

From: [Ferrari, Gabriela](#)
To: michael.hoernlein@alston.com
Subject: Your December 24, 2024, Public Records Request - Vermont Attorney General's Office
Date: Friday, December 27, 2024 9:41:50 AM
Attachments: [2024-12-27 PRR Response to Alston.pdf](#)
[image001.png](#)

Good morning,

I'm writing on behalf of Assistant Attorney General Jill Abrams. Please review the attached response regarding your public records request.

Best,

Gabriela Ferrari

Paralegal

Office of the Attorney General

109 State Street

Montpelier, Vermont 05609

gabriela.ferrari@vermont.gov

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STATE OF VERMONT
OFFICE OF THE ATTORNEY GENERAL
109 STATE STREET
MONTPELIER, VT
05609-1001

December 27, 2024

Via E-Mail Only: michael.hoernlein@alston.com

Michael R. Hoernlein
Alston & Bird
Vantage South End
1120 South Tryon Street, Suite 300
Charlotte, NC 28203-6818

Re: Your December 24, 2024, Public Records Request

Dear Mr. Hoernlein,

On behalf of the Vermont Attorney General's Office (AGO) Consumer Protection Unit (CPU), we are writing in response to the public request you submitted through the AGO's website on December 24, 2024. You requested:

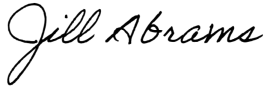
1. All agreements or contracts concerning the State of Vermont's retention, engagement, or appointment of any outside lawyer or law firm in connection with any investigation or litigation related to pharmacy benefit management, pharmacy care services, pharmaceuticals (including but not limited to opioids), 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;
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.

Your request is governed by Vermont's Public Records Act (PRA), 1 V.S.A. §§ 315-320.

The AGO requires an extension of time, not to exceed 10 business days from the time you submitted your request so that we may have sufficient time to review our files, talk with you about your requests, and to identify and make available any responsive records. Accordingly, we will respond to your request by January 10, 2025.

I will follow up with you next week to arrange a time to discuss your requests.

Sincerely,

A handwritten signature in cursive script that reads "Jill Abrams".

Jill S. Abrams
Assistant Attorney General