

CAUSE NO. D-1-GN-15-002291

BRIAN RODGERS,

Plaintiffs,

v.

THE CITY OF AUSTIN,  
Defendant.

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IN THE DISTRICT COURT

OF TRAVIS COUNTY, TEXAS

98<sup>TH</sup> JUDICIAL DISTRICT COURT

**DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S FIRST  
REQUEST FOR ADMISSION**

To: Plaintiff, by and through their attorneys of record, Bill Aleshire, AleshireLAW, P.C., 700 Lavaca, Suite 1400, Austin, Texas 78701.

Pursuant to the Texas Rules of Civil Procedure, Defendant, City of Austin, Texas serves its Amended Response to Plaintiff's First Request for Admission; Request No. 1.

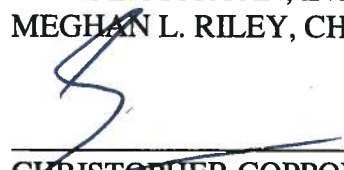
**DEFENDANT'S RESPONSE TO PLAINTIFF'S FIRST  
REQUEST FOR ADMISSION; ADMISSION NO. 1**

1. The statement in Your Original Answer that the City "has voluntarily produced all public records that are responsive to the public information requests identified in the petition" was not true on July 6, 2015.

**RESPONSE:**

The City admits that it had not produced all responsive records to Plaintiff as of July 6, 2015. The City denies that its pleading, since amended, was made in bad faith or made to harass Plaintiff.

RESPECTFULLY SUBMITTED,  
ANNE L. MORGAN, INTERIM CITY ATTORNEY  
MEGHAN L. RILEY, CHIEF, LITIGATION



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CHRISTOPHER COPPOLA  
Assistant City Attorney  
State Bar No. 24036401  
City of Austin-Law Department  
Post Office Box 1546  
Austin, Texas 78767-1546  
(512) 974-2161  
(512) 974-1311 [FAX]  
**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I certify that, on the 19<sup>th</sup> day of August, 2015, I served a copy of *Defendant's Amended Response to Plaintiff's First Request for Admission; Admission No. 1*, on Plaintiff, by and through its attorney of record, in compliance with the Texas Rules of Civil Procedure.

**Via Email to:**

Bill Aleshire  
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**ATTORNEY FOR PLAINTIFF**



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CHRISTOPHER COPPOLA