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May 2, 2007

City of Columbia Public Relations Department  
City Hall, First Floor  
1737 Main Street  
Columbia, SC 29201

**RE: Freedom of Information Act Request**

Dear Sir or Madam:

Pursuant to the South Carolina Freedom of Information Act, S.C. Code Ann. § 30-4-30, I am writing to request complete copies of the following:

1. Any and all invoices received by the City of Columbia or any related department or agency, from Richard M. Gergel or the law offices of Gergel, Nickles and Solomon, P.A., from January 1, 2002, through the date of this request;
2. Any and all checks made payable to Richard M. Gergel or the Law Offices of Gergel, Nickles and Solomon, P.A., paid by the City of Columbia or any related department or agency, during the time period of January 1, 2002, through the date of this request;
3. Any and all correspondence between the City of Columbia or any related department or agency and Richard M. Gergel during the time period of January 1, 2002, through the date of this request concerning any studies, reports or recommendations;
4. Any and all records of Richard M. Gergel working through or receiving payment from law firms other than his own (Gergel, Nickles and Solomon, P.A.) for work performed on behalf of the City of Columbia or any related departments or agencies, during the time period of January 1, 2002, through the date of this request.

I would appreciate your mailing the responsive documents in their entirety, including all attachments, enclosures and exhibits, to my attention at the above address.

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May 2, 2007  
Page Two

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In the event that you determine that a requested document contains material or information within the statutory exemptions to mandatory disclosure, I request you review such material for discretionary disclosure. Similarly, in the event that you determine a document contains material or information within the statutory exemptions to mandatory disclosure, I request, in accordance with the provisions of S.C. Code Ann. § 30-4-40(b), you produce any and all reasonably segregable portions of such document.

If you determine that all documents responsive to any individual requested item (or portion thereof) have been disclosed or specifically identified and withheld under the claim of authority, I request specific written confirmation of such fact. In the event that you determine you have no documentation responsive to an individual request (or portion thereof), I request specific written confirmation of that fact.

This request constitutes notice of demand for production of all described documents. If for any reason you determine that you will not send any document (or portion thereof) or that this request will not, in whole or in part, be complied with, I request prompt notice of any action taken. In addition, I request such notice include complete identification of the withheld documents (or portions thereof) by title, author, date, nature of such material and a thorough explanation of all legal and factual basis for your determination to deny disclosure. I request that in responding to this request you adhere to the time limitations set forth in S.C. Code Ann. § 30-4-30 (c).

I will pay the reasonable and direct costs of locating and reproducing the requested documents to the extent required by S.C. Code Ann. § 30-4-30(b). However, I request prior notice should you determine that such costs will exceed Two Hundred (\$200.00) Dollars.

Your attention to this request is greatly appreciated. Should you have any questions or concerns regarding the same, please do not hesitate to contact my office.

With kindest regards, I remain

Very truly yours,

Bentley D. Price

BDP/ank