WIGGINS, WILLIAMS & WIGGINS

A PROFESSIONAL CORPORATION

LAWYERS

TELEPHONE (505) 764-8400 FACSIMILE (505) 764-8585

1803 RIO GRANDE, NW
ALBUQUERQUE, NEW MEXICO 87104

MAILING ADDRESS:
P.O. BOX 1308
ALBUQUERQUE, NM 87103-1308

May 7, 2014

Mr. James Cherry 805 Kelly Road Magdalena, NM 87825

> <u>Response to Your Return of Records Responsive to</u> <u>Inspection Request: Socorro Electric Cooperative, Inc.</u>

Dear Mr. Cherry:

We recently received the materials which our law firm produced to you on behalf of Socorro Electric Cooperative ("SEC"), along with your brief May 5, 2014 letter explaining your attempt to return them. In your letter, you stated you found the \$25 fee to be exorbitant and threatening and the production non-compliant. You also implied that the source was inappropriate because "the document request was not made to your office."

First, our law firm did not threaten you in our April 24, 2014 cover letter sent with this production. We accurately informed you that you owed SEC the amount of \$25.00 for the production and that you would not be provided with future copies until this amount was paid in full. It is wholly reasonable to require a modest fee for copies, and \$1.00 per page is statutorily permitted under IPRA. Second, this production is fully responsive to your request and is complete to the best of our abilities. Third, it is not unusual for counsel to respond to IPRA requests. Thus, it is not unusual for SEC's attorneys to have responded on its behalf to your request. Because you did not explain the basis for your belief that the production is incomplete or that the source is inappropriate, we cannot respond further.

As stated in our April 24, 2014 letter to you, future information and document requests will not be processed until the outstanding bill for past requests is received in full. The outstanding bill remains \$25.00.

Sincerely,

Very truly yours,

WIGGINS, WILLIAMS & WIGGINS A Professional Corporation

By

Theresa E. Gheen

TEG:teg