

From: [Foster, Susan](#)
To: [AGO - Public Records Requests](#)
Cc: [Shephard, Whitney L.](#); [Bhirud, Ketan D.](#)
Subject: Public Records Request
Date: Friday, January 13, 2023 3:23:20 PM
Attachments: [Records Request - VT Attorney General.pdf](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Sir or Madam,

On behalf of Ketan Bhirud, please see the attached public records request. A copy of the same has been sent to your office via certified mail. Please direct any questions about this request to Ketan at 702-468-8779 or ketan.bhirud@troutman.com.

Thank you,

Susan Foster

Legal Practice Assistant

Direct: 585.270.2123 | Internal: 818-2123

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VIA U.S. MAIL AND ELECTRONIC MAIL
Vermont Office of the Attorney General
Attn: Public Records Act Request
109 State Street
Montpelier, VT 05609
ago.publicrecordsrequest@vermont.gov

Dear Vermont Office of the Attorney General,

Under the Vermont Public Records Law, I am requesting an opportunity to inspect or obtain copies of the public records described below on behalf of my client, SambaSafety. Since 1998, SambaSafety has led the transportation industry in driver risk management software. Its mission is to promote safer communities by reducing risk through data insights.

Unless otherwise specified, the relevant period for these Requests is from January 1, 2010, to the present. Please send all records responsive to this request to ketan.bhirud@troutman.com. If there are any fees associated with searching or copying these records, please inform me of the cost. The Vermont Public Records Law requires a response no later than three business days from receipt of a written request. If access to the records I am requesting will take longer than this amount of time, please contact me at 702-468-8779 to let me know when I will receive access to the records. If you withhold any documents in response to these requests, please cite the specific exemptions you rely on to justify the refusal to release the information.

Please note that SambaSafety's goal is to obtain copies of any agreements to provide traffic records in your state to any person or entity. SambaSafety does not intend to impose an undue burden and is happy to discuss ways to limit these requests. To that end, I would welcome a discussion with the records custodian and am available at your convenience at Ketan.Bhirud@troutman.com or (702) 468-8779.

Thank you for considering my request.

DEFINITIONS

For responding to this Request, the common usage of a word or term will apply unless the word or term is otherwise defined in this section. Unless a request states that a different meaning is intended, the following definitions are operative:

A. "Entity" means any firm, corporation, limited liability company, trust, association, partnership, joint venture, governmental body, or other forms of an entity, as the context may require to include rather than exclude documents from production.

B. "Person" means an individual, natural person, corporation, partnership, association, firm, joint venture, proprietorship, or any other entity or group of natural persons or such entities, singular or plural, male, female, or neuter gender, as the context may require to include rather than exclude documents from production.

C. "You" and "Your" refer to the Vermont Office of the Attorney General and any predecessor, successor, affiliate, or other Person or Entity acting on its behalf, as the context may require to include rather than exclude documents from production.

D. "Document" shall have its customary, broad sense to include any written or graphic matter, whether printed or reproduced by any process, written, or produced by hand; draft or final; original or reproduction; including but not limited to the following categories: letters, correspondence, emails, instant messages, notices, reports, video or audio files, interoffice communications, financial statements, proposals, prospectuses, offers, working papers, drawings, sketches, plans, guidelines, graphics, charts, photographs, .pdf files, tangible things, and any and all other data compilations or information resources from which information can be obtained or translated, if necessary, through detection devices into a reasonably usable form. "Document" includes the original of any document, in its native form and in whatever medium it may exist, and any copy of such original differing in any way from the original. "Document" also includes all metadata of any kind and all electronic document or data set that is available electronically, including information relating to how, when, and by whom it was collected, created, sent, copied, received, accessed, or modified; and how it is formatted, including data demographics such as size, location, storage requirements, and media information.

E. "Communication" means any mode or method of contact for the transmission, dissemination, request for, or receipt of information of any kind, including, without limitation, thoughts, mental impressions, ideas, suggestions, etc., conveyed in any format, and by any means or medium whatsoever. This term shall include, without limitation, all statements, admissions, denials, inquiries, discussions, conversations, negotiations, agreements, contracts, understandings, meetings, telephone conversations, letters, correspondence, notes, telegrams, emails, advertisements, or any other form of written or verbal intercourse. The Requests include communication to, from, or within any Entity, including any communications between and among its representatives, employees, agents, advisors, brokers, or attorneys (except when privileged).

F. "Date" means the exact day, month, and year of the event, communication, or other thing at issue, or the approximate day, month, and year if you do not know the exact date.

G. The words "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these Requests any information which might otherwise be construed to be outside the scope of this discovery request.

H. "Any" shall include and encompass "all" and vice-versa, as the context may require to include rather than exclude documents from production.

I. The terms "regarding," "relate to," "relates to," "relating to," "related to," "refer to," "refers to," "referring to," and "concerning" mean, without limitation, concerning, referring to, alluding to, responding to, relating to, connected with, commenting upon, in respect of, about, establishing, analyzing, criticizing, touching upon, constituting, comprising, composing, containing, mentioning, embodying, identifying, stating, pertaining directly to, pertaining indirectly to, supporting, refuting, reflecting, is in any way relevant to or being, as the context may require to include rather than exclude documents from production.

J. Regarding the terms defined herein, all terms used in the singular shall include the plural, and all terms used in the plural shall include the singular, as the context may require to include rather than exclude documents from production.

REQUESTS

1. To the extent they are in your possession, custody, or control, please provide all executed agreements that any agency in Vermont currently has or previously had with any Person or Entity to provide (i) traffic court or violation records, (ii) a compilation of traffic court or violation records, or (iii) other records that include traffic court or violation records.

2. To the extent they are in your possession, custody, or control, please provide all drafts of any agreements that any agency in Vermont has sent to or received from any Person or Entity concerning (i) traffic court or violation records, (ii) a compilation of traffic court or violation records, or (iii) other records that include traffic court or violation records.

3. To the extent you have any lists of Persons or Entities requesting or receiving (i) traffic court or violation records, (ii) a compilation of traffic court or violation records, or (iii) other records that include traffic court or violation records, please provide the lists. If you do not have such lists, please provide enough documents to sufficiently identify any Persons or Entities requesting or receiving traffic court or violation records, a compilation of traffic court or violation records, or other records that include traffic court or violation records.

Requested By: /s/ Ketan D. Bhirud
Date of Request: January 13, 2023

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