

SUPERIOR COURT OF FORSYTH COUNTY
STATE OF GEORGIA

FORSYTH COUNTY GEORGIA
FILED IN THIS OFFICE
FEB 25 2019
A. J. Allen
CLERK SUPERIOR COURT

VINAY BOSE, MOMMIES PROPERTIES,
LLC, and FH PARTNERS, LLC,

Plaintiffs,

vs.

JOHN RICHARDS, CHATTAHOOCHEE RIVER
CLUB HOMEOWNERS ASSOCIATION, INC.,
and JOHN DOE and JANE DOE,

Defendants.

CIVIL ACTION FILE

NO. 18CV-1887-1

18CV-1887-1
RESPMO
Response to Motion
1788406



**PLAINTIFF VINAY BOSE's RESPONSE TO FORSYTH COUNTY'S MOTION FOR
PROTECTIVE ORDER**

COMES NOW, Plaintiff Vinay Bose (hereinafter "Bose"), responds to Forsyth County's (hereinafter "County") Motion For Protective Order for the simple request of production of documents that are in the custody of the County.

Bose Joins Mommies Response to the Motion For Protective Order in its entirety in addition to the following Response of his own:

INTRODUCTION:

Over the past few years, the employees, elected officials and selected officials of the County have been actively instrumental in collaborating and colluding with the Defendant's to intentionally inflict harm on Bose personally and render his business useless. Both the Defendant's and Forsyth County have been successful in the latter while Bose is waiting in painful agony for the other shoe to drop.

In fact, as this Honorable Court will see and hear for itself, the brazen confidence of the Defendant-County relationship in the form of video tapes and clips during the Feb 25, 2019 hearing. The Defendants take extraordinary measures to suppress Bose's property rights and they also come to Bose's farm and threaten Bose with not just the Defendants suing Bose but also represented that both the Defendant and the County will be pursuing a suit against Bose (How would the Defendants know that? And what communications did they have with the County to be certain of that outcome? And with whom?). Please see video tape attached as "**Exhibit A**".

This was the final act on Oct 15, 2018 that forced Bose and his Co-Plaintiffs to file this instant action, as Bose is sick of being a defendant just like he was named in the RC Acres case, in which Bose should never have been a Party. The similarity of the two cases is astounding. RC Acres claimed that they had an easement through Bose's barn while Bose maintained that the easement was on the Southern Boundary and after a six week trial, the Jury agreed with Bose. In this case, the Defendants also claim that they have easements/access/trespass rights etc. all over Bose's farm. Defendants rely on their claims on Bose's property based on some "Agreement Regarding Development" that was filed referencing Bose's property 2 ½ years after Co-plaintiff Mommies purchased the property well outside the chain of title and just as in the RC Acres case, Bose maintains that the Defendants don't have any rights on Bose's property.

As the County admits, they are the custodian of several documents that will help prove Bose's point and instead of producing what they can, they run to the Court to seek a Protective Order on everything within two business days of sending a letter to Bose attached as "**Exhibit B**".

The underlying issues of this case is rather simple but the complication is that there are 620 property owners in Chattahoochee River Club ("CRC") that have absurd claims on Bose's property and only two of them have given Bose a Quit Claim Deed leaving 618 property owners

to contend with. The Defendant's and several other members of CRC have advised all others not to work with Bose and in essence fight this unnecessary battle. So, where does the County come in? The involvement of the County started with the "powers that be" who will do (and did) anything/everything to please a minimum of 1,236 (618 x 2) votes within just one CRC subdivision to crush the individual and property rights of an immigrant who speaks with an accent and one that cannot vote in District 5. Additionally, the "powers that be" have undoubtedly had numerous communications with the Powerful County Attorney's to inflict harm on one person trying to restart horse lessons in one property. This is clear in the letter from Ms. Mellissa Klatzkow who states that most of the documents are privileged and Bose questioned why? The question is why were there so many communications from so many people with the County attorney's to inflict harm on a low budget business of a horse farm, that was just trying to get back on its feet after being burnt in a 10 year dispute ending in a 6 week jury trial followed by three years in appeals and ending up with the same outcome that Bose maintained from Day 1 in front of this Court in the old building.

Furthermore, Ms. Klatzkow sent what she calls a "good faith" letter with an offer on February 13, 2019 in which she gives Bose only two business days to respond or else file a Motion For Protective Order. Bose responded to Ms. Klatzkow in the 3rd business day and addressed and debated Ms. Klatzkow's lengthy letter line by line and that letter is attached as "**Exhibit C**". It is clear that Bose's response letter to the County is a true good faith letter as Bose states that he will pay for reasonable costs as allowed by the law and Bose was willing to meet with Ms. Klatzkow and anyone from the County to negotiate this simple request for Production. Bose's letter dated Feb 18, 2019 was emailed to Ms. Klatzkow early morning on Feb 19, 2019, and Bose made it very clear to let the County know that he is willing to meet and

negotiate. Unknown to Bose, the County had already filed their Motion For Protective Order on the evening of Feb 18, 2019 and Bose had no knowledge of it.

ARGUMENTATION:

This issue is still a bud and has not even grown into a complete fruit let alone become ripe – For this Motion from the County. Wasting the Court’s time on this issue was/is not even warranted.

The County should have worked with Bose and produce what they don’t have a problem with and then move the Court to object to the rest and then file for Protective Order. Instead this speedy Motion from the County seems like a desperate effort to shut Bose down and intimidate a Pro-Se party, all of which is unnecessary. But these have been the actions that the County has taken against Bose over the past few years on anything and everything related to the property located at 3450 Bentwood Drive, Cumming, GA 30041 and have been successful in shutting the business of horse lessons down.

The County should know by now that Bose always communicates and they did not even wait until their own self-imposed short deadline of two business days were complete. They rushed to file this on a Federal holiday. Firstly giving a Pro-Se party a short deadline to respond does not show any “good faith” and secondly, clearly in his response Bose was and is willing to work with the County to get all their issues sorted out. The question becomes, why the rush, urgency and need to waste this Court’s time? Why is the County claiming cost burden of production on one hand and then spending way more than cost of discovery in attorney’s fees on the other? Additionally, Bose responded in detail to the County’s letter stating that Bose will pay costs allowed by law and Bose also showed the County precedence that Bose did pay the County

for documents seven months back, proof of which is in Bose's letter (Exhibit C). The County has misrepresented that it is costly and therefore they can't or won't produce. That is just not right.

As to the issues related to Privilege, Bose does not trust anyone from the County or its own hired attorney's. Bose does not trust that they should have to decide what is and what is not Privileged material. If an email is either copied or forwarded to anyone person generating it other than the one individual elected, selected or hired employee of the County, it should be produced. Similarly, Bose does not trust that anyone from the County or its attorney's should be able to decide what is and is not relevant.

CONCLUSION:

Bose and the County should coordinate their efforts to get the documents that the County will voluntarily produce upon payment by Bose and they could object to the rest of the documents first followed by Motions such as Protective requests on those documents. The Court can then see all the material and decide what Bose can have.

This 25th day of February, 2019.

Respectfully submitted,

By  _____

Vinay Bose, Pro Se

Vinay Bose,
3001 Wembley Ridge,
Atlanta, GA 30340
Phone: 770-480-1111

CERTIFICATE OF SERVICE (Rule 5.2)

Pursuant to Uniform Superior Court Rule 5.2 (2), I hereby certify that on the date below I have served a true and correct copy to opposing counsel and co-defendant's counsel and co-defendants with the foregoing **PLAINTIFF VINAY BOSE's RESPONSE TO FORSYTH COUNTY'S MOTION FOR PROTECTIVE ORDER** by the method shown below, addressed to:

- To:** Ms. Paul Frickey, (via hand delivery at hearing on Feb 25, 2019)
Jarrard Davis Law Firm,
222 Webb Street,
Cumming, GA 30040
- To:** Mr. R. Clay Ratterree, (via hand delivery at hearing on Feb 25, 2019)
Kimberly Cofer et al, LLP
P. O. Box 9946,
Savannah, GA 31412
- To:** Mr. Kevin J. Tallant, (via hand delivery at hearing on Feb 25, 2019)
Miles Hansford Tallant, LLC
202 Tribble Gap Road, Suite 200,
Cumming, GA 30040
- To:** Mr. Larry C. Oldham, (via hand delivery at hearing on Feb 25, 2019)
Larry C. Oldham, P.C.,
416 Pirkle Ferry Road, Suite K-500,
Cumming, GA 30040
- To:** Mr. Jeffrey H. Schneider, (via hand delivery at hearing on Feb 25, 2019)
Weissman, P.C.,
One Alliance Center,
3500 Lenox Road, Fourth Floor,
Atlanta, GA 30326
- To:** Mr. Stuart Teague, (via hand delivery at hearing on Feb 25, 2019)
Teague & Chambless, LLP,
110 Samaritan Drive, Suite 109,
Cumming, GA 30040

This 25th day of February, 2019.



Vinay Bose, Pro Se
3001 Wembley Ridge
Atlanta, GA 30340
770-480-1111



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February 13, 2019

VIA EMAIL ONLY

Mr. Vinay Bose
3001 Wembley Ridge
Atlanta, GA 30340
vinaybose@vinaybose.com

Re: Request for Production of Documents

Dear Mr. Bose:

This office and the undersigned represent Forsyth County, Georgia. We are in receipt of your Request for Production of Documents ("Request"), filed January 28, 2019. Please accept this as Forsyth County's initial, good faith response to your Request; and the County's contemporaneous effort at amicably resolving a discovery dispute. Some of the documents you are seeking in your Request are privileged. Your Request is also unduly burdensome, prohibitively expensive, and many of the requested documents appear to be irrelevant. As such, the County may have no choice but to file a Motion for Protective Order. If so, we will file same on or before February 18, 2019,

As a means of explanation, the County would offer the following.

First, we note that on July 13, 2018, you submitted a request seeking similar records under the Open Records Act ("ORA"). In responding, the County estimated that the total pre-retrieval estimate was \$1,925.73. You *declined* to pay the pre-retrieval costs and did not pursue that ORA request. As this Request is (even) broader than the prior ORA request, a brief review of anticipated costs is warranted.

Using the ORA as a guide, a preliminary search of hard-copy documents responsive to your Request resulted in approximately 417 pages at \$0.10 per page, thereby resulting in an estimate of \$41.70 for copying charges. Additionally, it will take an employee earning an hourly rate of \$16.00 per hour approximately one (1) hour, another employee earning an hourly rate of \$14.56 per hour approximately forty (40) hours, and another employee earning an hourly rate of

EXHIBIT B

\$16.45 per hour approximately one (1) hour to compile the requested documents, resulting in an administrative cost of \$614.85.

Additionally, a preliminary search for emails resulted in the identification of approximately 2,910 responsive emails. This office assumes that each responsive "hit" will generate three pieces of printed paper. Some printed emails generate more; some less. Based upon the produced number, it is estimated that responding to your Request will generate approximately 8,730 pieces of paper (2,910 x 3). This is a *conservative* estimate, as it does not account for attachments that will likely be a part of the responsive emails. Charging \$0.10 per page, it is estimated that your Request will result in \$873.00 for copying charges. Additionally, after the first 15 minutes, it will take an employee earning an hourly rate of \$34.09 approximately four (4) hours, and another employee earning an hourly rate of \$26.30 approximately forty-three (43) hours and thirty (30) minutes to compile the requested documents, resulting in an administrative cost of \$1,280.41. Consequently, Forsyth County anticipates that responding to your Request would cost **\$2,809.96** under the ORA.

Forsyth County understands that your Request is *not* an ORA request. The above explanation and fee estimate (using ORA methodology) is offered as a means of contextualizing the County's concern; and further highlighting the position the County will take in the event a Motion for Protective Order is warranted.

Please be aware that Forsyth County is permitted to charge you a minimum of **\$914.70** for processing your Request, *without* moving for a protective order or otherwise seeking relief from the Court. O.C.G.A. § 9-11-34(c) ("A reasonable document copy charge may be required"). Forsyth County intends to charge for all copying costs for this Request, as it is a fraction of the cost the County will incur responding. This is only for the 'paper' costs of production. Please also note that in the event the County is required to move for an order of protection, we will ask the Court to require you to pay the *entire* (reasonable) cost of production. Georgia Emission Testing Co. v. Reheis, 268 Ga. App. 560, 564 (2004) (a litigant may be required to pay a third-party's reasonable costs for producing the discovery).¹

Using a good-faith estimate, responding to this Request will require County employees to expend eighty-nine (89) hours and thirty (30) minutes; thereby translating (applying the pertinent hourly rate) to \$1,895.26 in direct administrative costs. The time and expense, alone, makes responding to this Request extremely burdensome.

Furthermore, your Request does not seem tailored to the production of relevant documents. Under Georgia law, a third-party is only required to provide *relevant* and

¹ Although you ask to personally inspect the documents *before* any copies are made and before you authorize payment for production, that is not possible for the majority of your request. The bulk of this request is contained in email correspondence, which is stored electronically. As the responsive emails may contain attorney-client privileges communications and other confidential information, Forsyth County will need to print, review, and, where necessary, redact the email correspondence *before* producing same.

nonprivileged documents. See O.C.G.A. § 9-11-34(c)(1), Sechler Family P'ship v. Prime Grp., Inc., 255 Ga. App. 854, 854 (2002). Accordingly, you are not permitted to utilize the Court's power to demand that a third-party provide irrelevant or privileged documents. However, and respectfully, the broad nature of your Request means that responding to this Request will necessarily require the County to provide hundreds of pages of material that appears irrelevant to your litigation.

Specially, a review of your Complaint indicates that Bose v. Richards, Civil Action No. 18-CV-1887-1 is a quiet title action relating to the applicability of certain covenants and easements affecting your property. However, despite the relatively narrow scope of the litigation, your Request is framed in a manner that seeks a vast array of documents. For example, your Request seeks *any and all* documents referencing "Mommies Properties LLC", "Vinay Bose", "Vinay", or "Bose", and *all* documents pertaining (generally) to the "Chattahoochee River Club". Based upon the un-constricted nature of the Request (with no embedded filters to reduce irrelevant 'hits'), the County will necessarily have to assemble, review and produce *all* documents relating, for example, to Chattahoochee River Club ("CRC") – including, for instance, a building permit for a neighbor's pool. While some of the documents responsive to your Request *may* be relevant in the quiet title litigation, it is highly likely that hundreds of documents responsive to your Request as presently framed *are not* relevant.

We would respectfully propose that you work with the County to narrow the parameters of your Request – such that you are only paying for what you truly want; and the County is not burdened to review and produce documents for which you have no use.

Finally, we note that your Request seeks a considerable number of privileged documents, which we are under no obligation to provide. Specifically, O.C.G.A. § 24-5-501(a)(2) provides that communications between an attorney and client are excluded from evidence on grounds of public policy and, therefore, we are not required to produce attorney-client communications. On the face of your Request, you seek numerous privileged documents - as you request documents from the attorneys at Jarrard & Davis, LLP and attorney Rich Neville. This is not incidental to your Request: you specifically ask for the communications and work product of numerous attorneys. Accordingly, our office intends to object to the production of any and all attorney-client communications and attorney work-product. Our office will not produce attorney-client communications or attorney work-product, which may otherwise be responsive to your Request, unless and until so ordered by the Court.

Please allow us to emphasize, and as mentioned above, we are happy to work with you in narrowing the scope. Forsyth County recognizes that it is the custodian of numerous records that are relevant and necessary for your litigation. Unfortunately, as worded, your Request will require the County to sift through 2,910 emails (approximately 8,730 pieces of paper); produce approximately 417 additional pages in hard copies; and spend approximately ninety (90) hours of County time processing your Request. This will be extraordinarily burdensome. Based upon the concerns expressed above, this Request is objectionable as framed.

We are, though, happy to discuss any alternative search criteria if you would like to

narrow the scope. By way of example, searching for "Chattahoochee River Club" *and* "Mommies Properties" (with our search query requiring 'hits' on both key phrases) is considerably narrower than searching for the "Chattahoochee River Club" alone. We would respectfully propose that you reach out to our office and allow us to work together to narrow your queries in a similar manner.

A narrowed Request for Production of Documents would produce less irrelevant documentation for you to manage, will be less expensive, will better comply with the intent of O.C.G.A. §9-11-34(c), and will be less burdensome on Forsyth County. Please contact our office if you would like to discuss this further, or if you would otherwise like to submit a more tailored Request for Production of Documents.

Kindest regards.

Sincerely,

JARRARD & DAVIS, LLP



Melissa A. Klatzkow

MAK/kgs

cc: Stuart Teague, Esq. (via email)
Larry Oldham, Esq. (via email)

February 18, 2019

VIA EMAIL ONLY

Ms. Melissa Klatzkow,
Jarrard & Davis Law Firm
(In Charge of Forsyth County,)
222 Webb Street,
Cumming, GA 30040

(Re: Request for Production of Documents to Non-Party in Civil Action 19-CV-0028-1)

Dear Ms. Melissa,

I am responding to your rather lengthy letter para by para and therefore this letter will be equally long with repeated points because that is how you made them.

Please accept this letter from me (Plaintiff Vinay Bose) as my initial good faith response to your position to have Forsyth County (hereinafter "County") produce what it, as a Non-Party is required to do. Firstly, I disagree that my legal and constitutionally protected request as per civil action rules are as you put it "discovery dispute". It is simply "discovery" without dispute from my side and therefore I do not understand why you or the powers that be in the County are seeing this specific request as a "dispute". However, I am glad you do recognize that the County sees me as a dispute because it must have realized by now as to what it did to me and therefore feels guilty enough to call it a dispute that it created.

Secondly, you state and I quote "*Some of the documents you are seeking in your Request are privileged*". My problem with that is twofold. Why? The County is a government body that is for "all People" and so I ask what do you have to hide from an injured and harmed citizen? Nowhere in my discovery request have I asked for any privileged information. Also, who is to decide what is privileged? If I am not mistaken, you are employed by the County and therefore you will do everything to make sure that you hide the truth of what actually happened and therefore you do not have the moral or legal authority to decide what is and what is not privileged. I am simply asking for documents that pertain to me and so my second problem is why would the County be running to its attorneys and what kind of bad advice did the attorneys give the County based on which they boldly went about destroying me on behalf of their friends?

Thirdly, you state and I quote "*Your Request is also unduly burdensome, prohibitively expensive, and many of the requested documents appear to be irrelevant.*" Let's take this one at a time.

EXHIBIT C⁴

“Unduly burdensome” – I disagree, as I know how easily a search can be done and what’s more you have done it already with the detailed accounting you present in your letter. For emails and documents in the computer, the IT employee can easily put in the search request into the computer and copy the results on a thumb drive and call me to come and see what copies I need. I will print out and happily pay for the copies I take and we will be done. Simple. No burden. Furthermore, I have been very specific that duplicates need not be produced and thereby taking that “burden” out. Please see (**). What you are doing is calling it a burden so you don’t have to produce documents and therefore I don’t see where the burden is unless the word “burden” is a legal use of a word to fight me and not produce.

“Prohibitively Expensive” – Another legal hiding terminology. Actually, what the County has done to me is “Prohibitively Expensive”. Ask Paul Frickey or Ken Jarrard or both. The question is Why? Because my discovery request is directly tied to what the County has done to an innocent legally naturalized Citizen of this Great Country (probably with help from their attorney’s). The wanton acts of the Defendant’s in this civil action and their influence over “Powerful” elected officials and their “attorney/s” have caused me to pay in real money upwards of \$ 50,000 just last year in just attorney’s fees and that does not include the “Prohibitively Expensive” toll it has taken on me and my family and business. So, for you to call a few thousand dollars to just make copies “Prohibitively Expensive” rings hollow. Nothing is nearly as Prohibitively Expensive as what your firm and its clients have done to me. Also, if the production of documents are done without trying to hide documents, the entire search will take no more than a few hours to get it on a thumb drive. Furthermore, what is “Prohibitively Expensive” is for the County to even run to its lawyers and waste precious time and money writing lengthy letters with legal research and then having the paralegals send them out and then filing motions with the court to not produce documents. How much will all this cost the County tax payers? Then there will be hearings and more motions and thereby wasting the Court’s precious time and resources for nothing, except finding the uncomfortable truth. Certainly all this will easily cost a lot more to the county than to directly deal with me and produce the documents and have me pay for the “relevant” copies that I make. Don’t you think so?

“Irrelevant” – Now this point of your takes the cake. How on earth do you or anyone in the County have the “discretion” to decide what is “relevant” and what is not? Each and every request I have asked for pertains specifically to either the Plaintiffs or the Defendants and their enabling influence over the robotic battering ram of the County employees in this civil action. Nothing more, nothing less. Please read and understand the complaint, which is attached. Therefore every request is relevant. Also, the law and rules of civil action afford me the right and protection to come and see and decide for myself as to what is and what is not relevant.

As for your point on filing a “Motion for Protective Order”. Like I said before, the County and you are wasting the tax payers money and will certainly continue to waste the Court’s time instead of just producing the documents, but I have learnt with painful experience that when

As for your bringing up issues that are actually irrelevant to the current discovery request is truly baffling. In case you did not know, I did pay for ORA and here is the proof of payment in the form of a cancelled Check number 250 that Forsyth County got funds for in Jul 2018:

So, what you are stating in your letter is simply incorrect. Also, not surprisingly the documents that were produced were truly irrelevant and useless to my side. I did not want to make that same mistake twice. In the process of verifying that the County would produce relevant and requested documents, I finally got to meet you via email and then speak to you. You were nice and you took the time to understand what I was seeking and that was it. I was going to let that sleeping dog lie despite continuing harm by the County and your law firm, but when one of the County's minions representing the County's position threatened to sue me by literally coming to my property and threatening me, I was forced to file this lawsuit that I never wanted and thereby forcing me to request (relevant) documents from the County as part of this suit. Two seasoned attorneys with their office in Forsyth County and I desperately tried to reason with the Defendants and the County to avoid the problems that ya'll have put us in, but to no avail and here we are.

As for what you and the County are offering, please do not conflate a Non-party discovery request with an ORA request, as they are mutually exclusive. There is no comparison between the two but you chose to jumblemix them as one and the same for the purposes of bringing in our prior irrelevant history and confusing the issue. Furthermore, since you opened that door and as you now know, I have already paid for one ORA and therefore the precedence for my making a payment for copies in non-party discovery should be self-evident. I am legally entitled to see the documents and am only required to pay for copies of those documents that I request copies of. I am not forcing you or any County employee to spend any time doing anything more than putting everything on a thumb drive. Like I stated before and your lengthy letter with citation of authority is a moot point because no citizen will ever know to complain that the County's efforts to pay fees to Jarrad & Davis would be far more than it would cost the tax payers to pay for the discovery request, because the entire bulk of your objections to produce documents is that it is "Costly". Also, your offer is confusing as I don't fully understand if you want me to pay \$914.70 or 2,809.96 or both thereby making everything "non-burdensome"? And then will you give me everything that was printed or will you not produce under the (false) veil of "Privilege"? On a related point, what is "Costly" is the time, resources and efforts the County's employees, elected and selected people and the County's attorneys have taken to suppress my constitutional rights. How come you never complained about the costs of those unwarranted acts and expenses by the County?

Thank you for your offer and so here is a counter offer. Just produce everything on a thumb drive and I will pay for what I take, which is what I am required to do. No need to waste any precious resources, especially paper. If you file motions, I am sure you know it will cost the County plenty of money. Also, if I lose in Forsyth, I will appeal (Please See the entire case file in Forsyth County - 09-CV-1442) and it will really cost the County's taxpayers a whole lot more money upwards of \$ 10,000 for something that even you and the County are stating costs a fraction of that to just produce the requested documents. Please take this counter offer to the County and decide accordingly. With the power and behavior of a few people on the top, I will predict that you and the County will choose to fight and waste more time and money, but that is the County's prerogative, especially since it is tax payer's free money. Also, please let me know who is the deciding authority in the County who makes these decisions to fight and I would love to meet with her/him and you and go over everything. Finally, if you are going make copies so ya'll can go through everything to hide documents or redact anything, then that is on ya'll and you should not be asking me to pay for any document that is rendered useless to me. Again, I am not asking you to redact anything in my request and in fact just so we are clear, I am actually asking the opposite. Your firm seems to have chosen to take on that burden and then make it sound like I am the problem. No mas. The government is for the people and the County should not be hiding anything and therefore my discovery request should not cost the County anything to produce it electronically, just as I requested it.

I am glad that Forsyth County understands that my Request is *not* an ORA request and therefore, it should not use any ORA methodology for any estimation. Furthermore, it is not even fair for the County to force the cost of someone that makes \$36 or \$24 per hour to do a

job that should be a minimum wage job and then force those expenses on me and then threaten motions based on a false premise. If the County insists on not producing the documents electronically, then my advice to the County is to use the lowest paid employee or hire someone at minimum wage or even \$ 10 per hour to do a process job such as this. Using your math, that comes to \$900 for an employee cost, which I still maintain is unnecessary (thumb drive). In your letter, you state that this is a "good faith estimate" (over which I don't have any control) and therefore there is nothing good about it. Finally, this is 2019 and all Courts in Georgia have electronic filing and therefore so should discovery when specifically requested thereby making it zero burden (unless the County and its attorneys are going through all documents and then hiding what makes them look bad).

You also state and I quote *"Although you ask to personally inspect the documents before any copies are made and before you authorize payment for production, that is not possible for the majority of your request. The bulk of this request is contained in email correspondence, which is stored electronically. As the responsive emails may contain attorney-client privileges communications and other confidential information, Forsyth County will need to print, review, and, where necessary, redact the email correspondence before producing same."* Again, my entire point is that I am not requesting the County to print and redact anything. Furthermore, even if you have to do that, it can be done electronically and therefore you don't have to waste paper and ink to print anything. Additionally, I reject the notion that the County can have any privileged communication pertaining to what they have done to an innocent citizen and then hide behind "attorney client" thingy. What exactly spooked ya'll with my request is the question? Why such a fight over mundane and routine documents controlled by the government? Why would there be a bulk of documents that any County Government employee or elected or selected official have that need undue attention from their attorneys pertaining to one single individual (legal) immigrant? Moreover, every citizen is the County and the County is every citizen and since I am a (legal taxpaying) citizen, you are my attorney and I waive any Privilege you claim and therefore I authorize you to produce everything without any redactions. See, problem solved and now you can produce.

Because you brought it up again, I would like to readdress what is relevant and irrelevant. You have either not understood the complaint or have only read a portion of it. I do understand that you may not have seen the video of how directly the County is involved as per the defendant. The only way to find what the County has in store to go after me is to get all information referencing "Mommies Properties LLC", "Vinay Bose", "Vinay", or "Bose", and *all* documents pertaining to the "Chattahoochee River Club". If after seeing the video, you still believe what I am requesting is unreasonable, we will let Judge Bagley or Appeals Court decide and I will be happy to be on board with that, but I am not going to take the biased view of the County and its paid attorneys. Also, the County has selectively harmed me just like the Defendants wanted while enjoying full protection of immunity, whereby it can abuse its powers without repercussions. This, the County employees and elected or selected officials have done relentlessly against me for years, which is also proven in your letter especially by using your

office. So, the only way to find the facts is to see what else the County has or has not done in CRC.

I do agree and I would respectfully work with the County with my Request to make sure that I am getting what I need and I will be happy to review and request only those documents that I have use for. However, I totally disagree that there can be any privileged communications that have any reference to me or my property address. So, after all this, if you still insist that there are, I would still like to see them and you can do your redacting but you still have to produce them. Furthermore, you can only redact statements that are privileged and not the entire document or emails or letters. This is to make it clear to refute what you were going to do as state in your letter and I quote *"Finally, we note that your Request seeks a considerable number of privileged documents, which we are under no obligation to provide. Specifically, O.C.G.A. § 24-5-501(a)(2) provides that communications between an attorney and client are excluded from evidence on grounds of public policy and, therefore, we are not required to produce attorney-client communications. On the face of your Request, you seek numerous privileged documents - as you request documents from the attorneys at Jarrard & Davis, LLP and attorney Rich Neville. This is not incidental to your Request: you specifically ask for the communications and work product of numerous attorneys. Accordingly, our office intends to object to the production of any and all attorney-client communications and attorney work-product. Our office will not produce attorney-client communications or attorney work-product, which may otherwise be responsive to your Request, unless and until so ordered by the Court"*. Looks like you have unnecessarily boxed yourself and have decided to waste the precious time of the Court with motions and hearings. So, this part of the ask will have to go to Court as it seems the bulk of my entire discovery request is going to be withheld or not produced while you want to charge me for it. Even here I will offer that you and I can sit and go through every document and agree on what should be redacted and then I will only have an agreed upon redacted document.

Also, what is not clear to me is that you talk about going through 9,147 pages and then you state that you may not produce a bulk of them and you seem to go through them only to redact (which I am not asking for) and then calling it burdensome on my dime. Again, I am not requesting you to go through anything and make it burdensome and I am not even asking you to print anything but that is something you want to do and then you craftily shift your problem onto me so as to not produce.

Please allow me to emphasize, I will be very happy to work with you in getting only what I need as long as you don't belittle my plight with legal jargon in order not to produce. I am glad to hear you say that Forsyth County recognizes that it is the custodian of numerous records that are relevant and necessary for my litigation and in that vein, I would like to state that no custodian/employee of Forsyth County knows what is and is not relevant, as only I do. Therefore if you were already able to determine the quantity of documents I

need, please put them on a thumb drive and I will come see them and make it zero burden for both of us. This will certainly narrow the scope of work by itself.

Finally, please let me tell you about the relationship between the "County, Precedence and Myself". Please see RC Acres Vs. Cambridge Faire et al (Vinay Bose), Civil Action 09-CV-1442. In that case my discovery request was almost identical to what I am requesting today. At that time Jarrad & Davis were in a small strip office center in the poor side of Cumming (where Mr. Oldham currently practices even today). In that case, your firm produced all County documents on the computer including emails and I hit print and paid for and collected them from the front desk lady. Also, in that case, the Plaintiff was using the County much the same way these Defendants are, absent political influence (because he could not vote in Forsyth County). That is the only difference. That discovery request of mine led to several County employees being witnesses in that case (a trifurcated six week trial) including Mr. Tom Brown amongst others. So, please ask around in your office for these facts and precedence and do what you want.

Kindest regards.

Sincerely,

Vinay Bose