

Elliott B Stonecipher  
Finish 3132 Coalition, L.L.C.  
2600 Greenwood Road  
Shreveport, Louisiana 71103

August 5, 2014

CERTIFIED MAIL, RETURN RECEIPT REQUESTED  
ARTICLE NUMBER \_\_\_\_\_

Michael D. Corbin  
District D Representative  
Shreveport City Council  
510 Red Baron Drive  
Shreveport, Louisiana 71115

Re: The decision of the Shreveport Metropolitan Planning Commission on May 7, 2014, denying the application for approval of Unit 6 of Esplanade Subdivision which Larkin Development At Railsback, L.L.C., filed with the Shreveport Metropolitan Planning Commission; the decision of the Shreveport City Council on June 10, 2014, modifying the application for approval of Unit 6 of Esplanade Subdivision which Larkin Development at Railsback, L.L.C., filed with the Shreveport Metropolitan Planning Commission and approving that application, as modified [Shreveport City Council Case No. SC-13-14]; and the Inner Loop Extension Project (i.e., the extension of Louisiana Highway 3132 from its current terminus at Flournoy-Lucas Road (Louisiana Highway 523) to a point at or near the Port of Shreveport-Bossier).

Dear Councilman Corbin:

Pursuant to the provisions of the Public Record Law (La. R.S. 44:1 et seq.), please provide me and the Finish 3132 Coalition, L.L.C. (the "Coalition") with a copy of all of the documents and records which are identified and described below and which are in your possession, custody, or control.

Please note that we are not interested in and are not requesting copies of any of the documents and records which are identified and described below and which are in the possession,

custody, or control of the City of Shreveport (the “City”) or which are located on or in and are available through any of the computer, digital, electronic, telephonic, and/or social media equipment, facilities, portals, accounts, or means of access which are registered to, owned, leased, controlled, or used by the City. We have previously requested copies of those documents and records from the City in a public records request directed to it, and have (presumably) received copies of those documents and records from the City.

What we are interested in and what we are seeking in this public records request is copies of all of the documents and records in ***your*** possession, custody, or control, including but not limited to, emails, text messages, twitter messages, and/or other computer, digital, electronic, telephonic, and/or social media postings or communications, which refer to, relate to, or concern any of the public subjects or matters described below and which have been generated, transmitted, posted, accessed, retrieved, received, and/or stored using computer, digital, electronic, telephonic, and/or social media equipment, facilities, portals, accounts, and/or means of access ***other than those which are registered to, owned, leased, controlled, and/or used by the City.***<sup>1</sup>

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<sup>1</sup>Please note, however, that our request covers, extends to, and includes not only all of the documents and records which have been generated, transmitted, posted, accessed, retrieved, and/or stored using any computer, digital, electronic, telephonic, and/or social media equipment, facilities, portals, accounts, and/or means of access which are registered to, owned, leased, controlled, and/or used ***by you or any of your agents, representatives or employees***, but all of the documents and records which have been generated, transmitted, posted, accessed, retrieved, and/or stored using any computer, digital, electronic, telephonic, and/or social media equipment, facilities, portals, accounts, and/or means of access which are registered to, owned, leased, controlled, and/or used ***by any persons or entities other than the City.***

In addition, please note that our requests for copies of documents and records under the Public Records Act (La. R.S. 44:1 et seq.) are expressly limited to documents and records which have been generated, transmitted, posted, accessed, retrieved, received, and/or stored with respect to any of the public subjects or matters described below *between May 7, 2014, and the date of this letter, August 5, 2014.*

Finally, please note that you are required to provide us with copies of the documents and records in *your* possession, custody, or control, including, but not limited to, emails, text messages, twitter messages, and/or other computer, digital, electronic, telephonic, or social media postings or communications, which refer to, relate to, or concern any of the public subjects or matters described below within three (3) days after the date on which you receive this request. See La. R.S. 44:1, et seq. (especially La. R.S. 44:31; La. R.S. 44:32(A), (C)(1), & (D); La. R.S. 44:33(B)(1); & La. R.S. 44:34).

The documents and records in *your* possession, custody, and control which we are hereby requesting that you copy and provide to us within three (3) days after the date on which you receive this letter, pursuant to and in accordance with the provisions of the Louisiana Public Records Law (La. R.S. 44:1, et seq.), are the following:

- (1) All documents and records which refer to, relate to, or in any way pertain to or concern any meetings, conversations, or communications by and between Cedric B. Glover (“Glover”) or any of his attorneys, agents, representatives, or employees and the Shreveport City Council (the “Council”), any of its members, and/or any of their attorneys, agents, representatives, or employees with respect to the decision of

the Shreveport Metropolitan Planning Commission (the "MPC") on May 7, 2014, denying the application for approval of Unit 6 of Esplanade Subdivision which Larkin Development at Railsback, L.L.C. ("Larkin Railsback"), had filed with it (the "MPC decision"); the decision of the Council on June 10, 2014, modifying the application for approval of Unit 6 of Esplanade Subdivision which Larkin Railsback had filed with the MPC and approving that application, as modified (the "Council decision"); or the extension of Louisiana Highway 3132 from its current terminus at Flournoy-Lucas Road (Louisiana Highway 523) to a point at or near the Port of Shreveport-Bossier ("La. Hwy. 3132").

- (2) All documents and records which refer to, relate to, or in any way pertain to or concern any meetings, conversations, or communications by and between Timothy A. Larkin, Larkin Development Company, Larkin Development North, L.L.C., Larkin Railsback (collectively, the "Larkin entities"), or any of their attorneys, officers, agents, representatives, or employees and Glover or any of his attorneys, agents, representatives, or employees with respect to the MPC decision, the Council decision, or La. Hwy. 3132.
- (3) All documents and records which refer to, relate to, or in any way pertain to or concern any meetings, conversations, or communications by and between the Larkin entities and/or any of their attorneys, members, officers, agents, representatives, or employees and the Council, any of its members, and/or any of their attorneys, agents, representatives, or employees with respect to the MPC decision, the Council decision, or La. Hwy. 3132.
- (4) All documents and records which refer to, relate to, or in any way pertain to or concern any meetings, conversations, correspondence, and/or communications by and between the Council, any of its members, and/or any of their attorneys, agents, representatives, and/or employees and the Louisiana Department of Transportation and Development, Dr. Eric Kalivoda, and/or any of their attorneys, officers, agents, representatives, and/or employees with respect to the MPC decision, the Council decision, and/or La. Hwy. 3132.
- (5) All documents and records which refer to, relate to, or in any way pertain to or concern any meetings, conversations, correspondence, and/or communications by and between the Council, any of its members, and/or any of their attorneys, agents, representatives, and/or employees and the Northwest Louisiana Council of

Governments, Kent Rogers, and/or any of their attorneys, officers, agents, representatives, and/or employees with respect to the MPC decision, the Council decision, and/or La. Hwy. 3132.

- (6) All documents and records which refer to, relate to, or in any way pertain to or concern any meetings, conversations, correspondence, and/or communications by and between the Council, any of its members, and/or any of their attorneys, agents, representatives, and/or employees and the MPC, Stephen Jean, and/or any of their attorneys, members, officers, agents, representatives, and/or employees with respect to the MPC decision, the Council decision, and/or La. Hwy. 3132.
- (7) All documents and records which refer to, relate to, or in any way pertain to, concern, or reflect any meetings, conversations, discussions, and/or communications by and between the Council, any of its members, or any of their attorneys, agents, representatives, or employees and any other persons or entities with respect to the MPC decision, the Council decision, and/or La. Hwy. 3132.
- (8) All documents and records which refer to, relate to, or in any way pertain to or concern any meetings, conversations, correspondence, and/or communications by and between any of the members of the Council themselves and/or any of their attorneys, agents, representatives, and/or employees with respect to the MPC decision, the Council decision, and/or La. Hwy. 3132.

If you have any questions or need any additional information in order to process or respond to any of the requests contained in this letter, please do not hesitate to contact me. I will be happy to answer your questions or provide you with any additional information I can.

Thank you in advance for your courtesy and cooperation and for giving these matters your prompt attention. With best regards, I am

Yours very truly,

Elliott B. Stonecipher

