

From: [Badley, Alicia](#)
To: [AGO - Public Records Requests](#)
Cc: [Hoernlein, Michael](#)
Subject: FOIA Request to the Office of the Vermont Attorney General
Date: Tuesday, December 24, 2024 1:31:46 PM
Attachments: [2024.12.24 Vermont FOIA Request.pdf](#)

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Good afternoon:

Please find attached a public records request from Alicia Badley on behalf of Michael Hoernlein, who is copied.
Please contact us with any questions.

Thanks,
Alicia

Alicia A. Badley
Senior Associate
ALSTON & BIRD
950 F Street, NW
Washington, DC 20004
+1 202 239 3636 (O)
+1 949 636 1069 (C)
Alicia.Badley@alston.com

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ALSTON & BIRD

Vantage South End
1120 South Tryon Street, Suite 300
Charlotte, NC 28203-6818
704-444-1000 | Fax: 704-444-1111

Michael R. Hoernlein

Direct Dial: +1 704-444-1041

Email: michael.hoernlein@alston.com

FREEDOM OF INFORMATION ACT REQUEST TO THE OFFICE OF THE VERMONT ATTORNEY GENERAL

Request Submitted to: Vermont Attorney General's Office
109 State Street
Montpelier, VT 05609
Phone: (802) 828-3171
Email: ago.publicrecordsrequests@vermont.gov

Date Requested: 12/24/2024

Request Submitted by: E-mail

Requester Information: Michael R. Hoernlein
Vantage South End
1120 South Tryon Street, Suite 300
Charlotte, NC 28203-6818
Office Phone: +1 704-444-1041
michael.hoernlein@alston.com

To Whom It May Concern:

In accordance with the provisions of Chapter 1 of the Vermont Statutes Annotated § 315 et seq., I request the following documents that are in the possession, custody, or control of the Office of the Vermont Attorney General:

1. All agreements or contracts concerning the State of Vermont's retention, engagement, or appointment of any outside lawyer or law firm in connection with any investigation or litigation related to pharmacy benefit management, pharmacy care services, pharmaceuticals (including but not limited to opioids), health care, or Medicare, including but not limited to any engagement letters, appointment letters, retention agreements, or contingency-fee agreements;
2. Records sufficient to show all payments or disbursements made by the State of Vermont or the Office of the Vermont Attorney General to any outside lawyer or law firm in connection with any investigation or litigation related to pharmacy benefit management, pharmacy care services, pharmaceuticals (including but not limited to opioids), health care, or Medicare;

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3. All documents and information regarding OptumRx, Inc. that (a) the State of Vermont has gathered or created in connection with any pre-litigation investigation into OptumRx, Inc. and (b) any outside lawyer or law firm has had access to by virtue of its representation of or other service to the State of Vermont.
4. All communications regarding OptumRx, Inc. that the State of Vermont has exchanged with any outside lawyer or law firm.
5. If not encompassed by the requests above, all documents related to the appointment of any outside lawyer or law firm in connection with any investigation or litigation related to pharmacy benefit management, pharmacy care services, pharmaceuticals (including but not limited to opioids), health care, or Medicare; and
6. If not encompassed by the requests above, records sufficient to show any restrictions or limitations on the Office of the Vermont Attorney General's or any outside lawyer's or law firm's use of any documents or information produced or collected in connection with any investigation or litigation related to pharmacy benefit management, pharmacy care services, pharmaceuticals (including but not limited to opioids), health care, or Medicare.

Please send electronic copies of the requested documents to michael.hoernlein@alston.com in PDF format.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Michael R. Hoernlein". The signature is written in a cursive style with a large, looped initial "M".

Michael R. Hoernlein