

# ALEXANDER & ASSOCIATES

ATTORNEYS AT LAW

June 26, 2009

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1020 Edgewood Avenue, N.E.  
Atlanta, Georgia 30307

## Via E-Mail

Jim Walls  
Atlanta Unfiltered

Re: Open Records Act Request/ Atlanta Unfiltered

Dear Mr. Walls,

This Firm represents the DeKalb County School District ("District"). This letter is in response to your June 23, 2009, Open Records Act request sent to the District via E-Mail. Your request was addressed to Dale Davis and was made pursuant to O.C.G.A. §§ 50-18-70, *et seq.* (the "Act"). The District has asked our Firm to respond to your requests under the Act. In your letter, you request the following:

1. Any written report or other communication submitted by the Honorable Thelma Wyatt Cummings Moore regarding her investigation into the circumstances surrounding the apparent suicide of Dunaire Elementary student Jaheem Herrera.

**Response:** The District objects to this Request to the extent that it requires disclosure of documents protected by the attorney-client privilege or which constitutes attorney-work product and/or trial preparation material. See O.C.G.A. § 50-18-72(e)(1)(2). Also, pursuant to O.C.G.A. § 50-18-70(d), "No public officer or agency shall be required to prepare reports, summaries, or compilations not in existence at the time of the request." Without waiving its objections, the District states that, at this time, the written report is incomplete and has not been finalized.

2. Any amendment to Judge Moore's contract with DeKalb County schools, including but not limited to any change in the requirement that she submit her findings in writing.

**Response:** The District objects to this Request to the extent that it requires disclosure of documents protected by the attorney-client privilege or which constitutes attorney-work product and/or trial preparation material. See O.C.G.A. § 50-18-72(e)(1)(2). Without waiving its objections, the District states that, the addendum to Judge Moore's contract is attached.

3. Any and all invoices submitted by Judge Moore to the school district regarding payment for said investigation.

**Response:** The District objects to this Request to the extent that it requires disclosure of documents protected by the attorney-client privilege or which constitutes attorney-work product. See O.C.G.A. § 50-18-72(e)(1)(2). Without waiving its objections, the District

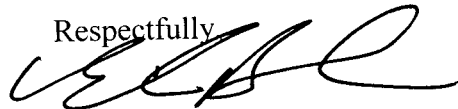
states that it will provide a summary of the amount charged to the District by Judge Thelma Wyatt Cummings Moore for the months of May and June.

May \$3,423.06

June \$166,955.75

Thank you for your courtesy in this matter.

Respectfully

A handwritten signature in black ink, appearing to read 'E.C. Burroughs', written in a cursive style.

Erick C. Burroughs, Esq.  
For Alexander and Associates