

**From:** [Mishaan, Jessica](#)  
**To:** [dcorren@burlingtontelecom.net](mailto:dcorren@burlingtontelecom.net)  
**Subject:** Further response to public records request  
**Date:** Wednesday, October 17, 2018 1:59:56 PM  
**Attachments:** [Toensing Documents.pdf](#)

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Mr. Corren,

Please find the correspondence below and documents attached from Sarah London.

Thank you,

**Jessica Mishaan** | Paralegal  
Office of the Attorney General | General Counsel and Administrative Law Division  
109 State Street Montpelier, VT 05609-1001  
p (802) 828-5500

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Dear Mr. Corren,

Following our earlier correspondence, attached please find records sent to Mr. Toensing on October 9, 2018.

Thank you,

Sarah

Customer	Case Reference	Project	Consultant	Date	Customer Comments	Billable Hrs
SOVAGO	SOVAGO-3961	Email Search 3	Dominggus Paliling	9/1/2018	Email search, deduplication, download.	2.0
				9/7/2018	Search with conditions	2.0
				9/15/2018	Add conditions to email search, deduplication.	3.0
				9/17/2018	Email search, clean up, deduplicate, sent out.	2.0
		Email Search 3 Total				9.0
<b>Grand Total</b>						<b>9.0</b>

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**From:** Bill Griffin  
**Sent:** Thursday, September 8, 2011 3:48 PM  
**To:** 'Kristen Ellwood'  
**Cc:** 'Richard Cassidy'  
**Subject:** attorneys fees claim -- IMS et al v. Sorrell et al (rich)

Kristen – Good news. Thanks for the quick turnaround.

Richard – We'll put together some basic information and send it your way. Thank you.

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**From:** Kristen Ellwood [mailto:kellwood@hoffcurtis.com]  
**Sent:** Thursday, September 08, 2011 12:11 PM  
**To:** Richard Cassidy  
**Cc:** Bill Griffin  
**Subject:** RE: attorneys fees claim -- IMS et al v. Sorrell et al

Attorney Griffin,

We have no conflicts with these entities.

Thank you,

Kristen Ellwood  
Hoff Curtis  
100 Main Street  
P.O. Box 1124  
Phone: 802/864-6400  
Fax: 802/860-1565  
E-mail: [kellwood@hoffcurtis.com](mailto:kellwood@hoffcurtis.com)  
Website: [www.hoffcurtis.com](http://www.hoffcurtis.com)

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**From:** Richard Cassidy  
**Sent:** Thursday, September 08, 2011 11:26 AM  
**To:** Kristen Ellwood  
**Cc:** Bill Griffin  
**Subject:** RE: attorneys fees claim -- IMS et al v. Sorrell et al

Kristen,

Please run a conflict check on the names listed below. Check with me if you see anything uncertain and then let Bill and me know whether we have any conflicts with these entities.

Rich Cassidy  
**Hoff Curtis**  
100 Main Street, PO Box 1124  
Burlington, VT 05401  
Office telephone: (802) 864-6400  
Fax: 802-860-1565  
email: [rcassidy@hoffcurtis.com](mailto:rcassidy@hoffcurtis.com)  
Blog: <http://onlawyering.com/>

www.hoffcurtis.com

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Thank you.

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**From:** Bill Griffin [mailto:BGriffin@atg.state.vt.us]  
**Sent:** Thursday, September 08, 2011 11:05 AM  
**To:** Richard Cassidy  
**Subject:** attorneys fees claim -- IMS et al v. Sorrell et al

Rich,

Just following up on your conversation with the AG and my phone message.

We are responding to attorneys' fees claims in the IMS case and are looking for an attorney with your experience to advise us and possibly testify on hourly rates for Vermont attorneys. We lost the case in the Supreme Court and are now dealing with the fees claims.

The plaintiffs in the case are IMS Health, Inc.; Verispan, LLC; Source Healthcare Analytics, Inc., a subsidiary of Wolters Kluwer Health, Inc.; and Pharmaceutical Research and Manufacturers of America.

Their attorneys are Hunton & Williams, Gravel & Shea, Akin Gump, Smith Anderson Blount and McGuire Woods for the first several defendants, and Arnold & Porter and Dinse Knapp for PHARMA.

Please give me a call when you get a chance.

Thanks.

Bill

*William Griffin  
Chief Assistant Attorney General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609  
802-828-5503*

**From:** Bill Griffin  
**Sent:** Thursday, September 22, 2011 8:05 PM  
**To:** 'Richard Cassidy' <RCassidy@hoffcurtis.com>  
**Subject:** RE: attorneys fees

Rich – Wednesday 3 to 5 works for me. I'll plan to call you then. Thanks.

**From:** Richard Cassidy [<mailto:RCassidy@hoffcurtis.com>]  
**Sent:** Thursday, September 22, 2011 8:02 PM  
**To:** Bill Griffin  
**Cc:** Kristen Ellwood  
**Subject:** RE: attorneys fees

Bill,

I'll take a close look at this on Monday.

How about discussing it Wednesday between 3 and 5?

If that works, Kristen can add it to my calendar.

Rich Cassidy  
**Hoff Curtis**  
100 Main Street, PO Box 1124  
Burlington, VT 05401  
Office telephone: (802) 864-6400  
Fax: 802-860-1565  
email: [rcassidy@hoffcurtis.com](mailto:rcassidy@hoffcurtis.com)  
**Blog:** <http://onlawyering.com/>  
[www.hoffcurtis.com](http://www.hoffcurtis.com)

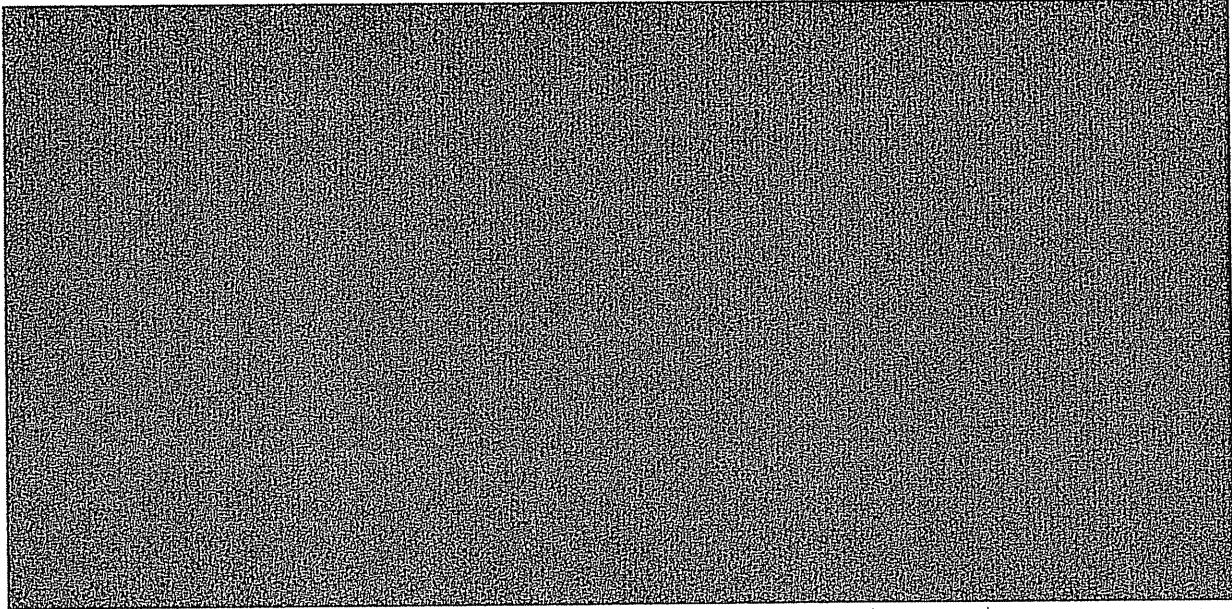
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Thank you.

**From:** Bill Griffin [<mailto:BGriffin@atg.state.vt.us>]  
**Sent:** Thursday, September 22, 2011 7:57 PM  
**To:** Richard Cassidy  
**Subject:** attorneys fees

Rich,

To follow up on our conversation a while back, the questions that we would like you to consider are:



As a matter of information:

- The rate claimed by Karen in this case is \$300 per hour for the course of the litigation (September 2007 till September 2009).
- The rate claimed by Linda Cohen is \$230 per hour for the course of the litigation.
- The rates claimed by Bob Hemley are \$300 per hour at the outset (fall 2007) and \$325 per hour from January 2008 forward.
- The rates claimed by Matt Byrne are \$275 per hour in fall 2007 and \$300 per hour from January 2008 forward.
- All four of them billed in 6 minute intervals.
- Bob and Karen have practiced since 1970 or thereabouts, Linda since 1992 and Matt since 1998.

The attachments are a couple of fee claim declarations prepared by Bob Hemley in other cases.

Let's plan to talk next week. Would Tuesday or Wednesday afternoon be ok?

Thanks.

Bill

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**From:** Richard Cassidy <RCassidy@hoffcurtis.com>  
**Sent:** Wednesday, October 5, 2011 3:00 PM  
**To:** Griffin, Bill; Kristen Ellwood  
**Cc:** David Cassetty  
**Subject:** Re: meet on 10/13 at 3 pm

I'll plan on it.  
Kristen,  
Pls. calendar.

Richard Cassidy  
Hoff Curtis  
802-864-6400

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**From:** Bill Griffin [mailto:BGriffin@atg.state.vt.us]  
**Sent:** Wednesday, October 05, 2011 10:36 AM  
**To:** Richard Cassidy  
**Cc:** David Cassetty <dcassetty@atg.state.vt.us>  
**Subject:** meet on 10/13 at 3 pm

Rich – In person would be great. We're at 3d floor, pavilion building. Turn right when you get off the elevator. If you could get us a rough outline by noon that date we'll be fully prepared. Thanks.

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**From:** Richard Cassidy [mailto:RCassidy@hoffcurtis.com]  
**Sent:** Wednesday, October 05, 2011 9:23 AM  
**To:** Bill Griffin  
**Subject:** RE: phone conf next Thursday

I have a half hour at 11.  
I am planning to come to Montpelier at 4 for the reception at the state house honoring Justice Johnson. Could meet face to face at 3 or 3:30.

Rich Cassidy  
**Hoff Curtis**  
100 Main Street, PO Box 1124  
Burlington, VT 05401  
Office telephone: (802) 864-6400  
Fax: 802-860-1565  
email: rcassidy@hoffcurtis.com  
**Blog:** <http://onlawyering.com/>  
[www.hoffcurtis.com](http://www.hoffcurtis.com)

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Thank you.

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**From:** Bill Griffin [mailto:BGriffin@atg.state.vt.us]  
**Sent:** Wednesday, October 05, 2011 9:17 AM

2011 BG 005

To: Richard Cassidy  
Cc: David Cassetty  
Subject: phone conf next Thursday

Richard – Thanks for your help today. Would you be available for a follow-up call next Thursday? Maybe 11 a.m., or 3 or 4 pm?



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**From:** Bill Griffin  
**Sent:** Thursday, October 13, 2011 12:15 PM  
**To:** 'Richard Cassidy'; David Cassetty  
**Subject:** Attorney's Fees litigation

Hi Rich,

Tomorrow at 1:30 works for us. We'll call you then. Hope to see you at the State House later today. That should be fun.

~Bill

-----Original Message-----

**From:** Richard Cassidy [mailto:RCassidy@hoffcurtis.com]  
**Sent:** Thursday, October 13, 2011 9:00 AM  
**To:** Bill Griffin; David Cassetty  
**Subject:** Attorney's Fees litigation

Bill, David,

I've not come as far as I would like in terms of my review and study before trying to put pen to paper.

Rather than do so prematurely, could we postpone my sending you a draft and then discussing it till Friday?

Rich  
Richard Cassidy  
Hoff Curtis  
802-864-6400

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**From:** Richard Cassidy <RCassidy@hoffcurtis.com>  
**Sent:** Thursday, November 10, 2011 7:58 PM  
**To:** Griffin, Bill  
**Cc:** David Cassetty; Sarah London  
**Subject:** Re: PhRMA and IMS update

Bill,

David gave me an early report, but thanks for the details.

Good luck with IMS and I look forward to hearing from you. I hope you won't need a final report, but if you do, be sure to give me a little warning as there are still a few things I think I should do to finish, like bread a couple of sample pleadings.

Rich  
Richard Cassidy  
Hoff Curtis  
802-864-6400

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**From:** Bill Griffin [mailto:BGriffin@atg.state.vt.us]  
**Sent:** Thursday, November 10, 2011 06:22 PM  
**To:** Richard Cassidy  
**Cc:** David Cassetty <dcassetty@atg.state.vt.us>; Sarah London <slondon@atg.state.vt.us>  
**Subject:** PhRMA and IMS update

Rich,

Just wanted you to be aware (if you're not already) that Janet, Dave and Sarah settled the PhRMA claim. [REDACTED]

[REDACTED] The settlement negotiations are confidential but the proposed settlement is already on the court record and implies Vermont rates consistent with our discussions.

[REDACTED] We did agree to attempt mediation, and agreed on a mediator. Mediation will likely be sometime next month.

Thank you for your help to date and for a very thorough draft report. My guess is that IMS will not settle and that we will be talking to you again in December or January.

Bill