

From: [Murphy, Laura](#)
To: [Alex Nelson](#)
Cc: [Mishaan, Jessica](#); [Devin Mcknight](#); [Hannah C. Waite](#); [Vermont_SHB](#); [Zachary M. York](#); [Ian Carleton](#)
Subject: RE: Public Records Act Request -- AGO
Date: Wednesday, October 18, 2023 8:25:50 AM

Dear Alex,

We plan to produce a chart that contains subject matter; sender, recipient, and/or custodian; attachment; and privilege basis information about multiple specific categories of documents. As mentioned, we also expect to be able to produce additional documents. We hope to send these to you soon.

Laura

From: Alex Nelson <Anelson@sheeheyvt.com>
Sent: Friday, October 13, 2023 12:29 PM
To: Murphy, Laura <Laura.Murphy@vermont.gov>
Cc: Mishaan, Jessica <Jessica.Mishaan@vermont.gov>; Devin Mcknight <DMcKnight@sheeheyvt.com>; Hannah C. Waite <HWaite@sheeheyvt.com>; Vermont_SHB <Vermont_SHB@shb.com>; Zachary M. York <zyork@sheeheyvt.com>; Ian Carleton <icarleton@sheeheyvt.com>
Subject: RE: Public Records Act Request -- AGO

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

Hi Laura,

Thank you for getting back to me. A description of the documents, alone, is unlikely to help us evaluate whether privilege was properly asserted. This is why a privilege logs contain a description of the communication, the date of the communication, subject line of the email communication (if applicable), the parties to the communication, and the basis for privilege. If cost/time are the issue, we are willing to pay for the additional staff time to create the log to the extent those costs are recoverable under the Public Records Act.

Please let me know if the AG will agree to this approach.

Thanks,

Alex

From: Murphy, Laura <Laura.Murphy@vermont.gov>
Sent: Friday, October 13, 2023 11:02 AM
To: Alex Nelson <Anelson@sheeheyvt.com>
Cc: Mishaan, Jessica <Jessica.Mishaan@vermont.gov>; Devin McKnight

<DMcKnight@sheeheyvt.com>; Hannah C. Waite <HWaite@sheeheyvt.com>; Vermont_SHB <Vermont_SHB@shb.com>; Zachary M. York <zyork@sheeheyvt.com>

Subject: RE: Public Records Act Request -- AGO

Dear Alex,

We will not be producing a privilege log per se, but we can provide additional description of the withheld documents. In reviewing documents to prepare the description, we've determined we may be able to produce some of the documents, which may include redactions. There would be an additional cost for any redactions, but not for the additional description of the withheld documents. My goal is to get this to you within the next month and certainly sooner if possible.

Laura

From: Alex Nelson <Anelson@sheeheyvt.com>

Sent: Thursday, October 12, 2023 9:25 AM

To: Murphy, Laura <Laura.Murphy@vermont.gov>

Cc: Mishaan, Jessica <Jessica.Mishaan@vermont.gov>; Devin Mcknight <DMcKnight@sheeheyvt.com>; Hannah C. Waite <HWaite@sheeheyvt.com>; Vermont_SHB <Vermont_SHB@shb.com>; Zachary M. York <zyork@sheeheyvt.com>

Subject: RE: Public Records Act Request -- AGO

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Hi Laura,

Following up on this. Is the AG's office willing to produce a privilege log?

Thanks,

Alex

From: Murphy, Laura <Laura.Murphy@vermont.gov>

Sent: Monday, September 25, 2023 7:41 AM

To: Alex Nelson <Anelson@sheeheyvt.com>

Cc: Mishaan, Jessica <Jessica.Mishaan@vermont.gov>; Devin McKnight <DMcKnight@sheeheyvt.com>; Hannah C. Waite <HWaite@sheeheyvt.com>; Vermont_SHB <Vermont_SHB@shb.com>; Zachary M. York <zyork@sheeheyvt.com>

Subject: RE: Public Records Act Request -- AGO

Good morning Alex,

Wanted to let you know that I received your message and will get back to you as soon as I can.

Regards,
Laura

From: Alex Nelson <Anelson@sheeheyvt.com>
Sent: Thursday, September 21, 2023 3:07 PM
To: Murphy, Laura <Laura.Murphy@vermont.gov>
Cc: Mishaan, Jessica <Jessica.Mishaan@vermont.gov>; Devin Mcknight <DMcKnight@sheeheyvt.com>; Hannah C. Waite <HWaite@sheeheyvt.com>; Vermont_SHB <Vermont_SHB@shb.com>; Zachary M. York <zyork@sheeheyvt.com>
Subject: RE: Public Records Act Request -- AGO

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Hi Laura,

Thank you. It is difficult to evaluate the AG's privilege contentions without a privilege log. Will the AG provide us a privilege log so we can evaluate whether an appeal is necessary? We of course understand that the creation of privilege log could implicate additional costs that we may be responsible for.

Best,

Alex

From: Murphy, Laura <Laura.Murphy@vermont.gov>
Sent: Thursday, September 21, 2023 2:51 PM
To: Alex Nelson <Anelson@sheeheyvt.com>
Cc: Mishaan, Jessica <Jessica.Mishaan@vermont.gov>; Devin McKnight <DMcKnight@sheeheyvt.com>; Hannah C. Waite <HWaite@sheeheyvt.com>; Vermont_SHB <Vermont_SHB@shb.com>; Zachary M. York <zyork@sheeheyvt.com>
Subject: RE: Public Records Act Request -- AGO

Thank you. The documents are attached.
Laura

From: Alex Nelson <Anelson@sheeheyvt.com>
Sent: Thursday, September 21, 2023 10:04 AM
To: Murphy, Laura <Laura.Murphy@vermont.gov>
Cc: Mishaan, Jessica <Jessica.Mishaan@vermont.gov>; Devin Mcknight <DMcKnight@sheeheyvt.com>; Hannah C. Waite <HWaite@sheeheyvt.com>; Vermont_SHB <Vermont_SHB@shb.com>; Zachary M. York <zyork@sheeheyvt.com>
Subject: RE: Public Records Act Request -- AGO

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sender.

Hi Laura,

Thank you for your help on this. We just submitted payment for \$393.30. Please let me know what the next steps are to receive the documents. Also, please give my paralegal Zach access to the production. His email address is: zyork@sheeheyvt.com.

Best,

Alex

From: Murphy, Laura <Laura.Murphy@vermont.gov>
Sent: Friday, September 15, 2023 5:15 PM
To: Alex Nelson <Anelson@sheeheyvt.com>
Cc: Mishaan, Jessica <Jessica.Mishaan@vermont.gov>; Devin McKnight <DMcKnight@sheeheyvt.com>; Hannah C. Waite <HWaite@sheeheyvt.com>; Vermont_SHB <Vermont_SHB@shb.com>
Subject: RE: Public Records Act Request -- AGO

Dear Alex,

Please see the attached response to your request.

Regards,
Laura

From: Murphy, Laura
Sent: Friday, September 8, 2023 10:50 AM
To: Alex Nelson <Anelson@sheeheyvt.com>
Cc: Mishaan, Jessica <Jessica.Mishaan@vermont.gov>; Devin Mcknight <DMcKnight@sheeheyvt.com>; Hannah C. Waite <HWaite@sheeheyvt.com>; Vermont_SHB <Vermont_SHB@shb.com>
Subject: RE: Public Records Act Request -- AGO

Thank you.
Laura

From: Alex Nelson <Anelson@sheeheyvt.com>
Sent: Friday, September 8, 2023 10:22 AM
To: Murphy, Laura <Laura.Murphy@vermont.gov>
Cc: Mishaan, Jessica <Jessica.Mishaan@vermont.gov>; Devin Mcknight <DMcKnight@sheeheyvt.com>; Hannah C. Waite <HWaite@sheeheyvt.com>; Vermont_SHB <Vermont_SHB@shb.com>
Subject: RE: Public Records Act Request -- AGO

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Hi Laura,

No problem. We'll look forward to hearing from you on 9/15.

Thanks ,

Alex

From: Murphy, Laura <Laura.Murphy@vermont.gov>
Sent: Friday, September 8, 2023 10:12 AM
To: Alex Nelson <Anelson@sheeheyvt.com>
Cc: Mishaan, Jessica <Jessica.Mishaan@vermont.gov>; Devin McKnight <DMcKnight@sheeheyvt.com>; Hannah C. Waite <HWaite@sheeheyvt.com>
Subject: RE: Public Records Act Request -- AGO

Dear Alex,

Is Pharmacia amenable to an extension until September 15? It's taking longer than expected to review documents.

Thank you –
Laura

From: Alex Nelson <Anelson@sheeheyvt.com>
Sent: Tuesday, August 29, 2023 10:35 AM
To: Murphy, Laura <Laura.Murphy@vermont.gov>
Cc: Mishaan, Jessica <Jessica.Mishaan@vermont.gov>; Devin Mcknight <DMcKnight@sheeheyvt.com>; Hannah C. Waite <HWaite@sheeheyvt.com>
Subject: RE: Public Records Act Request -- AGO

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Hi Laura,

Thanks for the update. Looking forward to hearing from you.

Best,

Alex

From: Murphy, Laura <Laura.Murphy@vermont.gov>

Sent: Monday, August 28, 2023 4:51 PM
To: Alex Nelson <Anelson@sheeheyvt.com>
Cc: Mishaan, Jessica <Jessica.Mishaan@vermont.gov>
Subject: Public Records Act Request -- AGO

Dear Alexandra:

I write in response to your public records act request dated August 25, 2023. Pursuant to 1 V.S.A. § 318(b)(5), the Attorney General's Office will need to invoke its right to the 10-day extension to respond to your request. The extension is necessary for the proper processing of the request because there is a need to search for, collect, and appropriately examine a large number of records, and I need to work with individuals from two or more parts of the Office to respond to the request. With the 10-day extension, I anticipate being able to provide a response to your request on September 11.

Regards,
Laura

Laura B. Murphy

Assistant Attorney General
Director, Environmental Protection Unit
Vermont Attorney General's Office
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WARNING: EXTERNAL E-MAIL.