

Garland, Samuel

From: Garland, Samuel
Sent: Tuesday, August 1, 2023 12:13 PM
To: Jaoude, Michael; Andru Volinsky
Cc: Gagnon, Lawrence; Galdieri, Anthony; John Tobin; Natalie J. Laflamme; Roberti, Nicholas; Tsier, Alice
Subject: RE: Rand v. State - Statement of Material Facts
Attachments: ConVal - Defendants' Witness List.pdf; ConVal - Plaintiffs' Witness List.pdf

Mike,

Thanks for following up about this. In terms of further discovery, we can't agree to continue fact depositions through August. Trial is currently scheduled for September. Our understanding was that we were going to extend discovery out so that the experts could be deposed. We did not understand the agreement to be that we would continue to conduct fact discovery until the eve of trial. We may need to meet and confer on this point if you're proposing that fact discovery is going to continue over the next month-plus.

That having been said, and as we've previously indicated, we're open to having a discussion around bringing in some ConVal witness testimony on the papers. To that end, we'd anticipate that our witness list would be largely the same as our list in ConVal, save that we would intend to call Dr. Schuls and not Dr. Costrell. I've attached a copy of our ConVal list to this email. I've also attached the plaintiff's list, because we listed "any witnesses named by the Plaintiffs" on our list.

It's hard to say in the abstract which of these witnesses we'd be likely to call at trial. Other than our experts, all (or virtually all) of the witnesses who testified during the ConVal trial were called by the plaintiffs. This is true of all of the Department of Education witnesses who were called, including Nathaniel Greene, who is listed only on our list. We'd need to have a better idea of which ConVal witnesses you'd be looking to call to know whether there are any others we'd want to call. Could you give us some insight into that? It'd help narrow things down.

Thanks,
Sam

Sam Garland
Senior Assistant Attorney General
N.H. Department of Justice
33 Capitol Street
Concord, NH 03301
(603) 271-3650

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From: Jaoude, Michael <michael.jaoude@whitecase.com>
Sent: Friday, July 28, 2023 10:32 AM
To: Garland, Samuel <Samuel.RV.Garland@doj.nh.gov>; Andru Volinsky <andruvolinsky@gmail.com>
Cc: Gagnon, Lawrence <Lawrence.P.Gagnon@doj.nh.gov>; Galdieri, Anthony <Anthony.J.Galdieri@doj.nh.gov>; John Tobin <jtobinjr@comcast.net>; Natalie J. Laflamme <natalie@laflammelaw.com>; Roberti, Nicholas

<nicholas.roberty@whitecase.com>; Tsier, Alice <alice.tsier@whitecase.com>

Subject: RE: Rand v. State - Statement of Material Facts

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Thanks, Sam.

I know last we spoke it sounded like you were tying up some loose ends on a potential witness list. We won't hold you to anything, but if you have a sense of that list it would be helpful so we can plan any depositions this month.

We should have our draft affidavits for Kevin and plaintiff witnesses early next week.

Michael-Anthony Jaoude | Associate

T +1 212 819 8270 M +1 716 903 0286 E michael.jaoude@whitecase.com

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From: Garland, Samuel <Samuel.RV.Garland@doj.nh.gov>

Sent: Thursday, July 27, 2023 8:20 PM

To: Jaoude, Michael <michael.jaoude@whitecase.com>; Andru Volinsky <andruvolinsky@gmail.com>

Cc: Gagnon, Lawrence <Lawrence.P.Gagnon@doj.nh.gov>; Galdieri, Anthony <Anthony.J.Galdieri@doj.nh.gov>; John Tobin <jtobinjr@comcast.net>; Natalie J. Laflamme <natalie@laflammelaw.com>; Roberti, Nicholas <nicholas.roberty@whitecase.com>

Subject: Rand v. State - Statement of Material Facts

All,

We filed our motion for summary judgment tonight. Per Rule 12(g), I've attached a word version of our statement of material facts. Please let me know if you have any issues opening the document or accessing the filings.

Thanks,
Sam

Sam Garland
Senior Assistant Attorney General
N.H. Department of Justice
33 Capitol Street
Concord, NH 03301
(603) 271-3650

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From: Jaoude, Michael <michael.jaoude@whitecase.com>

Sent: Tuesday, July 11, 2023 6:44 PM

To: Andru Volinsky <andruvolinsky@gmail.com>; Garland, Samuel <Samuel.RV.Garland@doj.nh.gov>

Cc: Gagnon, Lawrence <Lawrence.P.Gagnon@doj.nh.gov>; Galdieri, Anthony <Anthony.J.Galdieri@doj.nh.gov>; John Tobin <jtobinjr@comcast.net>; Natalie J. Laflamme <natalie@laflammelaw.com>; Roberti, Nicholas <nicholas.roberty@whitecase.com>

Subject: RE: Expert Depos - Rand Case

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24th is fine by me. Will do remote.

Can discuss rest tomorrow in person.

Thanks, Sam.

From: Andru Volinsky <andruvolinsky@gmail.com>

Date: Tuesday, Jul 11, 2023 at 5:40 PM

To: Garland, Samuel <Samuel.RV.Garland@doj.nh.gov>

Cc: Gagnon, Lawrence <Lawrence.P.Gagnon@doj.nh.gov>, Galdieri, Anthony <Anthony.J.Galdieri@doj.nh.gov>, Jaoude, Michael <michael.jaoude@whitecase.com>, John Tobin <jtobinjr@comcast.net>, Natalie J. Laflamme <natalie@laflammelaw.com>, Roberti, Nicholas <nicholas.roberti@whitecase.com>

Subject: Re: Expert Depos - Rand Case

I expect our W&C folks are traveling north. We'll respond in the a.m but nothing strikes me as earth shattering.

A

On Tue, Jul 11, 2023 at 4:58 PM Garland, Samuel <Samuel.RV.Garland@doj.nh.gov> wrote:

Hi Natalie & co.,

9:00 works for Dr. Cascadden's deposition on Friday. We've booked a room here at DOJ. We've also booked a room here for Thursday's deposition with a scheduled 9:30 a.m. start time. Please let us know if that start time doesn't work so we can inform the court reporter.

I have confirmation that Dr. Shuls is available to be deposed remotely on 7/24. Does that work on your end?

Also, we're planning to move for two of our outside attorneys from ConVal—John Munich and Nicci Warr—to appear PHV in this case. I've attached their affidavits here. Can you let us know your position on the motions?

Finally, in advance of our discussion tomorrow, I wanted to flag that we're increasingly questioning whether it is prudent to proceed to the merits of your adequacy claim without the benefit of the Court's verdict in ConVal. We aren't, as of yet, taking a firm position on that question, and I don't anticipate you'd agree with us if we said the trial should be continued. But I wanted to flag this issue in the interest of transparency, particularly because it wouldn't shock me if Judge Ruoff brings it up at the hearing. We can discuss further tomorrow.

I look forward to seeing everyone tomorrow.

Thanks,

Sam

Sam Garland

Senior Assistant Attorney General

N.H. Department of Justice

[33 Capitol Street](#)

[Concord, NH 03301](#)

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From: Natalie J. Laflamme <natalie@laflammelaw.com>

Sent: Tuesday, July 11, 2023 11:04 AM

To: Garland, Samuel <Samuel.RV.Garland@doj.nh.gov>

Cc: Jaoude, Michael <michael.jaoude@whitecase.com>; Galdieri, Anthony <Anthony.J.Galdieri@doj.nh.gov>; Gagnon, Lawrence <Lawrence.P.Gagnon@doj.nh.gov>; Andru Volinsky <andruvolinsky@gmail.com>; Roberti, Nicholas <nicholas.roberti@whitecase.com>; John Tobin <jtobinjr@comcast.net>

Subject: Re: Expert Depos - Rand Case

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Good morning,

For Dr. Cascadden's deposition on Friday (July 14), we'll propose 9:00 am. (She's coming from Berlin so I wouldn't push any earlier than that.)

I'm also attaching a copy of her updated resume. The only difference from the one submitted with her report is updated expiration date for her certifications.

Natalie J. Laflamme, Esq.
Laflamme Law, PLLC
natalie@laflammelaw.com
(603) 937-5434



L A F L A M M E L A W
— P L L C —

On Jul 10, 2023, at 9:38 AM, Garland, Samuel <Samuel.RV.Garland@doj.nh.gov> wrote:

Sounds good. No worries at all. We'll reserve a room and I'll follow up to confirm times.

From: Jaoude, Michael <michael.jaoude@whitecase.com>
Sent: Monday, July 10, 2023 9:37 AM
To: Garland, Samuel <Samuel.RV.Garland@doj.nh.gov>; Natalie J. Laflamme <natalie@laflammelaw.com>
Cc: Galdieri, Anthony <Anthony.J.Galdieri@doj.nh.gov>; Gagnon, Lawrence <Lawrence.P.Gagnon@doj.nh.gov>; Andru Volinsky <andruvolinsky@gmail.com>; Roberti, Nicholas <nicholas.roberti@whitecase.com>; John Tobin <jtobinjr@comcast.net>
Subject: RE: Expert Depos - Rand Case

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Hi Sam,

Sorry about that. Yes, if you could host that would be great. We can make the witnesses available for whatever makes sense with your timing.

Michael-Anthony Jaoude | Associate

T +1 212 819 8270 **M** +1 716 903 0286 **E** michael.jaoude@whitecase.com

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From: Garland, Samuel <Samuel.RV.Garland@doj.nh.gov>

Sent: Monday, July 10, 2023 9:36 AM

To: Jaoude, Michael <michael.jaoude@whitecase.com>; Natalie J. Laflamme <natalie@laflammelaw.com>

Cc: Galdieri, Anthony <Anthony.J.Galdieri@doj.nh.gov>; Gagnon, Lawrence <Lawrence.P.Gagnon@doj.nh.gov>; Andru Volinsky <andruvolinsky@gmail.com>; Roberti, Nicholas <nicholas.roberti@whitecase.com>; John Tobin <jtobinjr@comcast.net>

Subject: RE: Expert Depos - Rand Case

Mike and Natalie,

I wanted to follow up on the location for this week's depositions. Are we planning for us to host them here?

Thanks,

Sam

From: Garland, Samuel <Samuel.RV.Garland@doj.nh.gov>

Sent: Thursday, July 6, 2023 2:04 PM

To: Jaoude, Michael <michael.jaoude@whitecase.com>; Natalie J. Laflamme <natalie@laflammelaw.com>

Cc: Galdieri, Anthony <Anthony.J.Galdieri@doj.nh.gov>; Gagnon, Lawrence <Lawrence.P.Gagnon@doj.nh.gov>; Andru Volinsky <andruvolinsky@gmail.com>; Roberti, Nicholas <nicholas.roberti@whitecase.com>; John Tobin <jtobinjr@comcast.net>

Subject: RE: Expert Depos - Rand Case

Mike,

I have responses to a handful of your bullets, which I've put below in red. I'll follow up with additional information as I confirm it.

Thanks,

Sam

From: Jaoude, Michael <michael.jaoude@whitecase.com>
Sent: Thursday, July 6, 2023 10:27 AM
To: Natalie J. Laflamme <natalie@laflammelaw.com>; Garland, Samuel <Samuel.RV.Garland@doj.nh.gov>
Cc: Galdieri, Anthony <Anthony.J.Galdieri@doj.nh.gov>; Gagnon, Lawrence <Lawrence.P.Gagnon@doj.nh.gov>; Andru Volinsky <andruvolinsky@gmail.com>; Roberti, Nicholas <nicholas.roberti@whitecase.com>; John Tobin <jtobinjr@comcast.net>
Subject: RE: Expert Depos - Rand Case

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Hi Sam,

Given the schedule for next week, I thought it would be easier just to nail a few things down by email.

1. John Freeman Deposition – July 13th
 - a. Please confirm start time and location.

recall (probably incorrectly) that Andy may have indicated an interest in hosting. But we're happy to host here. I'll hold a room now, but just let us know if you'd like to have it somewhere else. Want to say 9:30 start time?

2. Corinne Cascadden – July 14th
 - a. Please confirm start time and location. I'll be traveling back to NYC in the afternoon so the earlier we can start the better. We propose a start between 8-9am.

Same comments as previously, except that we're happy to start it earlier to accommodate your travel. If we hold it at DOJ, we'd propose a start time of 8:30. If someone on your end is hosting, we can go as early as 8:00.

3. For scheduling purposes, do you have an idea of how many hours you anticipate for each deposition? Won't hold you to anything, but just want to figure out travel logistics, etc.

Subject of course to how the depositions proceed day of, we anticipate each one going around five hours, give or take.

4. Jay Greene – July 20th
 - a. Please confirm this will work. I will take the deposition virtually and can start at whatever time Mr. Greene is available and work around his schedule.

I can confirm that July 20 works for a remote depo of Dr. Greene. I'll confirm as start time as soon as I have it.

5. Shuls – TBD
 - a. Please propose dates for Mr. Shuls when possible.

I'm awaiting this information, but will send it along as soon as I have it.

6. Preliminary Witness List:
 - a. Below is a non-binding list to facilitate our discussions over the remaining schedules and depositions. If you could share a list on your end when possible that would be appreciated. We are happy to discuss general substance of testimony when you are able to meet with us.

i. Experts

1. Corinne Cascadden
2. John Freeman

ii. Fact Witnesses

1. Jennifer Dolloff – Ed.D (provision of special education services and costs in relation to adequacy)
2. Annette Blake (school counseling and costs in relation to adequacy)
3. Steven Rothnberg (CTE and costs in relation to adequacy)

iii. **Reservations (pending stipulations)**

1. ConVal Witnesses
2. Kevin Clougherty (Expert)
3. Named Plaintiffs
4. Rebuttal
5. Witnesses listed by State on potential witness list

Thanks for sending this along. We'll work to get you our list, though it may be early next week.

7. In person meeting

- a. Let us know if you are available prior to the hearing to meet regarding the above issues as well as the impact of ConVal and any other questions we may need to discuss prior to the hearing. We would like to nail down stipulations regarding the witnesses as soon as possible.

Are you envisioning a sit-down meeting a la what we've discussed in the past or a preliminary meeting to make sure we're on the same page for the hearing Wednesday? If the latter, I can be available for a Teams/Zoom meeting on Monday or Tuesday. I could also meet, either virtually or in person, Wednesday.

As for a sit-down meeting, I would propose scheduling it for the week of July 17 around the depositions. I can confirm with Anthony once he's back what day that week works best on our end.

I'm available to discuss today or tomorrow.

Best,

Mike

Michael-Anthony Jaoude | Associate

T +1 212 819 8270 **M** +1 716 903 0286 **E** michael.jaoude@whitecase.com

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From: Natalie J. Laflamme <natalie@laflammelaw.com>
Sent: Tuesday, June 27, 2023 4:38 PM
To: Garland, Samuel <Samuel.RV.Garland@doj.nh.gov>
Cc: Jaoude, Michael <michael.jaoude@whitecase.com>; Galdieri, Anthony <Anthony.J.Galdieri@doj.nh.gov>; Gagnon, Lawrence <Lawrence.P.Gagnon@doj.nh.gov>; Andru Volinsky <andruvolinsky@gmail.com>; Roberti, Nicholas <nicholas.roberti@whitecase.com>; John Tobin <jtobinjr@comcast.net>
Subject: Re: Expert Depos - Rand Case

Hi Sam,

You had suggested this Thursday for a virtual meeting to discuss implications of ConVal case. We're having a little trouble scheduling on our end. Does your team have availability on Friday instead? If not, we can push to next week.

Also wanted to check in about the schedule for the depositions of our experts and the stipulation meeting. Looks like we're set for John Freeman deposition on July 13. July 14 could be either Cascadden deposition or in-person meeting on stipulations. Whichever of Cascadden/stipulations doesn't happen on the 14th could be done the following week. Dr. Cascadden would be available the 17th or 18th.

<image001.png>

On Jun 21, 2023, at 9:08 AM, Garland, Samuel <Samuel.RV.Garland@doj.nh.gov> wrote:

Thanks, Mike. We'll circle up on scheduling the in-person meeting. I can confirm that Jay Greene for a remote deposition on July 18, 19, or 20. I'm waiting for confirmation on our other expert. Let us know which of those days works well and we can get it locked down.

A virtual meeting for the end of next week makes sense. I'm out this coming Monday, but here Wednesday through Friday. Would Thursday, 7/29 work for folks on your end? I can be flexible as to time.

Sam

From: Jaoude, Michael <michael.jaoude@whitecase.com>
Sent: Tuesday, June 20, 2023 11:03 AM
To: Garland, Samuel <Samuel.RV.Garland@doj.nh.gov>; Galdieri, Anthony <Anthony.J.Galdieri@doj.nh.gov>; Gagnon, Lawrence <Lawrence.P.Gagnon@doj.nh.gov>
Cc: Andru Volinsky <andruvolinsky@gmail.com>; Natalie J. Laflamme <natalie@laflammelaw.com>; Roberti, Nicholas <nicholas.roberti@whitecase.com>; John Tobin <jtobinjr@comcast.net>
Subject: RE: Expert Depos - Rand Case

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Sam,

Alternatively, we can schedule Mr. Freeman's deposition for July 13 or 14 and then use the other date to do the stipulation meeting if that works better. We could then schedule Dr. Cascadden for some time that works the following week to give you some breathing room! Unfortunately, I won't be able to be in NH the following week for a meeting.

If that doesn't work, we'll plan on meeting virtually for the stipulation.

A meeting soon makes sense to us too, I think we have a few things to discuss in addition to Conval. Should we set up a meeting for the end of next week to discuss? I think we have the following on the agenda:

- ConVal ruling
- Status conference hearing along with the SWEPT SJ (Ruoff last time seemed to treat this as a status conference regarding trial and scheduling, I think it makes sense we provide him with an update on the case)
- Preliminary Witness Lists (we will be able to share ours in advance)
 - Resolution of affidavits for Kevin Clougherty / Rand Plaintiffs.

- Remaining scheduling

Let me know if I'm missing anything else. (Rand team jump in as well, thanks!)

Michael-Anthony Jaoude | Associate

T +1 212 819 8270 M +1 716 903 0286 E michael.jaoude@whitecase.com

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From: Garland, Samuel <Samuel.RV.Garland@doj.nh.gov>

Sent: Tuesday, June 20, 2023 8:23 AM

To: Jaoude, Michael <michael.jaoude@whitecase.com>; Galdieri, Anthony <Anthony.J.Galdieri@doj.nh.gov>; Gagnon, Lawrence <Lawrence.P.Gagnon@doj.nh.gov>

Cc: Andru Volinsky <andruvolinsky@gmail.com>; Natalie J. Laflamme <natalie@laflammelaw.com>; Roberti, Nicholas <nicholas.roberti@whitecase.com>; John Tobin <jtobinjr@comcast.net>

Subject: RE: Expert Depos - Rand Case

Mike,

We're good to go on July 13 and 14 for Ms. Cascadden and Mr. Freeman's depositions. I'm hoping to have an answer to you today on the following week for our experts. In terms of meeting regarding a stipulation, we were also thinking the week of July 17 if that worked on your end. Between the two depositions in this case and the summary judgment hearing, Anthony and I can't make the prior week work.

Also, we're thinking it might make sense to touch base before the July 12 hearing to discuss what effect we think a ruling in ConVal might have on this case. Our post-trial briefing is due June 30, and it seems likely that any ruling Judge Ruoff enters in that case would inform the issues in this case, at least with respect to your adequacy claim. We'd like to talk that through in advance of the July 12 hearing. The rest of this week is tough for me, but I have some availability Tuesday through Friday of next week.

Thanks,

Sam

Sam Garland

Senior Assistant Attorney General

N.H. Department of Justice

[33 Capitol Street](#)

[Concord, NH 03301](#)

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From: Garland, Samuel <Samuel.RV.Garland@doj.nh.gov>

Sent: Thursday, June 15, 2023 3:40 PM

To: Jaoude, Michael <michael.jaoude@whitecase.com>; Galdieri, Anthony <Anthony.J.Galdieri@doj.nh.gov>; Gagnon, Lawrence <Lawrence.P.Gagnon@doj.nh.gov>

Cc: Andru Volinsky <andruvolinsky@gmail.com>; Natalie J. Laflamme <natalie@laflammelaw.com>; Roberti, Nicholas <nicholas.roberti@whitecase.com>; John Tobin <jtobinjr@comcast.net>

Subject: RE: Expert Depos - Rand Case

Mike, I'm hoping to have a response to this tomorrow. I'm sorry for the delay.

Sam

From: Jaoude, Michael <michael.jaoude@whitecase.com>

Sent: Tuesday, June 13, 2023 1:37 PM

To: Garland, Samuel <Samuel.RV.Garland@doj.nh.gov>; Galdieri, Anthony

<Anthony.J.Galdieri@doj.nh.gov>; Gagnon, Lawrence
<Lawrence.P.Gagnon@doj.nh.gov>
Cc: Andru Volinsky <andruvolinsky@gmail.com>; Natalie J. Laflamme
<natalie@laflammelaw.com>; Roberti, Nicholas <nicholas.roberti@whitecase.com>;
John Tobin <jtobinjr@comcast.net>
Subject: RE: Expert Depos - Rand Case

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Hi all,

Just gently following up – do these dates work for depositions?

Michael-Anthony Jaoude | Associate

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From: Jaoude, Michael
Sent: Tuesday, June 6, 2023 10:17 AM
To: Garland, Samuel <Samuel.RV.Garland@doj.nh.gov>; Galdieri, Anthony
<Anthony.J.Galdieri@doj.nh.gov>; Gagnon, Lawrence
<Lawrence.P.Gagnon@doj.nh.gov>
Cc: Andru Volinsky <andruvolinsky@gmail.com>; 'Natalie J. Laflamme'
<natalie@laflammelaw.com>; Roberti, Nicholas <nicholas.roberti@whitecase.com>;
'John Tobin' <jtobinjr@comcast.net>
Subject: Expert Depos - Rand Case

Hey all,

Given that the SJ hearing has been set for July 12th, would it be possible to set Ms. Cascadden and Mr. Freeman's depositions for July 13 and 14? We can also plan an in person meet up to discuss stipulations etc during that week if it makes sense. Since we will have to come up for the hearing anyways, this would make things a lot easier.

Let us know if those dates work for you.

Thanks,

Mike

Michael-Anthony Jaoude | Associate

T +1 212 819 8270 **M** +1 716 903 0286 **E** michael.jaoude@whitecase.com

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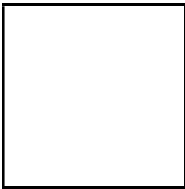
=====

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Andru Volinsky

attorney, 160 Law, PLLC
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PO Box 1181
Concord, NH 03302
160LawPLLC.com

This may be a legal communication. If you are not the intended recipient, please advise us and delete the communication. Also, an emailed inquiry to us does not create an attorney client relationship. We must first be certain that we do not have a conflict of interest and that we are interested in accepting your case. All clients will receive a formal retainer agreement signifying that we have accepted your case. Thank you.

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