



**KEN PAXTON**  
ATTORNEY GENERAL OF TEXAS

August 16, 2019

Kennon L. Wooten  
SCOTT DOUGLASS & MCCONNICO LLP  
303 Colorado Street, Suite 2400  
Austin, Texas 78701

*Via Email: [kwooten@scottdoug.com](mailto:kwooten@scottdoug.com)*

RE: Cause No. D-1-GN-19-003072; *Ken Paxton v. City of San Antonio, et al*; in the  
200th District Court of Travis County, Texas

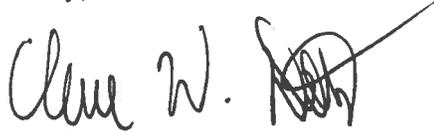
Dear Ms. Wooten:

Pursuant to Texas Rule of Civil Procedure 11, this letter is intended to memorialize our agreement—on behalf of plaintiff and defendants to the above-referenced case—to the following terms.

1. The City of San Antonio and Erik Walsh (“Defendants”) agree to provide Ken Paxton, Texas Attorney General (“Plaintiff”), with the documents that Plaintiff requested via the letter dated April 11, 2019 and that the City previously withheld under the litigation exception set forth in Section 552.103 of the Texas Public Information Act.
2. Plaintiff will have three business days after receiving the documents described in paragraph 1 to (a) notify Defendants if Plaintiff believes additional responsive documents exist and should be produced, or (b) file an agreed notice of nonsuit requesting dismissal with prejudice of Plaintiff’s Public-Information Act claims based on Plaintiff’s April 11, 2019 request as asserted by Plaintiff against Defendants in the above-referenced case. If Plaintiff provides the notice, Defendants will have three business days after receiving such notice to produce additional documents or otherwise respond to the notice. Within five business days after Defendants produce additional documents or otherwise respond, Plaintiff must either seek appropriate relief from the court or file an agreed notice of nonsuit requesting dismissal with prejudice of Plaintiff’s Public-Information Act claims based on Plaintiff’s April 11, 2019 request as asserted by Plaintiff against Defendants in the above-referenced case. Plaintiff’s notice of nonsuit must state that all court costs incurred in the above-referenced case will be taxed against the party incurring such costs.

If this letter accurately sets forth the parties’ agreement in the above-referenced case, please sign your name in the space below to document our agreement pursuant to Rule 11.

Sincerely,

A handwritten signature in black ink, appearing to read "Cleve W. Doty". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Cleve W. Doty  
Assistant Attorney General  
Administrative Law Division  
Office of the Texas Attorney General  
*Attorneys for Plaintiff*

AGREED:

A handwritten signature in black ink, appearing to read "Kennon Wooten". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Kennon Wooten  
SCOTT DOUGLAS & MCCONNICO LLP  
*Attorneys for Defendants*

Date: 8/16/2019