

STATE OF NEW MEXICO
OFFICE OF THE ATTORNEY GENERAL



HECTOR H. BALDERAS
ATTORNEY GENERAL

July 21, 2017

Carl Chavez
P.O Box 5431
Santa Fe, NM 87502

Re: Inspection of Public Records Complaint by Mr. Carl Chavez D-1328-DM-2012-385

Dear Mr. Chavez:

On April 25, 2016, the Office of the Attorney General Open Government Division ("OGD") received your complaint alleging that the Thirteenth Judicial District Court ("Court") violated the Inspection of Public Records Act ("IPRA"), NMSA 1978, sections 14-2-1 to -12 (2011), by not providing you with all records stemming from or related to your request, by not meeting deadlines imposed by the IPRA, and by not citing a valid exception for the documents that the Court withheld. You cite other non-IPRA related allegations as well. However, these other allegations do not relate to matters covered by this office and so will not be addressed in this letter.

The OGD has also reviewed the Court's response, copy attached, and other correspondence related to your March 14, 2016 IPRA request. After reviewing all of the information, we find that while the Court initially violated the IPRA by not sending you a "three day letter," they did eventually send you all correspondence relating to your IPRA request. Thus, we find that the Court is in substantive compliance with the IPRA. *See Derringer v. State*, 2003-NMSA-073, 133 N.M. 721 (2003).

NMSA 1978, § 14-2-1 states that if inspection of records will not be available in three days, a custodian shall send a "three day letter" notifying the requester when the records will be ready. In this instance, Mr. Wilson received the IPRA request on March 17, 2016 but did not respond to the request until March 22, 2016. Because the response time was greater than three days, the Court should have sent a "three day letter" notifying you when the records would be ready. Still, by March 31, 2016 the Court had provided all documents related to your IPRA request or had cited a valid exception as to why they did not provide certain documents.

Additionally, there is some disagreement as to whether or not the exception provided for withholding documents was valid. The OAG finds that the exception cited for withholding Judge Johnston's notes on the case was valid. While it may be prudent for the Court to cite the statutory authority for the exception in the future, the Memorandum Opinion that the Court cites lists the statutory authority for the exception and cites to published case law. Thus, the OAG finds that this opinion satisfies the requirements of the IPRA.

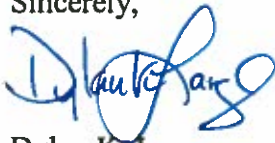
Carl Chavez
July 21, 2017
Page 2

Lastly, there was some disagreement if all the records had been provided. The OAG, after reviewing all the documents provided, finds that the Court either provided all documents that were related to your IPRA request or cited a valid exception as to why they did not have to provide the records.

Again, because the OGD finds that the Court sent you all records relating to your IPRA request, we find them in substantial compliance with the IPRA. *See Derringer*, 2003-NMSA-073.

Accordingly, we now consider this matter closed. Thank you for affording our Office with the opportunity to be of assistance. Please do not hesitate to contact our Office if you have questions about this determination or the IPRA in general.

Sincerely,



Dylan K. Lange
Assistant Attorney General

Cc: Richard T. Wilson, Attorney
Thirteenth Judicial District Court

INSPECTION OF PUBLIC RECORDS ACT ("IPRA") COMPLAINT FORM
New Mexico Office of the Attorney General
Open Government Division

YOUR CONTACT INFORMATION:

First Name: Carl Last Name: Chavez

Address: [REDACTED]

City: [REDACTED] State: [REDACTED] Zip Code: [REDACTED]

Phone Number: [REDACTED]

Email: [REDACTED]

IPRA REQUEST TO THE PUBLIC BODY:

Name of the Public Body that is the subject of this complaint (including city/town, county or region, if applicable): Thirteenth Judicial Court Sandoval County, Rio Rancho, NM

Format of IPRA Request: Written Oral

Date IPRA Request was Submitted to the Public Body: 3/14/2016

Date of all Responses Received from the Public Body: 3/29/2016

ALLEGED VIOLATIONS OF IPRA BY THE PUBLIC BODY: Please select from the following list the violations you allege the public body committed. Check all that apply.

RECORDS:

- No records were provided.
- The agency provided some but not all of the records responsive to the request.
- Records were provided, but they were not responsive to the request.
- The public body does not have custody or responsibility for the records, and the records custodian did not forward the request to the proper custodian.
- The request was for records in electronic format and although the records are available in electronic format, the copies of the public records were not provided in an electronic format.

DENIED REQUESTS TO INSPECT PUBLIC RECORDS

- Although some records were provided, the custodian did not include a written explanation for denying the production of exempt records or for redacting confidential information from records. (opinion only)
- No records were provided and the records custodian did not deliver or mail a written explanation to the requester within fifteen (15) calendar days after receiving the request that included a description of the records sought, the names and titles of each person responsible for denying the request, and a description of the reasons for the denial.

NOTICE

- Public body did not post in a conspicuous location at its administrative office or on the public body's website a notice setting forth: the rights of any person to inspect the public body's public records, the public body's responsibility to make public records available for inspection, the procedures for requesting inspection of public records, the procedures for requesting copies of public records, and/or reasonable fees for copying public records

DEADLINES (For purposes of deadlines imposed by the IPRA, the date the request is received is not counted)

- Inspection was not allowed within three (3) business days and the public body did not timely send a written "three-day letter" to the requester explaining when the records would be available or when the public body would respond to the request.
- The public body did not allow inspection or otherwise respond to the request within fifteen (15) calendar days from the date the custodian received the request.

FEES

- The public body charged fees in excess of \$1.00 per printed page for documents 11"X17" or smaller, or charged fees that exceeded the actual costs to copy the records.
- The public body did not provide a receipt upon request.

DETAILED EXPLANATION OF ALLEGED IPRA VIOLATIONS (Required): Please provide a description of the actions taken by the public body that violated the IPRA, including specific dates and why you believe the IPRA has been violated.

1) Richard T. Wilson (Staff Attorney & Assoc. Gen. Counsel) first responded on 3/22/2016, but the date of IPRA was 3/14/2016. The inspection was not allowed within 3 days (business) and did not timely send a written

"three-day letter" as required.

- 2) The Custodian did not include a written explanation for denying the production of records. Provided an "opinion" that was not conclusive for denying the production of exempt records or confidential information from records.
- 3) When requestor provided satisfactory reasons for why the "opinion" was not applicable, the custodian did not respond with satisfactory rebuttal for why withheld documents were not released. In the end stating that all documents were released when this was not true. Custodian tried stating "Attorney-Client privilege", but Mr. Filosa already has a client in the case and can't have 2 clients.
- 4) Custodian did not release the documents between Judge Cheryl H. Johnston & Mark A. Filosa, which was the sole or most important aspect of the IPRA Request. Correspondence just between them was requested, but not released, as requested.

ADDITIONAL INFORMATION: Please provide a copy of your original inspection request (if written), and any documentation or evidence you have regarding the alleged IPRA violation.

Information was sent by U.S. Mail to the office of Attorney General (OAG), but this form was not completed. Ms. Lavern Roller called me on 4/19/16 to direct me to this form that was to be submitted to investigate alleged IPRA violations. There is no law suit at this time against the public body.



OFFICE OF THE
ATTORNEY GENERAL
2016 APR 25 AM 9:01

**New Mexico
Office of the Attorney General**

HECTOR H. BALDERAS
Attorney General

ELIZABETH A. GLENN
Deputy Attorney General

INSPECTION OF PUBLIC RECORDS ACT COMPLAINT FORM

Under the Inspection of Public Records Act ("IPRA"), the Office of the Attorney General ("OAG") has the discretion and authority to enforce the IPRA's provisions. NMSA 1978, § 14-2-12. Generally, the OAG investigates and issues determinations regarding whether public agencies have violated the IPRA. All IPRA complaints submitted to the OAG, including any attached materials and any correspondence regarding those complaints, are public records subject to public inspection. Additionally, IPRA complaints and determinations from the OAG may be posted on our website.

All complaints submitted to the OAG will be reviewed for potential IPRA violations. The OAG may dismiss those complaints that fall outside IPRA's purview and those for which there is no remedy available under IPRA, or forward IPRA complaints to another appropriate agency for resolution. Please note that the OAG does not represent complainants in suits against public bodies.

P.O. Box 5431
Santa Fe, New Mexico 87502

April 4, 2016

Mr. Hector Balderas
Attorney General of New Mexico
408 Galisteo Street
Villagra Building
Santa Fe, NM 87501

Dear Attorney General Balderas:

Re: Complaints Regarding Alleged IPRA Violations and Investigation of Law Violations in Divorce Case: Renell A. Chavez v. Carl J. Chavez (Case: D-1329-DM-2012-00385) Thirteenth Judicial District Court, County of Sandoval

Hello. I want to begin by thanking you and your staff for all of the hard work and efforts for New Mexicans and for the opportunity to write you with these complaints that have been destroying my quality of life in New Mexico for over 3.75 years and appears to be infinite without any end in sight.

The contact information for the parties involved in my complaints is as follows:

Judge Cheryl H. Johnston
Thirteenth Judicial District Court
Sandoval County Courthouse
1500 Idalia A
Bernalillo, NM 87004
(505) 867-2373 ext. 1161

Mark A. Filosa (Petitioner's Attorney)
Filosa Law Firm
501 Main Street
TorC, NM 87901
Phone: (575) 894-7161
Fax: (575) 894-7570

I have enclosed recent Information Public Request Act (IPRA) documents supporting alleged violations by Judge Cheryl H. Johnston stemming from a recent IPRA Request where she refused to provide communications between her and Attorney Mark A. Filosa (Truth or Consequences) in the Case listed above. After indicating that she was withholding documents due to an Opinion (legal opinion enclosed), she later indicated that she provided all the documents requested in the IPRA. In one instance, she also claimed Attorney-Client Privilege with Mark A. Filosa, but Mark A. Filosa already has a client in the Case.

In a separate complaint, I am requesting an investigation into the above subject Case as I allege that I am being victimized by Judge Cheryl H. Johnston and Attorney Mark A. Filosa (Petitioner's Attorney in the Case) who was appointed by Judge Johnston to write Orders in the Case. This in itself is a clear conflict of interest (if not "Due Process" violation in the Case) and has presented the opportunity for collusion between Judge Johnston and Mr. Filosa. For example, I allege he has been unfairly influencing and or manipulating the Judge into signing Orders that he develops in the Case. Mark A. Filosa is supposed to be representing the Petitioner in the Case, and not Judge Cheryl H. Johnston or the Court. I also allege they are colluding together to inflict: mental anguish/duress, financial ruin, and more recently physical abuse of the Respondent in the Case. I truly feel victimized by them in this Case. One other party that is involved in the Case is the Realtor John Fernandez (Berkshire Hathaway Realtors, Albuquerque) who was appointed to sell the domicile by Order of Judge Johnston, and who has been unable to sell the domicile for over 2.75 years. In the end, I believe in the investigation that it will become evident they have engaged in unprofessional and unethical conduct in the Case with possible illegal actions.

Judge Johnston also refuses to dissolve the marriage (the Divorce Trial ended on April 9, 2015) and stop monthly payments (\$469.46/month plus 1/2 of every third paycheck in a given month) by the Respondent that should have ended when his daughter reached the age of 18 on March 1, 2014. Judge Johnston also refused to acknowledge that the domicile was in Trespass (Realtor Seller Agreement Expired on June 15, 2015) during the November 18, 2015 Hearing and she evicted (effective January 1, 2016) the Respondent from his domicile based on accusations made by the Realtor that I was preventing access to the domicile during the Trespass period, and where Judge Johnston also unilaterally appointed Mr. Zenon Myszkowski, P.C. at the November 18, 2015 Hearing to take charge (at significant cost to the parties in the Case) of the realtor responsibilities and finances removing the parties from the realtor agreement without consent by either party in the Case.

The eviction has resulted in an additional \$650/month (from \$1,500 to \$2,150, mo.) in housing and storage expenses to my monthly expenses beyond the budgeted amount established by the Court in the Case. Judge Johnston indicated at the November 18, 2015 Hearing that she didn't care about my finances and that I had to pay, and if I default, she is going to fine me. The Respondent has paid over ~ 3.75 years of monthly mortgage payments until sale (~ \$1,500/mo. with utilities which increased to \$2,150/mo. in January of 2016 due to eviction) \$67,500 because the domicile won't sell (Termites and Current Economic Situation in Rio Rancho) at the current lowered minimum price of \$260,000 and the Realtor has not been able (I suspect Mark A. Filosa is also in collusion with the realtor sitting on the domicile without sale) to sell the domicile for the past 2.75 years. **I made a reasonable offer of \$35,000 to the Petitioner for the domicile in March of 2014, but Judge Johnston has refused to act on it throughout the Case. This would have prevented the current impasse and the Divorce would have been finalized in March of 2014.** There was a broken front door lock and larceny of a jewelry box incident reported in the domicile on October 29, 2015 with the Rio Rancho Police Department. This is when I informed the Realtor (suspect in larceny) that he was no longer welcome in the domicile. I believe Mark A. Filosa has been controlling and utilizing the Realtor to his advantage in the Case to extort the most money for his client the Petitioner. It appears that he is also controlling Judge Johnston in the Case and I allege he has managed to manipulate and take control of the Court in his allowed capacity to write the Orders and with the condolence and/or collusion of Judge Johnston in the Case. The Respondent currently has paid the Petitioner over \$21,337.58 over the past 3.75 years and gave his Daughter who turned 18 on March 1, 2014 ~ \$10,222 dollars (Royce Funds Custodial Account) to begin school. **Since the Petitioner abandoned the household with his daughter on June 20, 2012, I have**

currently paid out at total of ~ \$101,009.58. It is important to note that I was evicted after informing the Realtor at the end of October 2015 that the Realtor Seller Agreement had expired several months back on June 15, 2015, and after the larceny of a jewelry box and broken front door in the domicile reported on October 29, 2015 to the Rio Rancho Police Department and for which the Realtor in my opinion was in Trespass of the domicile and is currently a suspect in the Larceny. I was chastised and treated like an animal before the Court during the November 18, 2015 Hearing as Judge Johnston refused to recognize that the domicile was in Trespass by the Realtor. In fact I allege the domicile to be in Trespass up to the present date.

I am concurrently following up via U.S. Mail with the NM Supreme Court Disciplinary Board seeking Censure of the Case and Disciplinary Actions against the parties' listed above for numerous State and Federal Civil Rights and U.S. Constitutional Rights violations and any other applicable violations, which constitute unprofessional and unethical conduct or illegal actions in the Case. My concerns with the NM Supreme Court is it is there to protect Judges and Attorneys who are accused of unprofessional and unethical conduct in the State Judicial Courts instead of ensuring Justice and Due Process for New Mexicans in its Courts. Consequently, I am also following up with Senators Heinrich and Udall in these matters to ensure fairness and justice in the review of my complaints.

I very much appreciate your assistance in resolving my complaint(s) and restoring my civil liberties in New Mexico. Please feel free to contact me at (505) 983-6047 or E-mail: miraclemaker40@yahoo.com if you have questions or wish to meet or communicate further on the complaints. Thank you.

Respectfully,



Carl J. Chávez
Respondent, Pro Se

Enclosures: Information Public Request Act (IPRA) March 14, 2016 Documentation of Alleged Violations by Judge Cheryl H. Johnston
Case Document: Respondent's Response to Order Developed for Court by Petitioner's Attorney, January 25, 2016
Case Document: Respondent's Response to Statement Regarding the Interim Payment, January 25, 2016

XC: New Mexico Senator Martin Heinrich
New Mexico Senator Tom Udall
New Mexico Supreme Court, Disciplinary Board
Case File

RECEIVED APR 08 2016

P.O. Box 5431
Santa Fe, New Mexico 87502

March 14, 2016

Sandoval County Courthouse
1500 Idalia A
Bernalillo, NM 87004

Dear Sir or Madam:

Re: State of New Mexico Sandoval County Thirteenth Judicial District Court Case No. D 1329 DM 2012-00385 (Judge Cheryl H. Johnston): Carl J. Chavez (Respondent) vs. Renell A. Chavez (Petitioner)
Inspection of Public Records Act Request (IPRA)

Dear Sir or Madam:

In accordance with the Inspection of Public Records Act, NMSA 1978, §§14-2-1 *et seq.* 1.13.4 NMAC, I hereby request the following records **from the period of January 1, 2014 to Present** related to the above Case directed to Judge Cheryl H. Johnston from Mark A. Filosa (Petitioner's Attorney) and/or vice versa or any Representative from the Filosa Law Firm (Law Firm): 501 Main Street, T or C, NM 87901; P.O. Box Drawer 391, Truth or Consequences, New Mexico 87901; (575) 894-7161 (Office) and (575) 894-7570 (Fax) and/or from the E-mail address: Filosa@zianet.com.

- 1) All personal correspondences excluding legal motions, pleadings, filings, etc. via U.S. Mail, E-mail, Personal Delivery, Records or Faxes, etc. The Respondent already has in his possession the legal motions, pleadings, filings, etc. from the Case, and is now searching for all other forms of communications between the parties that excluded the Respondent, but are related to the Case.
- 2) Phone logs, records, reports, or written notes or memos from all incoming and outgoing phone calls between the parties.
- 3) Written or typed notes or messages from all personal calls, e-mails, faxes, text messages, meetings, communiqués, etc. between the parties.
- 4) All communications to judicial management documenting communications and actions in the Case that may also document meetings, phone calls, etc. with the Law Firm where the Respondent was not present or privy to the communications.

The Respondent wants to "inspect records of e-mail correspondence between Judge Cheryl H. Johnston and the Law Firm and/or Representative thereof, a list of dates, times and duration of oncoming and outgoing phone calls between Judge Cheryl H. Johnston and the Law Firm, a list of faxes sent by or to Judge Johnston to or from the Law Firm and notes or memos by Judge Cheryl H. Johnston about phone conversations or meetings with the Law Firm."

I very much appreciate your attention to this matter. Please provide me with the estimated cost of the copies or information so I may promptly pay by check or court desired payment method. If we need to talk through any issues, please call or E-mail me.

Sincerely,



Carl John Chavez
Respondent, Pro Se
505-476-3490
miraclemaker40@yahoo.com

XC: Respondent Case File

Richard T Wilson <lludrtw@nmcourts.gov>

Mar 31 at 3:26 PM

To miraclemaker40

Mr. Chavez:

I have provided the documents for your IPRA request.

Thank you,
Rick

Richard T. Wilson
Staff Attorney and Associate General Counsel
Thirteenth Judicial District Court
505.867.2376 ext. 1132 Phone
505.865.0969 Fax
lludrtw@nmcourts.gov

----- Original Message -----

From: "miraclemaker40" <miraclemaker40@yahoo.com>
To: "lludrtw" <lludrtw@nmcourts.gov>
Sent: Thursday, March 31, 2016 7:55:05 AM
Subject: Re: Your IPRA Request

Mr. Wilson:

It appears after reviewing the IPRA documents provided by Judge Cheryl H. Johnston and the Sandoval County Court that the IPRA documents provided did not meet the specifications of the request. For example, only documents and communications between the two parties was requested. The requestor already has the work products in his file. The documents received include multiple parties and not communications between just the two parties in question. Therefore, Judge Cheryl H. Johnston is in violation of the IPRA Regulations.

I hereby request the number and type of documents only between the two parties intended in the IPRA request that Judge Johnston is withholding be immediately catalogued and withdrawn from her possession for further compliance and enforcement proceedings in the matter.

Please respond back by COB tomorrow or sooner. Thank you.

Sent from Yahoo Mail on Android

From:"Richard T Wilson" <lludrtw@nmcourts.gov>
Date:Tue, Mar 29, 2016 at 16:48
Subject:Your IPRA Request

Mr. Chavez:

Please see the attached documents for your request. There are 34 documents. My email will not let me attach all of them so I will be sending them in batches. As discussed this morning by phone, there are some notes taken by the judge which are exceptions to IPRA.

This is email 1.

Thanks,
Rick

Richard T. Wilson
Staff Attorney and Associate General Counsel
Thirteenth Judicial District Court
505.867.2376 ext. 1132 Phone
505.865.0969 Fax
lludrtw@nmcourts.gov

Richard T Wilson <lludrtw@nmcourts.gov>

To miraclemaker40@yahoo.com

Mar 22 at 7:35 AM

Mr. Carl John Chavez:

I am writing in response to your letter dated March 14, 2016. I received this letter on March 17, 2016 and I am working on gathering the information you have requested. The court's phone records are contained by a third party. I am working on getting an estimate for you as to the cost of pulling those records. You will have to pay for this and, as such, I want to pass on your wording for them. What should I request for you and do you have a preferred method of payment? Not sure what they will require as for payment, but I will ask for your preferred method.

Thanks,
Rick

Richard T. Wilson
Staff Attorney and Associate General Counsel
Thirteenth Judicial District Court
505.867.2376 ext. 1132 Phone
505.865.0969 Fax
lludrtw@nmcourts.gov

--
BEGIN-ANTISPAM-VOTING-LINKS

Teach CanIt if this mail (ID 0bQx1zDHa) is spam:

Spam: <https://antispam.roaringpenguin.com/canit/b.php?i=0bQx1zDHa&m=f643e32c5e4f&t=20160322&c=s>

Fraud/Phish: <https://antispam.roaringpenguin.com/canit/b.php?i=0bQx1zDHa&m=f643e32c5e4f&t=20160322&c=p>

Not spam: <https://antispam.roaringpenguin.com/canit/b.php?i=0bQx1zDHa&m=f643e32c5e4f&t=20160322&c=n>

Forget vote: <https://antispam.roaringpenguin.com/canit/b.php?i=0bQx1zDHa&m=f643e32c5e4f&t=20160322&c=f>

END-ANTISPAM-VOTING-LINKS

Reply, Reply All or Forward | More

4/1/2016

(1585 unread) - miraclemaker40 - Yahoo Mail

To Richard T Wilson

CC/BCC

Check will be method of payment. Phone records would consist of hand written notes, emails, faxes, etc. from Cheryl Johnston documenting all calls with Filosa. I am not after telephone documentation of dates and time of calls from the telephone company between parties. Any contact via hand written or electronic notes on computer file, emails, faxes, letters, etc.

Let's make sure you understand this IPRA. Please call me at 476 3490.

Sent from Yahoo Mail on Android

From: "Richard T Wilson" <lludrtw@nmcourts.gov>

Date: Tue, Mar 22, 2016 at 7:35

Subject: IPRA request dated March 14, 2016 and received on March 2016.

Mr. Carl John Chavez:

I am writing in response to your letter dated March 14, 2016. I received this letter on March 17, 2016 and I am working on gathering the information you have requested. The court's phone records are contained by a third party. I am working on getting an estimate for you as to the cost of pulling those records. You will have to pay for this and, as such, I want to pass on your wording for them. What should I request for you and do you have a preferred method of payment? Not sure what they will require as for payment, but I will ask for your preferred method.

Thanks,
Rick

Richard T. Wilson
Staff Attorney and Associate General Counsel
Thirteenth Judicial District Court
505.867.2376 ext. 1132 Phone
505.865.0969 Fax
lludrtw@nmcourts.gov

--
BEGIN-ANTISPAM-VOTING-LINKS

Teach CanIt if this mail (ID 0bQx1zDHa) is spam:
Spam: <https://antispam.roaringpenguin.com/canit/b.ph>

[i=0bQx1zDHa&m=f643e32c5e4f&t=20160322&c=s](https://antispam.roaringpenguin.com/canit/b.p.i=0bQx1zDHa&m=f643e32c5e4f&t=20160322&c=s)
Fraud/Phish: <https://antispam.roaringpenguin.com/canit/b.p.i=0bQx1zDHa&m=f643e32c5e4f&t=20160322&c=p>
Not spam: <https://antispam.roaringpenguin.com/canit/b.p.i=0bQx1zDHa&m=f643e32c5e4f&t=20160322&c=n>
Forget vote: <https://antispam.roaringpenguin.com/canit/b.p.i=0bQx1zDHa&m=f643e32c5e4f&t=20160322&c=f>

END-ANTISPAM-VOTING-LINKS

Send

12 more messages

Carl Chavez <miraclemaker40@yahoo.com>

Mar 30 at 9:05 PM

To Richard T Wilson Carl Chavez

Mr. Wilson:

I have reviewed the Opinion that you sent me.

This Opinion does not apply to me because I am a party in the Case representing myself Pro Se as my own Attorney. Therefore, I am privy to all court work products as I am the Respondent in the Case and my own Attorney in the Case with Judge Johnston and Attorney Filosa. Thus, I have full authorization and privileges to have direct access to all work product documents in the Case. Have Judge Johnston provide all work products to me in the Case as I have rights Pro Se as the Respondent in the Case to review any and all court documents under development and/or am privy to review and comments on all work products as the Respondent Pro Se in the Case.

If this does not change Judge Johnston's position on release of Court documents that the Respondent Pro Se shall have all authority Pro Se to review, then

please inform me of her position. If she concurs that I am Filosa's equivalent of the Attorney Pro Se representing the Respondent and therefore privy to all work products related to the Case, then please immediately submit the work product with all IPRA related connotations to the Respondent in the Case immediately.

Thank you.