

EXHIBIT 6

From: Anita Earls [mailto:AnitaEarls@southerncoalition.org]
Sent: Wednesday, February 10, 2016 9:19 AM
To: Farr, Thomas A.; Speas, Edwin M.
Cc: Strach, Phillip J.; McKnight, Michael D.; Lawler, Patrick; Allison Riggs
Subject: RE: draft 30b6 notice

Dear Tom,

I am responding on behalf of SCSJ and Poyner & Spruill. We have given your request careful consideration. We are not willing to accept service of the 30b6 notices attached to your email from yesterday. In our view the information you seek, and particularly the very broad questions you identify in the attachment to the notices, is not relevant to any issue of privacy and is not likely to lead to the discovery of relevant information. Moreover, we believe the information is attorney/client privileged information and that our clients have rights protected by the First Amendment to the US Constitution that require us to maintain the confidentiality of that information. We further reserve all other rights and privileges that may apply in these circumstances. Seeking to depose the Plaintiffs' counsel at this point in the litigation, less than two weeks before the end of the discovery period, seriously interferes with our ability to defend the many depositions already scheduled between now and February 19th, as well as interferes with our ability to prepare our case generally.

Without waiving any of our clients' rights and privileges, I will point out that as a non-profit public interest law organization, SCSJ's Form 990 provides all the information we are required to make public concerning the funding for our organization, including details of our fundraising activities. Our Form 990s for the last three fiscal years (2012-2014) are readily available on www.guidestar.org.

Sincerely,
Anita

Anita S. Earls
Executive Director
Southern Coalition for Social Justice
1415 West Highway 54, Suite 101