

MIDDLETON
REUTLINGER

October 24, 2019

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40 West Pike Street
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By First Class Mail and Email

Re: BFC Enterprises, LLC v. City of Murray, Kentucky

Dear Mr. Mando:

I am following up on a few matters in this case. First, we would like to get a discovery schedule set in this matter to move us forward, including a pretrial date and trial date. In order to avoid traveling to Hopkinsville, are you agreeable to entering a proposed scheduling order? If so, we will prepare a draft order for your review and comments and follow up with Judge Atkins' chambers to see if he would be willing to provide a pretrial date.

Second, we are requesting supplemental documents from the City of Murray in response to several requests for production of documents. Specifically, since the City of Murray's discovery responses were initially sent in September of 2018, we would like updated documents and responses for the following:

REQUESTS FOR PRODUCTION OF DOCUMENTS:

Request No. 1:

1. Produce any and all documents or "tangible things" (as that term is used in CR 34.01) which in any way relate to the allegations, claims, damages, issues, Plaintiff and/or defenses in this action.

Included in supplementing this request, we are requesting any additional meeting minutes addressing the alcohol regulatory fee and any relevant videos of those meetings.

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Request No. 5:

5. Produce copies of any and all reports (including print and electronic media), videos, transcripts, and any and all other documents you have in your possession, custody, or control regarding BFC Enterprises.

Included in supplementing this request, we are requesting any additional documents showing BFC's payment of the alcohol regulatory fee, as well as any other relevant document.

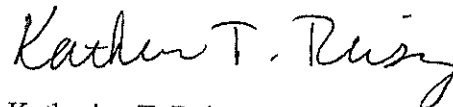
Request No. 13:

13. Produce all documents reflecting, referring, or relating to any and all open records requests, subpoenas, or any other formal or informal request for information and documents made to you, which relate in any way to the alcohol license regulatory fee, allegations, claims, damages, issues, Plaintiff, and/or defenses in this case as discussed in your Answer to Interrogatory No. 8.

We appreciate your prompt attention to this matter and I would request that you respond with a supplement to your document responses within thirty (30) days of the date of this letter.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Katherine T. Reisz