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June 2, 2016

**Via Overnight Delivery and e-mail**

A. Lee Parks, Esquire  
Parks Chesin Walbert, P.C.  
75 14th Street, 26th Floor  
Atlanta, Georgia 30309

Re: *Miguel Southwell*

Dear Mr. Parks:

The undersigned and this law firm represent the City of Atlanta (“the City”). Your May 31, 2016 correspondence (“your letter”) has been forwarded to us for a response. Please ensure that all future communication regarding this matter is directed in care of the undersigned.

At a threshold level, the implicit suggestion in your letter that there was any connection whatsoever between the termination of your client’s at-will employment and the airport’s procurement process is ridiculous, defamatory and has absolutely no basis in fact. That you have couched that allegation in the form of a question does not ameliorate either its falsity or outrageous nature.

As you may know, your letter is not the first time that angry and frustrated third-parties have recklessly contended, without any evidence whatsoever, that the Mayor has attempted to improperly interfere with the established procurement protocols and procedures utilized by the airport. Those frivolous allegations have been categorically disproved in each and every legal forum in which they have been raised in the past, and most assuredly will be disapproved again, should your client be brazen enough to assert them in any type of legal proceeding. Please rest assured that any such pursuit would be futile.

With respect to the enumerated questions raised in your letter, the City will not engage in a protracted letter writing campaign with you. If your client and your law firm truly believe that your client has a cause of action against the City, then file a frivolous lawsuit. You can rest assured that it will be vigorously and aggressively defended.

We acknowledge receipt of your litigation hold request and will implement appropriate procedures accordingly. Your separate Georgia Open Records Act request will be the subject of an independent reply within the statutorily prescribed time period.

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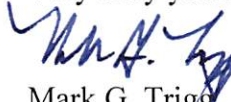
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Should you wish to discuss our client's position further, please do not hesitate to call the undersigned directly.

Best personal regards.

Very truly yours,



Mark G. Trigg

MGT:ss

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