

**From:** Michael Adley <[michaeladley@gibsonlawpartners.com](mailto:michaeladley@gibsonlawpartners.com)>  
**Sent:** Thursday, September 16, 2021 11:55 AM  
**To:** [leedurio@duriolaw.com](mailto:leedurio@duriolaw.com)  
**Cc:** Susan Quebedeaux <[susanquebedeaux@gibsonlawpartners.com](mailto:susanquebedeaux@gibsonlawpartners.com)>; Nell Stephens <[NellStephens@gibsonlawpartners.com](mailto:NellStephens@gibsonlawpartners.com)>; Gregory Logan <[greg@loganfirm.com](mailto:greg@loganfirm.com)>  
**Subject:** RE: SMPG v. Billy Broussard

Great. Thanks, Lee. We will complete the form and hopefully get this resolved.

Michael O. Adley  
Gibson Law Partners, LLC  
2448 Johnston Street  
Lafayette, LA 70503  
PO Box 52124  
Lafayette, LA 70505  
Phone: 337-761-6033  
Fax: 337-761-6061  
E-mail: [MichaelAdley@GibsonLawPartners.com](mailto:MichaelAdley@GibsonLawPartners.com)  
Website: <http://www.gibsonlawpartners.com>

**Privileged & Confidential:** This email is intended for the named recipient(s) only and may contain information that is proprietary, privileged, confidential, or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy, or disseminate this message or any part of it. Nothing in this email is intended to constitute a waiver of any privilege or the confidentiality of this message. If you have received this email in error, please notify the sender immediately and delete this message.

**From:** [leedurio@duriolaw.com](mailto:leedurio@duriolaw.com) <[leedurio@duriolaw.com](mailto:leedurio@duriolaw.com)>  
**Sent:** Thursday, September 16, 2021 11:54 AM  
**To:** Michael Adley <[michaeladley@gibsonlawpartners.com](mailto:michaeladley@gibsonlawpartners.com)>  
**Subject:** RE: SMPG v. Billy Broussard

Yes, we agree.

**Lee C. Durio**  
Attorney at Law  
241 W. Mills Avenue  
Breux Bridge, Louisiana 70517  
Phone: 337-909-1111  
Fax: 337-909-1112  
Email: [leedurio@duriolaw.com](mailto:leedurio@duriolaw.com)

**From:** Michael Adley <[michaeladley@gibsonlawpartners.com](mailto:michaeladley@gibsonlawpartners.com)>  
**Sent:** Tuesday, September 14, 2021 2:29 PM  
**To:** [leedurio@duriolaw.com](mailto:leedurio@duriolaw.com)  
**Cc:** Susan Quebedeaux <[susanquebedeaux@gibsonlawpartners.com](mailto:susanquebedeaux@gibsonlawpartners.com)>; Nell Stephens <[NellStephens@gibsonlawpartners.com](mailto:NellStephens@gibsonlawpartners.com)>; Gregory Logan <[greg@loganfirm.com](mailto:greg@loganfirm.com)>  
**Subject:** SMPG v. Billy Broussard

Lee,

We just concluded our meeting with Calder Hebert. We were asked to complete and submit the attached Petition for Zoning Change.

Prior to completing and executing the Petition for Zoning Change, we would like an agreement of the following:

- Completing and filing the Petition for Zoning Change and participation in any public hearings and appeals regarding the same are solely in an attempt at compromise.
- Completing and filing the Petition for Zoning Change and participation in any public hearings and appeals regarding the same shall not be considered an admission of guilt, wrongdoing, or an admission of a violation of any purported zoning. Billy Broussard and his legal entities expressly deny that they are in violation of any zoning ordinance and deny that any change in zoning is necessary.
- The Petition for Zoning Change, the information contained within, and the information discussed at any public hearing or appeal is not admissible in this litigation or any litigation concerning Billy Broussard or any of his legal entities, provided that it will be admissible only in any appeals of the decision on the Petition for Zoning Change.
- The Petition for Zoning Change asks that we enter the current zoning of the property. We dispute that the property is zoned as R-2; however, it has been represented to us in your petition that the property is zoned R-2. Filing in this blank on the Petition for Zoning Change as R-2 shall not be an admission that the property is zoned R-2 and shall not be admissible in any litigation concerning Billy Broussard or any of his legal entities.
- The Petition for Zoning Change asks that we enter the requested zoning change. We dispute that any zoning change is needed for Billy Broussard or his legal entities to conduct their current activities on the property; however, SMPG has alleged Billy Broussard and his legal entities are in violation of the current zoning. Filing in this blank on the Petition for Zoning Change shall not be an admission that the property needs to be rezoned as requested in order for Billy Broussard or any of his legal entities to conduct their current activities on the property and shall not be admissible in any litigation concerning Billy Broussard or any of his legal entities.

Please let me know if you can agree to the above.

Thanks.

Michael Adley

Michael O. Adley  
Gibson Law Partners, LLC  
2448 Johnston Street  
Lafayette, LA 70503  
PO Box 52124  
Lafayette, LA 70505  
Phone: 337-761-6033  
Fax: 337-761-6061  
E-mail: [MichaelAdley@GibsonLawPartners.com](mailto:MichaelAdley@GibsonLawPartners.com)  
Website: <http://www.gibsonlawpartners.com>