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# LATHAM & WATKINS LLP

June 15, 2020

## VIA EMAIL

Christopher M. Garrett  
City of Jacksonville  
Office of General Counsel  
City Hall, St. James Building  
117 West Duval Street, Suite 480  
Jacksonville, FL 32202

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Re: Subpoena Duces Tecum

Dear Mr. Garrett:

We write on behalf of IFM Investors Pty Ltd. (“IFM”) with respect to the subpoena duces tecum issued by your office on April 10, 2020 (the “Subpoena”) in connection with the JEA Invitation to Negotiate (“ITN”). As discussed on our June 3, 2020 call:

- With respect to Request No. 1 in the Subpoena, IFM only employed [REDACTED] in connection with the JEA ITN.
- With respect to Request No. 2 in the Subpoena, because IFM’s proposal did not progress to the phase of the bidding when an inspection of JEA assets would be contemplated, IFM does not possess any documents responsive to this request.

IFM believes the content of this letter should be exempt from mandatory disclosure under various provisions of Florida law, including but not limited to Florida Statutes Section 815.045, which protects trade secrets and exempts such material from disclosure.

Finally, IFM does not intend to waive any applicable attorney-client privilege, attorney work product protection, or other privilege, immunity, or legal obligation to maintain confidentiality in this communication, and any such waivers should be construed as inadvertent.

Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/ Nicholas L. McQuaid

Nicholas L. McQuaid  
of LATHAM & WATKINS LLP