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July 9, 2019

Via Electronic Mail to Valita.Quattlebarum@nhcs.net
New Hanover County Schools
Public Relations Department
Attn: Valita Quattlebaum, Chief Communications Officer

RE: Public Records Request

Dear Ms. Quattlebaum:

This request is made under the Freedom of Information Act pursuant to 5 U.S.C. §552 and N.C.G.S. §132-1. This firm represents several victims of sexual abuse that occurred at local New Hanover County Schools within the last two decades.

I am requesting copies of public records and documents, as further identified in Schedule A, which is attached to your Public Information Request form.

We agree to pay reasonable fees for the processing of this request after being given a quote for said fees and an opportunity to review the same prior to the time you process this request. Where possible, such as with requests for electronically stored information, e.g., e-mails, etc., we would request PDF versions of the same.

If our request is denied in whole or part, we ask that you justify all denials by reference to specific exemption provisions of the Act.

Thank you for your assistance. If you have any questions, or if we can make your work any easier, please do not hesitate to call.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joel R. Rhine", is written over a horizontal line.

Joel R. Rhine

JRR/slc



PUBLIC INFORMATION REQUEST

Send this Public Information Request to:

NHCS Public Relations Department - Attn.: Valita Quattlebaum, Chief Communications Officer
6410 Carolina Beach Road, Wilmington, NC 28412 • Phone 910-254-4221 • Fax 910-254-4477
valita.quattlebaum@nhcs.net • www.nhcs.net

DATE: July 9, 2019

NAME/TITLE: Joel R. Rhine

AFFILIATION: Media Parent Employee Student Business Owner
 Other Attorney for Former Students

ORGANIZATION (if applicable): Rhine Law Firm, PC

PHONE NUMBER: (910) 772-9960

EMAIL ADDRESS: JRR@rhinelawfirm.com and SLC@rhinelawfirm.com

INFORMATION REQUESTED: See Schedule A attached.
(Please be specific about your request - names, dates, etc.)

PLEASE NOTE: New Hanover County Schools will respond to your request in a timely manner. Please be advised that some information may take longer to produce depending on the nature of the request. The district will provide existing documents available on file. NHCS cannot create documents that do not exist. Please contact the Chief Communications Officer with any questions.

Schedule A

1. Agendas and Minutes from any and all Title IX Committee meetings, or similar for the last 10 years. This request includes any and all previous committees, subcommittees, task forces or work groups charged with similar missions or functions as your existing Title IX Committee. Personally identifying information of students may be redacted (e.g., names, student numbers, home addresses, etc.).
2. Copies of any and all insurance policies insuring New Hanover County Schools, officers and employees against injuries arising from the negligent hiring, negligent retention, negligent entrustment, negligent evaluation, negligent supervision, and negligent investigation of sexual abuse claims brought by students against school employees, including but not limited to Mike Kelly, who sexually assaulted multiple students after New Hanover County employees knew or should have known of the related issues.
3. All documents, including but not limited to photographs, recordings, electronic records, emails and chat/text/instant messages, made or received by Mike Kelly on any device, phone or computer in Mike Kelly's former office and/or possession to the extent that you are in possession, custody or control of such. This request includes copies of any material you have previously backed up from any such devices or computers, as permitted by your Policy 2115.
4. To the extent not provided above, all e-mails evidencing communication between Rick Holliday and Mike Kelly for the last ten (10) years. This includes any e-mails on your servers, in your archives and/or back-ups, sent between the two from their school and/or personal e-mail addresses. You may exclude "mass" e-mails sent to members of the school district's faculty and you may exclude communications regarding material covered by your Policy 9020.
5. All text and instant messages between Rick Holliday and Mike Kelly for the last ten (10) years contained on any phone or mobile device belonging to Rick Holliday.
6. Copies of all complaints made to New Hanover County Schools relating to Mike Kelly by parents and/or members of the public, consistent with your Policy 9510. The relevant time period includes 1999 to the present. Personally identifying information on students may be redacted.