

VAN DORN, CURTISS, ROUSSEAU & ROSS PLLC

(A Professional Limited Liability Company)

Attorneys at Law

P.O. Box 263, Main Street, Route 10
Orford, New Hampshire 03777-0263

Admitted in NH & VT

*Robin C. Curtiss
Cristina Rousseau
Kristin Ross*

*Phone (603) 353-4000
Fax (603) 353-4567*

*Edward M. Van Dorn, Jr.
(RETIRED)*

June 10, 2019

Via Email: ago.info@vermont.gov

Vermont Attorney General's Office
109 State Street
Montpelier, VT 05609

*Re: State v. Jody Herring
Docket No.: 980-8-15 Wncr*

To Whom It May Concern:

Please be advised that this request was previously faxed to your office on May 13, 2019. When my office called on Friday to check the status, we were informed that your office never received it. It would be appreciated if you could expedite this request at your earliest opportunity.

As you know, my office represents the Estate of Regina Herring and the Estate of Julie Falzarano as a result of an incident which occurred on August 7, 2015 and which involved Jody Herring. I understand that the criminal matter against Ms. Herring has concluded.

Pursuant to the Vermont Public Records Law, §315 et seq., please provide my office with a *complete* copy of the criminal investigation and prosecution of Ms. Herring. Please include all investigation reports, incident reports, reconstructions, diagrams, measurements, and any other analysis, in whatever form, by the state and local police departments. Please also include all photographs, witness statements (video, audio, and transcriptions), and deposition transcripts.

While Vermont law requires a response to this request within 2 days (or within 10 days for extraordinary circumstances), I certainly understand that this may be a voluminous file and that this request could take additional time. If you could please let me know when I might expect to receipt the file, that would be appreciated.

Please advise as to the cost of supplying these copies and payment will be promptly forwarded to your attention.

If you deny any or all of this request, please cite each specific exemption you feel justifies the

refusal to release the information so I may evaluate the appeal procedures available under the law.

Thank you for your anticipated assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kristin A. Ross', with a long horizontal flourish extending to the right.

Kristin A. Ross, Esq.

/KAR

CC: James Pepper, James.Pepper@vermont.gov