

----- Forwarded message -----

From: Brian Sullivan <bsullivan@mskvt.com>
Date: Tue, Nov 29, 2022 at 4:37 PM
Subject: RE: Enosburg Tower-Request for Property Access
To: Sandra Bruhn <sandrambruhn@gmail.com>
CC: Pippa Dorfman <sacredintheround@gmail.com>, Colleen Sheppard <ncsheppard17@gmail.com>, Derek Jones <djjmtl@sympatico.ca>, Tara Lombardi <tlombardi8@gmail.com>, Cyrus House <house.cy@gmail.com>, Charles Hungerford <consciousrootsvt@gmail.com>, Chris Bruhn <pcbwolfelake@gmail.com>

Good afternoon, Ms. Bruhn:

A representative of Industrial Tower and Wireless, LLC checked with the landowner of the subject property regarding this request. The landowner is not comfortable allowing the access that has been requested

Brian (he/him)

COVID-19 STATEMENT October 26, 2022

Our office is open to outside visitors. All attorneys and staff have been fully vaccinated. We ask that you please postpone your visit if you have either tested positive for Covid-19 within the past ten days or are exhibiting symptoms consistent with a Covid-19 infection. If you have been exposed to COVID-19 within the past ten days but have not tested positive or are not exhibiting symptoms, please wear a mask while visiting our office. If you do not have a mask, one will be provided. Please call our office with any questions at (802) 861-7000.

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Member of Law Firm Antiracism Alliance

From: Sandra Bruhn <sandrambruhn@gmail.com>
Sent: Tuesday, November 29, 2022 1:55 PM
To: Brian Sullivan <bsullivan@mskvt.com>
Cc: Pippa Dorfman <sacredintheround@gmail.com> Colleen Sheppard <ncsheppard17@gmail.com> Derek Jones <djjmtl@sympatico.ca> Tara Lombardi <tlombardi8@gmail.com> Cyrus House <house.cy@gmail.com> Charles Hungerford <consciousrootsvt@gmail.com> Chris Bruhn <pcbwolfelake@gmail.com>
Subject: Enosburg Tower-Request for Property Access
 Mr Brian Sullivan,

Within our discovery questions on October 28th we had asked to "permit entry upon designated land in possession or control of the applicant for the purpose of inspection and measuring, surveying, photographing, testing, or sampling the property or any designated object or operation thereon, within scope of Rule 26(b)".

ITW responded on November 11th that "ITW does not object to this request for entry. However, ITW neither owns nor presently controls the land on which its proposed telecommunications will be located. ITW will pass this request along to the landowner, in whose sole discretion compliance with this Request lies. ITW will transmit the landowner's response to the neighbors/intervenors".

Can you please advise as to the status and response to this request, as time is of the essence?

Regards,

Sandra Bruhn

860-882-7170