

From: Layman, James <James.Layman@vermont.gov>
Sent: Wednesday, May 10, 2023 12:56:57 PM
To: anne.galloway.vermont@gmail.com <anne.galloway.vermont@gmail.com>
Cc: Groff, David <david.groff@vermont.gov>
Subject: Fw: Response to VTDigger 4/26/23 Public Records Request re Jay Peak related projects

I understand from your auto-reply that I should have used this address. Please see below!
Thanks.

From: Layman, James
Sent: Wednesday, May 10, 2023 12:49 PM
To: Galloway, Anne <agalloway@vtdigger.org>
Cc: Groff, David <david.groff@vermont.gov>
Subject: Response to VTDigger 4/26/23 Public Records Request re Jay Peak related projects

Anne, please see the attached letter, which I am passing along at the request of AAG Dave Groff.

Please find below links to download the two productions referenced in the letter.

Part 1: <https://app.everlaw.com/1169/dl/8ipvSOt14Y3y27mQt861qFcaKPXVppPos8rKfdROveFq>
Part 2: https://app.everlaw.com/1169/dl/5biL0JO-HDZWkNN3Lm9pb1ySep86YJFWf_qLs8ioDBr1

Please let me know if you have any difficulty accessing these productions.

Best,

James

James Layman
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STATE OF VERMONT
OFFICE OF THE ATTORNEY GENERAL

109 STATE STREET

MONTPELIER, VT
05609-1001

May 10, 2023

Via Email
Anne Galloway
VTDigger.org

Re: 4/26/23 Public Records Request re Jay Peak related projects

Dear Ms. Galloway,

We are in receipt of your public records request dated April 26, 2023 regarding documents related to the Jay Peak projects and your prior request of March 28, 2022.

In your current request you have sought:

“any such documents originally withheld [from our production in response to your two requests dated March 28, 2022] under the litigation exemption that have now been produced in *Sutton*.”

In response to this request, please find a link to a production of 24,701 pages of materials responsive to your requests, which have been produced to the Plaintiffs in the *Sutton* matter since our last production to you.

Your request also seeks:

“any and all other documents, including those that I did not seek in my prior requests, that have been released in *Sutton*.”

In response to this request, please find a link to a production of 39,988 pages of materials responsive to this request, i.e., documents that were not responsive to your March 28, 2022 request, but which have been produced to the Plaintiffs in *Sutton* that have not otherwise been made available to you previously. These documents contain some redactions to protect individuals' personally identifiable information.

The email transmitting this letter contains links by which you can access our productions. The links will take you to a page where you can download the documents by clicking the download button. It is two productions, a 4 GB production, Bates labeled DIGGERPRA-039915-064615, and a 5 GB production, Bates labeled DIGGERPRA-064616 - 104603. Please let us know if you have difficulty accessing the files.

At your request, the Attorney General's Office has agreed to waive the fees applicable to this production insofar as it is an extension of the March 2022 request.

An appeal of this decision can be made to Ben Battles, Chief of the General Counseling and Administrative Law Division of the Attorney General's Office, at Benjamin.Battles@vermont.gov .

Sincerely,

/s/ David R. Groff

David R. Groff
Assistant Attorney General