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February 9, 2015

*Via E-mail: [mclifford@pierceatwood.com](mailto:mclifford@pierceatwood.com)*

Ms. Mary Clifford  
Legal Administrative Assistant  
to Ralph I. Lancaster, Special Master  
**Pierce Atwood, LLP**  
Merrill's Wharf  
254 Commercial Street  
Portland, Maine 04101

**RE: Florida v. Georgia  
Supreme Court of the United States  
No. 142, Original**

Dear Ms. Clifford:

I am writing to Ralph I. Lancaster, Special Master in the above referenced matter. I am the City Attorney for the City of Americus, Georgia. On January 28, 2015, the Mayor of the City of Americus was served with a subpoena for the production of documents by the State of Florida. Under Rule 6.1.3 of the Case Management Plan/Case Management Order No. 2 dated as of December 19, 2014, if a non-party which is served with a subpoena for the production of documents anticipates that full production of those documents will require more than ninety (90) days from service, the non-party is required to notify the Special Master within ten (10) days of the service of the subpoena of that fact.

I have met with the persons with the City of Americus who would be responsible for gathering the quite extensive documents required to respond to the notice to produce. They have advised me that while they think they might be able to provide those documents within the ninety (90) day time period, it is possible that they will not be able to do so, given the extensive nature of the document request and the fact that any of the requested documents that are older than five (5) years may be stored in boxes in the basement of City Hall, and it will take a while to sort through those documents.

Based upon the foregoing, on behalf of the City of Americus as a non-party recipient of the referenced subpoena for production of documents, we respectfully request a thirty (30) day extension to the initial ninety (90) day period allotted for the City of Americus to produce such documents. We will make every diligent effort to provide the documents within the original

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ninety (90) day time frame, but would respectfully request the thirty (30) day extension in case the City simply cannot provide such documents within that original time period.

I have discussed this matter with Vanessa Silke, who represents the State of Florida in connection with the subpoenas, and she has advised me that the State of Florida has no objection to the Special Master granting the thirty (30) day extension request.

Thank you for your consideration.

Very truly yours,



James M. Skipper, Jr.

JMSjr:bml

cc: Mr. Barry Blount, Mayor of the City of Americus  
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