

March 19, 2015

VIA U.S. MAIL AND EMAIL

Ralph I. Lancaster, Special Master
c/o Mary Clifford, Legal Administrative Assistant
Pierce Atwood LLP
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Re: *Florida v. Georgia*, Original No. 142 Non-Party Production Notice Letter

Dear Special Master Lancaster:

Pursuant to Section 6.1.2 of the amended Case Management Plan, we write on behalf of the Joseph W. Jones Ecological Research Center, Inc. ("Jones Center") regarding the subpoena served by the State of Florida on the Jones Center on March 9, 2015.

The Case Management Plan requires that non-parties notify the Special Master within ten days following service of a subpoena if the non-party anticipates "that full production will require more than one hundred and twenty (120) days from service."

As an initial matter, we note that the scope of Florida's requests is extremely broad, potentially encompassing much of the work of the Jones Center and its partners over the course of its entire existence. The Jones Center is a non-profit organization that has, for twenty years, managed approximately 29,000 acres of land through which portions of the Ichawaynochaway Creek and Flint River flow. Since 1991, it has advanced its mission to conserve environmental resources through care and careful study of its land and habitat. The resources of the Jones Center are limited, and many who study at the Jones Center are affiliated with other private, public, and academic institutions.

Although the subpoena is vague in many respects, responding to the subpoena, as it is currently drafted, would be an overwhelming undertaking that would significantly strain the limited resources of the Jones Center. Accordingly, we have begun the process of conferring with Florida's counsel to narrow the requests within a reasonable scope. Assuming we can reach a reasonable and timely compromise with the State of Florida, the Jones Center will work

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diligently to identify, collect, and produce any responsive documents within the schedule established in the Case Management Plan.

To be sure, depending on the outcome of our negotiation with the State of Florida, the review and production process could be substantial and time-consuming, particularly given the limited resources available to the Jones Center. The State of Florida has indicated that it does not oppose an extension to the extent one becomes necessary. If we determine at any point that circumstances may prevent production within the time allotted, we will move quickly to bring the matter to your earliest attention.

We would be glad to answer any questions you may have.

With best regards,



Michael A. Caplan

MAC/mtg

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