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May 30, 2018

Christopher Brook
Legal Director
American Civil Liberties Union of North Carolina
P.O. Box 28004
Raleigh, NC, 27611

RE: *Merrill v. Boswell*,
18 CVS 0867 (Wake Cty.)

Dear Chris:

Representative Boswell has made a decision to disclose the un-redacted set of documents Mr. Merrill requested in this action. Enclosed please find a CD with Defendant's un-redacted documents, bates-stamped as Boswell un-redacted POD_000001-001127. Please note that the numbering of this bates-stamped disclosure is different from a redacted bates-stamped disclosure provided to you previously, because a separate export had to be performed on the original data set. This resulted in a small page number variance in the order of the two sets of documents. Also, per our previous correspondence, the "blank page" (original bates number 001128) has been removed from this production as unresponsive.

This disclosure provides all information requested by Plaintiff in this action, free of redactions. In our view, today's production of documents resolves the pending controversy. We are filing a motion to dismiss, which we enclosed with this letter, to reflect our position.

As always, feel free to contact me if you need further assistance.

Sincerely,

Olga Vysotskaya de Brito
Special Deputy Attorney General

Enclosures: (1) CD with responsive documents stamped as Boswell un-redacted POD_000001-001127;
(2) Defendant's motion to dismiss.