

Delivery via Certified Mail – Return Receipt

April 7, 2011

The Honorable Kathleen M. Falk
Dane County- County Executive
City-County Building
210 Martin Luther King, Jr. Boulevard
Madison, WI 53703

Dear County Executive Falk:

Please accept this letter as a demand pursuant to the Wisconsin Open Records Law under §19.35 Wis. Stats. relative to any and all documents you or your record custodian have in your possession, custody or control relative to any communication you had with any party, including the District Attorney, the Court or any third party or organization, as it relates to the following cases:

2011CV1244 – Ismael R. Ozanne v. Jeff Fitzgerald et al.

2011CV1175 – Dane County et al v. State of Wisconsin et al.

2011CV1421 – Laborers Local 236 AFL-CIO et al. v. State of Wisconsin et al.

This request is being made relative to the ongoing litigation concerning the budget repair bill and the budget bill of Governor Scott Walker. This would include all hard copies, memoranda, correspondence, digital memoranda, voice mails, cell phone records, emails authored or received on your personal computer or any computer provided by either Dane County or the State of Wisconsin, and any and all other documentation, in whatever format, relative to the above cited cases. This is an all encompassing request for all documents in original format relative to any statements you made, any responses you made or received or requests made of you relative to these cases. Since you are the County Executive, you are not covered under the exemption provided to the District Attorney, and I would expect that all requested documents – including digital records - be provided in the original format without redactions, edits or amendments.

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I realize there may be a significant amount of documentation to produce relative to this request. However, I would expect a response within thirty (30) days.

Should there be a cost associated with this demand, please notify the undersigned and payment will immediately be remitted.

Should you have any questions relative to this demand, please do not hesitate to contact the undersigned.

Thank you for your courtesies in this matter.

Sincerely,

BUCHER LAW GROUP, LLC

s/ Paul E. Bucher

Paul E Bucher
Attorney at Law

PEB/sac