

ATTESTATION REGARDING REQUESTED RECORDS

Date: January 16, 2020
Agency: Easton Area School District
Requester: Jake Towne
Appeal Dkt #: 2019-2124

Records Requested:

Please provide me with e-mail copies or transcripts, etc. to any other party (including but not limited to attorney's in the employ of the school district or Palmer Township, engineers in the employ of the school district or Palmer Township, the homeowners at 110 South Greenwood Ave. or anyone in their employ) related in any stormwater system changes associated with the Palmer Elementary School location or the property at 110 South Greenwood Ave., Easton PA 18045, including any easement, eminent domain, etc. discussions from June 1, 2017 through September 24, 2019.

I, Rebecca A. Young, Esq., hereby declare, pursuant to 18 Pa.C.S. § 4904, that the following statements are true and correct based upon my personal knowledge information and belief:

1. I am a solicitor for the Easton Area School District.
2. On or about November 4, 2019, the firm received an electronic file containing more than 3,000 pages of emails that the District had identified as potentially responsive to the request.
3. Following resolution of technical issues regarding access to the electronic file, I personally reviewed the records provided by the District.
4. Many of the records were not responsive to the request, in that they occurred outside of the timeframe set forth in the request and/or that they did not relate to the topics set forth in the request.
5. The identification of records as "privileged" in the redaction log dated December 9, 2019 was based on my knowledge, information and belief that the communication was sent to or from the District and its legal counsel and/or contractors providing advice to counsel with regard to the contested legal matter that is the subject of the request.
4. The identification of records as "predecisional" in the redaction log dated December 9, 2019 was based on my knowledge, information and belief that:
 - a. the communication was among District staff, Board members and the District's legal counsel that included predecisional deliberations related to the contested legal matter that is the subject of the request; and/or

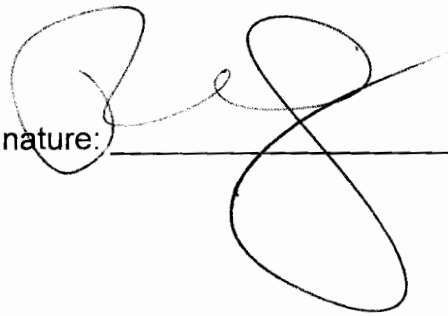
b. the communication was among District staff, Board members and contractors of the District that included predecisional deliberations related to the contested legal matter that is the subject of the request. See Finnerty v. Pennsylvania Department of Community and Economic Development, 208 A.3d 178 (Commw. Ct. 2019), appeal granted, 2019 WL 7370271 (Pa., December 31, 2019)

My contact information, including telephone number and email address, is:

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(610) 332-0390

Date: 1-16-20

Signature: _____

A handwritten signature in black ink, appearing to be 'R. Young', written over a horizontal line. The signature is stylized and cursive.