

From: [Laura Lowe](#)
To: [AGO - Public Records Requests; Alyssa Brown](#)
Subject: Public Records Law Request - loanDepot, Inc.
Date: Thursday, May 16, 2024 3:01:38 PM
Attachments: [image001.png](#)
[VT FOIA Request.pdf](#)

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To Whom it May Concern,

Attached please find a request for records under the Vermont Public Records Law (§315 *et seq.*). In the event there is a cost associated with the copying or release of these records, you may respond directly to this email for payment information and/or authorization. Feel free to reach out with any questions or concerns.

Best regards,

Laura Lowe
Paralegal



2600 W. Olive Avenue | Suite 500
Burbank, California 91505-4521
Tel [\(310\) 474-9111](tel:(310)474-9111)
Fax [\(310\) 474-8585](tel:(310)474-8585)
llowe@ahdootwolfson.com



May 16, 2024

VIA CERTIFIED U.S. MAIL AND EMAIL

Vermont Attorney General's Office
Public Records Act Request
109 State Street
Montpelier, VT 05609-1001
ago.publicrecordsrequests@vermont.gov

**Re: Public Records Law Request
loanDepot, Inc.**

Dear Sir or Madam:

Pursuant to the Vermont Public Records Law (§315 *et seq.*), this letter serves as a request for all documents relating to any investigation, review, or correspondence regarding the data breach that was announced by loanDepot, Inc. on or about January 4, 2024 (the “Data Breach”). Please send a copy of all such documents regarding the Data Breach, including all documents and communications related to the Data Breach, including, but not limited to, any documents or communications with or pertaining to loanDepot and/or its subsidiaries or parent entities by or with the Office of the Vermont Attorney General. This includes, without limitation, 1) all written correspondence with loanDepot concerning the Data Breach; 2) all documents relating to loanDepot’s protection, the unauthorized access of, or disclosure of personally identifiable information during or related to the Data Breach, 3) all documents concerning loanDepot’s post-Data Breach remedial efforts, including documents and communications with the Office of the Vermont Attorney General regarding notice of the Data Breach, 4) any other documents and communications in your possession relating to the Data Breach, and 5) any documents or information pertaining to any investigation of loanDepot, Inc. and/or its subsidiaries or parent entities since January 1, 2020 to present related to the Data Breach. Please also provide all documents relating to any other separate data breaches or data security incidents involving loanDepot since January 1, 2020.

Please send all documents responsive to this request to the following address:

Ahdoot & Wolfson, PC
ATTN: Tina Wolfson
2600 W. Olive Avenue, Suite 500
Burbank, California 91505

I am a partner at Ahdoot & Wolfson, PC, a law firm that represents Plaintiff(s) in the consolidated putative Class Action entitled *In re loanDepot Data Breach Litigation*, Case No. 8:24-cv-00136, in the United States District Court, Central District of California. This request is made as part of our investigation concerning the facts of the case and is not intended for a commercial use. Ahdoot & Wolfson, PC is willing to pay fees for this request up to a maximum of \$500. If you estimate that the fees will exceed this limit, please contact me at (310) 474-9111.

Thank you for your consideration.

Sincerely,



Tina Wolfson