

# Exhibit 1

**From:** [Hall, Kevin](#)  
**To:** [Mullen, Carmen T. Law Clerk \(Julia Bradshaw\) \(CMullenLC@sccourts.org\)](#)  
**Cc:** [Chad Johnston](#); [Griffin Lynch](#); [Carroll, Todd](#); [Duke White](#); [Shisko, Marghretta](#); [McQuillin, Mac](#); [Cook, Jeremy](#); [John Hoefler](#); [Walker Humphrey](#); [Mullen, Carmen T. Secretary \(Jamie Rhett\)](#)  
**Subject:** Horry County et al. v. City of Myrtle Beach et al. (2018-CP-26-07249)  
**Date:** Monday, October 7, 2019 3:45:15 PM  
**Attachments:** [imageb72eae.PNG](#)  
[image0c627f.PNG](#)  
[image35c591.PNG](#)  
[image800668.PNG](#)

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Dear Judge Mullen and Ms. Wilkes-D'Amato:

In response to discovery requests propounded by Horry County and the Horry County School District, the City of Myrtle Beach has produced more than 39,000 pages of documents. The County and the District have been diligently working through these voluminous materials, and we have made substantial progress in getting a handle on what is there. However, given the volume of documents, the review has and continues to be slow and tedious. Further, we are not able at this point to confirm that all responsive information that is necessary for an accounting review of TIF expenditures has been produced.

Given the 90-day discovery timeline initially set by the Court and the challenges involved with this many documents, the plaintiffs respectfully request a Status Conference so that we can update Your Honor on the status of discovery, progress made to date, and remaining discovery and accounting analysis to be conducted. We would be glad to make ourselves available at the Court's convenience for a Status Conference, and we are glad to assist the Court with coordinating the parties' schedules if that would be helpful.

Thank you.

Kevin Hall

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