

From: [Murphy, Laura](#)
To: ncornettlaw@gmail.com
Subject: Vermont Public Records Act Request
Date: Monday, October 19, 2020 1:05:00 PM
Attachments: [20201019 Murphy Response to Cornett.pdf](#)

Dear Mr. Cornett:

Please find attached the response to your October 15, 2020 public records request.

Sincerely,

Laura B. Murphy

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October 19, 2020

Mr. Neal Cornett
Attorney at Law
By email to: ncornettlaw@gmail.com

Dear Mr. Cornett:

I write in response to your Vermont Public Records Act request dated October 15, 2020 in which you seek:

all electronic correspondence, and any accompanying information (see discussion of SEC Data Delivery Standards, infra), including also any attachments, a) sent to or from or which copies (whether as cc: or bcc:) i) Nick Persampieri, ii) Laura Murphy, and/or iii) Alison Stone that, b) includes, anywhere, whether in an email address, in the sent, to, from, cc, bcc fields, or the subject fields or body of an email or email "thread", including also in any attachments, i) Eisenhof, in any usage (this includes, therefore, not only Eisenhof but also e.g., Eisenhoff, Eisenhoffer, and Eisenhofer), ii) Bench Walk (or "Benchwalk"), and/or iii) @gelaw.com, and c) is dated from April 1, 2020 through the date you process this request, inclusive.

We identified thirteen documents responsive to your request, and we are withholding them from disclosure. Eleven of the documents are privileged materials under 1 V.S.A. § 317(c)(3) and (4). Ten of those are email threads comprised of attorney-client, attorney work product, and common interest communications related to the State's AFFF (aqueous film-forming foams) litigation in *State of Vermont v. 3M et al.*, Docket No. 546-6-19 Cncv; MDL No. 2873, United States District Court for the District of South Carolina. One is an attorney-client, attorney work product communication related to your public records request. The remaining two documents are exempt under 1 V.S.A. § 317(c)(14); they are two email threads related to the AFFF litigation.

If you feel any information or records have been withheld in error, you may appeal to Deputy Attorney General Joshua Diamond at the following email address: joshua.diamond@vermont.gov.

Sincerely,
/s/ Laura B. Murphy
Assistant Attorney General