



J. Collin Sims
District Attorney

22nd Judicial District
Washington – St. Tammany Parishes

Civil Division
214954 Koop Drive, 2G
Mandeville, LA 70471

Telephone: (985) 898-3427
Fax: (985) 867-5124

Dan Kleinman
641 Shunpike Rd #123, Chatham, NJ 07928
Phone: 973-610-8296
SafeLibraries@pm.me
VIA EMAIL

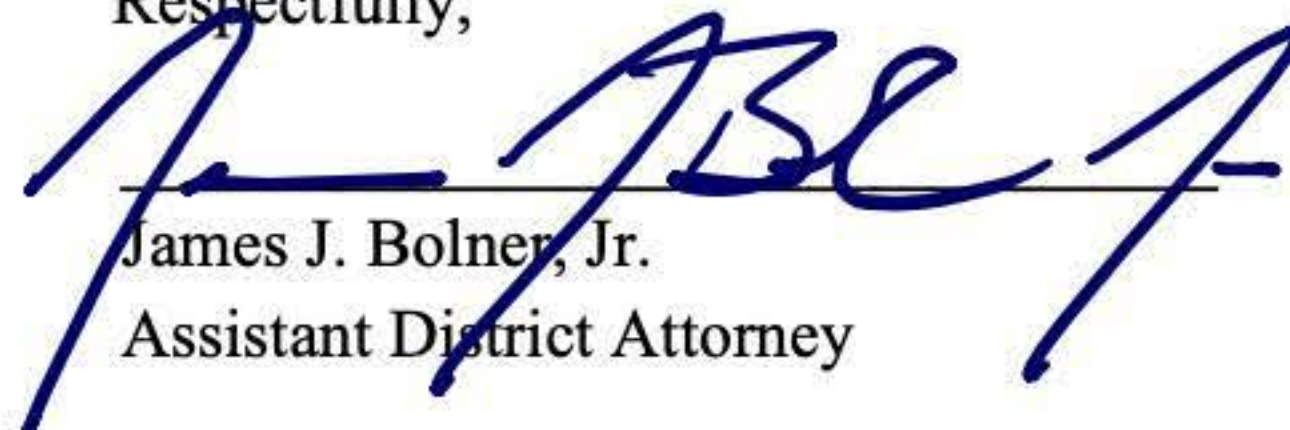
Re: Anthony Parr; et al, Plaintiffs—Appellees, v. David Cogle, et al Defendant—
Appellant, Kathy Seiden et al. Docket No. 24-30523

Dear Mr. Kleinman:

In the case referenced above, the District Attorney for St. Tammany Parish very recently successfully litigated the question of whether the recordings of conversations between two St. Tammany Parish Councilmembers and Bill McHugh are protected by the *legislative privilege*. The Fifth Circuit Court of Appeals held that the privilege applied. In light of this ruling, in our view, the material that is covered by the privilege is similar to intellectual property or material protected by copyright laws. Absent express permission from the holder of the privilege, any use of material protected by the privilege without authority is actionable.

Because the Councilmembers whose conversations were recorded did not release the recordings to the public, and did not give you express permission to post the recordings, your use of the recordings and transcripts of the recordings and transmission of the recordings and transcripts to third parties is a violation of the legislative privilege. Please consider this to be a formal demand for you to immediately cease publishing the recordings and transcripts on the internet, and to cease transmitting the recordings and transcripts to third parties in any form, electronic or otherwise. We ask that the post be taken down within 24 hours of your receipt of this correspondence. If you fail to comply, we will seek recourse against you in the courts. Thank you in advance for your anticipated cooperation.

Respectfully,



James J. Bolner, Jr.
Assistant District Attorney