

MONTGOMERY WILLARD, LLC
ATTORNEYS AND COUNSELORS AT LAW
1002 CALHOUN STREET
COLUMBIA, SOUTH CAROLINA 29201

MICHAEL H. MONTGOMERY
MHM@MONTGOMERYWILLARD.COM
DIRECT DIAL No. (803) 753-6484

POST OFFICE Box 11886
COLUMBIA, SOUTH CAROLINA 29211-1886

CERTIFIED CIVIL MEDIATOR

FACSIMILE (803) 799-2755
WORLD WIDE WEB [HTTP://WWW.MONTGOMERYWILLARD.COM](http://www.MONTGOMERYWILLARD.COM)

September 16, 2022

James E. Bradley, Esq.
Moore Bradley Myers
1700 Sunset Blvd.
West Columbia, SC 29169

Re: School District Five of Lexington and Richland Counties
Request for Files

Dear Ward,

I am writing as I understand you are serving in a role as General Counsel for School District Five of Lexington and Richland Counties. If you are not, please disregard this letter and let me know who is serving in that capacity at the present time.

As you know our firm served the District for a number of years. Recently I received the enclosed letter from Dr. Ross dated August 19, 2022, indicating that the School Board is requesting copies of the files relating to our representation of the School District, including all relevant information and communications. I will be pleased to work to provide this information as appropriate and in a reasonable time frame. Since the District is represented by counsel, I believe that it is ethically appropriate for me to communicate with them through you as their current counsel. Additionally, due to the ongoing litigation on a number of fronts involving the District and individual board members, I have some hesitation about sending this information directly to the Superintendent or the Board members given the sensitive and privileged nature of some of the file contents.

Therefore, I would appreciate you contacting me to discuss the best method of arranging to transfer the information to you so that you may conduct an appropriate review and advise the District regarding the best way to protect the District's attorney-client and work product privileges. In reviewing the recent Board Minutes, I did not observe any record relating to that request. Also, please note that I will be serving as a juror in Lexington County Common Pleas and General Sessions Court next week and may be difficult to reach until the following week.

James E. Bradley, Esq.
September 16, 2022
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I look forward to collaborating with you to arrange the transfer of the requested information,

With kind personal regards, I am,

Sincerely,

MONTGOMERY WILLARD, LLC

A handwritten signature in black ink, appearing to read "Michael H. Montgomery", with a long horizontal flourish extending to the right.

Michael H. Montgomery

MHM/cb



received
8/24/22

August 19, 2022

Michael Montgomery, Esq.
Montgomery Willard, LLC
PO Box 11886
Columbia, SC 29211-1186

Dear Mr. Montgomery:

I have been asked by the Board to request a copy of your files created in representing the School District. Please provide all information you have regarding your representation of the School District in the past including text messages, emails, correspondence, and all information or correspondence of any sort, no matter how recorded, to me.

I would appreciate you providing this in the next two weeks. If you cannot provide it in the next two weeks, please let me know when it will be available.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'AER', written over a horizontal line.

Dr. Akil E. Ross, Sr.
Superintendent Lexington-Richland
School District Five

AERsr:aw