

From: [Abrams, Jill](#)
To: [Hardimon Butler, Kayla](#)
Subject: RE: Public Records Request
Date: Friday, December 23, 2022 11:45:00 AM

Hi Kayla,

Nice to “meet” you by phone yesterday. Set forth below is what I believe to be our agreement regarding your public records request after discussing the challenges presented by the request (including that it seeks documents beyond those possessed by the Attorney General’s Office (“AGO”) because some of the requests are not specific enough for us to be able to do reasonable searches, and because they are unlimited in time).

Request No. 1-The AGO will search for agreements or contracts for its retention of the listed firms.

Request No. 2- The AGO will search for non-privileged records that reflect payments or disbursements made by the Vermont Attorney General’s Office to the listed firms.

Request No. 3- The AGO will search for documents that reflect the appointment by the AGO of any attorney in the listed firms as a Special Assistant Attorney General.

Request No. 4- The AGO will search for agreement or contracts for the retention of counsel regarding opioids or insulin. As I mentioned, “insulin” may be too broad for a search because of the number of subjects it covers, but we will try, and to the extent that we are able to include “pharmaceutical pricing” in the search, we will do so.

Request No. 5-- The AGO will search for records that reflect payments or disbursements made by the Vermont Attorney General’s Office to a law firm that has been retained regarding opioids, insulin or pharmaceutical pricing, with the same caveat as in Request No. 4.

Request No. 6-The AGO will search for records that relate to the appointment of a lawyer or law firm other than those listed in Request No. 1 regarding opioids, insulin, or pharmaceutical pricing, with the same caveat as in Nos. 4 and 5.

Only Request No. 2 specifically seeks “non-privileged” records. Am I correct that applies with respect to the other requests as well, given that we are unable to produce privileged records?

Our office has closed today because we lost power and Dec. 26, 2022 is a holiday. Let’s find a time next week to further discuss Request No. 7 and the issue presented by the unlimited time frame in your requests.

Jill

From: Hardimon Butler, Kayla <Kayla.Butler@alston.com>
Sent: Wednesday, December 21, 2022 4:19 PM
To: Abrams, Jill <jill.abrams@vermont.gov>
Subject: RE: Public Records Request

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Thank you. Please use the number 317-698-8813.

Kayla Hardimon Butler
+1 404 881 7971 (O)
Kayla.Butler@alston.com

From: Abrams, Jill <jill.abrams@vermont.gov>
Sent: Wednesday, December 21, 2022 3:18 PM

To: Hardimon Butler, Kayla <Kayla.Butler@alston.com>

Subject: RE: Public Records Request

EXTERNAL SENDER – Proceed with caution

Hi,

I'll phone you at 2pm tomorrow at the number on your email unless there's a different number you prefer. I'll be calling from a 917 exchange so please don't think I'm spam!

Jill

From: Hardimon Butler, Kayla <Kayla.Butler@alston.com>

Sent: Wednesday, December 21, 2022 1:22 PM

To: Abrams, Jill <jill.abrams@vermont.gov>

Subject: RE: Public Records Request

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Good afternoon:

I will likely need to take your questions under consideration and then get back to you, which is why I hoped to receive a note regarding the questions in advance. If you'd like to ask your questions over the phone, I am available tomorrow afternoon after 1:00 PM.

Best,

Kayla

Kayla Hardimon Butler

Associate

ALSTON & BIRD

1201 West Peachtree Street

Atlanta, GA 30309

+1 404 881 7971 (O)

Kayla.Butler@alston.com

From: Abrams, Jill <jill.abrams@vermont.gov>

Sent: Wednesday, December 21, 2022 11:00 AM

To: Hardimon Butler, Kayla <Kayla.Butler@alston.com>

Subject: RE: Public Records Request

EXTERNAL SENDER – Proceed with caution

Dear Ms. Butler,

As I mentioned below and in my previous communication, I would like to talk with you to discuss your public records request for several reasons including that you seek categories of records that the Attorney General does not possess, that the requests are unlimited in time, and that you request categories of documents that are insufficiently specific for us to be able to do a diligent search. I am out of the office this week but am willing to talk with you if you provide times that you are available. I am available until 11:30am or after 4pm today if you would like to talk today.

Jill

From: Abrams, Jill
Sent: Wednesday, December 21, 2022 10:33 AM
To: Hardimon Butler, Kayla <Kayla.Butler@alston.com>
Subject: RE: Public Records Request

It would be much more efficient to have a discussion. Is there a time you are available today?

From: Hardimon Butler, Kayla <Kayla.Butler@alston.com>
Sent: Tuesday, December 20, 2022 3:50 PM
To: Abrams, Jill <jill.abrams@vermont.gov>
Subject: RE: Public Records Request

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Good afternoon,

Could you please let me know of any specific questions you have regarding the request?

Best,
Kayla

Kayla Hardimon Butler
+1 404 881 7971 (O)
Kayla.Butler@alston.com

From: Abrams, Jill <jill.abrams@vermont.gov>
Sent: Monday, December 19, 2022 12:49 PM
To: Hardimon Butler, Kayla <Kayla.Butler@alston.com>
Subject: Public Records Request

EXTERNAL SENDER – Proceed with caution

Hi,
We've received your request and have some questions. Is there a good time today between 2:30 and 3pm or after 3:30 pm when we can talk?
Thanks.

Jill S. Abrams
Director, Consumer Protection and Antitrust Unit
Office of the Vermont Attorney General
109 State Street
Montpelier, Vermont
(802) 828-1106

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