

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK , ss.

SUPERIOR COURT
C.A. NO. 2084CV01858

ENERGY POLICY ADVOCATES,

Plaintiff,

v.

OFFICE OF THE ATTORNEY GENERAL OF
MASSACHUSETTS, ANDREA JOY
CAMPBELL, IN HER OFFICIAL CAPACITY AS
ATTORNEY GENERAL,

Defendant.

**DEFENDANT'S SPECIFIC OBJECTIONS AND RESPONSES TO
PLAINTIFF'S QUESTIONS PERTAINING TO DEFENDANT'S
INDEX OF EXEMPTED RECORDS**

Defendant Office of the Attorney General of Massachusetts (“AGO”) provides the following specific objections and responses to Plaintiff Energy Policy Advocates’ Questions (“Questions”) regarding the AGO’s January 30, 2024 index of documents withheld as exempt posed pursuant to the Court (Deakin, J.)’s March 26, 2024 Memorandum and Order on Plaintiff’s Motion for Entry of Order of Impoundment and Protective Order to Obtain Sufficient Information to Brief Summary Judgment Motions (Dkt. No. 20).

RESPONSES AND OBJECTIONS

First, as reflected in the July 9, 2024 Index of Withheld Records (attached hereto), Records previously identified on the January 30, 2024 Index have been excluded where they are non-responsive to Plaintiff’s April 28, 2020 Public Records Request Letter (hereinafter the “April 2020 PR Letter”), or otherwise duplicative. Specifically, Records No. 36, and its

associated family, and Record No. 97 have been excluded as duplicates of Records that appear elsewhere on the Index. Additionally, Record Nos. 56 and 96 have been excluded as non-responsive to the April 2020 PR Letter. In each instance, these previously logged emails are not themselves responsive to the Letter, contain no substantive discussion, and were only initially identified as responsive because of publicly available attachments, which the Letter specifically excludes. Similarly, consistent with the Letter's instruction to treat publicly available documents as non-responsive, the Index does not contain publicly available documents, even where they are the family member of a logged document. As such, three previously inadvertently logged, publicly available Records—Nos. 53, 54, and 86—each the family members of responsive documents, have been excluded as non-responsive.

Therefore, the below responses pertain to the documents listed on the July 9, 2024 Index.¹

Question No. 1.a

For all one hundred and three Records in the Index except as noted in (1)(b), individually and for each, please:

*a) As to each Record, state the formal name of any and all authors of the document or, as to email, all Parties to the correspondence (e.g., **email sender, recipient, cc:, bcc:; attachment-author if stated on its face, otherwise as listed in the document's Metadata, and if the two are in conflict please provide both and note both**), and the title or position of all such authors or parties to the correspondence and if such title or position is with an entity that is not The Office of the Attorney General or not currently within The Office of the Attorney General, state whether or not the relevant individuals' names are shown in the Index, and provide their email address; if Respondent does not know this information regarding any particular Record, please explain the nature of the Respondent's knowledge or lack of knowledge; **and for any Party or Person that is not an employee of the Office of the Attorney General, please state whether the Office has a non-disclosure, confidentiality common interest, other agreement or basis relevant to***

¹ Record Numbers assigned on the July 9, 2024 Index are intentional as those numbers have been carried over from the the January 30, 2024 Index to ensure continuity in identifying Records at issue. To the extent any documents were previously inadvertently omitted, they have been given alphanumeric record numbers.

any claim of privilege, and identify the date such agreement was executed and the parties to any such agreement.

Response to Question 1.a:

First, as to the requested information concerning parties to correspondence, authors of documents, and their relevant positions, the AGO's responses as to each Record² are reflected in the July 9, 2024 Index and AGO's forthcoming production of documents, including Records No. 17, 22, 26, 27, 30, 31, 37, 51, 63, 93, and 98.

Second, regarding the nature of the privileged and/or confidential relationship with any non-AGO employees reflected on the July 9, 2024 Index that render the withheld Records exempt:

1. Communications and documents exchanged with the State Energy & Environmental Impact Center at NYU School of Law, including Elizabeth Klein, Sydney Colopy, and Hampden Macbeth, are covered by a legal services agreement between the AGO and the Center, the term of which extends through and covers the Records at issue.³
2. Communications with Professor Sharmila Murthy are covered by a retention agreement between the AGO and Professor Murthy, the term of which extends through and covers the Records at issue.

² As reflected in response to Question 1.c in the July 9, 2024 Index, numerous non-responsive "family member[s] of responsive document[s]" were included on the January 30, 2024 Index so as to not split families, however, responses to Question 1.a have not been provided in instances where information about the family member has no bearing on the privileged or exempted nature of the responsive Records or document family.

³ By disclosing the existence of this or other agreements, the AGO does not waive any claimed exemptions, protections, or privileges that may be asserted over communications between itself and the other entities that may predate, postdate, or exceed the scope, of such agreements.

3. Communications and documents exchanged with attorneys for other states' Attorneys General are covered by both the common-interest doctrine and a common-interest agreement between the AGO and those states, the term of which extends through and covers the Records at issue.

Question 1.b

b) As to each non-email Record (e.g., attachments), provide the document title as stated on its face otherwise as listed in the document's Metadata; if any of the aforementioned Records in this clause have no title even in the document's Metadata, please state so affirmatively and state with specificity the Record's subject matter.

As to records which are emails, please provide the subject line of such email, or, if you assert that you are unable to provide the full subject line without breaching any pertinent privilege, provide the nonprivileged portions of such subject line and state whether the subject line contains a keyword which is contained within Petitioner's request in this matter.

Response to Question 1.b

The AGO's responses as to each Record⁴ are reflected in the July 9, 2024 Index.

Question 1.c)

As to each Record, list which keyword(s), 3rd-party correspondent(s), etc., and which of the two EPA Requests (e.g. January or April request), make each Record responsive.

Response to Question 1.c)

The AGO's responses as to each Record are reflected in the July 9, 2024 Index.

Question 1.d)

As to each Record, state whether the Record was shared at any time with any other Party by The Office of the Attorney General, including pursuant to any public records request whether within Massachusetts or without.

⁴ As reflected in response to Question 1.c in the July 9, 2024 Index, numerous non-responsive "family member[s] of responsive document[s]" were included on the January 30, 2024 index so as to not split families, however, responses to Question 1.b have not been provided in instances where information about the family member has no bearing on the privileged or exempted nature of the responsive Records or document family.

- i) *If it was shared, please Identify all Persons or Parties it was shared with, the time and date it was shared, by whom, and whether any further commentary and/or correspondence and/or exchange was included and/or followed that sharing or forwarding.*

Response to Question 1.d:

The AGO objects to the above Question in its entirety, as reflected in its April 30, 2024 submission to the Court (Dkt. No. 21). The AGO reserves the right to further responses or objections to the above Question, pending the Court's resolution of its general objection.

Question 2

For all Records for which you have asserted an exemption under M.G.L. c. 4 § 7, cl. 26(d), individually and for each:

- a) *Please describe and provide the title of any factual studies or reports that are the subject of, or related to, the purportedly exempt Record; and*
- b) *the date of their creation and the percentage of the factual studies or reports that was complete as of April 16, 2024.*

Response to Question 2:

The AGO states that, to the extent any exempt Records reference, discuss, or relate to any factual studies or reports, such factual studies or reports are neither the primary subject of the Record nor the basis for the AGO's exemption claim and therefore no further response is required.

Question 3

For Index Record numbers 1, 40 and 59, for which you have asserted an exemption under M.G.L. c. 4 § 7, cl. 26(f): individually and for each please provide any facts which support the claim that the contents are confidential, and explain how those contents' revelation would prejudice the alleged underlying investigation.

Response to Question 3:

As to Record No. 1, see the AGO's forthcoming production of documents. As to Records 40 and 59, the AGO states that, considering the information that has already been provided, no

further information is necessary to establish these Records are exempt under the Public Records Law on numerous grounds, including M.G.L. c. 4, § 7, 26(f).

For the Defendant,

ANDREA JOY CAMPBELL
ATTORNEY GENERAL

/s/ Katherine M. Fahey
Katherine M. Fahey, BBO #699003
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July 9, 2024

CERTIFICATE OF SERVICE

I hereby certify that I served the responses and enclosed index by sending it to counsel for Plaintiff on July 9, 2024, via email.

/s/ Katherine M. Fahey
Katherine M. Fahey
Assistant Attorney General

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Index of Withheld Documents in Response to April 2020 Public Records Request
July 9, 2024

Record Number	Sender(s)/Recipient(s)	1.a - any and all authors	1.b - document title/subject line	1.c - responsiveness, key word	CC	Family Date	Type of Document	Subject	Exemption(s)	Explanation
2	Email chain b/w AAsG Brian Clappier, Christophe Courchesne, Timothy Reppucci	AAG Brian Clappier	RE: Exxon Investor Team	Parent email of responsive document		2/1/20 3:48 AM	email	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
3	attachment to 2			family member of responsive document		2/1/20 3:48 AM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
4	attachment to 2			family member of responsive document		2/1/20 3:48 AM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
5	attachment to 2			family member of responsive document		2/1/20 3:48 AM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
6	attachment to 2			family member of responsive document		2/1/20 3:48 AM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
7	attachment to 2	AAG Brian Clappier	Mark_Zenner_summary_11.4.2019.docx	April 2020 PR Letter: Complaint AND GHG		2/1/20 3:48 AM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
8	attachment to 2			family member of responsive document		2/1/20 3:48 AM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
9	attachment to 2			family member of responsive document		2/1/20 3:48 AM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
10	attachment to 2			family member of responsive document		2/1/20 3:48 AM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
11	attachment to 2			family member of responsive document		2/1/20 3:48 AM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.

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Record Number	Sender(s)/Recipient(s)	1.a - any and all authors	1.b - document title/subject line	1.c - responsiveness, key word	CC	Family Date	Type of Document	Subject	Exemption(s)	Explanation
12	attachment to 2			family member of responsive document		2/1/20 3:48 AM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
13	attachment to 2			family member of responsive document		2/1/20 3:48 AM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
14	attachment to 2			family member of responsive document		2/1/20 3:48 AM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
15	attachment to 2			family member of responsive document		2/1/20 3:48 AM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
16	attachment to 2	AAG Brian Clappier	Copy_of_transcript_summary_1.31.2020.xlsx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		2/1/20 3:48 AM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
17	Christophe Courchesne/EPD federal litigation attorneys and staff	see document production	see document production	family member of responsive document		2/6/20 1:46 PM	email	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
18	attachment to 17	Sydney Colopy	Weekly_2-5_final.docx	April 2020 PR Letter: Complaint AND GHG, gas		2/6/20 1:46 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
19	attachment to 17			family member of responsive document		2/6/20 1:46 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
20	AAG Megan Herzog/Steve Novick, Oregon AGO		Updated Murthy Article	Parent email of responsive document	AAG David Frankel	2/10/20 3:12 PM	email	Email and attachment concerning article about constitutionality of certain state and local actions on climate change	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Attorney communications subject to common-interest agreement.
21	Attachment to 20	Sharmila Murthy	Constitutionality_of_state_and_local_norm_sustaining_acti on_on_global_climate_-_Murthy-Feb_8_2020_(sent_to_journal).docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		2/10/20 3:12 PM	attachment	Email and attachment concerning article about constitutionality of certain state and local actions on climate change	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Attorney communications subject to common-interest agreement.
22	AAG Christophe Courchesne/EPD federal litigation attorneys and staff	see document production	see document production	Parent email of responsive document		2/12/20 12:26 PM	email	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
23	Attachment to 22	Sydney Colopy	Weekly_2-12_final.docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		2/12/20 12:26 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.

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24	attachment to 22			family member of responsive document		2/12/20 12:26 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
25	Sharmila Murthy/AAG David Frankel	Sharmila Murthy	RE: Citing to article	Parent email of a responsive document (responsive attachment child excluded as a publicly filed document)	AAG Megan Herzog, AAG Christophe Courchesne	2/14/20 4:05 PM	email	Email concerning article about constitutionality of certain state and local actions on climate change	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Attorney communications subject to common-interest agreement.
26	AAG Christophe Courchesne/EPD federal litigation attorneys and staff	see document production	see document production	Parent email of responsive document		2/19/20 12:08 PM	email	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
27	Elizabeth Klein, NYU/AAG Christophe Courchesne, AAG Melissa Hoffer, AAG Rebecca Tepper	see document production	see document production	Parent email of responsive document	David Hayes & Jessica Rachel Bell, NYU	2/25/20 8:58 PM	email	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
28	Attachment to 27			family member of responsive document		2/25/20 8:58 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
29	Attachment to 27	Hampden Macbeth	FERC_and_RTO_weekly_report_2020.02.25_final.docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		2/25/20 8:58 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
30	AAG Christophe Courchesne/AAG David Frankel forwarding Elizabeth Klein, NYU/AAG Christophe Courchesne, Melissa Hoffer, Rebecca Tepper	see document production	see document production	Parent email of a responsive document		2/26/20 2:16 PM	email	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
31	AAG David Frankel/EPD federal litigation attorneys and staff	see document production	see document production	Parent email of responsive document	AAG Christophe Courchesne	2/26/20 3:18 PM	email	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
32	Attachment to 31	Sydney Colopy	Weekly_2-26_final.docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		2/26/20 3:18 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
33	attachment to 31			family member of responsive document		2/26/20 3:18 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
37	AAG Christophe Courchesne/EPD federal litigation attorneys and staff	see document production	see document production	Parent email of responsive document		3/4/20 12:31 PM	email	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
38	Attachment to 37	Sydney Colopy	Weekly_3-4_final.docx	April 2020 PR Letter: Complanat AND GHG, greenhouse gas		3/4/20 12:31 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
39	Attachment to 37			family member of responsive document		3/4/20 12:31 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.

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40	AAG Joshua Segal (MD AGO)/MA AAsG Seth Schofield, CT AAG Daniel Salton, Del. AAsG Valerie Edge, Jameson Tweedie, Christian Wright, HI AAG Bill Cooper, ME AAG Laura Jensen, MD AAsG Andrea Baker, JB Howard, Steven Goldstein, MN AAsG Leigh Currie, Peter Surdo, NJ AAsG Aaron Love, Lauren Brick, Dianna Shinn, Daniel Resler, NY AAsG David Frankel, Gavin McCabe, Steven Wu, Monica Wagner, Michael Myers, OR AAsG Steve Novick, Patrick Garrahan, PA AAsG Aimee Thomson, Jacob Boyer, VT AAsG Benjamin Battles, Nick Persampieri, WA AAsG Bill Sherman, Kelly Wood, Laura Watson		Climate removal/remand cases -- decision from Fourth Circuit!	Parent email of responsive document	MA AAsG Christophe Courchesne, Bessie Dewar, CA AAsG Heather Leslie, Erin Ganahl, David Zonana, Josh Patashnik	3/6/20 4:05 PM	email	Emails regarding decision in climate litigation in 4th Circuit (4)	M.G.L. c. 4, § 7, cl. 26(d), (f); attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Reveals attorney mental impressions concerning effect of legal decision.
41	AAG Timothy Reppucci/AAG Christophe Courchesne		Current Draft	Parent email of responsive document		3/6/20 10:25 PM	email	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
42	attachment to 41	AAG Melissa Hoffer	Exxon_Amended_Complaint_Annotated_2020.03.06_(TJR).docx	April 2020 PR Letter: Complaint AND GHG		3/6/20 10:25 PM	attachment	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
43	Email chain b/w AAsG Timothy Reppucci & Christophe Courchesne	AAG Christophe Courchesne	RE: Current Draft	April 2020 PR Letter: Complaint AND GHG		3/9/20 12:42 PM	email	AGO attorney emails discussing draft document relating to Com. of Mass. v. Exxon Mobil litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy and attorney work product re: Com. of Mass. v. Exxon Mobil litigation
44	AAG Timothy Reppucci/AAG Christophe Courchesne	AAG Timothy Reppucci	Annotation Printing Prep	Parent email of responsive document	Jessica Young, AGO	3/9/20 3:00 PM	email	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
45	attachment to 44			family member of responsive document		3/9/20 3:00 PM	attachment	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
46	attachment to 44	AAG Melissa Hoffer	Exxon_Complaint_Annotated_Final_Version_-_10-24-2019.docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		3/9/20 3:00 PM	attachment	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
47	AAG Christophe Courchesne/Jessica Young, AGO forwarding 220189.1		FW: Annotation Printing Prep	Parent email of responsive document		3/9/20 3:52 PM	email	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.

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Index of Withheld Documents in Response to April 2020 Public Records Request
July 9, 2024

Record Number	Sender(s)/Recipient(s)	1.a - any and all authors	1.b - document title/subject line	1.c - responsiveness, key word	CC	Family Date	Type of Document	Subject	Exemption(s)	Explanation
48	attachment to 47			family member of responsive document		3/9/20 3:52 PM	attachment	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
49	attachment to 47	AAG Melissa Hoffer	Exxon_Complaint_Annotated_Final_Version_-_10-24-2019.docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		3/9/20 3:52 PM	attachment	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
50	AAG Seth Schofield/AAG Richard Johnston, Melissa Hoffer, Shennan Kavanaugh, Matthew Berge, Andy Goldberg, Brian Clappier, Christophe Courchesne, Timothy Reppucci, Sigmund Roos, Taylor O'Hare			parent email of a responsive document (responsive attachment child excluded as a publicly filed document)		3/10/20 2:32 PM	email	AGO attorney email forwarding Rule 28(j) letter filed in a First Circuit case and agenda relating to meeting to discuss Com. of Mass. v. Exxon Mobil litigation	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
51	AAG Christophe Courchesne/EPD federal litigation attorneys and staff	see document production	see document production	Parent email of responsive document		3/11/20 12:59 AM	email	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
52	attachment to 51	Hampden Macbeth	FERC_and_RTO_weekly_report_2020.03.10final.docx	April 2020 PR Letter: Complaint and GHG		3/11/20 12:59 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
55	attachment to 51			family member of responsive document		3/11/20 12:59 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
57	AAG Timothy Reppucci/AAG Christophe Courchesne	AAG Timothy Reppucci	Amended Complaint	Parent email of responsive document	AAG Brian Clappier	3/11/20 10:26 PM	email	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
58	attachment to 57	AAG Melissa Hoffer	Exxon_Amended_Complaint_Annotated_2020.03.11_(TJR).docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		3/11/20 10:26 PM	attachment	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
59	Email chain b/w AAGs Melissa Hoffer, Richard Johnston, Rebecca Tepper, Christophe Courchesne and AGO Communications Staff Chloe Gotsis, Emalie Gainey, and Jillian Fennimore			April 2020 PR Letter: Complaint AND GHG, greenhouse gas		3/13/20 7:30 PM	email	AGO attorney emails discussing article about Op-ed in Boston Business Journal regarding climate lawsuits	M.G.L. c. 4, § 7, cl. 26(d), (f); attorney-client privilege	Relates to development of AGO policy positions. Attorney-client communications regarding Com. of Mass. v. Exxon Mobil litigation and related investigation
60	email chain b/w AAGs Christophe Courchesne and Melissa Hoffer			Parent email of responsive document		3/16/20 11:47 PM	email	AGO attorney emails and attached attorney-prepared memorandum regarding nature and status of state and municipal climate lawsuits in various jurisdictions	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communications regarding litigation.

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61	attachment to 60			family member of responsive document		3/16/20 11:47 PM	attachment	AGO attorney emails and attached attorney-prepared memorandum regarding nature and status of state and municipal climate lawsuits in various jurisdictions	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communications regarding litigation.
62	attachment to 60	AAG Christophe Courchesne	Juliana_Cheat_Sheet.docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		3/16/20 11:47 PM	attachment	AGO attorney emails and attached attorney-prepared memorandum regarding nature and status of state and municipal climate lawsuits in various jurisdictions	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communications regarding litigation.
63	Christophe Courchesne/EPD federal litigation attorneys and staff	see document production	see document production	Parent email of responsive document		3/18/20 12:19 PM	email	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
64	attachment to 63	Sydney Colopy	Weekly_3-18_final.docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		3/18/20 12:19 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
65	attachment to 63			family member of responsive document		3/18/20 12:19 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
66	AAG Jim Sweeney/AAG Richard Johnston, Melissa Hoffer, Seth Schofield, Christophe Courchesne, Matthew Berge		Opp. to Stay of Motion to Remand	Parent email of responsive document		3/18/20 1:12 PM	email	AGO attorney email discussing and attaching draft brief in Com. of MA v. Exxon Mobil Corp.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy in Com. of Mass. v. Exxon Mobil Corp. litigation.
67	attachment to 66	AAG Jim Sweeney	First_Cir._Motion_to_Stay_Opp_memo_(1).docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		3/18/20 1:12 PM	attachment	AGO attorney email discussing and attaching draft brief in Com. of MA v. Exxon Mobil Corp.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy in Com. of Mass. v. Exxon Mobil Corp. litigation.
68	AAG Brian Clappier/AAG Christophe Courchesne and AAG Timothy Reppucci		Exxon Complaint - cite checks	Parent email of responsive document		3/20/20 5:59 PM		AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
69	attachment to 68	AAG Melissa Hoffer	Exxon_Amended_Complaint_Annotated_2020.03.20_(TJR,BCJ).docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		3/20/20 5:59 PM	attachment	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
70	AAG Christophe Courchesne/Michelle Predi, AGO		FW: Muni/State Cases	Parent email of responsive document	Jessica Young, AGO	3/31/20 7:28 PM	email	AGO attorney emails and attached attorney-prepared memorandum regarding nature and status of state and municipal climate lawsuits in various jurisdictions	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communications regarding litigation.
71	attachment to 70	AAG Christophe Courchesne	Juliana_Cheat_Sheet.docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		3/31/20 7:28 PM	attachment	Memorandum prepared by AGO attorney discussing and distinguishing 9th Circuit case.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Attorney-client communication and memorandum containing attorney mental impressions and litigation strategy.

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71.A	attachment to 70			family member of responsive document		3/31/20 7:28 PM	attachment	Memorandum prepared by AGO attorney discussing and distinguishing 9th Circuit case.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Attorney-client communication and memorandum containing attorney mental impressions and litigation strategy.
72	AAG Timothy Reppucci/AAsG Christophe Courchesne & Brian Clappier		NY Trial Transcript Summaries	Parent email of responsive document		3/31/20 10:17 PM	email	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
72.A	attachment to 72			family member of responsive document		3/31/20 10:17 PM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
73	attachment to 72			family member of responsive document		3/31/20 10:17 PM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
74	attachment to 72	AAG Brian Clappier	Roger_Read_2019.10.28-29.docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		3/31/20 12:00 AM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
75	attachment to 72			family member of responsive document		3/31/20 10:17 PM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
76	attachment to 72			family member of responsive document		3/31/20 10:17 PM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
77	attachment to 72			family member of responsive document		3/31/20 10:17 PM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
78	attachment to 72	AAG Brian Clappier	Rex_Tillerson_2019.10.30.docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		3/31/20 10:17 PM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
79	attachment to 72			family member of responsive document		3/31/20 10:17 PM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.

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80	attachment to 72			family member of responsive document		3/31/20 10:17 PM	attachment	AGO attorney emails forwarding and discussing attorney-prepared summaries of trial testimony in New York trial; AGO attorney emails discussing potential claims against Exxon.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney work product and mental impressions. Relates to potential Exxon litigation.
81	AAG Brian Clappier/AAG Christophe Courchesne and AAG Timothy Reppucci		Wellington Notes from CID documents	Parent email of responsive document		4/7/20 6:43 PM	email	AGO attorney memorandum and cover email discussing documents received from third party in response to CID relating to Exxon	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
82	attachment to 81	AAG Brian Clappier	2020.04.07 - Wellington_CID_Notes.docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		4/7/20 6:43 PM	attachment	AGO attorney memorandum and cover email discussing documents received from third party in response to CID relating to Exxon	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
83	AAG Shennan Kavanaugh/AAG Richard Johnston		Exxon: [Draft] First Request for Production.	Parent email of responsive document	AAsG Melissa Hoffer, Matthew Berge, Andy Goldberg, Brian Clappier, Christophe Courchesne, Timothy Reppucci, Jim Sweeney	4/10/20 5:55 PM	email	AGO attorney email plus draft redlined discovery request to defendant Exxon Mobil	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy and work product re: Com. of Mass. v. Exxon Mobil Corp. litigation.
84	attachment to 83	AAG Richard Johnston	Draft_8_of_First_Request_for_Production_of_Documents_to_ExxonMobil_4.10.20_(with_IAG_comments)_(sk).docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		4/10/20 5:55 PM	attachment	AGO attorney email plus draft redlined discovery request to defendant Exxon Mobil	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy and work product re: Com. of Mass. v. Exxon Mobil Corp. litigation.
85	AAG Tim Reppucci/AAG Christophe Courchesne		RE: Complaint additions	Parent email of responsive document	AAG Brian Clappier	4/13/20 9:45 PM	email	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
87	attachment to 85	AAG Melissa Hoffer	Exxon_Amended_Complaint_Annotated_2020.04.13_-_Wellington_amends_-_BC_(tjr)_draft_2_(tjr).docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		4/13/20 9:45 PM	attachment	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
88	Two emails from AAG Christophe Courchesne/AAG Melissa Hoffer		Draft amended complaint	Parent email of responsive document	AAsG Jim Sweeney, Lilia DuBois, Glenn Kaplan, Brian Clappier, Timothy Reppucci, Shennan Kavanaugh, Andy Goldberg	4/14/20 1:01 PM	email	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
89	attachment to 88	AAG Melissa Hoffer	2020-4-13 - Exxon_Amended_Complaint_Annotated.docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		4/14/20 1:01 PM	attachment	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.
90	AAG Shennan Kavanaugh/AAG Richard Johnston		Exxon: [Draft] First Request for Production of Documents.	Parent email of responsive document	AAsG Melissa Hoffer, Matthew Berge, Andy Goldberg, Brian Clappier, Christophe Courchesne, Timothy Reppucci, Jim Sweeney, Sigmund Roos, Seth Schofield	4/14/20 6:06 PM	email	AGO attorney email plus draft redlined discovery request to defendant Exxon Mobil	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy and work product re: Com. of Mass. v. Exxon Mobil Corp. litigation.

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91	attachment to 90	AAG Richard Johnston	Draft_8_of_First_Request_for_Production_of_Documents_to_ExxonMobil_4.10.20_(with_IAG_comments_(sk_(rj)).docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		4/14/20 6:06 PM	attachment	AGO attorney email plus draft redlined discovery request to defendant Exxon Mobil	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy and work product re: Com. of Mass. v. Exxon Mobil Corp. litigation.
92	attachment to 90			family member of responsive document		4/14/20 6:06 PM	attachment	AGO attorney email plus draft redlined discovery request to defendant Exxon Mobil	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy and work product re: Com. of Mass. v. Exxon Mobil Corp. litigation.
93	Christophe Courchesne/EPD federal litigation attorneys and staff	see document production	see document production	Parent email of responsive document		4/15/20 1:08 PM	email	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
94	Attachment to 93	Sydney Colopy	Weekly_4-15_final.docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		4/15/20 1:08 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
95	Attachment to 93			family member of responsive document		4/15/20 1:08 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
98	Christophe Courchesne/EPD federal litigation attorneys and staff	see document production	see document production	Parent email of responsive document		4/22/20 12:48 PM	email	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
99	attachment to 98	Hampden Macbeth	FERC_and_RTO_weekly_report_2020.28.21final.docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		4/22/20 12:48 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
100	attachment to 98	Hampden Macbeth	MOPR_Rehearing_Request_Orders.docx	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		4/22/20 12:48 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
101	attachment to 98			family member of responsive document		4/22/20 12:48 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
102	attachment to 98			family member of responsive document		4/22/20 12:48 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege, attorney work product	Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
103	Email chain b/w AAsG Andy Goldberg, Richard Johnston, Melissa Hoffer, Shennan Kavanaugh, Matthew Berge, Brian Clappier, Christophe Courchesne, Timothy Reppucci		RE: The Future of Exxon and the Permian's Flaring Crisis DeSmog	April 2020 PR Letter: Complaint AND GHG, greenhouse gas		4/23/20 2:22 PM	email	AGO attorney emails regarding draft amended complaint in Exxon litigation.	M.G.L. c. 4, § 7, cl. 26(d), attorney-client privilege; attorney work product	Relates to development of AGO policy positions. Attorney-client communication concerning litigation strategy re: Com. of Mass. v. Exxon Mobil Corp. litigation.