

**Energy Policy Advocates v. Office of the Attorney General**  
**2084-cv-01858, Suffolk Superior**  
**Index of Withheld Documents in Response to Public Records Requests**  
**Revised January 30, 2024**

Record Number	Sender(s)/Recipient(s)	CC	Family Date	Type of Document	Subject	Exemption(s)	Explanation
1 / HARDIN0000549	AAG Melissa Hoffer/Bradley Campbell, Conservation Law Foundation		1/20/16 2:57 PM	email	Emails to AAG regarding investigative matter and NRD claims	M.G.L. c. 4, § 7, cl. 26 (f)	Relates to AGO investigation.
2	Email chain b/w AAsG Brian Clappier, Christophe Courchesne, Timothy Reppucci		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		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		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		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		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		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		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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9	attachment to 2		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		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		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.
12	attachment to 2		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		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		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		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		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)	CC	Family Date	Type of Document	Subject	Exemption(s)	Explanation
17	Christophe Courchesne/EPD federal litigation attorneys and staff		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		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		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	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 CIA.
21	Attachment to 20		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 CIA.
22	AAG Christophe Courchesne/EPD federal litigation attorneys and staff		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		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.
24	attachment to 22		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	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 CIA.
26	AAG Christophe Courchesne/EPD federal litigation attorneys and staff		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	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		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.

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29	Attachment to 27		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/AAsG Christophe Courchesne, Melissa Hoffer, Rebecca Tepper		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 Franke/EPD federal litigation attorneys and staff	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		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		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.
34	Email chain b/w AAsG David Frankel, Turner Smith, Christophe Courchesne, Megan Herzog, Andy Goldberg, Matthew Ireland		2/26/20 4:02 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.
35	attachment to 34		2/26/20 4:02 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.
36	Attachment to 34		2/26/20 4:02 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		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		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		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, MD AGO/Multiple AGOs, including MA AGO		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		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		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		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	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		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		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		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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48	attachment to 47		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		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/AAsG Richard Johnston, Melissa Hoffer, Shennan Kavanaugh, Matthew Berge, Andy Goldberg, Brian Clappier, Christophe Courchesne, Timothy Reppucci, Sigmund Roos, Taylor O'Hare		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		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		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.
53	attachment to 51		3/11/20 12:59 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU		Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
54	attachment to 51		3/11/20 12:59 PM	attachment	Email chain discussing and attaching weekly updates from the State Energy and Environmental Impact Center at NYU		Relates to development of AGO policy positions. Contains attorney discussion of legal issues and litigation.
55	attachment to 51		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.
56	AAG Seth Schofield/ Richard Johnston, Melissa Hoffer, Shennan Kavanaugh, Matthew Berge, Andy Goldberg, Brian Clappier, Former AAG Christophe Courchesne, Former AAG Timothy Reppucci, Sigmund Roos, Taylor O'Hare, AGO Paralegal		3/11/20 2:07 PM	email	AGO attorney email regarding court filings in RI climate case	attorney-client privilege	AGO attorney communication regarding court filing in State of Rhode Island v. Shell Oil Products, et al., U.S. Ct. of App. for 1st Cir., No. 19-1818.

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57	AAG Timothy Reppucci/AAG Christophe Courchesne	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		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 AAsG Melissa Hoffer, Richard Johnston Rebecca Tepper, Christophe Courchesne and Chloe Gotsis, Emalie Gainey, and Jillian Fennimore, AGO Comms		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 AAsG Christophe Courchesne and Melissa Hoffer		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.
61	attachment to 60		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		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		3/18/20 12:19 PM		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		3/18/20 12:19 PM		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		3/18/20 12:19 PM		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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66	AAG Jim Sweeney/AAsG Richard Johnston, Melissa Hoffer, Seth Schofield, Christophe Courchesne, Matthew Berge		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		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		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		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	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		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		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.
73	attachment to 72		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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Record Number	Sender(s)/Recipient(s)	CC	Family Date	Type of Document	Subject	Exemption(s)	Explanation
74	attachment to 72		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		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		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		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		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		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.
80	attachment to 72		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		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.

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82	attachment to 81		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	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		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	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.
86	attachment to 85		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		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	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.

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Record Number	Sender(s)/Recipient(s)	CC	Family Date	Type of Document	Subject	Exemption(s)	Explanation
89	attachment to 88		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	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.
91	attachment to 90		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		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		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		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		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.
96	Email chain b/w AAsG Timothy Reppucci and Christophe Courchesne and confidential litigation consultant		4/15/20 5:27 PM	email	Email chain with expert relating to 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 and work product re: Com. of Mass. v. Exxon Mobil Corp. litigation.

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97	Elizabeth Klein, NYU/AAG Christophe Courchesne, AAG Melissa Hoffer, AAG Rebecca Tepper	David Hayes & Jessica Rachel Bell, NYU	4/21/20 7:36 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.
98	Christophe Courchesne/EPD federal litigation attorneys and staff		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		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		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		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		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		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.