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November 18, 2019

Douglas Kirk
Via Email: dougkirk@gvtc.com

Re: *Kirk v. Comal Appraisal District*, C2018-1576B

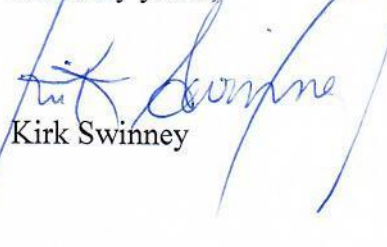
Dear Mr. Kirk:

I will soon respond to your recent Motion to Compel and for Sanctions and Request for Abatement, as well as your recent Response to Defendant's Second Request for Production and Inspection of Documents and Motion to Instruct Defendant to Adhere to the Texas Rules of Civil Procedure.

Since you seem to have a hard time identifying attempts to confer to resolve matters, please let me specifically identify this correspondence as such an attempt to resolve the matters of your motions and the District's response short of a hearing.

Your motions are utterly egregious. Much of your pleadings are of undiscernible procedural basis. These motions are, unfortunately, a continuation of the offensive and deliberately obstructionist pattern of your conduct in this litigation. Your conduct has grossly exaggerated the cost of this litigation. However, if you will withdraw both motions, and forthrightly respond to the second request for production, by 5:00 p.m. CST on November 19, 2019, the Defendant will not at this time seek sanctions and attorney fees from you for those frivolous filings. However, if you file further inappropriate pleadings or responses, the District will utilize your recent filings as evidence of your continued egregious conduct. The District is not open to further negotiations on this matter.

Sincerely yours,



Kirk Swinney

cc: Rufino H. Lozano, Chief Appraiser, Comal Appraisal District, via e-mail