

19th JUDICIAL COURT FOR THE PARISH OF EAST BATON ROUGE

NO. STATE OF LOUISIANA DIVISION “ ”

OUR PUBLIC PARKS
VERSUS
UNIVERSITY LAKES, L.L.C.

FILED: _____
DEPUTY CLERK

**PETITION FOR WRIT OF MANDAMUS
FOR ENFORCEMENT OF PUBLIC RECORDS REQUEST**

NOW INTO COURT comes Petitioner, Our Public Parks, to ask that this Court issue a Writ of Mandamus directing respondent University Lakes, LLC to provide Petitioner with responsive public records in its possession.

Specifically, University Lakes, LLC is a subsidiary of the LSU Foundation that was set up to be the “conduit” for more than \$77 million in public funds. Those funds are to be spent on a public project – the renovation of six publicly-owned lakes near LSU’s campus.

But when it received a public records request from Petitioner, University Lakes, LLC declined to turn over anything but one single document on the theory that it is not subject to public records requests. That is incorrect. Because University Lakes, LLC is an entity that is using public funds for a public purpose, Louisiana law requires it to comply with public records requests. Accordingly, mandamus should issue.

I. JURISDICTION, VENUE, AND PRESCRIPTION

1. Jurisdiction is proper in this Court pursuant to La. C.C.P. Art. 3862.
2. The Nineteenth Judicial District is the proper venue for this Court because:
 - a. Pursuant to La. Code Civ. Proc. arts. 73, 74, and 78, the acts and/or failure that harmed Plaintiff occurred in East Baton Rouge Parish; and
 - b. Pursuant to La. Code Civ. Proc. art. 42, at least one party is domiciled in East Baton Rouge Parish.

II. PARTIES

3. Petitioner Our Public Parks is a non-profit corporation organized under the laws of Louisiana, charter number 47105402N, domiciled in East Baton Rouge Parish.

4. Respondent University Lakes LLC is a limited liability company, charter number 43670135K, domiciled in East Baton Rouge Parish. It is located at Located at 3796 Nicholson Drive, Baton Rouge, LA 70802.

5. Respondent is not a non-profit corporation.

III. LEGAL BACKGROUND

A. Nature of Mandamus

6. Mandamus is “a writ directing a public officer, a corporation or an officer thereof, or a limited liability company” to perform certain duties.¹

7. A writ of mandamus is available “in all cases where the law provides no relief by ordinary means or where the delay involved in obtaining ordinary relief may cause injustice,” except in matters which would compel the expenditure of state funds.²

8. After receiving a petition for a writ of mandamus, the court will issue an alternative writ directing the defendant to perform the act or to show cause as to why the petition should fail.³

9. If the defendant opposes the writ, the court will set a hearing to consider the merits of each position, after which the court may render judgment.⁴

B. The constitutional and statutory right to public records extends to private entities like University Lakes, LLC that use public funds for public purposes.

10. The right to examine public documents is constitutionally protected under the “right to direct participation” of Article 12 section 3 of the Louisiana Constitution. Under that provision, “[n]o person shall be denied the right to observe the deliberation of public bodies and examine public documents, except in cases established by law.”

11. The Louisiana Supreme Court has repeatedly and emphatically adopted a broad reading of Article 12 section 3, holding that whenever “there is doubt as to whether the public has the right of access to certain records, the doubt must be resolved in favor of the public’s right to see. To allow otherwise would be an improper and arbitrary restriction on the public’s constitutional rights.”⁵

¹ La. C.C.P. art. 3861.

² La. C.C.P. art. 3862.

³ La. C.C.P. art. 3865.

⁴ La. C.C.P. art. 3866.

⁵ *In Re Matter Under Investigation*, 15 So.3d 972, 989 (La. 2009) (emphasis added) (internal citations omitted); see also *Capital City Press v. East Baton Rouge Parish Metropolitan Council*, 696 So.2d 562, 564 (La. 1997); *Title Research Corporation v. Rausch*, 450 So.2d 933, 936 (La. 1984).

12. Therefore, the “legislature, by the public records statutes, sought to guarantee, in the most expansive and unrestricted way possible, the right of the public to inspect and reproduce those records which the laws deem to be public.”⁶

13. Under the Public Records Law, the definition of public bodies subject to public records requests includes any “instrumentality of state, parish, or municipal government,” including some “public or quasi-public” corporations.⁷

14. For example, in *New Orleans Bulldog Soc’y v. Louisiana Soc’y for the Prevention of Cruelty to Animals*, 2016-1809 (La. 5/3/17), 222 So. 3d 679, the Louisiana Supreme Court found that the Louisiana Society for the Prevention of Cruelty to Animals – a private entity – had to comply with a public records request because of its “function of providing animal control services for the City of New Orleans.”

15. In that case, the Court looked to a cooperative endeavor agreement in which the LSPCA provided “animal control services for the City [] at the behest of the municipality and arising out of their outlined agreement to do so.”⁸ The Court also looked to the public money that flowed to the LSPCA to carry out its functions.⁹

16. Given those factors, the Court concluded that the LSPCA was an “instrumentality of the municipality through its execution of the CEA, and is therefore subject to the Public Records Law as it relates to its specific functions and duties under the CEA.”¹⁰

17. Specifically, the Court held that “the use of public money in this context triggers the Public Records Law.” *Id.* at 687. The Court explained that the “public has a fundamental right to know how that money is spent by the LSPCA through its animal control services outlined in the CEA. Any finding otherwise would be in contravention to the well-established principles of liberal construction of the Public Records Law.”¹¹

18. Similarly, in *State of Louisiana, et al. v. Nicholls College Foundation*, 564 So.2d 682 (La. 1990), the Louisiana Supreme Court found Nicholls College Foundation, a private corporation, was a “public body” subject to the Public Records Law.

⁶ *Landis v. Moreau*, 779 So.2d at 936 (quoting *Title Research Corp. v. Rausch*, 450 So.2d at 695).

⁷ *New Orleans Bulldog Soc’y v. Louisiana Soc’y for the Prevention of Cruelty to Animals*, 2016-1809 (La. 5/3/17), 222 So. 3d 679, quoting R.S. 44:1 et seq.

⁸ *Id.* at 685.

⁹ *Id.* at 686.

¹⁰ *Id.* at 685.

¹¹ *Id.*

19. The court concluded that because of the because of Nicholls College Foundation's "relationship with the University, and adhering to our settled notion that that the Public Records Law favors a liberal construction of the public records law so as to enlarge, rather than restrict, public access to public records, the Court determined the Federation is a 'quasi-public' nonprofit corporation 'designated as an entity to perform a governmental or proprietary function,' which therefore made it subject to the Public Records Law."¹²

20. Additionally, the First Circuit has broadly held that the "ultimate recipients of [public] funds, whether they be governmental, public or private bodies, are subject to the Public Records Law insofar as their financial records are concerned."¹³

21. This rule applies particularly to construction projects using public money. In *Lewis v. Spurney*, 456 So. 2d 206, 207 (La. Ct. App. 4th 1984), the Fourth Circuit held that the Louisiana World Exposition, Inc., a private corporation, was subject to public records requests because it was using public money for the for the purpose of constructing the Louisiana exhibit at the World's Fair. The court in *Lewis* concluded that the corporate nature of the defendants was "irrelevant" – the question was "simply whether [the] records are 'public records' or not."

22. Thus, in Opinion 15-0086, the Louisiana Attorney General summarized the law by opining that entities would be subject to public records requests "to the extent they take on the performance of a governmental function and use public funds and resources."

IV. FACTUAL BACKGROUND

A. University Lakes is using more than \$77 million in public money for the governmental function of renovating publicly-owned and operated property.

23. University Lakes, LLC was "established by the LSU Real Estate and Facilities Foundation, an affiliate of the LSU Foundation, to support efforts to restore the six lakes surrounding the LSU campus."¹⁴

24. The sole member of University Lakes, LLC is the LSU Real Estate and Facilities Foundation.¹⁵

¹² *New Orleans Bulldog Soc'y, supra*, at 686, *explicating State of Louisiana, et al. v. Nicholls College Foundation*, 564 So.2d 682 (La. 1990).

¹³ *Carter v. Fench*, 322 So. 2d 305, 307 (La. Ct. App. 1975)

¹⁴ <https://www.lsufoundation.org/who-we-are/our-team/reff/projects.php>

¹⁵ [https://app.la.state.la.us/PublicReports.nsf/0/7C68C51156DF3EE986258BBE00767F1C/\\$FILE/00006278.pdf](https://app.la.state.la.us/PublicReports.nsf/0/7C68C51156DF3EE986258BBE00767F1C/$FILE/00006278.pdf)

25. University Lakes, LLC is “responsible for issuing contracts and overseeing work to deepen the lakes, restore habitats, and build sidewalks and bike paths around the system.”¹⁶

26. All of the six lakes are public property. LSU owns University Lake and three of the smaller lakes near it, while the City-Parish owns City Park Lake and Lake Erie.”¹⁷

27. Notably, University Lakes, LLC describes itself “as a conduit for multiple sources of funding for project design/construction contracts.”¹⁸

28. The funds that University Lakes, LLC is the “conduit” for are almost entirely public funds.

29. Specifically, more than \$77 million of the total \$81 million for the lakes renovation project derive from state and local public entities, including state appropriation:

Funding Sources (July 2025)			
SOURCE	AMOUNT	RESTRICTIONS	STATUS
BREC	\$5M	Yes	Funded
EBR City-Parish	\$5.35M	Yes	Funded
LSU	\$66K	No	Funded
State (OCD)	\$10M CBDG-MIT	Yes	Funded
State (Capital Outlay)	\$50M + \$750K*	Yes	Funded
State (LADOTD)	\$5M	Yes	Funded
LSU Foundation	\$4M	Yes	Funded
TOTAL	\$81,100,000		

29

30. Like the respondent in *New Orleans Bulldog Soc’y*, University Lakes, LLC is spending this public money in substantial part pursuant to a series of cooperative endeavor agreements with governmental entities.

¹⁶ <https://www.csrinc.com/projects/university-lakes-project-advisory>

¹⁷ <https://www.225batonrouge.com/our-city/university-lakes-project-finally-underway-heres-residents-will-see-improvement> See also:

https://hdlégisuite.brla.gov/attachments/2020/Baton%20Rouge%20Lakes%20Ground%20Lease%20-%20Memo_ED733C23.pdf . BREC refers to the Recreation and Parks Commission for East Baton Rouge.

¹⁸ <https://www.legis.la.gov/legis/NGO/NgoDoc.aspx?NgoId=2371&search=ALL>

¹⁹ <https://www.universitylakesproject.org/funding>

31. These CEAs make explicit that University Lakes, LLC is using the money for public purposes.

32. For example, a 2020 CEA states that University Lakes, LLC, “has undertaken the University Lakes Project for the primary benefit of the public entities that are Parties to the Lakes MOU and that UL itself will receive only a nominal benefit from the Project and the Services.”

33. The CEA specifies that University Lakes, LLC is subject to auditing by the Legislative Auditor of the State of Louisiana and/or the Office of the Governor, Division of Administration.”

34. The CEA specifies that it is “contingent upon the appropriation of funds to fulfill the requirements of this Agreement by the Louisiana Legislature (the ‘Legislature’) or other governmental entities.”

35. And the Baton Rouge Lakes Master Plan is explicit that the purpose of the entire project is renovation of publicly-owned and publicly-operated land. It states that “lake system is owned and operated by three entities. City Park Lake and Lake Erie are owned by the City-Parish of East Baton Rouge.”²⁰

36. In sum, University Lakes, LLC is using tens of millions of dollars of public money for an unambiguously public function: the renovation and development of public property.

B. University Lakes refused to comply with a public records request submitted by Our Public Parks.

37. Our Public Parks is a non-profit corporation which is interested in the affairs of governance and the use of public money by “private entities.”

38. Its officers are neighbors to the lakes, and so are particularly concerned about the major development of that area.

39. On July 7, 2026, Our Public Parks submitted a public records request (attached here as Exhibit A) to University Lakes, LLC, requesting five categories of documents:

1. All contracts between University Lakes LLC and any contractor for construction or work to be performed at the LSU Lakes or lakes owned by others.
2. All bonds or sureties providing any public entity with indemnity for performance of the work and payment of claims provided in No. 1 above. This request should include all sureties as provided by La. Stat. Ann. § 38:2211 et seq.
3. All written procurement policies for construction work.

²⁰ https://drive.google.com/file/d/1gjfJF5Z13oQ8aJ-_LG9ubb3Qw9NgP0/view?usp=sharing at pg. 8.

4. All written procurement policies for selection of architects, engineers, landscape engineers and consultants of any type. This should include any written documents adopted to comply with La. Stat. Ann. § 38:2211.

5. All financial records showing contributions, donations or grants, from the State of Louisiana, The City of Baton Rouge, The Parish of East Baton Rouge or BREC.

40. Part of the purpose of these requests was to monitor the expenditure of public funds and to determine if the public has been adequately protected from contractor default.

41. To its credit, University Lakes, LLC responded quickly. But it contended that it was “not a public or quasi-public entity subject to Louisiana Public Records Law.”²¹

42. It did, however, provide a single document: a “ledger report showing all funds deposited.”²²

43. University Lakes, LLC provided that one document pursuant to R.S. 17:3390, a statute that provides some protection from public records requests for a “nonprofit corporation, whose principal purpose is to support one or more programs, facilities, or research or educational opportunities offered by public institutions of higher education.”

44. R.S. 17:3390 does not apply to University Lakes, LLC, however, because that entity is not a non-profit corporation.²³

45. When Our Public Parks pointed out that R.S. 17:3390 does not apply and made clear that it was making an amicable demand for public records, University Lakes, LLC responded: “Sue if you must, but assume you’re aware that funding sources/amounts, project partner/funding agreements, and contracts are all posted on universitylakesproject.org/details”

46. But the documents Petitioner is seeking are not all found on the universitylakesproject.org website.

47. For example, that website has no bond or surety information, or procurement policies.

48. Nor is it clear if it has all contractor agreements.

49. Accordingly, Petitioner now brings suit.

²¹ See Exhibit B.

²² *Id.*

²³ University Lakes, LLC is neither a non-profit nor a corporation. As noted on the Secretary of State’s website, it is not a non-profit entity. See Exhibit B. And the term “corporation” does not include a LLC. See R.S. 12:1301 (A)(10) (“No limited liability company organized under this Chapter shall be deemed, described as, or referred to as an incorporated entity, corporation, body corporate, body politic, joint stock company, or joint stock association.”)

50. Our Public Parks files these proceedings as a mandamus proceeding but reserves its right to seek other forms of relief as needed, as these proceedings progress. Our Public Parks seeks to avail itself of all relief provided for a requester of Public Records who has wrongfully been denied access to those records, as provided in La. Stat. Ann. § 44:35 et. seq. including but not limited to attorney fees, costs and damages.

51. Our Public Parks will be making additional public records request of University Lakes, LLC and reserves its right to amend this petition in the event other public records are illegally withheld.

VI. CONCLUSION

52. WHEREFORE, Our Public Parks prays that service of this petition, and the alternative writ, be made upon the defendant University Lakes, LLC. and that after summary proceedings be had that this Court:

- a. Order University Lakes, LLC to immediately turn over to it all of the requested documents;
- b. That this Court determines appropriate attorney fees, costs and damages as provided by La. Stat. Ann. § 44:35 and all penalties as provided by law; and
- c. Provide all general and equitable relief as appropriate.

53. Furthermore, La. Stat. Ann. § 44:35 provides that this matter "...shall be tried by preference and in a summary manner..."

54. Our Public Parks requests timely trial of this matter and requests the issuance of an alternative writ of mandamus in accordance with La. Code Civ. Proc. art. 3865 ("Upon the filing of a petition for a writ of mandamus, the court shall order the issuance of an alternative writ directing the defendant to perform the act demanded or to show cause to the contrary.")

Please Serve:

University Lakes, LLC
through its Registered Agent
Leu Anne Greco
3796 Nicholson Drive
Baton Rouge, LA 70802

Respectfully submitted,



William Most, La. Bar No. 36914
David Lanser, La. Bar No. 37764
Most & Associates
201 St. Charles Ave. Suite 2500, # 9685
New Orleans, LA 70170
williammost@gmail.com
(504) 509-5023

19th JUDICIAL COURT FOR THE PARISH OF EAST BATON ROUGE

NO. STATE OF LOUISIANA DIVISION " "
OUR PUBLIC PARKS
VERSUS
UNIVERSITY LAKES, L.L.C.

FILED: _____ DEPUTY CLERK

ALTERNATIVE WRIT OF MANDAMUS IN ACCORD
WITH LA. CODE CIV. PROC. ANN. ART. 3865

On reading and filing the verified petition of Our Public Parks, petitioner in the above-entitled action, and good cause appearing; now, therefore,

IT IS ORDERED that an alternative writ of mandamus issue out of, and under the seal of this court, directed to respondent, University Lakes, LLC. commanding respondent to provide to Our Public Parks the following public records:

1. All contracts between University Lakes LLC and any contractor for construction or work to be performed at the LSU Lakes or lakes owned by others.
2. All bonds or sureties providing any public entity with indemnity for performance of the work and payment of claims provided in No. 1 above. This request should include all sureties as provided by La. Stat. Ann. § 38:2211 et seq.
3. All written procurement policies for construction work.
4. All written procurement policies for selection of architects, engineers, landscape engineers and consultants of any type. This should include any written documents adopted to comply with La. Stat. Ann. § 38:2211.
5. All financial records showing contributions, donations or grants, from the State of Louisiana, The City of Baton Rouge, The Parish of East Baton Rouge or BREC.

or, in the alternative, to show cause before this court on the _____ day of _____ 2026 at _____ a.m/p.m. or as soon after that time as counsel can be heard, before this court or to why they have not done so.

Baton Rouge , Louisiana this _____ day of _____ 2026.

JUDGE

Please Serve:

University Lakes, LLC
through its Registered Agent:
Leu Anne Greco
3796 Nicholson Drive
Baton Rouge, LA 70802.

MOST & ASSOCIATES

201 St. Charles Ave.
Ste. 2500, # 9685
New Orleans, LA 70170

(504) 509-5023
mostlawoffice.com
williammost@gmail.com

University Lakes LLC
3796 Nicholson Drive
Baton Rouge, LA 70802
Via U.S. Mail and email to lgreco@lsufoundation.org

July 7, 2026

Re: Public Records Act Request

Dear Ms. Greco,

This letter is a Public Records request on behalf of Our Public Parks, Inc. to University Lakes LLC pursuant the Louisiana Public Records Law, La.R.S.44:1, *et seq.* I am requesting the following categories of documents from January 1, 2015 to the present:

1. All contracts between University Lakes LLC and any contractor for construction or work to be performed at the LSU Lakes or lakes owned by others.
2. All bonds or sureties providing any public entity with indemnity for performance of the work and payment of claims provided in No. 1 above. This request should include all sureties as provided by La. Stat. Ann. § 38:2211 *et seq.*
3. All written procurement policies for construction work.
4. All written procurement policies for selection of architects, engineers, landscape engineers and consultants of any type. This should include any written documents adopted to comply with La. Stat. Ann. § 38:2211.
5. All financial records showing contributions, donations or grants, from the State of Louisiana, The City of Baton Rouge, The Parish of East Baton Rouge or BREC.

Under the provisions of R.S. 44:32, if you raise a question as to whether the record requested is a public record, you are required to notify in writing the person making the request as to your determination and the reasons, including the legal basis, therefor. Said notice shall be made within five days of the receipt of the request, exclusive of weekends and public holidays. Under the provisions of R.S. 44:33, if the public record is not immediately available you are required to certify this in writing promptly, and in your certificate fix a day and hour within three days, exclusive of weekends and public holidays.

If all or part of the request is denied, please provide the name, address, and telephone number of the agency official responsible for the denial, and the official responsible for the appeals of denied requests. Also, if portions of the requested records are exempt from release, I request that all reasonably segregable, nonexempt portions of those records be released. In addition, if records are withheld, I request that you specifically identify those records by providing a list of records being withheld with an accompanying explanation of the exemptions

EXHIBIT A

being used to withhold the requested records. This list should include the title and brief description of each of the withheld records, any date or dates associated with each of the withheld records, and a list of attachments, appendices, amendments or other materials included with each of the withheld records.

If your search fails to identify the requested records, I ask that you (1) describe in detail the search procedure, including the information about the files that were searched, (2) identify the person or persons who conducted the search, and (3) explain why a more comprehensive search of your offices would be unreasonable.

Also, if any privilege or exemption is claimed, please provide a privilege log. As you may be aware, any assertion of privilege "must be made individually as to particular documents, and not *in globo* against the entirety of a mass of records." *Roper v. EBR Parish*, 634,960 (19th JDC, Feb. 4, 2016) at 11, *quoting Skamangas*, 876 So.2d 1017. Thus, "Courts have held that in order to meet this burden, the custodian must state what documents are being withheld, on a document by document basis, and give an explanation, on a document by document basis, as to why each document is not subject to production under the Public Records Law." *Roper*, at 11.

I am requesting electronic copies of any of the above-referenced documents. Upon identifying the records, please contact me at williammost@gmail.com or at (504)509-5023 to make plans to transmit the records. Thank you for your help and cooperation with this request.

Sincerely,



William Most

EXHIBIT A



William Most <williammost@gmail.com>

Public Records Request to University Lakes LLC

Leu Anne Greco <lgreco@lsufoundation.org>

Mon, Jul 13, 2026 at 9:05 AM

To: William Most <williammost@gmail.com>

Cc: Veronica Barnes <veronicasuzannebarnes@gmail.com>, David Lanser <lanser@mostandassociates.com>

Sue if you must, but assume you're aware that funding sources/amounts, project partner/funding agreements, and contracts are all posted on universitylakesproject.org/details

From: William Most <williammost@gmail.com>**Sent:** Monday, July 13, 2026 8:00 AM**To:** Leu Anne Greco <lgreco@lsufoundation.org>**Cc:** Veronica Barnes <veronicasuzannebarnes@gmail.com>; David Lanser <lanser@mostandassociates.com>**Subject:** Re: Public Records Request to University Lakes LLC

Notice: This email originated outside of the organization, please use caution when replying to unknown senders.

Leu Anne,

Please consider this an amicable demand for the documents. If University Lakes LLC will produce the requested documents without the need for litigation, please let me know!

Thank you!

William

On Thu, Jul 9, 2026 at 4:14 PM Leu Anne Greco <lgreco@lsufoundation.org> wrote:

LSU Real Estate and Facilities Foundation implements the project through University Lakes LLC, a special purpose disregarded entity of which it is the sole member.

Of course, if R.S. 17:3390 does not apply, you would not be entitled to any financial records, as the LLC is not a public or quasi-public nonprofit corporation under R.S.44:1.

From: William Most <williammost@gmail.com>**Sent:** Thursday, July 9, 2026 3:29 PM

EXHIBIT B

To: Leu Anne Greco <lgreco@lsufoundation.org>
Cc: Veronica Barnes <veronicasuzannebarnes@gmail.com>; David Lanser <dlanser@mostandassociates.com>
Subject: Re: Public Records Request to University Lakes LLC

You don't often get email from williammost@gmail.com. [Learn why this is important](#)

Notice: This email originated outside of the organization, please use caution when replying to unknown senders.

Leu Anne,

Thank you for the quick response! However, R.S. 17:3390 applies to "nonprofit corporations," and University Lakes LLC is not designated by the Secretary of State as a non-profit corporation. See below.

Can you clarify why R.S. 17:3390 would apply here?

William



Search Disclaimer Search Instructions

* Indicates a required field

Active records are shown in Bold.

Total Results: 4

Items	Type	City	Detail
UNIVERSITY LAKES LLC	United Liability Company	BATON ROUGE	Details
THE UNIVERSITY LAKES IMPROVEMENT AND PRESERVATION ASSOCIATION, INCORPORATED	Non-Profit Corporation	BATON ROUGE	Details
THE UNIVERSITY LAKES IMPROVEMENT AND PRESERVATION ASSOCIATION, INCORPORATED	Non-Profit Corporation	BATON ROUGE	Details
LAKE SHORE HMA UNIVERSITY SA, LTD.	Partnership	LAFAYETTE	Details

On Thu, Jul 9, 2026 at 3:08 PM Leu Anne Greco <lgreco@lsufoundation.org> wrote:

Mr. Most,

University Lakes LLC is not a public or quasi-public entity subject to Louisiana Public Records Law. However, pursuant to La. R.S. 17:3390, records directly relating to receipt of public funds are public records and those transactions within your request are attached. This is a ledger report showing all funds deposited, pulled from electronic bank statements; I can also send excerpted copies of those if you like but the ledger is easier to see.

Yours truly,

Leu Anne Greco

Vice President & General Counsel
LSU Foundation

3796 Nicholson Drive, Baton Rouge, LA 70802-8633

office [225-578-0525](tel:225-578-0525) | cell [225-921-3753](tel:225-921-3753)

lgreco@lsufoundation.org

From: William Most <williammost@gmail.com>

Sent: Tuesday, July 7, 2026 5:50 PM

To: Leu Anne Greco <lgreco@lsufoundation.org>

Cc: Veronica Barnes <veronicasuzannebarnes@gmail.com>; David Lanser <lanser@mostandassociates.com>

Subject: Public Records Request to University Lakes LLC

You don't often get email from williammost@gmail.com. [Learn why this is important](#)

Notice: This email originated outside of the organization, please use caution when replying to unknown senders.

Ms. Greco,

Please find attached a public records request to University Lakes LLC. If you have any questions, please feel free to reach out!

Thank you,

William Most

--

William Most

Most & Associates

mostandassociates.com

EXHIBIT B

19th JUDICIAL COURT FOR THE PARISH OF EAST BATON ROUGE

NO.

STATE OF LOUISIANA

DIVISION " "

OUR PUBLIC PARKS

VERSUS

UNIVERSITY LAKES, L.L.C.

FILED: _____

DEPUTY CLERK

VERIFICATION OF PETITION FOR MANDAMUS

STATE OF LOUISIANA

PARISH OF EAST BATON ROUGE

§
§
§

Before me, the undersigned Notary Public, personally came and appeared:

COLEMAN BROWN

who after identifying themselves to me and being duly sworn, did depose and say:

I am the President of Our Public Parks and also a director of the organization. On behalf of Our Public Parks, I have read the Petition for Mandamus, and the facts alleged therein are true and correct.



Coleman Brown
For Our Public Parks

SWORN TO AND SUBSCRIBED
BEFORE ME, this 12 day
of July, 2026.


NOTARY PUBLIC

H KIRKLEY
PRINT NAME

7410
NOTARIAL NO.

EXHIBIT C

19th JUDICIAL COURT FOR THE PARISH OF EAST BATON ROUGE

NO. STATE OF LOUISIANA DIVISION “ ”

OUR PUBLIC PARKS

VERSUS

UNIVERSITY LAKES, L.L.C.

PLAINTIFF’S REQUEST FOR NOTICE

NOW INTO COURT comes Plaintiff, Our Public Parks, pursuant to Louisiana Code of Civil Procedure article 1572, who moves this Court for written notice at least ten (10) days in advance of the date fixed for a trial or hearing of any exception, motion, rule, or trial on the merits in the above-captioned proceeding and, pursuant to Louisiana Code of Civil Procedure articles 1913 and 1914, requests immediate notice of all interlocutory and final orders and judgments on any exceptions, motions, rules, or the trial on the merits in the above-captioned proceeding.

Respectfully submitted,



William Most, 36914
David Lanser, 37764
MOST & ASSOCIATES
201 St. Charles Ave., Ste. 2500, #9685
New Orleans, LA 70170
Telephone: (504) 509-5023
Telephone: (504) 533-4521
Fax: (504) 414-6400
williammost@gmail.com
david.lanser@gmail.com

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