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James P. Berryman

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Michael P. Carey

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Bryan P. Fiengo

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Carolyn P. Kelly

Kristi D. Kelly

Nicholas F. Kepple

Robert B. Keville

Jillian K. Miller

Roger T. Scully

Robert G. Tukey

Kyle J. Zrenda

In Memoriam

Andrew J. Brand

James F. Brennan

James J. Courtney

L. Patrick Gray, III

Michael V. Sage

Matthew Shafner

Max M. Shapiro

Charles J. Suisman

Thomas B. Wilson

Louis C. Wool

Of Counsel

Hinda K. Kimmel

Jay B. Levin

Richard A. Schatz

March 4, 2020

Via electronic mail – Melanie.Bachman@ct.gov

Melanie A. Bachman  
Executive Director  
State of Connecticut  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

Re: February 19, 2020 FOI Request

Dear Ms. Bachman:

Thank you for your correspondence of March 3, 2020. We appreciate the disclosure of the emails in response to Attorney Callahan's public record request on behalf of the Town of Groton.

To the extent that your letter invites the Town to withdraw its Petition for Reconsideration, the Town declines to do so. The Petition was timely made, being filed within the applicable statutory period of time from the date of your "letter" of February 14, 2020. On behalf of the Council you expressly chose to author and to issue the document within a closed docket proceeding, without having taken the applicable and ordinary requirements of process. Due to this, the Town has no choice but to avail itself fully of its legal remedies in order to protect its financial, legal and governmental interests.

The Town also expects its Petition to be treated in the ordinary course. We notice that you assert authorship to the document, and defend its statements and legality. As a result, the Town must respectfully request that you immediately recuse yourself from all consideration of the Petition and no longer participate, in any way, in the Petition's disposition.

*A Tradition of Innovative Solutions*

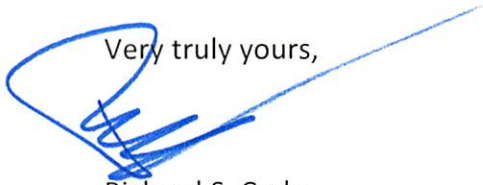
Suisman, Shapiro, Wool, Brennan, Gray & Greenberg, P.C.  
2 Union Plaza, Suite 200 • P.O. Box 1591, New London, CT 06320  
Phone 860-442-4416 • Fax 860-442-0495 • www.suismanshapiro.com

Melanie A. Bachman  
Executive Director  
March 4, 2020

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Please let us know if you have any questions or comments.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Richard S. Cody', is written over the closing 'Very truly yours,'. The signature is stylized and somewhat illegible due to the cursive nature of the handwriting.

Richard S. Cody

Cc: Council Members (via electronic mail – [siting.council@ct.gov](mailto:siting.council@ct.gov))  
Petition No. 1214 Service List (via electronic mail - see attached service list)  
Assistant Attorney General Robert L. Marconi (via electronic mail – [Robert.marconi@ct.gov](mailto:Robert.marconi@ct.gov))

CERTIFICATION

I hereby certify that a copy of the foregoing document was sent via electronic mail to the following service list on March 4, 2020:

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Richard S. Cody