

PORTEOUS, HAINKEL AND JOHNSON, L.L.P.

704 CARONDELET STREET
 NEW ORLEANS, LOUISIANA 70130-3774
 TELEPHONE 504-581-3838
 FACSIMILE 504-581-4069

WWW.PHJLAW.COM

408 N. COLUMBIA STREET
 COVINGTON, LOUISIANA 70433-2920
 TELEPHONE 985-893-4790
 FACSIMILE 985-893-1392

211 WEST FIFTH STREET
 THIBODAUX, LOUISIANA 70301-3199
 TELEPHONE 985-446-8451
 FACSIMILE 985-447-3004

343 THIRD STREET, SUITE 202
 BATON ROUGE, LOUISIANA 70801-1309
 TELEPHONE 225-383-8900
 FACSIMILE 225-383-7900

C. GORDON JOHNSON, JR.*
 JAMES S. THOMPSON
 RALPH R. ALEXIS, III
 ADRIANNE L. BAUMGARTNER
 JAMES R. CARTER
 GLENN B. ADAMS
 WM. RYAN ACOMB
 FRED M. TROWBRIDGE, JR.
 WILLIAM C. LOZES
 CHARLES L. CHASSAIGNAC, IV
 MICHAEL G. GEE
 DAN RICHARD DORSEY
 JAMES R. NIESET, JR.
 JAMES E. JOHNSON
 CHAUNTIS T. JENKINS
 KATHLEEN E. SIMON
 NICHOLAS C. GRISTINA
 BRYAN J. HAYDEL, JR.

*Of Counsel

EMAIL ADDRESS OF WRITER
 ralexis@phjlaw.com

DIRECT DIAL NUMBERS OF WRITER:
 Telephone: (504) 412-6290
 Fax: (504) 412-6390

WILLIAM A. PORTEOUS, JR. (1899-1969)
 F. CARTER JOHNSON, JR. (1905-1964)
 JOHN J. HAINKEL, JR. (1938-2005)
 WILLIAM A. PORTEOUS, III (1937-2006)

NANCY L. CROMARTIE
 PATRICIA P. BARATTINI
 EMILY S. MORRISON
 MICHELE TROWBRIDGE BARRECA
 RALPH J. AUCOIN, JR.
 MATTHEW L. MANN
 DARRIN M. O'CONNOR
 ELEANOR W. WALL
 LLOYD T. BOURGEOIS, JR.
 GORDON P. GUTHRIE, III
 LEANDRO R. AREA

PLEASE REPLY TO:
NEW ORLEANS

July 7, 2014

The Honorable Jay C. Zainey
 Judge, U.S. District Court
 Eastern District of Louisiana
 500 Poydras Street, Suite C455
 New Orleans, LA 70130

Re: Tammy Griffith vs. State of Louisiana, et. al.
 USDC Eastern District No. 11-245, Div. C
Consolidated with
 Stacey Guichard v. State of Louisiana, et al
 USDC Eastern District No. 11-535, Div. C
 Our File Nos.: 546.0277/546.0278

Dear Judge Zainey:

Please find Defendant David Bell's psychotherapy records from his mental health care providers (Bates-stamped Bell Psychotherapy 001 – 187) that were ordered to be produced by Magistrate Judge Shushan by June 18, 2014 Order (Rec. Doc. 433).

As stated in the *Memorandum in Support of David Bell's Objections to the Magistrate Judge's June 18, 2014 Order* ("Objection"), Rec. Doc. 439-1, p. 8, these records were not in undersigned counsel's possession until after the filing of Bell's opposition to Plaintiff's motion that requested, *inter alia*, the documents contained herein (Rec. Doc. 429).

Review of these records show them to be intensely private, irrelevant to the facts of this lawsuit and containing repeated mention of nonparties (and even the records of treatment of nonparties). We provide these records to supplement Bell's previously filed Objections and,

Honorable Jay C. Zainey
July 7, 2014
Page 2

further respectfully request that this Honorable Court conduct an *in camera* inspection as part of the process of reviewing Bell's Objections.

Thank you for your consideration of this request.

Sincerely,



RALPH R. ALEXIS, III

RRA,III/cad
Enclosures

cc: Ms. Nghana Lewis Gauff (*via facsimile*)(w/o enclosures)
Honorable Magistrate Judge Sally Shusan (*via facsimile*)(w/o enclosures)