

Rickey L. Faulkner rfaulkner@ccfww.com

Energy Centre, Suite 211 1127 Judson Road Longview, Texas 75601 (903) 758-5543 (903) 753-6989 Fax

Mailing Address: P.O. Box 2665 Longview, Texas 75606 www.ccfww.com

July 15, 2015

Via Certified Mail - RRR and First Class U. S. Mail Mr. Dean Kinney 2705 Aspen St Kilgore, Texas 75662

RE:

Kilgore College

Mr. Kinney:

I recently spoke with Troy Bataille, an attorney with the firm of Goldberg Segalla of Hartford, Connecticut. Mr. Bataille stated that you recently contacted him to request a copy of the EPA Peer Audit Review Report for Kilgore College. Mr. Bataille was initially unclear who you were and by what authority you were requesting the information. Mr. Bataille called the College to verify whether or not you are an official of Kilgore College.

Upon learning that you were not an authorized representative of the College, Mr. Bataille correctly advised you that the report had not been prepared and even if it had been completed, the report is an attorney-client privileged document between his firm and the College. Mr. Bataille further stated that you continued to claim a right to obtain a copy of the report and demanded that it be produced. Mr. Bataille felt your efforts were clearly an attempt to circumvent the attorney-client privilege.

Because Kilgore College has an attorney-client relationship with Goldberg Segalla and has clearly asserted the attorney-client privilege, we believe your demand for production and attempts to induce the College's representatives to breach that privilege to be inappropriate. Kilgore College demands that you cease and desist from efforts to induce or persuade its representatives (by deception or otherwise) to release information that, at this point, is privileged. Should you continue, the College reserves all its rights to seek judicial relief along with attorney's fees and costs of court.

When the report is completed and delivered to the College, there are appropriate procedures provided by law by which you can assert your request for information and the College can respond.

Rick Faulkner

cc:

Tommy Konczak P.O. Box 1932

Kilgore, Texas 75663

Phil Patterson 2217 Simmons St. Kilgore, Texas 75662

KC Board of Trustees (e-mail only)

Bill Holda, KC President (e-mail only)

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PS Form 3800, August 2006

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