

Edward D. Sloan, Jr.

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December 14, 2015

CERTIFIED MAIL NO. 7014 2120 0003 3057 9749

The Hon. Nikki R. Haley
1205 Pendleton Street
Columbia, SC 29201

Dear Governor Haley:

I understand that:

you are the Governor,

the Governor is Chairman of the State Budget and Control Board,

the Insurance Reserve Fund is a part of the SBCB,

during the period 2007 to 2010, there were more than 17 lawsuits against the Department of Transportation as a Defendant that the IRF defended on behalf of the DOT,

17 of these lawsuits were for damages alleging water on road surface, and
the IRF settled those 17 suits on behalf of Defendant DOT.

Pursuant to the South Carolina Freedom of Information Act, § 30-4, and 5 U.S.C. 552, I request that you mail me a copy of the following public records in your possession, custody, or control related to the above 17 lawsuits:

1. the Complaints and amended Complaints, if any,
2. the Order, judgment, stipulation of dismissal, or other public record that concluded each suit,

3. the settlement agreement, if any,

To that extent, please produce responsive public records in their entirety, including all attachments, enclosures, and exhibits. In the event you determine that a requested public record contains material or information within the statutory exemptions to mandatory disclosure, I request that you review such public record for discretionary disclosure. Similarly, in the event you determine a public record contains material or information within the statutory exemptions to mandatory disclosure, I request, in accordance with the provisions of § 30-4-40(b), you produce any and all reasonably segregable portions of such public record.

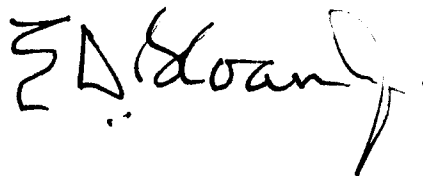
If you determine that all public records responsive to any individual requested item (or portion thereof) have not been disclosed or specifically identified and withheld under the claim of authority, I request specific written confirmation of such fact. In the event you determine you have no public record responsive to an individual request item (or portion thereof), I request specific written confirmation of that fact.

This request constitutes notice of demand for production of all described public records. If, for any reason, you determine that you will not send me any public record 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 public record or portions thereof by title, author, date, nature of such material, and a thorough explanation of all legal and factual bases for your determination to deny production. I request that in responding to this request you adhere to the time limitations set forth in § 30-4-30(c).

This request for disclosure of these public records is primarily to benefit the general public; I request that you waive the fees, if any, pursuant to § 30-4-30(b).

I will pay the reasonable and direct costs of locating and reproducing the requested public records to the extent required by § 30-4-30(b). However, I request prior notice should you determine that such costs will exceed \$500.

Yours very truly,

A handwritten signature in black ink, appearing to read "E. A. Sloan". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.