, Louisiana 71101

RE: Public Records Request

Dear Mr. Norwood:

This letter constitutes a Public Records Request for records from the City of Shreveport, Engineering Department and is directed to you as custodian, pursuant to Louisiana law. This is made on behalf of Finish 3132 Coalition, L.L.C.

I am specifically requesting copies of all e-mails, letters, memorandum and other written communications in any form, beginning November 1, 2006 to the date of this request, by and between yourself or any member of your staff regarding the following subjects:

Inner Loop Extension  
Inter Loop Expressway  
LA Hwy. 3132  
Flournoy-Lucas Road  
LA Hwy 523  
Ellerbe Road  
Railsback Road  
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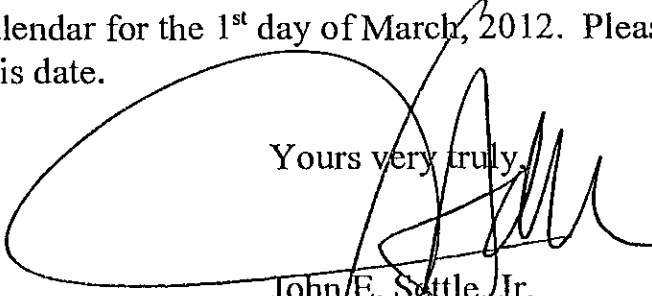


1915 Citizens Bank Drive • Bossier City, Louisiana 71111 • John@SettleLawFirm.com  
Phone: 318-742-5513 • Fax: 318-742-7170

6 Mr. Jerry Jones  
7 DOTD Secretary Sherri LaBas  
8 Mr. Eric Kalivoda of DOTD  
9 Ms. Shawn Wilson of DOTD  
10 Mr. John Sanders of DOTD  
11 Mr. Keith Tindall of DOTD  
12 State Representative Jane Smith  
13 Senator Lydia Jackson  
14 Senator Sherri Smith-Cheek Buffington  
15 Mr. Timmy Teepell, former gubernatorial Chief of Staff  
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28 Mr. Bryan Wooley, former Shreveport City Councilman  
29 Mr. Oliver Jenkins, Shreveport City Councilman  
30 Mr. Michael Corbin, Shreveport City Councilman  
31 Mr. Jim Dowling

I have marked my calendar for the 1<sup>st</sup> day of March, 2012. Please respond to this request on or before this date.

Yours very truly,

  
John E. Settle, Jr.  
Attorney for  
Finish 3132 Coalition, L.L.C.

JES,JR/kc

cc: Mr. Elliott Stonecipher

FINISH 3132 COALITION, LLC.

SUIT NO.

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RON NORWOOD, P.O. and  
CITY OF SHREVEPORT,  
ENGINEERING DEPARTMENT

CADDO PARISH, LOUISIANA

## ORDER

Considering the foregoing Petition:

IT IS ORDERED that Defendants show cause on the 2<sup>nd</sup> day of April, 2012 at 9:30 clock a.m. why:

- (a) A Writ of Mandamus should not be issued directing production to Petitioner the following records, to-wit:

“copies of all e-mails, letter, memorandum and other written communications in any form, beginning November 1, 2006 to the date of this request, by and between yourself or any member of your staff regarding the following subjects:

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- 31 Mr. Jim Dowling”.

(b) All costs of these proceedings should not be directed against Defendants.

Shreveport, Caddo Parish, Louisiana this the \_\_\_\_\_ day of \_\_\_\_\_,

2012.

\_\_\_\_\_  
DISTRICT JUDGE

SERVICE INFORMATION:

Mr. Ron Norwood, P.O.  
City Engineer - City of Shreveport  
505 Travis Street, Suite 300  
Shreveport, LA 71101

City of Shreveport, Engineering Department  
through its Agent for Service  
Mayor Cedric B. Glover  
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