

Sandy Alexander

From: Marie Rovira [marie@txmunicipallaw.com]
Sent: Friday, June 10, 2016 5:40 PM
To: csa@caforensicsllc.com
Cc: julie.kobel@dpfps.org; Joshua Mond; Julie Fort; Heather Shankle
Subject: Second Notice of Default of Settlement Agreement
Attachments: Second Notice of Default of Settlement Agreement vF.pdf

Mr. Alexander,

Please see the attached letter in regards to your recent contact with the Dallas Police and Fire Pension System. Thank you for your attention to this matter.

Kind Regards,

MARIE ROVIRA
ATTORNEY



6351 PRESTON RD • STE 350 • FRISCO, TX 75034 • PHONE: 972.668.6400 • FAX: 972.668.6414
MARIE@TXMUNICIPALLAW.COM • WWW.TXMUNICIPALLAW.COM

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June 10, 2016

Via CMRRR #7012 3460 0000 0452 0132

Via email: csa@caforensicsllc.com

Columbus A. Alexander
Suite 600, The Madison
15851 Dallas Parkway
Addison, Texas 75001

Re: **SECOND NOTICE OF EVENT OF DEFAULT** of Settlement Agreement
for Cause No. 02-04814, 44th Judicial District Court of Dallas County, Texas
("Agreement")

Dear Mr. Alexander,

I represent, and am writing on behalf of, the Dallas Police and Fire Pension System ("Pension System"). This law firm previously reminded you of a settlement agreement you entered into with the Pension System. This law firm notified you that your submission of multiple public information requests on eight different occasions by between April 6, 2016, to May 19, 2016, violated the terms of this settlement agreement. You cured this default by withdrawing the public information requests by letter dated May 27, 2016.

However, the Pension System received additional public information requests from Julie Kobel requesting the same information as your previous requests on the following dates:

June 1, 2016 – three letters

June 6, 2016 – three letters

June 8, 2016 – three letters

Ms. Kobel is utilizing an email address with the same domain name as the email address you used to submit your withdrawn public information requests. The Pension System has good reason to believe you instructed or otherwise caused Ms. Kobel to submit these requests in an effort to circumvent the settlement agreement you entered into.

The Pension System will consider your default under the Settlement Agreement cured if you or Ms. Kobel submit a letter withdrawing the following written requests:

June 1, 2016 – three letters

June 6, 2016 – three letters

DALLAS

6351 Preston Rd. • Suite 350
Frisco, TX 75034
P: 972.668.6400 • F: 972.668.6414
Toll Free: 1.855.668.6400

MESSER, ROCKEFELLER & FORT, PLLC
www.txmunicipallaw.com

ABILENE

4400 Buffalo Gap Rd. • Suite 2800
Abilene, TX 79606
P: 325.701.7960 • F: 325.701.7961

June 8, 2016 – three letters

The withdrawal must be received in our office by 12:00 p.m. on Tuesday, June 14, 2016. You must submit your withdrawal letter via email to the following addresses:

Julie@txmunicipallaw.com

Marie@txmunicipallaw.com

Heather@txmunicipallaw.com

If you insist upon remaining in default of the Settlement Agreement, or commit future defaults, the Pensions System will use the legal remedies available to it by law, which could include remedies such as seeking return of the consideration provided by the Pension System under the Settlement Agreement or specific enforcement.

Very truly yours,

MESSER, ROCKEFELLER & FORT



MARIE N. ROVIRA

ATTORNEY FOR THE PENSION SYSTEM

MNR/HS

cc: Julie Kobel

via email: julie.kobel@dpfps.org