

STATE OF NORTH CAROLINA	File No. 26M000599-640
County NEW HANOVER	(to be assigned by Clerk)

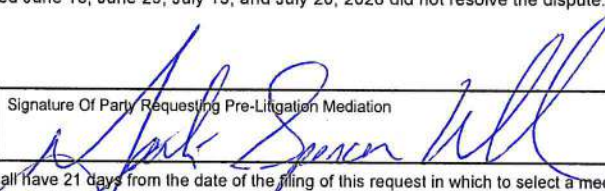
**REQUEST FOR PRE-LITIGATION
MEDIATION OF PUBLIC RECORDS DISPUTE**
G.S. 7A-38.3E

Name And Address Of Party Requesting Pre-Litigation Mediation Of Public Records Dispute MARK SPENCER WILLIAMS, as authorized representative of and on behalf of DeFlockILM.org 105 N. 6th Street Wilmington, North Carolina 28401	Telephone No. (910) 304-5360
Name Of Person, Entity Or Agency From Whom Records Are Sought NEW HANOVER COUNTY; and EDWARD J. McMAHON, in his official capacity as SHERIFF OF NEW HANOVER COUNTY	

REQUEST

The undersigned party requests, pursuant to G.S. 7A-38.3E, that the parties named below meet with the undersigned and a duly selected or appointed mediator, to conduct a pre-litigation mediation of their public records dispute as described below:

(Please briefly describe below the nature of the public records dispute.)

On April 28, 2026, Mark Spencer Williams, acting as an authorized representative of DeFlockILM.org, requested from the New Hanover County Sheriff's Office electronic copies of the County's Flock Safety Organization Audit, Network Audit, and Event Log — the County's own record of searches run against its automatic license plate reader (ALPR) system — including the Organization Name field. On June 11, 2026, the County produced 2,980,082 records but redacted the Organization Name field — the identity of the agency that ran each search — in every row. That one field is the sole matter in dispute. The requester seeks electronic production of the previously produced records with the Organization Name field unredacted, and does not seek individual officer names, user names, anonymous entry codes, or captured plate data. The County has not identified a statute or other legal authority that it contends authorizes withholding of the Organization Name field. Five North Carolina law enforcement agencies using the same vendor have produced the identical field to the requester in response to materially identical requests — the Carolina Beach Police Department (CBPD), the North Carolina A&T State University Police Department (NC A&T PD), the University of North Carolina at Pembroke Police Department (UNCPD), the Kure Beach Police Department (KBPD), and the University of North Carolina at Charlotte Police Department (UNCC PD) — each naming the searching agencies while withholding individual-user information. The Buncombe County Sheriff's Office has produced the same field to other requesters, and representative productions can be provided in mediation. The parties' correspondence dated June 18, June 29, July 13, and July 20, 2026 did not resolve the dispute.	
Date Of Request For Mediation August 3, 2026	Signature Of Party Requesting Pre-Litigation Mediation  NC BAR #34292

In accordance with G.S. 7A-38.3E, the parties shall have 21 days from the date of the filing of this request in which to select a mediator. The mediator may be a certified mediator selected from the list maintained by the Dispute Resolution Commission and available through the Clerk. If the parties cannot agree on a mediator, the party filing this request shall make that fact known to the clerk. In the absence of a designation of a mediator within the time prescribed, a mediator shall be appointed by the senior resident superior court judge.

A mediator selected by the parties shall be compensated at a rate agreed on between the parties and the mediator. Unless otherwise agreed to by the parties, all mediator fees shall be paid directly to the mediator at the conclusion of the mediation.

It shall be the responsibility of the mediator to schedule the mediation; to notify the parties of the date, time and location of the mediation; to conduct the mediation; and to prepare a certificate stating the results of the mediation which the mediator shall file with the clerk and serve on the parties.

Pursuant to G.S. 7A-38.3E, the parties may agree to waive pre-litigation mediation of their dispute by informing the mediator in writing of the waiver. No mediator fee shall be assessed against any party if all parties waive mediation prior to the initial mediation meeting.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of this Request has been mailed by certified mail, return receipt requested, to each of the parties named below.

Name And Address Of Party To The Dispute New Hanover County c/o Karen Richards, Deputy County Attorney 230 Government Center Drive Wilmington, NC 28403	Name And Address Of Party To The Dispute Edward J. McMahon, in his official capacity as Sheriff of New Hanover County P.O. Box 15500 Wilmington, NC 28408
Name And Address Of Party To The Dispute	Name And Address Of Party To The Dispute
Date Mailed August 3, 2026	Signature Of Party Requesting Pre-Litigation Mediation  NC BAR #34292