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PROTECTION REPORT**

**Shady Trial Lawyer  
Pipeline Update: Shady Eight  
Member Morgan & Morgan  
Cited For Ethical Failings**

In newly uncovered documents, Morgan & Morgan, fresh off recent sanctions order for using AI in legal filings, cited for “wildly unethical” behavior in connection with their termination from state contract in Kansas

DEMOCRATS



## ‘Wildly Unethical’: Biden Donor's Law Firm Attacked Republican Client, Withheld Legal Docs

A federal judge recently sanctioned Morgan & Morgan for using AI to write fake legal citations



L: Kansas attorney general Kris Kobach (Scott Olson/Getty Images) R: Attorney John Morgan (Wikimedia Commons)

Chuck Ross  
March 1, 2025

A prominent national law firm that donates prolifically to Democrats attacked its own client, Kansas attorney general Kris Kobach (R.), and withheld work product from the Republican’s office after he fired the firm for subpar performance, in what Kobach’s office viewed as a major ethical breach by a firm recently sanctioned for using AI software to write legal briefings.

Kobach fired Morgan & Morgan, the firm of prominent Joe Biden supporter John Morgan, in March 2023 from handling a state lawsuit against natural gas companies accused of price gouging. Kobach said the firm's "performance was not up to what we expected."

Lawyers in Kobach's office asked the firm for all of the records it had compiled during the case, a standard request in any attorney-client relationship. But Morgan & Morgan lawyers stonewalled the request, according to attorneys in Kobach's office and emails obtained by the *Washington Free Beacon*.

"We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives," Morgan & Morgan attorney Douglas Acklin wrote to colleagues on March 31, 2023.

Morgan & Morgan, which bills itself as "America's Largest Injury Firm," also removed organizational codes from 10,000 documents they returned to Kobach's office, a gratuitous step that attorneys there believe was meant to complicate their case.

And in one exchange with a Kobach deputy, Morgan & Morgan attorney James Young accused Kobach of engaging in "coordinated political hackery" with the oil and gas industry, U.S. Chamber of Commerce, and others.

"From an attorney ethics perspective, this is wildly unethical," said a person involved in the discussions with Morgan & Morgan. "Deliberately withholding documents that we were on contract for that should be owned by us. I was flabbergasted that they were taking that position."

The revelation comes amid a rough patch for the Florida-based Morgan & Morgan, which handles cases ranging from slip and fall accidents to dog bites to environmental cases. Last month, a federal judge **fin**ed three Morgan & Morgan attorneys for citing fake cases generated by an AI chatbot as part of a personal injury lawsuit against Walmart.

The ethics concerns and political leanings could raise red flags for other Republican states and municipalities in business with Morgan & Morgan.

Morgan & Morgan lawyers donated \$4.5 million to Democratic candidates and causes between 2017 and 2023, according to FEC filings. John Morgan, the firm's founder, was one of former president Joe Biden's closest donors and supporters. Morgan, who hosted multiple fundraisers for Biden, stood by Biden amid calls last year for the Democrat to drop out of the presidential race because of concerns about his health and mental acuity.

Morgan, who is reportedly considering a run for Florida governor, has ingratiated himself with the Biden family. He flew Biden's brother, Frank Biden, to the presidential inauguration in 2021 on his private jet and considered hiring the Biden brother to work at Morgan & Morgan, *Politico* reported.

"Between the recent sanctions proceedings over use of AI case citations and this revelation about trying to withhold case materials from a former client, it may well be that Morgan & Morgan's days of working for states are numbered," said O.H. Skinner, a former solicitor general for Arizona and executive director of Alliance for Consumers. "These are not minor infractions, they go to the reliability of the firm vis-a-vis the public trust."

The *Wall Street Journal* editorial board in 2023 questioned why red states hired the firm for commission-based cases given the firm's position as one of the Democratic Party's biggest supporters.

"One mystery of modern politics is why so many Republican-led states employ trial lawyers who file junk lawsuits and donate to their political opponents," the editorial board wrote on March 7, 2023.

The board praised Kobach and Iowa attorney general Breanna Bird for dropping Morgan & Morgan from handling litigation on behalf of the state. The board took issue with firms like Morgan & Morgan that handle cases based on contingency fees, arguing that those arrangements often benefit trial lawyers at the expense of states.

"Trial lawyers get huge fees on jackpot lawsuits, then feed their winnings back to politicians as campaign cash," the editorial board wrote.

Morgan, who founded the firm in 1988, stands by its work for Kobach's office and says he believes they were fired for political reasons.

"We maintain that our firing was politically motivated and hurt Kansans, who will never see justice since the AG walked away from the case earlier this year," Morgan told the *Free Beacon*. "We fulfilled every obligation we had during the transition, and the record supports that we did everything by the books."

But employees in Kobach's office dispute that characterization, while admitting it is not a surprise that Morgan & Morgan would be upset at being dropped from the Kansas case.

"What was a surprise was the completely scummy way that they responded to what was ultimately an ordinary business decision that attorneys deal with every day," the source said.

**Published under:** [Democratic Donors](#) , [Ethics](#) , [Joe Biden](#) , [Kansas](#)

**Selected And Annotated Internal Emails  
Between Morgan & Morgan And  
The Kansas Attorney General Office**

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

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**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General’s office. Also, you will be sending back the original two hard drives.

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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FOR THE PEOPLE.COM

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kansas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

## Hutchison, Robert

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**From:** Jack, Melanie  
**Sent:** Thursday, April 20, 2023 8:05 AM  
**To:** Burrows, Daniel  
**Cc:** Oleen, Fran  
**Subject:** Morgan & Morgan

Dan,

This week we received a hard drive from Epiq, the document management company that had all of the natural gas discovery on its platform. The company, at the request of Morgan and Morgan, removed all the coding on these documents and returned them to us. Also, I know that any memo, graphs, emails, or other work product will not be produced. We were told by James Young at Morgan and Morgan that this is proprietary and they would not be providing it. They even suggested they will bill us of the work done by Equip to return our documents.

I have not had IT look at the hard drive, but it won't provide us with a clear cut view of the CEA documents relevant to that litigation or the subpoena enforcement case against Macquarie. I specifically asked Morgan and Morgan about this and that is when they admitted the documents were uncoded.

His email is: James Young - [JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)

I have filed the notice of withdrawal of Morgan and Morgan in the subpoena enforcement case. We did not enter their appearance in the CEA litigation.

Let me know if you have other questions.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699



## Hutchison, Robert

---

**From:** Burrows, Daniel  
**Sent:** Thursday, April 20, 2023 10:21 AM  
**To:** 'jyoung@forthepeople.com'  
**Cc:** Oleen, Fran; Jack, Melanie  
**Subject:** File Transfer

Mr. Young:

I am concerned about something one of our attorneys told me recently about the transfer of responsibility for the Kansas natural gas litigation from your firm to our office. Apparently, the hard drive they received from Epiq (the document management company your firm used) lacked any coding on the documents. I'm told Epiq removed all that *at Morgan & Morgan's direction*. Relatedly, I have also been told that you are refusing to provide us with the remainder of the file (such as memos, graphs, and other documents with pertinent case analysis) on the grounds that they are supposedly proprietary work product.

If the above is true, it seems like a violation of attorney ethics rules. Both Florida and Kansas (whose law you subjected yourself to by seeking pro hac admission in our courts), require attorneys to "take steps to the extent reasonably practicable to protect a client's interests" at the termination of representation. Indeed, a recent Florida ethics opinion states that a lawyer "has an ethical obligation to comply with a client's or former client's reasonable request for copies of file material where that information would serve a useful purpose to the client," Fla. Bar Ethics Op. 88-11 (Reconsideration) (Mar. 23, 2021); *see also Fla. Bar v. Varner*, 992 So.2d 224 (Fla. 2008) (attorney disciplined for failing to deliver complete file to successor counsel during ongoing litigation); *Dubose v. Shelnut*, 566 So. 2d 921 (Fla. Dist. Ct. App. 1990) (duty to deliver specifically requested documents to former client); *cf. In re Deines*, 430 P.3d 437 (Kan. 2018); *In re Hawkins*, 373 P.3d 718 (Kan. 2016); *In re Green*, 156 P.3d 628 (Kan. 2007). Given that we are replacing you in the middle of ongoing litigation, our need for those additional items should be plain. How you may feel about the circumstances of the termination is irrelevant. Comment 9 to the Model Rule makes that clear: "Even if the lawyer has been unfairly discharged by the client, a lawyer must take all reasonable steps to mitigate the consequences to the client."

I am especially concerned about your direction to your contractor to remove coding from documents. This not only fails your duty to protect our interests, but seems to actively and maliciously impair our ability to continue with the litigation. Your actions have made it difficult to have a clear-cut view of the CEA documents relevant to that litigation or the enforcement case against Macquarie.

Furthermore, our contract specifically stated that you would "make available at reasonable times all of [your] books, documents, papers, records and other evidence" related to the contract. Section 1.32; *see also* Specifications ("Contractor shall timely provide to the Attorney General's Office: All relevant case information and documents...; suggestions for case strategy and other information needed to determine other case actions"). So your refusal to turn over the file (and apparent spoliation thereof) could be a contract breach as well as an ethical one.

I hope this is all a misunderstanding. Is there a time we can discuss this matter today or tomorrow?

### Dan Burrows

Chief Advisor | Office of the Attorney General  
Topeka, Kansas  
Phone: (785) 368-8435  
Email: daniel.burrows@ag.ks.gov

## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, April 21, 2023 8:51 AM  
**To:** Burrows, Daniel  
**Cc:** Oleen, Fran; Jack, Melanie; Juan Martinez x2192; Tim Fox x26041; dkovel; mbrowne  
**Subject:** Kansas Natural Gas

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dan,

In addition to the preposterous false narrative your boss previously peddled to the media, you have just made some rather serious ethical accusations. Because these allegations impact my co-counsel and colleagues, I have added them to this thread.

We are not refusing to provide Kansas with anything which you are entitled to.

I disagree with your impression that Kansas is in the middle of on-going litigation. The complaint we drafted was filed a little over two months ago and to our knowledge, discovery has not commenced and motions to dismiss have not been ruled upon.

Our original draft, which was shared with your team, was extensively annotated with citations to relevant documents now in your possession. In light of this, I'm not sure I understand how Kansas is being impaired in the Macquarie litigation. There is still plenty of time for you and your time to create your own coding panel, review the documents and record your mental impressions in a system you pay for.

Perhaps you are referring to our work product related to the other targets of the investigation? If so, surely you would agree that there is no current case which triggers an obligation for us to share our work product or mental impressions.

Fla. Bar Ethics Op. 88-11 (Reconsideration) makes clear that "the file generated by a lawyer is the property of the lawyer rather than the client. See, Dowda and Fields, P.A. v. Cobb, 452 So.2d 1140, 1142 (Fla.5th DCA1984). Therefore, other than original papers and documents given to the lawyer by the client or previously paid for by a client, a lawyer is not obligated to provide a client with the lawyer's original file."

Your team asked for the subpoena response materials, and at our own expense, still wholly unreimbursed by Kansas, after being summarily terminated for what can only be described as suspect reasons, we compiled and shipped you the docs and data which responded to the subpoenas we issued.

I understand that you are now also seeking our work product in the form of the attorney notes and impressions our team created on the system we paid for.

We are happy to have a discussion about an arrangement for providing this material as well, but disagree that somehow you are entitled to our work product and mental impressions of the case.

I am not aware of, nor did I instruct anyone to withhold any materials aside from asking Epiq to quickly compile the subpoena responses in isolation in order to get them to you in timely fashion.

During our representation, we spent considerable time and money on behalf of Kansas. Below is a summary of the time and related lodestar based on our hourly rates:

<u>Firm</u>	<u>Hours</u>	<u>Lodestar</u>
Morgan & Morgan	3,642.83	\$2,120,535.52
Kirby McInerney	797	\$514,482.50
Brown Pelican	160.1	\$128,283

In addition to the above time, we also engaged experts and hosted the document review platform for Kansas' benefit. The expenses of such items are \$39,386.53. This does not include the license fees for Relativity, which we absorbed.

Consistent with the law in Kansas, we believe the above amounts are recoverable under either quantum meruit, or some other claim in contract, law, or equity.

As such, we make claim for this amount **(\$2,802,687.50)** and assert a charging lien over any recovery under K.S.A. 7-108. We will, within the appropriate timeframe, also serve you with notice of same.

Should you engage replacement outside counsel for the Macquarie litigation, pursuant to another RFP or otherwise, please let them know of the existence of this lien.

Should you engage replacement outside counsel for continued investigation or litigation against the other responsible parties, which we certainly encourage, we will be happy to discuss an arrangement with the new counsel to save them the time and expense that we undertook.

You dance dangerously close to the line in alleging spoliation and ethical breaches. But this not the first time your office has uttered falsehoods about our team. In the Wall Street Journal article which was conveniently published on the very same day we received our termination letter, AG Kobach was quoted saying that our firm "engaged subcontractors in violation of the agreement" and that our performance was not up to what he expected.

This falsehood is simply over the top and has publicly harmed our respective reputations. Note, unlike AG Kobach, I have never been sanctioned by a court or disciplined by the bar. Rather, I chair our local bar disciplinary committee, serve on the Bar's standing committee on professionalism, and previously chaired the Jacksonville Ethics Commission.

The truth, as you are no doubt aware, is that each attorney and law firm which was deployed on this project, was **specifically approved by the KSAG both verbally and in writing**. Moreover, the principal attorneys who worked on this matter were actually sworn in as Special Assistant Attorneys General by Kansas AG Schmidt, and received certificates in recognition of this honor. Moreover, the quality of our work product which led to the only AG case filed in this matter, was never called into question by a single employee of the KSAG. In fact, quite the opposite is true.

The quotes provided to the Wall Street Journal, along with AG Kobach's social media posts concerning this matter, imply that our firms operated outside of, or in violation of, the contract terms, and provided subpar work resulting in some harm to Kansas.

The broader implication of the story is that we were fired for cause, which clearly was not the case. We ask that you take appropriate steps to retract these falsehoods in order to correct and clarify the record to avoid further impairing our reputation and character.

Despite the new administration's tone and tenor, we do wish you luck in your mission to protect Kansas consumers and hold the responsible parties accountable for their role in price gouging natural gas. You are lucky to have at least two excellent attorneys in your office to see that through.

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Mr. Young:

I am concerned about something one of our attorneys told me recently about the transfer of responsibility for the Kansas natural gas litigation from your firm to our office. Apparently, the hard drive they received from Epiq (the document management company your firm used) lacked any coding on the documents. I'm told Epiq removed all that *at Morgan & Morgan's direction*. Relatedly, I have also been told that you are refusing to provide us with the remainder of the file (such as memos, graphs, and other documents with pertinent case analysis) on the grounds that they are supposedly proprietary work product.

If the above is true, it seems like a violation of attorney ethics rules. Both Florida and Kansas (whose law you subjected yourself to by seeking pro hac admission in our courts), require attorneys to "take steps to the extent reasonably practicable to protect a client's interests" at the termination of representation. Indeed, a recent Florida ethics opinion states that a lawyer "has an ethical obligation to comply with a client's or former client's reasonable request for copies of file material where that information would serve a useful purpose to the client," Fla. Bar Ethics Op. 88-11 (Reconsideration) (Mar. 23, 2021); *see also Fla. Bar v. Varner*, 992 So.2d 224 (Fla. 2008) (attorney disciplined for failing to deliver complete file to successor counsel during ongoing litigation); *Dubose v. Shelnut*, 566 So. 2d 921 (Fla. Dist. Ct. App. 1990) (duty to deliver specifically requested documents to former client); *cf. In re Deines*, 430 P.3d 437 (Kan. 2018); *In re Hawkins*, 373 P.3d 718 (Kan. 2016); *In re Green*, 156 P.3d 628 (Kan. 2007). Given that we are replacing you in the middle of ongoing litigation, our need for those additional items should be plain. How you may feel about the circumstances of the termination is irrelevant. Comment 9 to the Model Rule makes that clear: "Even if the lawyer has been unfairly discharged by the client, a lawyer must take all reasonable steps to mitigate the consequences to the client."

I am especially concerned about your direction to your contractor to remove coding from documents. This not only fails your duty to protect our interests, but seems to actively and maliciously impair our ability to continue with the litigation. Your actions have made it difficult to have a clear-cut view of the CEA documents relevant to that litigation or the enforcement case against Macquarie.

Furthermore, our contract specifically stated that you would "make available at reasonable times all of [your] books, documents, papers, records and other evidence" related to the contract. Section 1.32; *see also* Specifications ("Contractor shall timely provide to the Attorney General's Office: All relevant case information and documents...; suggestions for case strategy and other information needed to determine other case actions"). So your refusal to turn over the file (and apparent spoliation thereof) could be a contract breach as well as an ethical one.

I hope this is all a misunderstanding. Is there a time we can discuss this matter today or tomorrow?

**Dan Burrows**

Chief Advisor | Office of the Attorney General

Topeka, Kansas

Phone: (785) 368-8435

Email: [daniel.burrows@ag.ks.gov](mailto:daniel.burrows@ag.ks.gov)

**James Young**

Attorney

[My Bio](#)

**P:** (904) 361-0012

**F:** (904) 361-4307

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

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**From:** Jack, Melanie  
**Sent:** Wednesday, May 3, 2023 9:19 AM  
**To:** 'Takumyo, Kimmie'; Douglas Acklin x6133  
**Cc:** James Young x6172; Patrick Mathews x4676; EMS-DL-Morgan; Oleen, Fran  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

After review of the three thumb drives sent to us, I am having problems opening some of the files. I am not a tech person, but my IT person tells me we need a key or some other way to open these files:

2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	DAT File	210
2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	OPT File	856
CE_001	9/16/2022 4:39 PM	DAT File	39 KB
CE_001	9/16/2022 4:30 PM	OPT File	51 KB
MEL001B	9/8/2022 6:02 PM	DAT File	651 KB
MEL001B	9/8/2022 5:57 PM	OPT File	358 KB

Please clarify if these file are the uncoded documents from Relativity.

Also, it appears the documents returned to us do not contain the full investigation conducted by Morgan and Morgan.

Specifically, I am unable to locate any documents related to the Macquarie investigation/litigation. Please advise.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach

## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Thursday, May 4, 2023 9:54 AM  
**To:** 'James Young x6172'  
**Cc:** Oleen, Fran  
**Subject:** Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

James,

Due to the two Macquarie litigation cases, it is imperative I have access to all investigation, research and litigation documents including communications with counsel for Macquarie.

For example, at the meet and confer(s) did you offer to limit a subpoena request in some way? The most pressing case is the subpoena enforcement litigation.

I can't know what is missing in the documents if I don't know they exist. The documents that form the basis of the CEA petition are subject to discovery. It is impossible for me to know the perimeters of discovery without some guidance.

Your help is appreciated.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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## Hutchison, Robert

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**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 9:58 AM  
**To:** Jack, Melanie  
**Cc:** Oleen, Fran; Juan Martinez x2192  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Sure. Adding Juan, as he was party to some communications as well.

We will begin forwarding you any and all emails to and from counsel.

We had two discussions about narrowing subpoena requests if they agreed to produce. They never agreed to produce so there are no agreements.

I will send you everything in my electronic file.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

**MORGAN & MORGAN**  
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**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Thursday, May 4, 2023 10:54 AM  
**To:** James Young x6172 <JYoung@ForThePeople.com>  
**Cc:** Fran.Oleen <Fran.Oleen@ag.ks.gov>  
**Subject:** \*EXT\* Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

---

James,



## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Friday, May 5, 2023 10:33 AM  
**To:** jyoung@forthepeople.com  
**Cc:** Oleen, Fran  
**Subject:** Macquarie subpoena

Good morning,

The August 18, 2022 subpoena issued to Macquarie references an Exhibit A, a template for data. May I have a copy of that.

Will you kindly provide the entire Macquarie response to this subpoena?

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Friday, May 5, 2023 2:25 PM  
**To:** 'James Young x6172'  
**Cc:** Oleen, Fran; Juan Martinez x2192; mbrowne; dkovel; Orié Braun  
**Subject:** RE: Macquarie subpoena

James,

The production you sent me is from CIMA, not Macquarie.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
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---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, May 5, 2023 12:40 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Cc:** Oleen, Fran <Fran.Oleen@ag.ks.gov>; Juan Martinez x2192 <juanmartinez@forthepeople.com>; mbrowne <mbrowne@brownepelican.com>; dkovel <dkovel@kmlp.com>; Orié Braun <obraun@kmlp.com>  
**Subject:** RE: Macquarie subpoena

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Melanie:

I don't see an exhibit A in my files, but adding others to confirm. Not sure what to make of that. Maybe Juan, Orié or Matt will recall.

## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Friday, May 5, 2023 2:27 PM  
**To:** 'James Young x6172'; Oleen, Fran  
**Subject:** RE: \*EXT\* Response of Macquarie Energy, LLC to Subpoena in In The Matter of the Investigation of Natural Gas Pricing Winter Storm Uri- KSAG File No: CP21-002300

I am not able to open these files. I can't log in with the password.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, May 5, 2023 12:54 PM  
**To:** Oleen, Fran <Fran.Oleen@ag.ks.gov>; Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Subject:** FW: \*EXT\* Response of Macquarie Energy, LLC to Subpoena in In The Matter of the Investigation of Natural Gas Pricing Winter Storm Uri- KSAG File No: CP21-002300

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This was also part of the production email

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

## Hutchison, Robert

---

**From:** Burrows, Daniel  
**Sent:** Thursday, May 18, 2023 3:48 PM  
**To:** James Young x6172  
**Cc:** Oleen, Fran; Jack, Melanie; Juan Martinez x2192; Tim Fox x26041; dkovel; mbrowne  
**Subject:** RE: Kansas Natural Gas

Mr. Young:

My apologies for the delay in getting back to you.

I thought that we could have a reasonable discussion about the issues here. Despite your vituperative e-mail, I remain hopeful that we can discuss this as professionals and not name-calling children. That's why I requested a phone call to sort out whether there was some misunderstanding. I still think a phone call would be useful.

But let me address a few of your points. First, we have not, to this point, contested that your firm may be entitled to some sort of fee somewhere along the line. Any such fee, however, would be under the contract that you and your firm agreed to when the representation began. And that contract was contingent on a recovery. At best, then, your claim is unripe. *If* any such recovery is obtained, we would be happy to discuss whether and what compensation may be appropriate under section 1.12 of the contract, which says you shall receive a prorated fee. But your resort to other methods of determining your compensation is unsupportable. Early termination was clearly contemplated in the contract and you agreed to the terms of section 1.12. You have no grounds to go back on it now. As long as we are talking about section 1.12, however, I should point out that any fee paid under that provision is subject to offset for the state's damages. Insofar as you hinder our ability to continue pursuing this case, we will consider the additional costs incurred as an appropriate offset.

Second, I'm not sure where you are getting your idiosyncratic definition of "on-going litigation." Two cases are filed in court. They are moving forward. That you may think we have "plenty of time... to create [our] own coding panel, review the documents and record [our] mental impressions in a system [we] pay for" is not particularly relevant. *In re Docking*, 196 P.3d 1149, 1152 (Kan. 2008) (client's ability to avoid harm using successor counsel does not relieve ethical violation; merely delaying client's case is sufficient to violate ethics rules). And, even setting aside ethical duties, your agreement entitled us to even work product as I pointed out in my original email. *If you want to be paid, you will provide it to us.* You cannot withhold valuable consideration and then turn around and demand a fee. That is not how contracts work.

Again, I believe a phone call could be useful in sorting all this out. In the end, we probably do not want or need your *entire* file on this matter. But we do need to be able to access and review the documents received in the investigation in a way that doesn't require us to start from scratch.

### Dan Burrows

Chief Deputy Attorney General | Office of the Attorney General  
Topeka, Kansas  
Phone: (785) 368-8435  
Email: daniel.burrows@ag.ks.gov

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, April 21, 2023 8:51 AM  
**To:** Burrows, Daniel <Daniel.Burrows@ag.ks.gov>  
**Cc:** Oleen, Fran <Fran.Oleen@ag.ks.gov>; Jack, Melanie <Melanie.Jack@ag.ks.gov>; Juan Martinez x2192 <juanmartinez@forthepeople.com>; Tim Fox x26041 <tfox@forthepeople.com>; dkovel <dkovel@kmlp.com>;

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dan,

In addition to the preposterous false narrative your boss previously peddled to the media, you have just made some rather serious ethical accusations. Because these allegations impact my co-counsel and colleagues, I have added them to this thread.

We are not refusing to provide Kansas with anything which you are entitled to.

I disagree with your impression that Kansas is in the middle of on-going litigation. The complaint we drafted was filed a little over two months ago and to our knowledge, discovery has not commenced and motions to dismiss have not been ruled upon.

Our original draft, which was shared with your team, was extensively annotated with citations to relevant documents now in your possession. In light of this, I'm not sure I understand how Kansas is being impaired in the Macquarie litigation. There is still plenty of time for you and your time to create your own coding panel, review the documents and record your mental impressions in a system you pay for.

Perhaps you are referring to our work product related to the other targets of the investigation? If so, surely you would agree that there is no current case which triggers an obligation for us to share our work product or mental impressions.

Fla. Bar Ethics Op. 88-11 (Reconsideration) makes clear that "the file generated by a lawyer is the property of the lawyer rather than the client. See, Dowda and Fields, P.A. v. Cobb, 452 So.2d 1140, 1142 (Fla.5th DCA1984). Therefore, other than original papers and documents given to the lawyer by the client or previously paid for by a client, a lawyer is not obligated to provide a client with the lawyer's original file."

Your team asked for the subpoena response materials, and at our own expense, still wholly unreimbursed by Kansas, after being summarily terminated for what can only be described as suspect reasons, we compiled and shipped you the docs and data which responded to the subpoenas we issued.

I understand that you are now also seeking our work product in the form of the attorney notes and impressions our team created on the system we paid for.

We are happy to have a discussion about an arrangement for providing this material as well, but disagree that somehow you are entitled to our work product and mental impressions of the case.

I am not aware of, nor did I instruct anyone to withhold any materials aside from asking Epiq to quickly compile the subpoena responses in isolation in order to get them to you in timely fashion.

During our representation, we spent considerable time and money on behalf of Kansas. Below is a summary of the time and related lodestar based on our hourly rates:

<b>Firm</b>	<b>Hours</b>	<b>Lodestar</b>
Morgan & Morgan	3,642.83	\$2,120,535.52

Kirby McInerney	797	\$514,482.50
Brown Pelican	160.1	\$128,283

In addition to the above time, we also engaged experts and hosted the document review platform for Kansas’ benefit. The expenses of such items are \$39,386.53. This does not include the license fees for Relativity, which we absorbed.

Consistent with the law in Kansas, we believe the above amounts are recoverable under either quantum meruit, or some other claim in contract, law, or equity.

As such, we make claim for this amount **(\$2,802,687.50)** and assert a charging lien over any recovery under K.S.A. 7-108. We will, within the appropriate timeframe, also serve you with notice of same.

Should you engage replacement outside counsel for the Macquarie litigation, pursuant to another RFP or otherwise, please let them know of the existence of this lien.

Should you engage replacement outside counsel for continued investigation or litigation against the other responsible parties, which we certainly encourage, we will be happy to discuss an arrangement with the new counsel to save them the time and expense that we undertook.

You dance dangerously close to the line in alleging spoliation and ethical breaches. But this not the first time your office has uttered falsehoods about our team. In the Wall Street Journal article which was conveniently published on the very same day we received our termination letter, AG Kobach was quoted saying that our firm “engaged subcontractors in violation of the agreement” and that our performance was not up to what he expected.

This falsehood is simply over the top and has publicly harmed our respective reputations. Note, unlike AG Kobach, I have never been sanctioned by a court or disciplined by the bar. Rather, I chair our local bar disciplinary committee, serve on the Bar’s standing committee on professionalism, and previously chaired the Jacksonville Ethics Commission.

The truth, as you are no doubt aware, is that each attorney and law firm which was deployed on this project, was **specifically approved by the KSAG both verbally and in writing**. Moreover, the principal attorneys who worked on this matter were actually sworn in as Special Assistant Attorneys General by Kansas AG Schmidt, and received certificates in recognition of this honor. Moreover, the quality of our work product which led to the only AG case filed in this matter, was never called into question by a single employee of the KSAG. In fact, quite the opposite is true.

The quotes provided to the Wall Street Journal, along with AG Kobach’s social media posts concerning this matter, imply that our firms operated outside of, or in violation of, the contract terms, and provided subpar work resulting in some harm to Kansas.

The broader implication of the story is that we were fired for cause, which clearly was not the case. We ask that you take appropriate steps to retract these falsehoods in order to correct and clarify the record to avoid further impairing our reputation and character.

Despite the new administration’s tone and tenor, we do wish you luck in your mission to protect Kansas consumers and hold the responsible parties accountable for their role in price gouging natural gas. You are lucky to have at least two excellent attorneys in your office to see that through.

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Mr. Young:

I am concerned about something one of our attorneys told me recently about the transfer of responsibility for the Kansas natural gas litigation from your firm to our office. Apparently, the hard drive they received from Epiq (the document management company your firm used) lacked any coding on the documents. I'm told Epiq removed all that *at Morgan & Morgan's direction*. Relatedly, I have also been told that you are refusing to provide us with the remainder of the file (such as memos, graphs, and other documents with pertinent case analysis) on the grounds that they are supposedly proprietary work product.

If the above is true, it seems like a violation of attorney ethics rules. Both Florida and Kansas (whose law you subjected yourself to by seeking pro hac admission in our courts), require attorneys to "take steps to the extent reasonably practicable to protect a client's interests" at the termination of representation. Indeed, a recent Florida ethics opinion states that a lawyer "has an ethical obligation to comply with a client's or former client's reasonable request for copies of file material where that information would serve a useful purpose to the client," Fla. Bar Ethics Op. 88-11 (Reconsideration) (Mar. 23, 2021); *see also Fla. Bar v. Varner*, 992 So.2d 224 (Fla. 2008) (attorney disciplined for failing to deliver complete file to successor counsel during ongoing litigation); *Dubose v. Shelnett*, 566 So. 2d 921 (Fla. Dist. Ct. App. 1990) (duty to deliver specifically requested documents to former client); *cf. In re Deines*, 430 P.3d 437 (Kan. 2018); *In re Hawkins*, 373 P.3d 718 (Kan. 2016); *In re Green*, 156 P.3d 628 (Kan. 2007). Given that we are replacing you in the middle of ongoing litigation, our need for those additional items should be plain. How you may feel about the circumstances of the termination is irrelevant. Comment 9 to the Model Rule makes that clear: "Even if the lawyer has been unfairly discharged by the client, a lawyer must take all reasonable steps to mitigate the consequences to the client."

I am especially concerned about your direction to your contractor to remove coding from documents. This not only fails your duty to protect our interests, but seems to actively and maliciously impair our ability to continue with the litigation. Your actions have made it difficult to have a clear-cut view of the CEA documents relevant to that litigation or the enforcement case against Macquarie.

Furthermore, our contract specifically stated that you would "make available at reasonable times all of [your] books, documents, papers, records and other evidence" related to the contract. Section 1.32; *see also* Specifications ("Contractor shall timely provide to the Attorney General's Office: All relevant case information and documents...; suggestions for case strategy and other information needed to determine other case actions"). So your refusal to turn over the file (and apparent spoliation thereof) could be a contract breach as well as an ethical one.

I hope this is all a misunderstanding. Is there a time we can discuss this matter today or tomorrow?

**Dan Burrows**

Chief Advisor | Office of the Attorney General

Topeka, Kansas

Phone: (785) 368-8435

Email: [daniel.burrows@ag.ks.gov](mailto:daniel.burrows@ag.ks.gov)

**James Young**

Attorney

[My Bio](#)

P: (904) 361-0012

F: (904) 361-4307

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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FOR THE PEOPLE.COM

## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, May 19, 2023 5:50 AM  
**To:** Burrows, Daniel  
**Cc:** Oleen, Fran; Jack, Melanie; Juan Martinez x2192; Tim Fox x26041; dkovel; mbrowne  
**Subject:** Re: \*EXT\* RE: Kansas Natural Gas

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Dan:

Your email does not address and your office has not yet corrected the falsehoods about our work on the case and mischaracterizations about our use of third parties. Please let us know when that will be done. As you are aware, the appropriate mechanism for unringing such a bell is to deploy the same medium used to create the falsehoods in the first place. If you'd like to coordinate with our PR team, I'd be happy to connect them with your comms person.

Also, please have your public records folks work on getting a fulsome response to my pending request, which is now over a month old. I need those records to evaluate our position on this contract and your related request.

Your presumption that any fee owed to us is limited to the contract overlooks or misconstrues the remedies attendant to quantum meruit as well as the damages for breach of the duty of good faith and fair dealing. I believe both claims are recognized under Kansas law but I'm sure your next email will make it all clear for me.

Once we have the complete record, including the outstanding public records, we will be in a position to determine next steps.

It's my belief that the surreptitious termination of our agreement was not done in good faith or for convenience, as that term is used in the agreement. Rather, it was a piece of coordinated political hackery at the behest of the Oil and Gas industry, US Chamber of Commerce and Federalist Society, likely organized at a fancy RAGA event. The immediate reposting of the RFP and snarky e-mail communication between your office and procurement undermines the idea that this was anything else. I'm happy to consider alternative theories supported by evidence, should you have any.

Despite such shenanigans, and as relayed in my prior email, I am available to talk anytime. I believe in this project and want very much to protect the good people of Kansas because they deserve better.

During the engagement, we met weekly with your people and remained available the entire 30 days post termination to talk about such things. The only time you joined us was when we had to beg you to let us file this case and explain how the natural gas market worked. But I'm still not sure you fully understand what you are even complaining about. You have all of the responses to all of the subpoenas issued. We have not withheld a single document. If I'm wrong about that, let me know and let's focus on solving that.

What you do not have is our work product, our mental impressions, the classification/triage and relevance attribution of some of the documents. There is a glimmer of hope in your e-mail though. We did extensive work on this matter. We spent considerable time and money on Kansas' behalf. If you have a proposal on how



our firms will be compensated, I'm all ears. If you want to reduce to writing how you intend to satisfy our lien, I'm all ears.

I trust that the replacement firm selected for this next month will be made aware of such things prior to contract execution, but leave that to you. Side note: +1 for use of vituperative. The judges would have also accepted invective, calumniating or opprobrious.

In keeping with your narrative that my actions are childlike and unprofessional, I'll close with a joke.

Why did the Lesser Prarie Chicken cross the road?

To escape oil and gas exploration, naturally.

Sent from my iPhone

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

On May 18, 2023, at 4:48 PM, Burrows, Daniel <Daniel.Burrows@ag.ks.gov> wrote:

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---

Mr. Young:

My apologies for the delay in getting back to you.

I thought that we could have a reasonable discussion about the issues here. Despite your vituperative e-mail, I remain hopeful that we can discuss this as professionals and not name-calling children. That's why I requested a phone call to sort out whether there was some misunderstanding. I still think a phone call would be useful.

But let me address a few of your points. First, we have not, to this point, contested that your firm may be entitled to some sort of fee somewhere along the line. Any such fee, however, would be under the contract that you and your firm agreed to when the representation began. And that contract was

**Full Set Of Internal Emails Between  
Morgan & Morgan And The Kansas  
Attorney General Office Re Termination**

## Hutchison, Robert

---

**From:** Doran, Pat [DACC] <Pat.Doran@ks.gov>  
**Sent:** Tuesday, March 7, 2023 1:52 PM  
**To:** Dalton, Charles  
**Subject:** Fwd: Contract #51337, Natural Gas Recovery Litigation  
**Attachments:** Morgan Morgan Jacksonville PLLC. 03-07-2023.docx

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---

**From:** Todd Herman [DAFPM] <Todd.Herman@ks.gov>  
**Sent:** Tuesday, March 7, 2023 9:21 AM  
**To:** jyoung@forthepeople.com <jyoung@forthepeople.com>  
**Cc:** Doran, Pat [DACC] <Pat.Doran@ks.gov>; Diel, Tracy [DACC] <Tracy.Diel@ks.gov>; Edwards, Bonnie [DAFPM] <Bonnie.Edwards@ks.gov>; Proffitt, Adam [Budget] <Adam.C.Proffitt@ks.gov>  
**Subject:** Contract #51337, Natural Gas Recovery Litigation

Dear James,

The State of Kansas is electing to Terminate for Convenience Contract 51337 for Natural Gas Recovery Litigation.

A termination clause on page 3 section 1.11. **Termination for Convenience** of your contract reads:

**Termination for Convenience:** The Director of Purchases may terminate performance of work under this contract in whole or in part whenever, for any reason, the Director of Purchases shall determine that the termination is in the best interest of the State of Kansas. In the event that the Director of Purchases elects to terminate this contract pursuant to this provision, it shall provide the Contractor written notice at least thirty (30) days prior to the termination date. The termination shall be effective as of the date specified in the notice. The Contractor shall continue to perform any part of the work that may have not been terminated by the notice.

Please accept this letter as the required minimum 30 days notice for termination. The effective date and last day of service required will be April 09, 2023.

Please make sure to transfer and deliver to the state all case files and records related to the investigation covered by this contract, and all other documents provided to the firm by the state in connection with this matter.

The Department thanks you for the service you have provided during the term of this contract.

Sincerely,

Todd Herman  
Director of Purchases | Office of Procurement and Contracts

Kansas Department of Administration  
900 SW Jackson, Suite 451-S | Topeka, KS 66612-1216  
[todd.herman@ks.gov](mailto:todd.herman@ks.gov) | <https://admin.ks.gov/>  
Follow Us: [facebook.com/KSDofA](https://www.facebook.com/KSDofA) | [twitter.com/KSDofA](https://twitter.com/KSDofA)



## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Tuesday, March 7, 2023 9:25 AM  
**To:** Oleen, Fran; Jack, Melanie  
**Subject:** FW: Contract #51337, Natural Gas Recovery Litigation  
**Attachments:** Morgan Morgan Jacksonville PLLC. 03-07-2023.docx

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Color me confused, but I guess that is politics for you.

We are meeting internally to discuss next steps and will let you know.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Todd Herman [DAFPM] <Todd.Herman@ks.gov>  
**Sent:** Tuesday, March 7, 2023 10:21 AM  
**To:** James Young x6172 <JYoung@ForThePeople.com>  
**Cc:** Doran, Pat [DACC] <Pat.Doran@ks.gov>; Diel, Tracy [DACC] <Tracy.Diel@ks.gov>; Edwards, Bonnie [DAFPM] <Bonnie.Edwards@ks.gov>; Proffitt, Adam [Budget] <Adam.C.Proffitt@ks.gov>  
**Subject:** \*EXT\* Contract #51337, Natural Gas Recovery Litigation

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

---

Dear James,

The State of Kansas is electing to Terminate for Convenience Contract 51337 for Natural Gas Recovery Litigation.

A termination clause on page 3 section 1.11. **Termination for Convenience** of your contract reads:

**Termination for Convenience:** The Director of Purchases may terminate performance of work under this contract in whole or in part whenever, for any reason, the Director of Purchases shall determine that the termination is in the best interest of the State of Kansas. In the event that the Director of Purchases elects to terminate this contract pursuant to this provision, it shall provide the Contractor written notice at least thirty (30) days prior to the termination date. The termination shall be effective as of the date specified in the notice. The Contractor shall continue to perform any part of the work that may have not been terminated by the notice.

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Please make sure to transfer and deliver to the state all case files and records related to the investigation covered by this contract, and all other documents provided to the firm by the state in connection with this matter.

The Department thanks you for the service you have provided during the term of this contract.

Sincerely,

Todd Herman  
Director of Purchases | Office of Procurement and Contracts

Kansas Department of Administration  
900 SW Jackson, Suite 451-S | Topeka, KS 66612-1216  
[todd.herman@ks.gov](mailto:todd.herman@ks.gov) | <https://admin.ks.gov/>  
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## Hutchison, Robert

---

**From:** Oleen, Fran  
**Sent:** Tuesday, March 7, 2023 6:29 PM  
**To:** 'James Young x6172'; Jack, Melanie  
**Subject:** RE: Contract #51337, Natural Gas Recovery Litigation

Hi James. I am really sorry you guys found out this way. As I am sure you can imagine, this decision came from our administration, and not from Melanie or me. We very much enjoy working with you all.

Talk to you tomorrow.

Fran

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Tuesday, March 7, 2023 9:25 AM  
**To:** Oleen, Fran <Fran.Oleen@ag.ks.gov>; Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Subject:** FW: Contract #51337, Natural Gas Recovery Litigation

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Color me confused, but I guess that is politics for you.

We are meeting internally to discuss next steps and will let you know.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Todd Herman [DAFPM] <[Todd.Herman@ks.gov](mailto:Todd.Herman@ks.gov)>  
**Sent:** Tuesday, March 7, 2023 10:21 AM  
**To:** James Young x6172 <JYoung@ForThePeople.com>  
**Cc:** Doran, Pat [DACC] <[Pat.Doran@ks.gov](mailto:Pat.Doran@ks.gov)>; Diel, Tracy [DACC] <[Tracy.Diel@ks.gov](mailto:Tracy.Diel@ks.gov)>; Edwards, Bonnie [DAFPM] <[Bonnie.Edwards@ks.gov](mailto:Bonnie.Edwards@ks.gov)>; Proffitt, Adam [Budget] <[Adam.C.Proffitt@ks.gov](mailto:Adam.C.Proffitt@ks.gov)>  
**Subject:** \*EXT\* Contract #51337, Natural Gas Recovery Litigation

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---

Dear James,

The State of Kansas is electing to Terminate for Convenience Contract 51337 for Natural Gas Recovery Litigation.

A termination clause on page 3 section 1.11. **Termination for Convenience** of your contract reads:

**Termination for Convenience:** The Director of Purchases may terminate performance of work under this contract in whole or in part whenever, for any reason, the Director of Purchases shall determine that the termination is in the best interest of the State of Kansas. In the event that the Director of Purchases elects to terminate this contract pursuant to this provision, it shall provide the Contractor written notice at least thirty (30) days prior to the termination date. The termination shall be effective as of the date specified in the notice. The Contractor shall continue to perform any part of the work that may have not been terminated by the notice.

Please accept this letter as the required minimum 30 days notice for termination. The effective date and last day of service required will be April 09, 2023.

Please make sure to transfer and deliver to the state all case files and records related to the investigation covered by this contract, and all other documents provided to the firm by the state in connection with this matter.

The Department thanks you for the service you have provided during the term of this contract.

Sincerely,

Todd Herman  
Director of Purchases | Office of Procurement and Contracts

Kansas Department of Administration  
900 SW Jackson, Suite 451-S | Topeka, KS 66612-1216  
[todd.herman@ks.gov](mailto:todd.herman@ks.gov) | <https://admin.ks.gov/>  
Follow Us: [facebook.com/KSDofA](https://www.facebook.com/KSDofA) | [twitter.com/KSDofA](https://twitter.com/KSDofA)



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## Hutchison, Robert

---

**From:** Juan Martinez x2192 <juanmartinez@forthepeople.com>  
**Sent:** Wednesday, March 8, 2023 9:17 AM  
**To:** Jack, Melanie; Oleen, Fran  
**Cc:** James Young x6172; dkovel; mbrowne; Orié Braun; Tim Fox x26041; Douglas Acklin x6133  
**Subject:** KS NG Call Cancelled

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Good morning,

Given recent events, we are cancelling today's call. We are discussing next steps on our end and will be in touch to schedule our next call. Thanks.

Best,  
Juan

**Juan Martinez**  
Attorney  
[My Bio](#)

**P:** (813) 393-5463  
**F:** (813) 393-5489  
**A:** 201 N Franklin St, 7th Floor, Tampa, FL 33602

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Wednesday, March 8, 2023 10:50 AM  
**To:** 'Juan Martinez x2192'; Oleen, Fran  
**Cc:** James Young x6172; dkovel; mbrowne; Orié Braun; Tim Fox x26041; Douglas Acklin x6133  
**Subject:** RE: KS NG Call Cancelled

I understand.

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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**Sent:** Wednesday, March 8, 2023 9:17 AM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>; Oleen, Fran <Fran.Oleen@ag.ks.gov>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; dkovel <dkovel@kmlp.com>; mbrowne <mbrowne@brownepelican.com>; Orié Braun <obraun@kmlp.com>; Tim Fox x26041 <tfox@forthepeople.com>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Subject:** KS NG Call Cancelled

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Juan

**Juan Martinez**

Attorney

[My Bio](#)

**P:** (813) 393-5463

**F:** (813) 393-5489

**A:** 201 N Franklin St, 7th Floor, Tampa, FL 33602

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## Hutchison, Robert

---

**Subject:** Canceled: Kansas Natural Gas Weekly Team Call

**Start:** Wed 3/23/2022 1:00 PM  
**End:** Wed 3/23/2022 2:00 PM  
**Show Time As:** Free

**Recurrence:** (none)

**Organizer:** Juan Martinez x2192

**Importance:** High

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Join Zoom Meeting

<https://forthepeople.zoom.us/j/97032991211?pwd=QWhuR05OenFZaGhIQ3plcEhsRDJUQT09>

Meeting ID: 970 3299 1211

Passcode: 834169

One tap mobile

+13126266799,,97032991211#,,,,\*834169# US (Chicago)

+16468769923,,97032991211#,,,,\*834169# US (New York)

Dial by your location

+1 312 626 6799 US (Chicago)

+1 646 876 9923 US (New York)

+1 301 715 8592 US (Washington DC)

+1 346 248 7799 US (Houston)

+1 408 638 0968 US (San Jose)

+1 669 900 6833 US (San Jose)

+1 253 215 8782 US (Tacoma)

Meeting ID: 970 3299 1211

Passcode: 834169

Find your local number: <https://forthepeople.zoom.us/u/addGYCrgkp>

Join by SIP

[97032991211@zoomcrc.com](mailto:97032991211@zoomcrc.com)

Join by H.323

162.255.37.11 (US West)

162.255.36.11 (US East)

115.114.131.7 (India Mumbai)

115.114.115.7 (India Hyderabad)

213.19.144.110 (Amsterdam Netherlands)

213.244.140.110 (Germany)

103.122.166.55 (Australia Sydney)  
103.122.167.55 (Australia Melbourne)  
149.137.40.110 (Singapore)  
64.211.144.160 (Brazil)  
149.137.68.253 (Mexico)  
69.174.57.160 (Canada Toronto)  
65.39.152.160 (Canada Vancouver)  
207.226.132.110 (Japan Tokyo)  
149.137.24.110 (Japan Osaka)  
Meeting ID: 970 3299 1211  
Passcode: 834169

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## Hutchison, Robert

---

**From:** Teters, Chris  
**Sent:** Monday, March 13, 2023 2:30 PM  
**To:** Deaver, Nancy  
**Subject:** Opioids - Next Round of Sign Ons, Missing Forms  
**Attachments:** Rubris - Subdivision Missing Sign On As Of 3-13.xlsx

Christopher Teters  
Assistant Attorney General, Consumer Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Avenue, 2nd Floor  
Topeka, Kansas 66612-1597  
785-296-3751 phone  
785-291-3699 fax  
[chris.teters@ag.ks.gov](mailto:chris.teters@ag.ks.gov)  
[www.ag.ks.gov](http://www.ag.ks.gov)

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## Hutchison, Robert

---

**From:** Deaver, Nancy  
**Sent:** Thursday, March 16, 2023 11:47 AM  
**To:** Teters, Chris  
**Subject:** Rubris missing sign on  
**Attachments:** Copy of Rubris - Subdivision Missing Sign On As Of 3-13(AutoRecovered).xlsx

Nancy Deaver  
Program Consultant, Consumer Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10<sup>th</sup> Ave, 4<sup>th</sup> Floor  
Topeka, KS 66612-1597  
785-296-3751 (ph)  
785-296-3131 (fax)  
[Nancy.Deaver@ag.ks.gov](mailto:Nancy.Deaver@ag.ks.gov)  
[www.ag.ks.gov](http://www.ag.ks.gov)

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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Tuesday, March 21, 2023 10:42 AM  
**To:** Jack, Melanie; Oleen, Fran  
**Cc:** Tim Fox x26041; mbrowne; Juan Martinez x2192; dkovel; Orié Braun; Douglas Acklin x6133  
**Subject:** Kansas Gas project update

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Macquarie's reply to our response is due this Friday, 3/24. I am not sure if you informed them of our termination, or perhaps they read about it in the WSJ, but we will timely forward you any communication we get from them.

I am also not certain if you have served the complaint yet, but we wanted to remind you that Beatrice Franklin, counsel for Macquarie has agreed to waive formal service of process and accept via email, in exchange for 60 days to respond to the complaint.

We can forward you the email confirming this if need be. If the AG intends, as we hope, to litigate this claim, you should email the complaint to her at [BFranklin@susmangodfrey.com](mailto:BFranklin@susmangodfrey.com)

We have been asked to join similar litigation on behalf of Kansas consumers and local governments.

While we are considering this opportunity, we kindly ask that you confirm the AG's office either consents to, or takes no position with regard to our collective involvement.

Finally, we are happy to jump on a call with you to answer any final questions you have on March 29 at 2:00 eastern.

Invite to follow. If you think that such a call makes sense.

It goes without saying that all greatly enjoyed working with you both, Nick, Jeff, and AG Schmidt.

We will be cheering you on and watching closely from the sidelines as AG Kobach follows through with his promises to hold accountable those who attempt to take advantage of Kansans during a natural disaster.

### James Young

Attorney

[My Bio](#)

P: (904) 361-0012

F: (904) 361-4307

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Tuesday, March 21, 2023 2:47 PM  
**To:** 'James Young x6172'; Oleen, Fran  
**Cc:** Tim Fox x26041; mbrowne; Juan Martinez x2192; dkovel; Orié Braun; Douglas Acklin x6133  
**Subject:** RE: Kansas Gas project update

Good afternoon,

Thank you for the information and reminders. We have served the CEA petition and worked with Beatrice Franklin on service.

I will forward your request to administration regarding your anticipated involvement with Kansas consumers and/or governments.

I would like to have a call on March 29, 2023, as I have a couple questions best suited to a call.

We have also enjoyed our working relationship and wish you the best.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>; Oleen, Fran <Fran.Oleen@ag.ks.gov>

**Cc:** Tim Fox x26041 <tfox@forthepeople.com>; mbrowne <mbrowne@brownepelican.com>; Juan Martinez x2192 <juanmartinez@forthepeople.com>; dkovel <dkovel@kmlp.com>; Ori Braun <obraun@kmlp.com>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Subject:** Kansas Gas project update

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While we are considering this opportunity, we kindly ask that you confirm the AG's office either consents to, or takes no position with regard to our collective involvement.

Finally, we are happy to jump on a call with you to answer any final questions you have on March 29 at 2:00 eastern.

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It goes without saying that all greatly enjoyed working with you both, Nick, Jeff, and AG Schmidt.

We will be cheering you on and watching closely from the sidelines as AG Kobach follows through with his promises to hold accountable those who attempt to take advantage of Kansans during a natural disaster.

**James Young**

Attorney

[My Bio](#)

**P:** (904) 361-0012

**F:** (904) 361-4307

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

---

**From:** Teters, Chris  
**Sent:** Tuesday, March 21, 2023 2:54 PM  
**To:** Deaver, Nancy  
**Subject:** Updated Contact List and Rubris Report  
**Attachments:** ClaimExportJob\_7639923\_Project\_10429\_Claim\_12567\_export\_20230321194358.xlsx;  
Rubris - Subdivision Missing Sign On As Of 3-21(7002712.1).xlsx

Nancy,

Please find the contact list you sent me updated with my notes and the updated Rubris report attached to this email.

Thank You,

Christopher Teters  
Assistant Attorney General, Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Avenue, 2nd Floor  
Topeka, Kansas 66612-1597  
785-296-3751 phone  
785-291-3699 fax  
[chris.teters@ag.ks.gov](mailto:chris.teters@ag.ks.gov)  
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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Tuesday, March 21, 2023 3:26 PM  
**To:** Burrows, Daniel; Oleen, Fran  
**Subject:** Morgan and Morgan Kansas Gas project update

Good afternoon,

Below is an email from Morgan and Morgan following up on service of the CEA complaint.

They also advised us they have been asked to join “similar litigation on behalf of Kansas consumers and local governments.” I suspect this is some kind of partnership with attorney Jim Zakoura, Fouston & Siefkin. Jim was very active in the KCC litigation and also very insistent on the path the AG’s office should take in the natural gas investigation and litigation. James Young has been the contact person for Jim Zakoura, who always wants to share his opinions.

Morgan and Morgan is considering this opportunity and asks if the AG’s office either consents to, or takes no position with regard to their “collective involvement.” This is all the information they provided about Morgan and Morgan’s potential natural gas litigation.

We will have a call with Morgan and Morgan on March 29 at 1:00 pm central to discuss the transfer of files to our office and a couple other housekeeping matters.

Let me how you would like to respond to Morgan and Morgan.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
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**Sent:** Tuesday, March 21, 2023 10:42 AM

**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>; Oleen, Fran <Fran.Oleen@ag.ks.gov>

**Cc:** Tim Fox x26041 <tfox@forthepeople.com>; mbrowne <mbrowne@brownepelican.com>; Juan Martinez x2192 <juanmartinez@forthepeople.com>; dkovel <dkovel@kmlp.com>; Orie Braun <obraun@kmlp.com>; Douglas Acklin x6133 <dacklin@forthepeople.com>

**Subject:** Kansas Gas project update

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**James Young**

Attorney

[My Bio](#)

P: (904) 361-0012

F: (904) 361-4307

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

---

**From:** Oleen, Fran  
**Sent:** Tuesday, March 21, 2023 8:49 PM  
**To:** Jack, Melanie; Burrows, Daniel  
**Subject:** RE: Morgan and Morgan Kansas Gas project update

Dan, Melanie and I talked about this. I recommend we take no position on any involvement Morgan and Morgan may have on anything when we have so little information. If there is any potential conflict in the future, we can consider a waiver at that time, presuming they ask.

Fran

---

**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Tuesday, March 21, 2023 3:26 PM  
**To:** Burrows, Daniel <Daniel.Burrows@ag.ks.gov>; Oleen, Fran <Fran.Oleen@ag.ks.gov>  
**Subject:** Morgan and Morgan Kansas Gas project update

Good afternoon,

Below is an email from Morgan and Morgan following up on service of the CEA complaint.

They also advised us they have been asked to join “similar litigation on behalf of Kansas consumers and local governments.” I suspect this is some kind of partnership with attorney Jim Zakoura, Fouston & Siefkin. Jim was very active in the KCC litigation and also very insistent on the path the AG’s office should take in the natural gas investigation and litigation. James Young has been the contact person for Jim Zakoura, who always wants to share his opinions.

Morgan and Morgan is considering this opportunity and asks if the AG’s office either consents to, or takes no position with regard to their “collective involvement.” This is all the information they provided about Morgan and Morgan’s potential natural gas litigation.

We will have a call with Morgan and Morgan on March 29 at 1:00 pm central to discuss the transfer of files to our office and a couple other housekeeping matters.

Let me how you would like to respond to Morgan and Morgan.



Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Sent:** Tuesday, March 21, 2023 10:42 AM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Cc:** Tim Fox x26041 <[tfox@forthepeople.com](mailto:tfox@forthepeople.com)>; mbrowne <[mbrowne@brownepelican.com](mailto:mbrowne@brownepelican.com)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>; dkovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>; Orié Braun <[obraun@kmlp.com](mailto:obraun@kmlp.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Subject:** Kansas Gas project update

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Macquarie's' reply to our response is due this Friday, 3/24. I am not sure if you informed them of our termination, or perhaps they read about it in the WSJ, but we will timely forward you any communication we get from them.

I am also not certain if you have served the complaint yet, but we wanted to remind you that Beatrice Franklin, counsel for Macquarie has agreed to waive formal service of process and accept via email, in exchange for 60 days to respond to the complaint.

We can forward you the email confirming this if need be. If the AG intends, as we hope, to litigate this claim, you should email the complaint to her at [BFranklin@susmangodfrey.com](mailto:BFranklin@susmangodfrey.com)

We have been asked to join similar litigation on behalf of Kansas consumers and local governments.

While we are considering this opportunity, we kindly ask that you confirm the AG's office either consents to, or takes no position with regard to our collective involvement.

Finally, we are happy to jump on a call with you to answer any final questions you have on March 29 at 2:00 eastern.

Invite to follow. If you think that such a call makes sense.

It goes without saying that all greatly enjoyed working with you both, Nick, Jeff, and AG Schmidt.

We will be cheering you on and watching closely from the sidelines as AG Kobach follows through with his promises to hold accountable those who attempt to take advantage of Kansans during a natural disaster.

**James Young**

Attorney

[My Bio](#)

**P:** (904) 361-0012

**F:** (904) 361-4307

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

---

**From:** Burrows, Daniel  
**Sent:** Wednesday, March 22, 2023 10:44 AM  
**To:** Oleen, Fran; Jack, Melanie  
**Subject:** RE: Morgan and Morgan Kansas Gas project update

Yes, what Fran said. We'll consider in due course any official request to waive conflicts—we're not a blanket "no." But there's not enough information here to do that.

---

**From:** Oleen, Fran <Fran.Oleen@ag.ks.gov>  
**Sent:** Tuesday, March 21, 2023 8:49 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>; Burrows, Daniel <Daniel.Burrows@ag.ks.gov>  
**Subject:** RE: Morgan and Morgan Kansas Gas project update

Dan, Melanie and I talked about this. I recommend we take no position on any involvement Morgan and Morgan may have on anything when we have so little information. If there is any potential conflict in the future, we can consider a waiver at that time, presuming they ask.

Fran

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Tuesday, March 21, 2023 3:26 PM  
**To:** Burrows, Daniel <[Daniel.Burrows@ag.ks.gov](mailto:Daniel.Burrows@ag.ks.gov)>; Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Subject:** Morgan and Morgan Kansas Gas project update

Good afternoon,

Below is an email from Morgan and Morgan following up on service of the CEA complaint.

They also advised us they have been asked to join "similar litigation on behalf of Kansas consumers and local governments." I suspect this is some kind of partnership with attorney Jim Zakoura, Fouston & Siefkin. Jim was very active in the KCC litigation and also very insistent on the path the AG's office should take in the natural gas investigation and litigation. James Young has been the contact person for Jim Zakoura, who always wants to share his opinions.

Morgan and Morgan is considering this opportunity and asks if the AG's office either consents to, or takes no position with regard to their "collective involvement." This is all the information they provided about Morgan and Morgan's potential natural gas litigation.

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Let me how you would like to respond to Morgan and Morgan.

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**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Sent:** Tuesday, March 21, 2023 10:42 AM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Cc:** Tim Fox x26041 <[tfox@forthepeople.com](mailto:tfox@forthepeople.com)>; mbrowne <[mbrowne@brownepelican.com](mailto:mbrowne@brownepelican.com)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>; dkovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>; Orié Braun <[obraun@kmlp.com](mailto:obraun@kmlp.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Subject:** Kansas Gas project update

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Macquarie's' reply to our response is due this Friday, 3/24. I am not sure if you informed them of our termination, or perhaps they read about it in the WSJ, but we will timely forward you any communication we get from them.

I am also not certain if you have served the complaint yet, but we wanted to remind you that Beatrice Franklin, counsel for Macquarie has agreed to waive formal service of process and accept via email, in exchange for 60 days to respond to the complaint.

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We will be cheering you on and watching closely from the sidelines as AG Kobach follows through with his promises to hold accountable those who attempt to take advantage of Kansans during a natural disaster.

**James Young**

Attorney

[My Bio](#)

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Wednesday, March 29, 2023 7:52 AM  
**To:** 'James Young x6172'; Oleen, Fran  
**Cc:** 'Tim Fox x26041'; 'mbrowne'; 'Juan Martinez x2192'; 'dkovel'; 'Orie Braun'; 'Douglas Acklin x6133'  
**Subject:** RE: Kansas Gas project update

Good morning,

Will you kindly sent out a Zoom invite for our meeting this afternoon? Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
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---

**From:** Jack, Melanie  
**Sent:** Tuesday, March 21, 2023 2:47 PM  
**To:** 'James Young x6172' <JYoung@ForThePeople.com>; Oleen, Fran <Fran.Oleen@ag.ks.gov>  
**Cc:** Tim Fox x26041 <tfox@forthepeople.com>; mbrowne <mbrowne@brownepelican.com>; Juan Martinez x2192 <juanmartinez@forthepeople.com>; dkovel <dkovel@kmlp.com>; Orie Braun <obraun@kmlp.com>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Subject:** RE: Kansas Gas project update

Good afternoon,

Thank you for the information and reminders. We have served the CEA petition and worked with Beatrice Franklin on service.

I will forward your request to administration regarding your anticipated involvement with Kansas consumers and/or governments.

I would like to have a call on March 29, 2023, as I have a couple questions best suited to a call.

We have also enjoyed our working relationship and wish you the best.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
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**Sent:** Tuesday, March 21, 2023 10:42 AM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>

**Cc:** Tim Fox x26041 <[tfox@forthepeople.com](mailto:tfox@forthepeople.com)>; mbrowne <[mbrowne@brownepelican.com](mailto:mbrowne@brownepelican.com)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>; dkovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>; Orié Braun <[obraun@kmlp.com](mailto:obraun@kmlp.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** Kansas Gas project update

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**James Young**

Attorney

[My Bio](#)

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## Hutchison, Robert

---

**Subject:** Kansas Gas Project Update  
**Location:** <https://forthepeople.zoom.us/j/97549887381>  
**Start:** Wed 3/29/2023 1:00 PM  
**End:** Wed 3/29/2023 1:30 PM  
**Recurrence:** (none)  
**Meeting Status:** Accepted  
**Organizer:** Douglas Acklin x6133

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Douglas Acklin x6133 is inviting you to a scheduled Zoom meeting.

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+1 360 209 5623 US

+1 386 347 5053 US

+1 408 638 0968 US (San Jose)

+1 507 473 4847 US

+1 564 217 2000 US

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+1 669 900 6833 US (San Jose)

+1 689 278 1000 US

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213.244.140.110 (Germany)

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64.211.144.160 (Brazil)

149.137.68.253 (Mexico)

69.174.57.160 (Canada Toronto)

65.39.152.160 (Canada Vancouver)

207.226.132.110 (Japan Tokyo)

149.137.24.110 (Japan Osaka)

Meeting ID: 975 4988 7381

## Hutchison, Robert

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**Start:** Wed 3/29/2023 1:00 PM  
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**Show Time As:** Tentative

**Recurrence:** (none)

**Meeting Status:** Not yet responded

**Organizer:** Douglas Acklin x6133

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## Hutchison, Robert

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+1 646 876 9923 US (New York)

+1 360 209 5623 US

+1 386 347 5053 US

+1 408 638 0968 US (San Jose)

+1 507 473 4847 US

+1 564 217 2000 US

+1 669 444 9171 US

+1 669 900 6833 US (San Jose)

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207.226.132.110 (Japan Tokyo)

149.137.24.110 (Japan Osaka)

Meeting ID: 975 4988 7381

## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Wednesday, March 29, 2023 9:30 AM  
**To:** 'Douglas Acklin x6133'  
**Subject:** Accepted: Kansas Gas Project Update

## Hutchison, Robert

---

**From:** Oleen, Fran <fran.oleen@ag.ks.gov>  
**Sent:** Wednesday, March 29, 2023 12:43 PM  
**To:** dacklin@forthepeople.com  
**Subject:** Accepted: Kansas Gas Project Update

When: Mar 29, 2023 1:00:00 PM



## Hutchison, Robert

---

**From:** David Kovel <dkovel@kmlp.com>  
**Sent:** Thursday, March 30, 2023 10:38 AM  
**To:** Brosterman, Melvin A.; James Young x6172  
**Cc:** Jack, Melanie  
**Subject:** Re: Hartree letter

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Mel,

I hope you are well.

Please coordinate the production with Melanie, who is cc'd here. We will not be representing Kansas going forward.

Best,  
David

---

**From:** Brosterman, Melvin A. <mbrosterman@stroock.com>  
**Sent:** Thursday, March 30, 2023 11:30:34 AM  
**To:** David Kovel <dkovel@kmlp.com>; James Young x6172 <JYoung@ForThePeople.com>  
**Subject:** Re: Hartree letter

[**ATTENTION:** This message is from an external source.]

David, were going to be getting out our response the request in the next day or so. We intend to send it to the assistant AG who signed it. Should it also go to you and or James as cc's?

**Melvin A. Brosterman**

**STROOCK**

180 Maiden Lane, New York, NY 10038  
D: 212.806.5632  
M: 973.713.9420

mbrosterman@stroock.com | [vCard](#) | [www.stroock.com](#)

---

**From:** David Kovel <dkovel@kmlp.com>  
**Sent:** Thursday, March 2, 2023 12:09 PM  
**To:** Brosterman, Melvin A. <mbrosterman@stroock.com>  
**Subject:** Re: Hartree letter

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David Kovel, *Managing Partner*  
Kirby McInerney LLP  
250 Park Avenue, Suite 820, New York, NY 10177  
p. [212.371.6600](tel:212.371.6600) · f. [212.751.2540](tel:212.751.2540)  
e. [DKovel@kmlp.com](mailto:DKovel@kmlp.com) · [www.kmlp.com](http://www.kmlp.com)

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**From:** Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>  
**Sent:** Thursday, March 2, 2023 11:26:20 AM  
**To:** David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>  
**Subject:** Re: Hartree letter

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That's fine. If I forget to call u feel free to call me at 973-713-9420

**Melvin A. Brosterman**

**STROOCK**

180 Maiden Lane, New York, NY 10038  
D: 212.806.5632  
M: 973.713.9420

[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com) | [vCard](#) | [www.stroock.com](http://www.stroock.com)

---

**From:** David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>  
**Sent:** Thursday, March 2, 2023 11:13:06 AM  
**To:** Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>  
**Subject:** Re: Hartree letter

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How about 9:45 tomorrow?

---

**From:** Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>  
**Sent:** Thursday, March 2, 2023 10:12 AM  
**To:** David Kovel  
**Subject:** Re: Hartree letter

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Sorry David. How's 4:30 or 5 today. Also pretty good tomorrow morning  
Melvin A. Brosterman  
STROOCK

180 Maiden Lane, New York, NY 10038

D: 212.806.5632<tel:212.806.5632>

M: 973.713.9420

mbrosterman@stroock.com<mailto:mbrosterman@stroock.com> | vCard

<<https://www.stroock.com/people/MBROSTERMAN/vcard>> |

<http://www.stroock.com><<http://www.stroock.com>>

---

From: David Kovel <dkovel@kmlp.com>

Sent: Thursday, March 2, 2023 9:35:06 AM

To: Brosterman, Melvin A. <mbrosterman@stroock.com>

Subject: RE: Hartree letter

Mel, I'll have to get on a mediation zoom at around 9:45. Perhaps we can pick another time to talk late late today or tomorrow. Best, David David Kovel, Managing Partner Kirby McInerney LLP 250 Park Avenue, Suite 820, New York, NY 10177 p.

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Best,

David

[Kirby McInerney LLP]

David Kovel, Managing Partner

Kirby McInerney LLP

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[EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkoIQxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF\\$\[kmlp\[.\]com\]<https://urldefense.com/v3/ https://www.kmlp.com ;!!N5JtT8\\_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXyr57leTE0IL9er2S\\$>](https://urldefense.com/v3/http://www.kmlp.com;!!N5JtT8_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXyr57leTE0IL9er2S$)

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Sent: Wednesday, March 1, 2023 4:54 PM  
To: David Kovel <dkovel@kmlp.com>  
Subject: Re: Hartree letter

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I'll try u tomorrow. I can text first. My cell iab973-713-9420. What is your number?

Melvin A. Brosterman

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M: 973.713.9420

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From: David Kovel <dkovel@kmlp.com>  
Sent: Wednesday, March 1, 2023 4:51:28 PM  
To: Brosterman, Melvin A. <mbrosterman@stroock.com>  
Subject: Re: Hartree letter

David Kovel, Managing Partner Kirby McInerney LLP 250 Park Avenue, Suite 820, New York, NY 10177 p. 212.371.6600 · f. 212.751.2540 e. DKovel@kmlp.com · www.kmlp.com  
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Kirby McInerney LLP

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Sorry, I'm tied up for the next couple. How about between 9-9:45 tomorrow?

---

From: Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>  
Sent: Wednesday, March 1, 2023 4:45:53 PM  
To: David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>

Subject: Re: Hartree letter

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Give me your cell number and I will call u shortly.

Melvin A. Brosterman

STROOCK

180 Maiden Lane, New York, NY 10038

D: 212.806.5632<tel:212.806.5632>

M: 973.713.9420

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**From:** David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>  
**Sent:** Wednesday, March 1, 2023 2:16:55 PM  
**To:** Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>  
**Subject:** FW: Hartree letter

Hi Mel, Please see attached and let me know when we can discuss. Best, David David Kovel,  
Managing Partner Kirby McInerney LLP 250 Park Avenue, Suite 820, New York, NY 10177 p.  
212.371.6600 · f. 212.751.2540 e. [DKovel@kmlp.com](mailto:DKovel@kmlp.com) · [www.kmlp.com](http://www.kmlp.com)

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Hi Mel,

Please see attached and let me know when we can discuss.

Best,

David

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David Kovel, Managing Partner  
Kirby McInerney LLP

250 Park Avenue, Suite 820, New York, NY 10177

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Subject: Re: Hartree letter

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Sorry David. How's 4:30 or 5 today. Also pretty good tomorrow morning

Melvin A. Brosterman

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180 Maiden Lane, New York, NY 10038

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David

[Kirby McInerney LLP]  
David Kovel, Managing Partner  
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e. DKovel@kmlp.com [https://urldefense.com/v3/ http://www.kmlp.com ;!!N5JjT8\\_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkolOqxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF\\$\[kmlp\[.\]com\]<https://urldefense.com/v3/ https://www.kmlp.com ;!!N5JjT8\\_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXyr57leTE0IL9er2S\\$>](https://urldefense.com/v3/http://www.kmlp.com;!!N5JjT8_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkolOqxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF$[kmlp[.]com]<https://urldefense.com/v3/https://www.kmlp.com;!!N5JjT8_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXyr57leTE0IL9er2S$>)

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Melvin A. Brosterman

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ZjQcmQRYFpfptBannerEnd

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David Kovel, Managing Partner  
Kirby McInerney LLP  
250 Park Avenue, Suite 820, New York, NY 10177  
p. 212.371.6600<tel:212.371.6600> · f. 212.751.2540<tel:212.751.2540>

e. DKovel@kmlp.com [https://urldefense.com/v3/ http://www.kmlp.com ;!!N5Jt8\\_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkolOqxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF\\$\[kmlp\[.\]com\]<https://urldefense.com/v3/ https://www.kmlp.com ;!!N5Jt8\\_g!ephiWMf3Z0aBd0kJKphvVO7W\\_L\\_zyhdAaXIU5xRJ9HW7sV2rJAoohnE4I5fx2uVmgUEGM8iHzpCdMn2b\\$>](https://urldefense.com/v3/ http://www.kmlp.com ;!!N5Jt8_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkolOqxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF$[kmlp[.]com]<https://urldefense.com/v3/ https://www.kmlp.com ;!!N5Jt8_g!ephiWMf3Z0aBd0kJKphvVO7W_L_zyhdAaXIU5xRJ9HW7sV2rJAoohnE4I5fx2uVmgUEGM8iHzpCdMn2b$>)

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Sorry, I'm tied up for the next couple. How about between 9-9:45 tomorrow?

---

From: Brosterman, Melvin A. <mbrosterman@stroock.com>  
Sent: Wednesday, March 1, 2023 4:45:53 PM  
To: David Kovel <dkovel@kmlp.com>  
Subject: Re: Hartree letter

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Give me your cell number and I will call u shortly.

Melvin A. Brosterman

STROOCK

180 Maiden Lane, New York, NY 10038

D: 212.806.5632<tel:212.806.5632>

M: 973.713.9420

mbrosterman@stroock.com<mailto:mbrosterman@stroock.com> | vCard  
<<https://www.stroock.com/people/MBROSTERMAN/vcard>> |  
<http://www.stroock.com><[https://urldefense.com/v3/ https://protect-us.mimecast.com/s/xF77C4x3VpurWRLsWs4sC ;!!N5Jt8\\_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXyr57leTE0KSXsoP\\$>](https://urldefense.com/v3/ https://protect-us.mimecast.com/s/xF77C4x3VpurWRLsWs4sC ;!!N5Jt8_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXyr57leTE0KSXsoP$>)>

---

**From:** David Kovel <dkovel@kmlp.com>  
**Sent:** Wednesday, March 1, 2023 2:16:55 PM

To: Brosterman, Melvin A. <mbrosterman@stroock.com>  
Subject: FW: Hartree letter

Hi Mel, Please see attached and let me know when we can discuss. Best, David David Kovel, Managing Partner Kirby McInerney LLP 250 Park Avenue, Suite 820, New York, NY 10177 p. 212.371.6600 · f. 212.751.2540 e. DKovel@kmlp.com · www.kmlp.com

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Report Suspicious <[https://us-phishalarm-ewt.proofpoint.com/EWT/v1/N5Jt8\\_g!JALYL\\_ iy\\_ LeWKGgoAgnRPeylCr0xfcYH1ktRaWktGc4uPidRp\\_uwPZqDYMiCZKukskehwrBm5TGE4YKHpoF-wrHLMEAWvJzPh-dyiRxoUXAYms-e6YZGHxUqDQLaZnYADoscoWz4-BNQUAg\\$](https://us-phishalarm-ewt.proofpoint.com/EWT/v1/N5Jt8_g!JALYL_ iy_ LeWKGgoAgnRPeylCr0xfcYH1ktRaWktGc4uPidRp_uwPZqDYMiCZKukskehwrBm5TGE4YKHpoF-wrHLMEAWvJzPh-dyiRxoUXAYms-e6YZGHxUqDQLaZnYADoscoWz4-BNQUAg$)>

ZjQcmQRYFpfptBannerEnd

Hi Mel,

Please see attached and let me know when we can discuss.

Best,

David

[Image removed by sender. Kirby McInerney LLP]

David Kovel, Managing Partner  
Kirby McInerney LLP  
250 Park Avenue, Suite 820, New York, NY 10177  
p. 212.371.6600<tel:212.371.6600> · f. 212.751.2540<tel:212.751.2540>  
e. DKovel@kmlp.com [https://urldefense.com/v3/ http://www.kmlp.com ;!!N5Jt8\\_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkoIQxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF\\$](https://urldefense.com/v3/ http://www.kmlp.com ;!!N5Jt8_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkoIQxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF$)

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David Kovel, *Managing Partner*  
Kirby McInerney LLP  
250 Park Avenue, Suite 820, New York, NY 10177  
p. [212.371.6600](tel:212.371.6600) · f. [212.751.2540](tel:212.751.2540)  
e. [DKovel@kmlp.com](mailto:DKovel@kmlp.com) · [www.kmlp.com](http://www.kmlp.com)

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## Hutchison, Robert

---

**From:** Brosterman, Melvin A. <mbrosterman@stroock.com>  
**Sent:** Thursday, March 30, 2023 10:42 AM  
**To:** David Kovel; James Young x6172  
**Cc:** Jack, Melanie; Masiuk, Elizabeth F.  
**Subject:** Re: Hartree letter

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks David. Melanie, we should be in a position to email you our response and the few exhibits early next week. After you receive it, feel free to contact me with any questions you may have. Mel

**Melvin A. Brosterman**

### STROOCK

180 Maiden Lane, New York, NY 10038  
D: 212.806.5632  
M: 973.713.9420

mbrosterman@stroock.com | [vCard](#) | [www.stroock.com](#)

---

**From:** David Kovel <dkovel@kmlp.com>  
**Sent:** Thursday, March 30, 2023 11:38 AM  
**To:** Brosterman, Melvin A. <mbrosterman@stroock.com>; James Young x6172 <JYoung@ForThePeople.com>  
**Cc:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Subject:** Re: Hartree letter

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Hi Mel,

I hope you are well.

Please coordinate the production with Melanie, who is cc'd here. We will not be representing Kansas going forward.

Best,  
David

---

**From:** Brosterman, Melvin A. <mbrosterman@stroock.com>  
**Sent:** Thursday, March 30, 2023 11:30:34 AM  
**To:** David Kovel <dkovel@kmlp.com>; James Young x6172 <JYoung@ForThePeople.com>  
**Subject:** Re: Hartree letter

[ATTENTION: This message is from an external source.]

David, were going to be getting out our response the request in the next day or so. We intend to send it to the assistant AG who signed it. Should it also go to you and or James as cc's?

**Melvin A. Brosterman**

**STROOCK**

180 Maiden Lane, New York, NY 10038

D: 212.806.5632

M: 973.713.9420

mbrosterman@stroock.com | [vCard](#) | [www.stroock.com](#)

---

**From:** David Kovel <dkovel@kmlp.com>

**Sent:** Thursday, March 2, 2023 12:09 PM

**To:** Brosterman, Melvin A. <mbrosterman@stroock.com>

**Subject:** Re: Hartree letter

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Ok



David Kovel, *Managing Partner*

*Kirby McInerney LLP*

250 Park Avenue, Suite 820, New York, NY 10177

p. [212.371.6600](tel:212.371.6600) · f. [212.751.2540](tel:212.751.2540)

e. [DKovel@kmlp.com](mailto:DKovel@kmlp.com) · [www.kmlp.com](http://www.kmlp.com)

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---

**From:** Brosterman, Melvin A. <mbrosterman@stroock.com>

**Sent:** Thursday, March 2, 2023 11:26:20 AM

**To:** David Kovel <dkovel@kmlp.com>

**Subject:** Re: Hartree letter

[ATTENTION: This message is from an external source.]

That's fine. If I forget to call u feel free to call me at 973-713-9420

**Melvin A. Brosterman**

**STROOCK**

180 Maiden Lane, New York, NY 10038

D: 212.806.5632  
M: 973.713.9420

mbrosterman@stroock.com | [vCard](#) | [www.stroock.com](http://www.stroock.com)

---

**From:** David Kovel <dkovel@kmlp.com>  
**Sent:** Thursday, March 2, 2023 11:13:06 AM  
**To:** Brosterman, Melvin A. <mbrosterman@stroock.com>  
**Subject:** Re: Hartree letter

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How about 9:45 tomorrow?

---

**From:** Brosterman, Melvin A. <mbrosterman@stroock.com>  
**Sent:** Thursday, March 2, 2023 10:12 AM  
**To:** David Kovel  
**Subject:** Re: Hartree letter

[ATTENTION: This message is from an external source.]

Sorry David. How's 4:30 or 5 today. Also pretty good tomorrow morning  
Melvin A. Brosterman  
STROOCK  
180 Maiden Lane, New York, NY 10038  
D: 212.806.5632<tel:212.806.5632>  
M: 973.713.9420  
mbrosterman@stroock.com<mailto:mbrosterman@stroock.com> | [vCard](#)  
<<https://www.stroock.com/people/MBROSTERMAN/vcard>> |  
<http://www.stroock.com><<http://www.stroock.com>>

---

**From:** David Kovel <dkovel@kmlp.com>  
**Sent:** Thursday, March 2, 2023 9:35:06 AM  
**To:** Brosterman, Melvin A. <mbrosterman@stroock.com>  
**Subject:** RE: Hartree letter

Mel, I'll have to get on a mediation zoom at around 9:45. Perhaps we can pick another time to talk late late today or tomorrow. Best, David David Kovel, Managing Partner Kirby McInerney LLP 250 Park Avenue, Suite 820, New York, NY 10177 p.  
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[EJ6uC34tJEc\\_X4OaU0DGRbYByOplBtQPD5AQpAOWUFBe9RBdbmWX\\_OE0MhKW2fmGstIjR6lDhH29FEeH22S20Ramjw1Smw\\$>](mailto:EJ6uC34tJEc_X4OaU0DGRbYByOplBtQPD5AQpAOWUFBe9RBdbmWX_OE0MhKW2fmGstIjR6lDhH29FEeH22S20Ramjw1Smw$>)

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Mel,

I'll have to get on a mediation zoom at around 9:45. Perhaps we can pick another time to talk late late today or tomorrow.

Best,

David

[Kirby McInerney LLP]

David Kovel, Managing Partner

Kirby McInerney LLP

250 Park Avenue, Suite 820, New York, NY 10177

p. 212.371.6600<tel:212.371.6600> · f. 212.751.2540<tel:212.751.2540>

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From: Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>

Sent: Wednesday, March 1, 2023 4:54 PM

To: David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>

Subject: Re: Hartree letter

[ATTENTION: This message is from an external source.]

I'll try u tomorrow. I can text first. My cell iab973-713-9420. What is your number?

Melvin A. Brosterman

STROOCK

180 Maiden Lane, New York, NY 10038

D: 212.806.5632<tel:212.806.5632>

M: 973.713.9420

mbrosterman@stroock.com<mailto:mbrosterman@stroock.com> | vCard  
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<http://www.stroock.com><[https://urldefense.com/v3/https://protect-us.mimecast.com/s/xF77C4x3VpurWRLsWs4sC/;!!N5JjT8\\_g!cWG0m8rMBYOKQuR8GED1ixfa8Vf2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXyr57leTE0HzEi0s6\\$](https://urldefense.com/v3/https://protect-us.mimecast.com/s/xF77C4x3VpurWRLsWs4sC/;!!N5JjT8_g!cWG0m8rMBYOKQuR8GED1ixfa8Vf2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXyr57leTE0HzEi0s6$)>

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**From:** David Kovel <dkovel@kmlp.com>  
**Sent:** Wednesday, March 1, 2023 4:51:28 PM  
**To:** Brosterman, Melvin A. <mbrosterman@stroock.com>  
**Subject:** Re: Hartree letter

David Kovel, Managing Partner Kirby McInerney LLP 250 Park Avenue, Suite 820, New York, NY 10177 p. 212.371.6600 · f. 212.751.2540 e. DKovel@kmlp.com · www.kmlp.com  
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Kirby McInerney LLP  
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Sorry, I'm tied up for the next couple. How about between 9-9:45 tomorrow?

---

From: Brosterman, Melvin A. <mbrosterman@stroock.com>  
Sent: Wednesday, March 1, 2023 4:45:53 PM  
To: David Kovel <dkovel@kmlp.com>  
Subject: Re: Hartree letter

[ATTENTION: This message is from an external source.]

Give me your cell number and I will call u shortly.

Melvin A. Brosterman

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180 Maiden Lane, New York, NY 10038

D: 212.806.5632<tel:212.806.5632>

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<http://www.stroock.com><[https://urldefense.com/v3/ https://protect-us.mimecast.com/s/xF77C4x3VpurWRLsWs4sC ;!!N5Jt8\\_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXyr57leTE0KSXxsoP\\$>](https://urldefense.com/v3/https://protect-us.mimecast.com/s/xF77C4x3VpurWRLsWs4sC;!!N5Jt8_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXyr57leTE0KSXxsoP$>)

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**From:** David Kovel <dkovel@kmlp.com>  
**Sent:** Wednesday, March 1, 2023 2:16:55 PM  
**To:** Brosterman, Melvin A. <mbrosterman@stroock.com>  
**Subject:** FW: Hartree letter

Hi Mel, Please see attached and let me know when we can discuss. Best, David David Kovel, Managing Partner Kirby McInerney LLP 250 Park Avenue, Suite 820, New York, NY 10177 p. 212.371.6600 · f. 212.751.2540 e. DKovel@kmlp.com · www.kmlp.com

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ZjQcmQRYFpfptBannerEnd

Hi Mel,

Please see attached and let me know when we can discuss.

Best,

David

[Image removed by sender. Kirby McInerney LLP]

David Kovel, Managing Partner

Kirby McInerney LLP  
250 Park Avenue, Suite 820, New York, NY 10177  
p. 212.371.6600<tel:212.371.6600> · f. 212.751.2540<tel:212.751.2540>  
e. DKovel@kmlp.com [https://urldefense.com/v3/ http://www.kmlp.com ;!!N5JjT8\\_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkoIQxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF\\$\[kmlp\[.\]com\]<https://urldefense.com/v3/ https://www.kmlp.com ;!!N5JjT8\\_g!eR9cBQU3IZnOqf22AiQ2AeLf41FpEsYjOotqHPGL5LTc4aXCQi5tHpOLLSPnk69moGLvlpwqJKZ3we0I\\$>](https://urldefense.com/v3/http://www.kmlp.com;!!N5JjT8_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkoIQxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF$[kmlp[.]com]<https://urldefense.com/v3/https://www.kmlp.com;!!N5JjT8_g!eR9cBQU3IZnOqf22AiQ2AeLf41FpEsYjOotqHPGL5LTc4aXCQi5tHpOLLSPnk69moGLvlpwqJKZ3we0I$>)

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How about 9:45 tomorrow?

David Kovel, Managing Partner  
Kirby McInerney LLP  
250 Park Avenue, Suite 820  
New York, NY 10177  
p. 212.371.6600 • f. 212.751.2540  
e. DKovel@kmlp.com • [https://urldefense.com/v3/ http://www.kmlp.com ;!!N5JjT8\\_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkoIQxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF\\$\[kmlp\[.\]com\]](https://urldefense.com/v3/http://www.kmlp.com;!!N5JjT8_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkoIQxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF$[kmlp[.]com])

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---

From: Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>  
Sent: Thursday, March 2, 2023 10:12 AM  
To: David Kovel  
Subject: Re: Hartree letter

[ATTENTION: This message is from an external source.]

Sorry David. How's 4:30 or 5 today. Also pretty good tomorrow morning  
Melvin A. Brosterman  
STROOCK  
180 Maiden Lane, New York, NY 10038

D: 212.806.5632<tel:212.806.5632>  
M: 973.713.9420  
mbrosterman@stroock.com<mailto:mbrosterman@stroock.com> | vCard  
<<https://www.stroock.com/people/MBROSTERMAN/vcard>> |  
<http://www.stroock.com><<http://www.stroock.com>>

---

From: David Kovel <dkovel@kmlp.com>  
Sent: Thursday, March 2, 2023 9:35:06 AM  
To: Brosterman, Melvin A. <mbrosterman@stroock.com>  
Subject: RE: Hartree letter

Mel, I'll have to get on a mediation zoom at around 9:45. Perhaps we can pick another time to talk late late today or tomorrow. Best, David David Kovel, Managing Partner Kirby McInerney LLP 250 Park Avenue, Suite 820, New York, NY 10177 p.

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Mel,

I'll have to get on a mediation zoom at around 9:45. Perhaps we can pick another time to talk late late today or tomorrow.

Best,

David

[Kirby McInerney LLP]  
David Kovel, Managing Partner  
Kirby McInerney LLP  
250 Park Avenue, Suite 820, New York, NY 10177  
p. 212.371.6600<tel:212.371.6600> · f. 212.751.2540<tel:212.751.2540>  
e. DKovel@kmlp.com [https://urldefense.com/v3/\\_http://www.kmlp.com\\_!!N5JjT8\\_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkolOqxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF\\$\[kmlp\[.\]com\]<https://urldefense.com/v3/\\_https://www.kmlp.com\\_!!N5JjT8\\_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXyr57leTE0IL9er2S\\$>](https://urldefense.com/v3/_http://www.kmlp.com_!!N5JjT8_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkolOqxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF$[kmlp[.]com]<https://urldefense.com/v3/_https://www.kmlp.com_!!N5JjT8_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXyr57leTE0IL9er2S$>)

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From: Brosterman, Melvin A. <mbrosterman@stroock.com>  
Sent: Wednesday, March 1, 2023 4:54 PM  
To: David Kovel <dkovel@kmlp.com>  
Subject: Re: Hartree letter

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I'll try u tomorrow. I can text first. My cell iab973-713-9420. What is your number?

Melvin A. Brosterman

STROOCK

180 Maiden Lane, New York, NY 10038

D: 212.806.5632<tel:212.806.5632>

M: 973.713.9420

mbrosterman@stroock.com<mailto:mbrosterman@stroock.com> | vCard  
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<http://www.stroock.com><[https://urldefense.com/v3/https://protect-us.mimecast.com/s/xF77C4x3VpurWRLsWs4sC/\\_!!N5Jt8\\_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2oqJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXYr57leTE0HzEi0s6\\$](https://urldefense.com/v3/https://protect-us.mimecast.com/s/xF77C4x3VpurWRLsWs4sC/_!!N5Jt8_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2oqJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXYr57leTE0HzEi0s6$)>

---

**From:** David Kovel <dkovel@kmlp.com>  
**Sent:** Wednesday, March 1, 2023 4:51:28 PM  
**To:** Brosterman, Melvin A. <mbrosterman@stroock.com>  
**Subject:** Re: Hartree letter

David Kovel, Managing Partner Kirby McInerney LLP 250 Park Avenue, Suite 820, New York, NY 10177 p. 212.371.6600 · f. 212.751.2540 e. DKovel@kmlp.com · www.kmlp.com  
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David Kovel, Managing Partner  
Kirby McInerney LLP  
250 Park Avenue, Suite 820, New York, NY 10177  
p. 212.371.6600<tel:212.371.6600> · f. 212.751.2540<tel:212.751.2540>  
e. DKovel@kmlp.com [https://urldefense.com/v3/\\_http://www.kmlp.com\\_!!N5Jt8\\_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkolOqxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF\\$\[kmlp\[.\]com\]<https://urldefense.com/v3/\\_https://www.kmlp.com\\_!!N5Jt8\\_g!ephiWMf3Z0aBd0kJKphvVO7W\\_L\\_zyhdAaXIU5xRJ9HW7sV2rJAoohnE4I5fx2uVmgUEGM8iHzpCdMn2b\\$>](https://urldefense.com/v3/_http://www.kmlp.com_!!N5Jt8_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkolOqxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF$[kmlp[.]com]<https://urldefense.com/v3/_https://www.kmlp.com_!!N5Jt8_g!ephiWMf3Z0aBd0kJKphvVO7W_L_zyhdAaXIU5xRJ9HW7sV2rJAoohnE4I5fx2uVmgUEGM8iHzpCdMn2b$>)

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Sorry, I'm tied up for the next couple. How about between 9-9:45 tomorrow?

---

From: Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>  
Sent: Wednesday, March 1, 2023 4:45:53 PM  
To: David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>  
Subject: Re: Hartree letter

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Give me your cell number and I will call u shortly.

Melvin A. Brosterman

STROOCK

180 Maiden Lane, New York, NY 10038

D: 212.806.5632<tel:212.806.5632>

M: 973.713.9420

mbrosterman@stroock.com<mailto:mbrosterman@stroock.com> | vCard  
<<https://www.stroock.com/people/MBROSTERMAN/vcard>> |  
<http://www.stroock.com><[https://urldefense.com/v3/https://protect-us.mimecast.com/s/xF77C4x3VpurWRLsWs4sC\\_!!N5Jt8\\_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXyr57leTE0KSXssoP\\$](https://urldefense.com/v3/https://protect-us.mimecast.com/s/xF77C4x3VpurWRLsWs4sC_!!N5Jt8_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXyr57leTE0KSXssoP$)>

---

**From:** David Kovel <dkovel@kmlp.com>  
**Sent:** Wednesday, March 1, 2023 2:16:55 PM  
**To:** Brosterman, Melvin A. <mbrosterman@stroock.com>  
**Subject:** FW: Hartree letter

Hi Mel, Please see attached and let me know when we can discuss. Best, David David Kovel,  
Managing Partner Kirby McInerney LLP 250 Park Avenue, Suite 820, New York, NY 10177 p.  
212.371.6600 · f. 212.751.2540 e. DKovel@kmlp.com · www.kmlp.com

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Report Suspicious <[https://us-phishalarm-ewt.proofpoint.com/EWT/v1/N5Jt8\\_g!JALYL\\_ iy\\_ LeWKGgoAgnRPeylCr0xfcYH1ktRaWktGc4uPidRp\\_uwPZqDYMiCZKukskehWRbM5TGE4YKHpoF-wrHLMEAWvJzPh-dyiRxoUXAYms-e6YZGHxUqDQLaZnYADoscoWz4-BNQUAg\\$](https://us-phishalarm-ewt.proofpoint.com/EWT/v1/N5Jt8_g!JALYL_ iy_ LeWKGgoAgnRPeylCr0xfcYH1ktRaWktGc4uPidRp_uwPZqDYMiCZKukskehWRbM5TGE4YKHpoF-wrHLMEAWvJzPh-dyiRxoUXAYms-e6YZGHxUqDQLaZnYADoscoWz4-BNQUAg$)>

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Hi Mel,

Please see attached and let me know when we can discuss.

Best,

David

[Image removed by sender. Kirby McInerney LLP]

David Kovel, Managing Partner

Kirby McInerney LLP

250 Park Avenue, Suite 820, New York, NY 10177

p. 212.371.6600<tel:212.371.6600> · f. 212.751.2540<tel:212.751.2540>

e. DKovel@kmlp.com [https://urldefense.com/v3/ http://www.kmlp.com ;!!N5Jt8\\_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkolOqxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF\\$\[kmlp\[.\]com\]<https://urldefense.com/v3/ https://www.kmlp.com ;!!N5Jt8\\_g!eR9cBQU3IZnOqf22AiQ2AeLf41FpEsYjOotqHPGL5LTc4aXCQi5tHpOLLSPnk69moGLvlpwqJKZ3we0I\\$>](https://urldefense.com/v3/http://www.kmlp.com;!!N5Jt8_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkolOqxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF$[kmlp[.]com]<https://urldefense.com/v3/https://www.kmlp.com;!!N5Jt8_g!eR9cBQU3IZnOqf22AiQ2AeLf41FpEsYjOotqHPGL5LTc4aXCQi5tHpOLLSPnk69moGLvlpwqJKZ3we0I$>)

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Kirby McInerney LLP  
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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Thursday, March 30, 2023 11:21 AM  
**To:** 'Brosterman, Melvin A.'; David Kovel; James Young x6172  
**Cc:** Masiuk, Elizabeth F.  
**Subject:** RE: Hartree letter

Very good. Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>  
**Sent:** Thursday, March 30, 2023 10:42 AM  
**To:** David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>; James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Cc:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Masiuk, Elizabeth F. <[emasiuk@stroock.com](mailto:emasiuk@stroock.com)>  
**Subject:** Re: Hartree letter

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Thanks David. Melanie, we should be in a position to email you our response and the few exhibits early next week. After you receive it, feel free to contact me with any questions you may have. Mel

**Melvin A. Brosterman**

**STROOCK**  
180 Maiden Lane, New York, NY 10038  
D: 212.806.5632  
M: 973.713.9420

**From:** David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>  
**Sent:** Thursday, March 30, 2023 11:38 AM  
**To:** Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>; James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Cc:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Subject:** Re: Hartree letter

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Hi Mel,

I hope you are well.

Please coordinate the production with Melanie, who is cc'd here. We will not be representing Kansas going forward.

Best,  
David

---

**From:** Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>  
**Sent:** Thursday, March 30, 2023 11:30:34 AM  
**To:** David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>; James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Subject:** Re: Hartree letter

[**ATTENTION:** This message is from an external source.]

David, were going to be getting out our response the request in the next day or so. We intend to send it to the assistant AG who signed it. Should it also go to you and or James as cc's?

**Melvin A. Brosterman**

**STROOCK**

180 Maiden Lane, New York, NY 10038

D: 212.806.5632

M: 973.713.9420

**From:** David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>  
**Sent:** Thursday, March 2, 2023 12:09 PM  
**To:** Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>  
**Subject:** Re: Hartree letter

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David Kovel, *Managing Partner*  
Kirby McInerney LLP  
250 Park Avenue, Suite 820, New York, NY 10177  
p. [212.371.6600](tel:212.371.6600) · f. [212.751.2540](tel:212.751.2540)  
e. [DKovel@kmlp.com](mailto:DKovel@kmlp.com) · [www.kmlp.com](http://www.kmlp.com)

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**From:** Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>

**Sent:** Thursday, March 2, 2023 11:26:20 AM

**To:** David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>

**Subject:** Re: Hartree letter

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That's fine. If I forget to call u feel free to call me at 973-713-9420

**Melvin A. Brosterman**

**STROOCK**

180 Maiden Lane, New York, NY 10038

D: 212.806.5632

M: 973.713.9420

[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com) | [vCard](#) | [www.stroock.com](http://www.stroock.com)

---

**From:** David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>

**Sent:** Thursday, March 2, 2023 11:13:06 AM

**To:** Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>

**Subject:** Re: Hartree letter

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How about 9:45 tomorrow?

---

**From:** Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>

**Sent:** Thursday, March 2, 2023 10:12 AM

**To:** David Kovel

Subject: Re: Hartree letter

[ATTENTION: This message is from an external source.]

Sorry David. How's 4:30 or 5 today. Also pretty good tomorrow morning

Melvin A. Brosterman

STROOCK

180 Maiden Lane, New York, NY 10038

D: 212.806.5632<<tel:212.806.5632>>

M: 973.713.9420

[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)<<mailto:mbrosterman@stroock.com>> | vCard

<<https://www.stroock.com/people/MBROSTERMAN/vcard>> |

<http://www.stroock.com><<http://www.stroock.com>>

---

From: David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>

Sent: Thursday, March 2, 2023 9:35:06 AM

To: Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>

Subject: RE: Hartree letter

Mel, I'll have to get on a mediation zoom at around 9:45. Perhaps we can pick another time to talk late late today or tomorrow. Best, David David Kovel, Managing Partner Kirby McInerney LLP 250 Park Avenue, Suite 820, New York, NY 10177 p.

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[Kirby McInerney LLP]

David Kovel, Managing Partner

Kirby McInerney LLP

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e. [DKovel@kmlp.com](mailto:DKovel@kmlp.com) <https://urldefense.com/v3/> <http://www.kmlp.com> ;!!N5Jt8\_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkolOqxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF\$[

kmlp[.]com]<[https://urldefense.com/v3/ https://www.kmlp.com ;!!N5Jt8\\_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXr57leTE0IL9er2S\\$](https://urldefense.com/v3/https://www.kmlp.com;!!N5Jt8_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXr57leTE0IL9er2S$)>

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I'll try u tomorrow. I can text first. My cell iab973-713-9420. What is your number?

Melvin A. Brosterman

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**Subject:** Re: Hartree letter

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e. [DKovel@kmlp.com](mailto:DKovel@kmlp.com) [https://urldefense.com/v3/\\_http://www.kmlp.com\\_!!N5Jt8\\_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivgEBvUsgvjkoIQxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF\\$\[kmlp\[.\]com\]<https://urldefense.com/v3/\\_https://www.kmlp.com\\_!!N5Jt8\\_g!ephiWMf3Z0aBd0kJKphvVO7W\\_L\\_zyhdAaXIU5xRJ9HW7sV2rJAoohnE4l5fx2uVmqUEGM8iHzpCdMn2b\\$>](https://urldefense.com/v3/_http://www.kmlp.com_!!N5Jt8_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivgEBvUsgvjkoIQxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF$[kmlp[.]com]<https://urldefense.com/v3/_https://www.kmlp.com_!!N5Jt8_g!ephiWMf3Z0aBd0kJKphvVO7W_L_zyhdAaXIU5xRJ9HW7sV2rJAoohnE4l5fx2uVmqUEGM8iHzpCdMn2b$>)  
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Sorry, I'm tied up for the next couple. How about between 9-9:45 tomorrow?

---

From: Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>  
Sent: Wednesday, March 1, 2023 4:45:53 PM  
To: David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>  
Subject: Re: Hartree letter

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Give me your cell number and I will call u shortly.

Melvin A. Brosterman

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180 Maiden Lane, New York, NY 10038

D: 212.806.5632<<tel:212.806.5632>>

M: 973.713.9420

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**From:** David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>  
**Sent:** Wednesday, March 1, 2023 2:16:55 PM  
**To:** Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>  
**Subject:** FW: Hartree letter

Hi Mel, Please see attached and let me know when we can discuss. Best, David David Kovel, Managing Partner Kirby McInerney LLP 250 Park Avenue, Suite 820, New York, NY 10177 p. 212.371.6600 · f. 212.751.2540 e. DKovel@kmlp.com · www.kmlp.com

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Hi Mel,

Please see attached and let me know when we can discuss.

Best,

David

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David Kovel, Managing Partner

Kirby McInerney LLP

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Thank you.

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Report Suspicious <[https://us-phishalarm-ewt.proofpoint.com/EWT/v1/N5Jt8\\_g!JALYL\\_ iy\\_ LeWKGgoAgnRMufGYkd\\_B2xSlwOkP83DFDkLNS\\_P1z8ZhvTeX0hNDJoKxcbQsY77Fsx0kXapFkk\\_6WbvnM1Uhnwc\\_gcKQq05gs76scFmbjTcxEbAwjGkzPVXqqpSgFnzkgQI0SA\\$](https://us-phishalarm-ewt.proofpoint.com/EWT/v1/N5Jt8_g!JALYL_ iy_ LeWKGgoAgnRMufGYkd_B2xSlwOkP83DFDkLNS_P1z8ZhvTeX0hNDJoKxcbQsY77Fsx0kXapFkk_6WbvnM1Uhnwc_gcKQq05gs76scFmbjTcxEbAwjGkzPVXqqpSgFnzkgQI0SA$)>

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[Image removed by sender. Kirby McInerney LLP]

David Kovel, Managing Partner  
Kirby McInerney LLP  
250 Park Avenue, Suite 820, New York, NY 10177  
p. 212.371.6600<<tel:212.371.6600>> · f. 212.751.2540<<tel:212.751.2540>>  
e. [DKovel@kmlp.com](mailto:DKovel@kmlp.com) [https://urldefense.com/v3/\\_http://www.kmlp.com\\_!!N5Jt8\\_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkolOqxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF\\$\[kmlp\[.\]com\]](https://urldefense.com/v3/_http://www.kmlp.com_!!N5Jt8_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkolOqxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF$[kmlp[.]com])<[https://urldefense.com/v3/\\_https://www.kmlp.com\\_!!N5Jt8\\_g!ephiWMf3Z0aBd0kJKphvVO7W\\_L\\_zyhdAaXIU5xRJ9HW7sV2rJAoohnE4I5fx2uVmguEGM8iHzpCdMn2b\\$](https://urldefense.com/v3/_https://www.kmlp.com_!!N5Jt8_g!ephiWMf3Z0aBd0kJKphvVO7W_L_zyhdAaXIU5xRJ9HW7sV2rJAoohnE4I5fx2uVmguEGM8iHzpCdMn2b$)>  
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Sorry, I'm tied up for the next couple. How about between 9-9:45 tomorrow?

From: Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>  
Sent: Wednesday, March 1, 2023 4:45:53 PM  
To: David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>  
Subject: Re: Hartree letter

[ATTENTION: This message is from an external source.]

Give me your cell number and I will call u shortly.

Melvin A. Brosterman

STROOCK

180 Maiden Lane, New York, NY 10038

D: 212.806.5632<<tel:212.806.5632>>

M: 973.713.9420

[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)<<mailto:mbrosterman@stroock.com>> | vCard  
<<https://www.stroock.com/people/MBROSTERMAN/vcard>> |  
<http://www.stroock.com><[https://urldefense.com/v3/https://protect-us.mimecast.com/s/xF77C4x3VpurWRLsWs4sC\\_!!N5Jt8\\_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXYr57leTE0KSXxsoP\\$](https://urldefense.com/v3/https://protect-us.mimecast.com/s/xF77C4x3VpurWRLsWs4sC_!!N5Jt8_g!cWG0m8rMBYOKQuR8GED1ixfa8VF2ogJMCbB23KYNSY6-Shxu9xpuYvFD4TsmJsMXYr57leTE0KSXxsoP$)>

---

From: David Kovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>  
Sent: Wednesday, March 1, 2023 2:16:55 PM  
To: Brosterman, Melvin A. <[mbrosterman@stroock.com](mailto:mbrosterman@stroock.com)>  
Subject: FW: Hartree letter

Hi Mel, Please see attached and let me know when we can discuss. Best, David David Kovel,  
Managing Partner Kirby McInerney LLP 250 Park Avenue, Suite 820, New York, NY 10177 p.  
212.371.6600 · f. 212.751.2540 e. [DKovel@kmlp.com](mailto:DKovel@kmlp.com) · [www.kmlp.com](http://www.kmlp.com)

ZjQcmQRYFpfptBannerStart

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Report Suspicious <[https://us-phishalarm-ewt.proofpoint.com/EWT/v1/N5JtT8\\_g!JALYL\\_!y\\_LeWKGgoAgnRPeylCr0xfcYH1ktRaWktGc4uPidRp\\_uwPZqDYMiCZKukskehWRbM5TGE4YKHpoF-wrHLMEAWvJzPh-dyiRxoUXAYms-e6YZGHxUqDQLaZnYADoscoWz4-BNQUAg\\$](https://us-phishalarm-ewt.proofpoint.com/EWT/v1/N5JtT8_g!JALYL_!y_LeWKGgoAgnRPeylCr0xfcYH1ktRaWktGc4uPidRp_uwPZqDYMiCZKukskehWRbM5TGE4YKHpoF-wrHLMEAWvJzPh-dyiRxoUXAYms-e6YZGHxUqDQLaZnYADoscoWz4-BNQUAg$)>

ZjQcmQRYFpfptBannerEnd

Hi Mel,

Please see attached and let me know when we can discuss.

Best,

David

[Image removed by sender. Kirby McInerney LLP]

David Kovel, Managing Partner  
Kirby McInerney LLP

250 Park Avenue, Suite 820, New York, NY 10177

p. 212.371.6600<<tel:212.371.6600>> · f. 212.751.2540<<tel:212.751.2540>>

e. [DKovel@kmlp.com](mailto:DKovel@kmlp.com) [https://urldefense.com/v3/!N5JtT8\\_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkoIQxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF\\$\[kmlp\[.\]com\]](https://urldefense.com/v3/!N5JtT8_g!aVF-EdFaCQBpjYkYfs9fY5WXcz0BmqivqEBvUsgvjkoIQxoAVrbV1MnW59wwRf8ATtoIDTRWcu0bEmF$[kmlp[.]com])<[https://urldefense.com/v3/!N5JtT8\\_g!eR9cBQU3IZnOqf22AiQ2AeLf41FpEsYjOotqHPGL5LTc4aXCQi5tHpOLLSPnk69moGLvlpwqJKZ3we0I\\$](https://urldefense.com/v3/!N5JtT8_g!eR9cBQU3IZnOqf22AiQ2AeLf41FpEsYjOotqHPGL5LTc4aXCQi5tHpOLLSPnk69moGLvlpwqJKZ3we0I$)>

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David Kovel, *Managing Partner*  
Kirby McInerney LLP  
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p. [212.371.6600](tel:212.371.6600) · f. [212.751.2540](tel:212.751.2540)  
e. [DKovel@kmlp.com](mailto:DKovel@kmlp.com) · [www.kmlp.com](http://www.kmlp.com)

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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, March 30, 2023 12:21 PM  
**To:** Jack, Melanie  
**Cc:** Andrea Gauthier x6229  
**Subject:** Macquarie Motion to Withdraw  
**Attachments:** Macquarie Motion to Withdraw 03.30.2023.docx

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Please see draft attached. Let us know if we need to tweak this to comply with any local rules.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

---

**From:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Sent:** Thursday, April 6, 2023 2:41 PM  
**To:** Jack, Melanie  
**Cc:** Oleen, Fran  
**Subject:** Your Address to Return Requested Data

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Melanie – we are getting ready to send the Kansas Gas case original form data to you and two original drives sent to us. It will be on a physical drive, and could you provide a regular mailing address for it to be sent to and receipted for?  
Thanks, Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

---

**From:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Sent:** Thursday, April 6, 2023 2:55 PM  
**To:** Jack, Melanie  
**Cc:** Oleen, Fran  
**Subject:** FW: MDL Time

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

We had the address below.

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Andrea Gauthier x6229 <agauthier@forthepeople.com>  
**Sent:** Thursday, April 6, 2023 3:42 PM  
**To:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Subject:** RE: MDL Time

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Thank you.

**Andrea Gauthier**  
Legal Assistant

**P:** (904) 361-4492  
**F:** (904) 361-4477  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:22 PM  
**To:** Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: MDL Time

Not really. I thought you had her hours.

I heard back from James on the Kansas AG Data Return. Do you have Melanie Jack's physical mail address at the Kansas Attorney General's office. If not, I will ask her.

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:13 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Subject:** RE: MDL Time

I do have MDL hours for Renee. 176

I wasn't sure if you needed hers as well.

Thank you.

**Andrea Gauthier**  
Legal Assistant

**P:** (904) 361-4492

F: (904) 361-4477

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 6, 2023 3:06 PM

**To:** Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: MDL Time

That makes sense as the lower number folks were off Kroger and on to Zytiga at the end of February. And I am just going to the Opioid meetings but not coding.

Now I do not know if you have MDL hours for Renee. I hope she is entering time as all her bill4time should be all Kroger and common benefit?

Jennifer Williams and John Early are not on here and I will confirm that is because they only worked Zytiga in March – which is probably true.

Thankyou!

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Sent:** Thursday, April 6, 2023 2:35 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** MDL Time

This is the MDL time per staff for March:

Acklin, Doug	17.5
Eisel, Daniel	0.8
Engleman, Stephen	171.4

Lahtaw, Awng	18.5
Mizeras, Yvonne	183.6
Pittman, Julie	182.3
Provenzano, Denise	136.8
Rhodes, Angela	10.9
Rodriguez, Marie	155.7
Tamayo, Raymond	4.9
Zumwalt, Rand	133.27

Thank you.

**Andrea Gauthier**

Legal Assistant

**P:** (904) 361-4492

**F:** (904) 361-4477

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Thursday, April 6, 2023 3:14 PM  
**To:** 'Douglas Acklin x6133'  
**Cc:** Oleen, Fran  
**Subject:** Natural Gas investigation

What about the other discovery/responses received from suppliers that went to Morgan and Morgan?

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Sent:** Thursday, April 6, 2023 2:41 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Cc:** Oleen, Fran <Fran.Oleen@ag.ks.gov>  
**Subject:** Your Address to Return Requested Data

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Melanie – we are getting ready to send the Kansas Gas case original form data to you and two original drives sent to us. It will be on a physical drive, and could you provide a regular mailing address for it to be sent to and receipted for?  
Thanks, Doug

**Douglas Acklin**  
Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

---

**From:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Sent:** Thursday, April 6, 2023 3:24 PM  
**To:** Jack, Melanie  
**Subject:** RE: Natural Gas investigation

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Yes, we are planning to send all the original uncoded responses received from all the energy companies that provided data. So, all the various custodians in our Relativity data bank and the two original hard drives we received. Costs have been described as nominal and I expect James will forward a bill later.  
Have a nice Easter weekend!

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Thursday, April 6, 2023 4:14 PM  
**To:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Cc:** Fran.Oleen <Fran.Oleen@ag.ks.gov>  
**Subject:** \*EXT\* Natural Gas investigation

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## What about the other discovery/responses received from suppliers that went to Morgan and Morgan?

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor



Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 2:41 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Subject:** Your Address to Return Requested Data

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Melanie – we are getting ready to send the Kansas Gas case original form data to you and two original drives sent to us. It will be on a physical drive, and could you provide a regular mailing address for it to be sent to and receipted for?  
Thanks, Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Thursday, April 6, 2023 3:51 PM  
**To:** Oleen, Fran  
**Subject:** FW: Natural Gas investigation

FYI - See the note below from Douglas Acklin about returning our files. They are sending uncoded docs from Relativity, which means we don't get their analysis.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Sent:** Thursday, April 6, 2023 3:24 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Subject:** RE: Natural Gas investigation

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Yes, we are planning to send all the original uncoded responses received from all the energy companies that provided data. So, all the various custodians in our Relativity data bank and the two original hard drives we received. Costs have been described as nominal and I expect James will forward a bill later.  
Have a nice Easter weekend!

**Douglas Acklin**  
Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Thursday, April 6, 2023 4:14 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Subject:** \*EXT\* Natural Gas investigation

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

---

## What about the other discovery/responses received from suppliers that went to Morgan and Morgan?

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 2:41 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Subject:** Your Address to Return Requested Data

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Melanie – we are getting ready to send the Kansas Gas case original form data to you and two original drives sent to us. It will be on a physical drive, and could you provide a regular mailing address for it to be sent to and received for?  
Thanks, Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Thursday, April 6, 2023 3:57 PM  
**To:** 'Douglas Acklin x6133'  
**Subject:** RE: Natural Gas investigation

Thank you for your help with this.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Sent:** Thursday, April 6, 2023 3:24 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Subject:** RE: Natural Gas investigation

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Yes, we are planning to send all the original uncoded responses received from all the energy companies that provided data. So, all the various custodians in our Relativity data bank and the two original hard drives we received. Costs have been described as nominal and I expect James will forward a bill later.

Have a nice Easter weekend!

**Douglas Acklin**  
Attorney

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**Sent:** Thursday, April 6, 2023 4:14 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Subject:** \*EXT\* Natural Gas investigation

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What about the other discovery/responses received from suppliers that went to Morgan and Morgan?

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
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**Sent:** Thursday, April 6, 2023 2:41 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Subject:** Your Address to Return Requested Data

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Melanie – we are getting ready to send the Kansas Gas case original form data to you and two original drives sent to us. It will be on a physical drive, and could you provide a regular mailing address for it to be sent to and receipted for?

Thanks, Doug

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

---

**From:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Sent:** Monday, April 10, 2023 8:34 AM  
**To:** Jack, Melanie  
**Cc:** James Young x6172; Juan Martinez x2192  
**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Melanie – Please see the tracking number for the drives mailed to you over the weekend.  
Thank you!

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** ul Haq, Mohammed Riyaz <MohammedRiyazulHaq@epiqglobal.com>  
**Sent:** Saturday, April 8, 2023 8:32 PM  
**To:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Cc:** David Neff x8756 <dneff@forthepeople.com>; Bhosale, Shalaka Sudhir <ShalakaSudhir.Bhosale@epiqglobal.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>; Andrea Gauthier x6229 <agauthier@forthepeople.com>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

---

Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552  
SVC Type: FedEx Priority Overnight  
Recipient Information:  
Melanie Jack



Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq  
Project Analyst | Client Services | Epiq  
E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>;

EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**

Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

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## Hutchison, Robert

---

**From:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Sent:** Thursday, April 13, 2023 2:48 PM  
**To:** Jack, Melanie  
**Cc:** James Young x6172  
**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Thursday, April 13, 2023 3:31 PM  
**To:** Douglas Acklin x6133 <dacklin@forthepeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>  
**Cc:** ul Haq, Mohammed Riyaz <MohammedRiyazulHaq@epiqglobal.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

---

Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

# Travel history

SORT BY DATE/TIME  
Ascending

TIME ZONE  
Local Scan Time

Saturday, 4/8/2023	2:16 PM	• Shipment information sent to FedEx	
	3:27 PM	• Picked up	TEMPE, AZ
	3:28 PM	• Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	• Left FedEx origin facility	TEMPE, AZ
	6:52 PM	• At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	• Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	• Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	• Departed FedEx hub	MEMPHIS, TN
	5:17 PM	• At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	• At local FedEx facility	TOPEKA, KS
	8:11 AM	• On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	• At local FedEx facility	TOPEKA, KS
	9:23 AM	• Delay • Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	• At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	ⓘ Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Sunday, April 9, 2023 6:00 PM  
**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>  
**Cc:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**  
Attorney

P: (904) 361-4498  
F: (904) 361-4479  
A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>  
**Sent:** Saturday, April 8, 2023 8:32 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

---

Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552  
SVC Type: FedEx Priority Overnight  
Recipient Information:  
Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612

Thanks,  
**Riyaz**  
Mohammed Riyaz ul Haq  
Project Analyst | Client Services | Epiq  
E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

**People. Partnership. Performance.**  
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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Saturday, April 8, 2023 1:22 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General’s office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Friday, March 31, 2023 3:16 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmathews@forthepeople.com](mailto:pmathews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

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F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231  
**F:** (407) 563-8026  
**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kansas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084

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## Hutchison, Robert

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**From:** Jack, Melanie  
**Sent:** Thursday, April 13, 2023 3:46 PM  
**To:** 'Douglas Acklin x6133'  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

The address is correct. I don't know what might have happened. I will inquire.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Sent:** Thursday, April 13, 2023 2:48 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>  
**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

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My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Thursday, April 13, 2023 3:31 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.



# Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	①	Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG -

Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 6, 2023 1:37 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmy <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350

Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM



**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231  
**F:** (407) 563-8026  
**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kansas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084

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## Hutchison, Robert

---

**From:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Sent:** Thursday, April 13, 2023 3:59 PM  
**To:** Jack, Melanie  
**Cc:** James Young x6172  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Ok, Thanks Melanie. Let us know if we are going to try and send it back to you.

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Thursday, April 13, 2023 4:46 PM  
**To:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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The address is correct. I don't know what might have happened. I will inquire.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 13, 2023 2:48 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Thursday, April 13, 2023 3:31 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

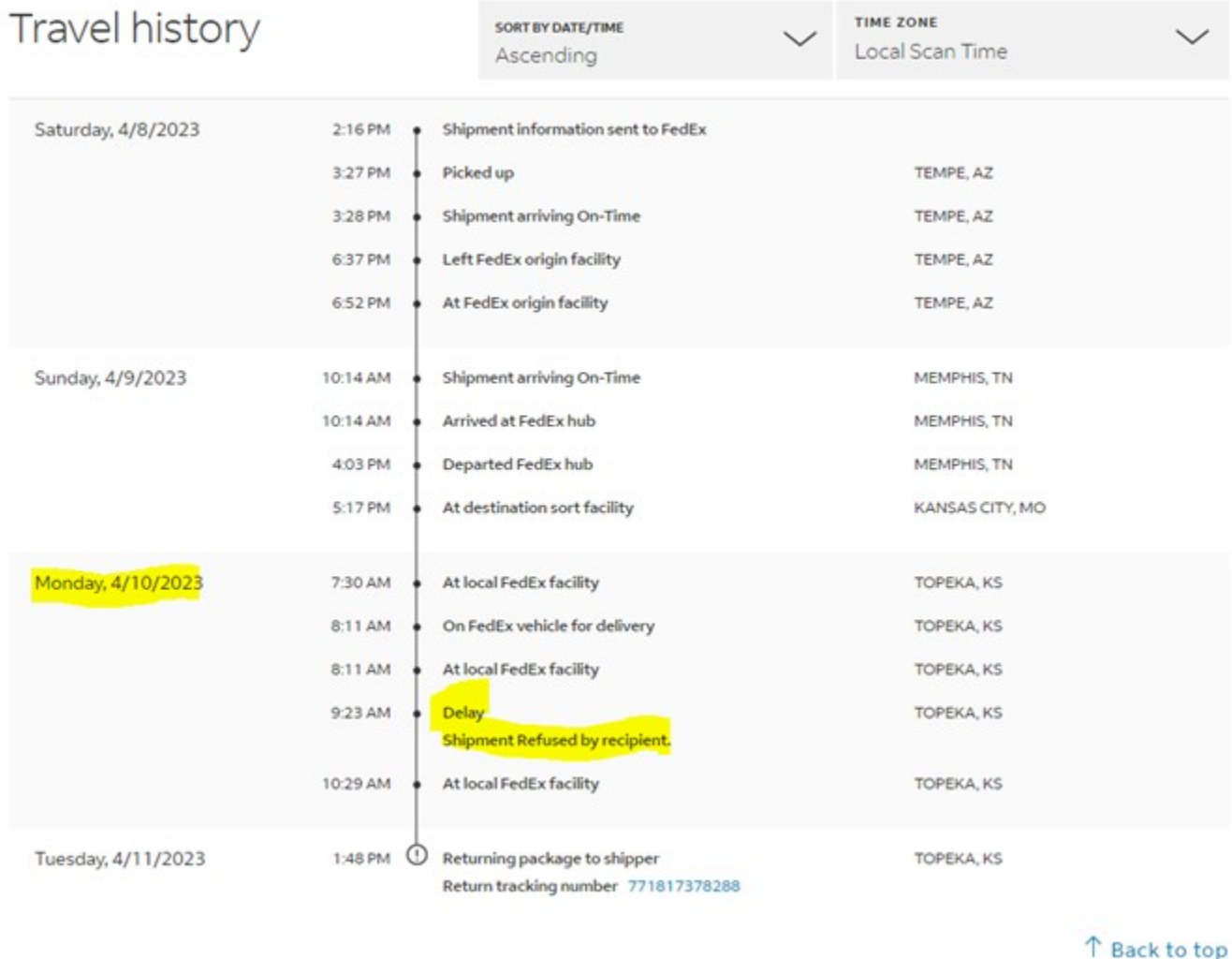
**Importance:** High

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---

Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.



[↑ Back to top](#)

Best regards,

**Kimmyo Takumyo**  
 Epiq | Project Manager  
 311 S. Wacker Dr. Suite 350  
 Chicago, IL 60606  
 Mobile: +1773-359-7797  
 Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Sunday, April 9, 2023 6:00 PM  
**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>  
**Cc:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Saturday, April 8, 2023 1:22 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be received for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Friday, March 31, 2023 3:16 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmathews@forthepeople.com](mailto:pmathews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)  
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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.  
Thanks!

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 12:05 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Friday, March 31, 2023 8:51 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kanas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack

Shawntelle Hammer

Platts

Kansas AG

SES

Southern Star

Tenaska Marketing Ventures

Macquarie Energy

MIECO

Hartree

ICE

Non-Custodial (Monika Barz)      Which is BP

BP Oil

Bryan Johnson



Lee Casey

No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

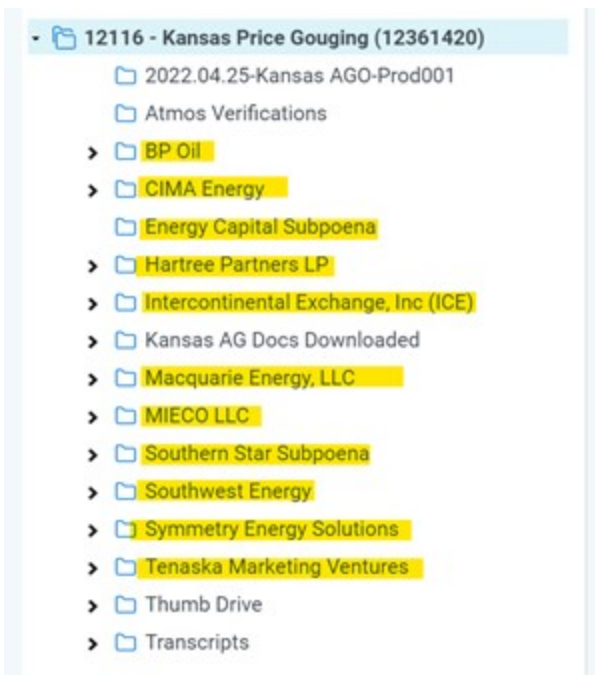
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**

Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Thursday, April 13, 2023 4:07 PM  
**To:** 'Douglas Acklin x6133'  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Sent:** Thursday, April 13, 2023 2:48 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>  
**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Thursday, April 13, 2023 3:31 PM  
**To:** Douglas Acklin x6133 <dacklin@forthepeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>  
**Cc:** ul Haq, Mohammed Riyaz <MohammedRiyazulHaq@epiqglobal.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

# Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	①	Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 6, 2023 1:37 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case



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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350

Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231  
**F:** (407) 563-8026  
**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kansas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084

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## Hutchison, Robert

---

**From:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** Jack, Melanie  
**Cc:** James Young x6172; Patrick Mathews x4676; Takumyo, Kimmie  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Melanie, we will let you know when it goes back out and get you tracking information.

Kimmie, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Thursday, April 13, 2023 5:07 PM  
**To:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the

person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 2:48 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 13, 2023 3:31 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

# Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	①	Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 6, 2023 1:37 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmy <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350



Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kansas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Wednesday, March 29, 2023 4:39 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084

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## Hutchison, Robert

---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Thursday, April 13, 2023 6:07 PM  
**To:** Douglas Acklin x6133; Jack, Melanie  
**Cc:** James Young x6172; Patrick Mathews x4676; EMS-DL-Morgan  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <melanie.Jack@ag.ks.gov>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>; Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Melanie, we will let you know when it goes back out and get you tracking information.

Kimmie, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Thursday, April 13, 2023 5:07 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 2:48 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Thursday, April 13, 2023 3:31 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number,

771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

## Travel history

SORT BY DATE/TIME  
Ascending

TIME ZONE  
Local Scan Time

Saturday, 4/8/2023	2:16 PM	• Shipment information sent to FedEx	
	3:27 PM	• Picked up	TEMPE, AZ
	3:28 PM	• Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	• Left FedEx origin facility	TEMPE, AZ
	6:52 PM	• At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	• Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	• Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	• Departed FedEx hub	MEMPHIS, TN
	5:17 PM	• At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	• At local FedEx facility	TOPEKA, KS
	8:11 AM	• On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	• At local FedEx facility	TOPEKA, KS
	9:23 AM	• Delay • Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	• At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	① Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

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Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Cc:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General’s office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General’s Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

---

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Friday, March 31, 2023 3:16 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimmie Takumyo**

Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmathews@forthepeople.com](mailto:pmathews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 11:40 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**

Project Manager

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F: (407) 563-8026

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.  
Thanks!

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 12:05 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**  
Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kanas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

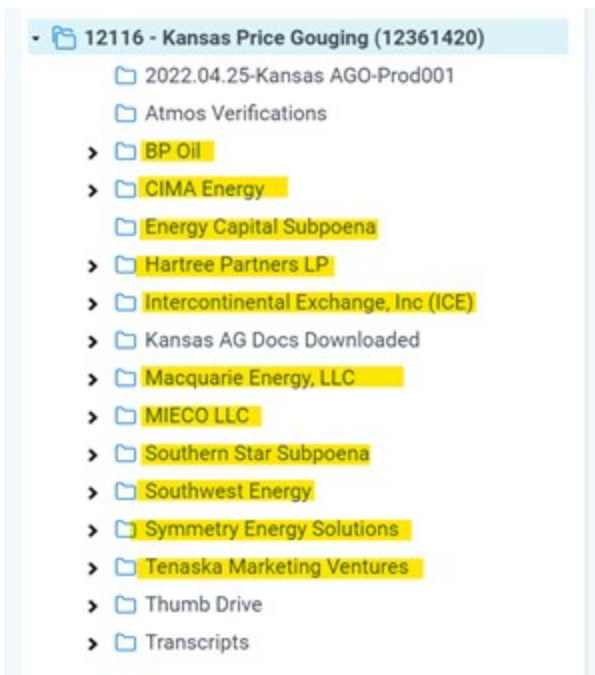
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**

Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Friday, April 14, 2023 8:18 AM  
**To:** 'Takumyo, Kimmie'; Douglas Acklin x6133  
**Cc:** James Young x6172; Patrick Mathews x4676; EMS-DL-Morgan  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Thursday, April 13, 2023 6:07 PM  
**To:** Douglas Acklin x6133 <dacklin@forthepeople.com>; Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimmy Takumyo**

Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 13, 2023 4:14 PM

**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmy <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Melanie, we will let you know when it goes back out and get you tracking information.

Kimmy, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 13, 2023 2:48 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 13, 2023 3:31 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

# Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	①	Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 6, 2023 1:37 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350

Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**  
Project Manager

**P:** (407) 563-3231  
**F:** (407) 563-8026  
**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084

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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kansas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084

**MORGAN & MORGAN**

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## Hutchison, Robert

---

**From:** Giddie, Neil Sprunith <NeilSprunith.Giddie@epiqglobal.com>  
**Sent:** Friday, April 14, 2023 9:03 AM  
**To:** Jack, Melanie; Takumyo, Kimmie; Douglas Acklin x6133  
**Cc:** James Young x6172; Patrick Mathews x4676; EMS-DL-Morgan  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie,

This is received, Kimmie will circle back in regard to the below.

Thanks,

### Neil Sprunith Giddie

Project Analyst, Client Services

Epiq | eDiscovery

Email: [neilsprunith.giddie@epiqglobal.com](mailto:neilsprunith.giddie@epiqglobal.com)

People. Partnership. Performance.

[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Friday, April 14, 2023 8:18 AM  
**To:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Thursday, April 13, 2023 6:07 PM  
**To:** Douglas Acklin x6133 <dacklin@forthepeople.com>; Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Melanie, we will let you know when it goes back out and get you tracking information.

Kimmie, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.



**Douglas Acklin**  
Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor

Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

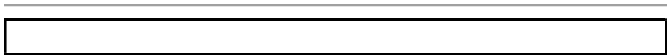
**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 2:48 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

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My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 13, 2023 3:31 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

## Travel history

SORT BY DATE/TIME  
Ascending

TIME ZONE  
Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	ⓘ	Returning package to shipper Return tracking number <a href="#">771817378288</a>	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>  
**Sent:** Saturday, April 8, 2023 8:32 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552  
SVC Type: FedEx Priority Overnight  
Recipient Information:  
Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612

Thanks,  
**Riyaz**  
Mohammed Riyaz ul Haq  
Project Analyst | Client Services | Epiq  
E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>;

EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email:[kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 6, 2023 3:40 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>;

EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email:[kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 6, 2023 3:26 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General’s office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General’s Office:

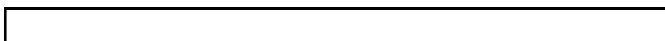
Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:  
Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!  
Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmathews@forthepeople.com](mailto:pmathews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

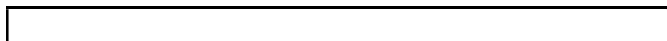
**Patrick Mathews**  
Project Manager

P: (407) 563-3231



F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Friday, March 31, 2023 1:58 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>;

EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

---

Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>

**Sent:** Friday, March 31, 2023 1:15 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>;

EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

## Shalaka Bhosale

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 11:40 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of Epiq. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report phishing by using the "Phish Alert Report" button above.

Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**

Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084

[Redacted]

[Redacted]

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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.  
Thanks!

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

[Redacted]

[Redacted]

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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 12:05 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](mailto:pmatthews@forthepeople.com)  
[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

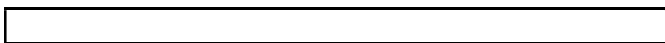
P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Friday, March 31, 2023 8:51 AM

**To:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kansas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack

Shawntelle Hammer

Platts

Kansas AG

SES

Southern Star

Tenaska Marketing Ventures

Macquarie Energy

MIECO

Hartree

ICE

Non-Custodial (Monika Barz)

Which is BP

BP Oil

Bryan Johnson

Lee Casey

No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

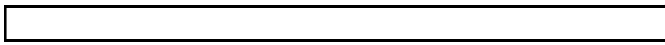
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

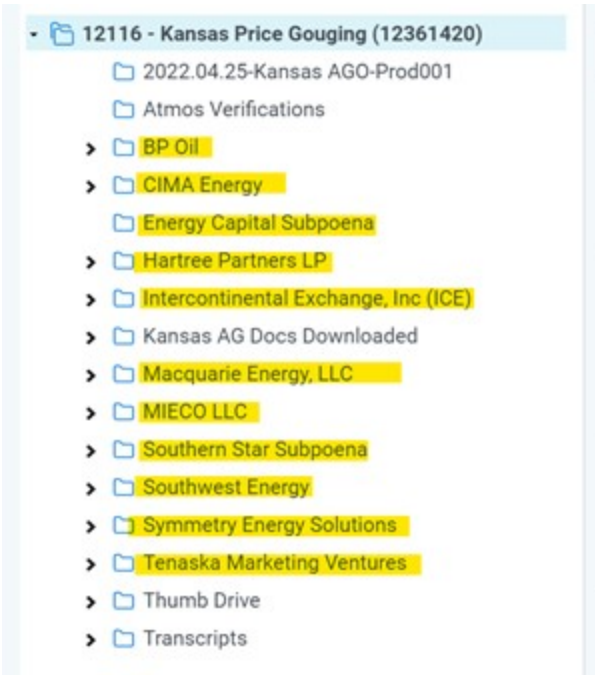
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, April 14, 2023 9:30 AM  
**To:** General  
**Subject:** Request for records

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please accept this email as a formal request for public records relating to contract #51337 (Natural Gas Recovery Litigation)

Specifically, we seek any records of communication:

- Between the office of the Kansas Attorney General and any news media about the contract. This includes text messages and voicemails to the extent available.
- Between the office of the Kansas Attorney General and any natural gas company about the contract. This includes text messages and voicemails to the extent available.
- Between the office of the Kansas Attorney General and any lobbyist, government relations, trade or advocacy groups, including but not limited to representatives of the Natural Gas or energy industry, Federalist Society, United States Chamber of Commerce, Republican Attorneys General Association, etc., about the contract. This includes text messages and voicemails to the extent available.
- Between the office of the Kansas Attorney General and any lawyers outside of the Kansas Attorney General about reissuing the RFP for this contract.
- We also seek the full email thread from 2/23 with the subject “outside counsel contract”.
- Internal communications about the cancellation of this contract.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

---

**From:** General  
**Sent:** Friday, April 14, 2023 9:56 AM  
**To:** Hutchison, Robert  
**Subject:** FW: Request for records

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, April 14, 2023 9:30 AM  
**To:** General <General@ag.ks.gov>  
**Subject:** Request for records

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please accept this email as a formal request for public records relating to contract #51337 (Natural Gas Recovery Litigation)

Specifically, we seek any records of communication:

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- Between the office of the Kansas Attorney General and any natural gas company about the contract. This includes text messages and voicemails to the extent available.
- Between the office of the Kansas Attorney General and any lobbyist, government relations, trade or advocacy groups, including but not limited to representatives of the Natural Gas or energy industry, Federalist Society, United States Chamber of Commerce, Republican Attorneys General Association, etc., about the contract. This includes text messages and voicemails to the extent available.
- Between the office of the Kansas Attorney General and any lawyers outside of the Kansas Attorney General about reissuing the RFP for this contract.
- We also seek the full email thread from 2/23 with the subject "outside counsel contract".
- Internal communications about the cancellation of this contract.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

---

**From:** Hutchison, Robert  
**Sent:** Friday, April 14, 2023 11:49 AM  
**To:** 'JYoung@ForThePeople.com'  
**Subject:** Kansas Open Records Request  
**Attachments:** 04.14.2023 - Morgan - KORA Response.pdf

Mr. Young,

Please see the attached letter. Thank you.

Robert C. Hutchison  
Associate Deputy Attorney General – Civil Division  
Legal Oversight and Government Counsel Section  
Office of Kansas Attorney General Kris Kobach  
120 SW 10<sup>th</sup> Avenue, 2<sup>nd</sup> Floor  
Topeka, Kansas 66612-1597  
Phone: (785) 368-8401  
Cell: (785) 213-9334  
Fax: (785) 296-2420  
[robert.hutchison@ag.ks.gov](mailto:robert.hutchison@ag.ks.gov)  
[www.ag.ks.gov](http://www.ag.ks.gov)

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## Hutchison, Robert

---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Friday, April 14, 2023 12:42 PM  
**To:** Jack, Melanie; Douglas Acklin x6133  
**Cc:** James Young x6172; Patrick Mathews x4676; EMS-DL-Morgan; Giddie, Neil Sprunith  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie and Douglas,

Please note that FedEx updated the scheduled delivery of the return package to Monday, April 17. We will follow up on Monday to confirm receipt and the next steps.

UPDATED DELIVERY

# Monday

4/17/2023 before 4:30 pm  
estimated between  
8:30 am - 12:30 pm

Initially expected: Friday, 4/14/2023

DELAYED

Want updates on this shipment? Enter your email and we will do the rest!

YOUR EMAIL

SUBMIT

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DELIVERY STATUS

Operational Delay

TRACKING ID

771817378288



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- PACKAGE RE FEDEX TOPEKA, KS 4/11/2023 1
- OPERATION, FLAGSTAFF, 4/14/2023 9
- OUT FOR DE
- TO PHOENIX, A; Updated Del. 4/17/2023 k estimated be 8:30 am - 12

↓ View tra

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

**From:** Giddie, Neil Sprunith <NeilSprunith.Giddie@epiqglobal.com>  
**Sent:** Friday, April 14, 2023 9:03 AM  
**To:** 'Jack, Melanie' <Melanie.Jack@ag.ks.gov>; Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

This is received, Kimmie will circle back in regard to the below.

Thanks,

**Neil Sprunith Giddie**

Project Analyst, Client Services

Epiq | eDiscovery

Email: [neilsprunith.giddie@epiqglobal.com](mailto:neilsprunith.giddie@epiqglobal.com)

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---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 8:18 AM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 13, 2023 6:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

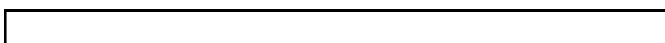
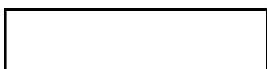
Melanie, we will let you know when it goes back out and get you tracking information.

Kimmie, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 13, 2023 2:48 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

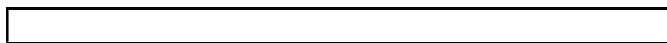
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Thursday, April 13, 2023 3:31 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

---

Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

# Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	• Shipment information sent to FedEx	
	3:27 PM	• Picked up	TEMPE, AZ
	3:28 PM	• Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	• Left FedEx origin facility	TEMPE, AZ
	6:52 PM	• At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	• Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	• Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	• Departed FedEx hub	MEMPHIS, TN
	5:17 PM	• At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	• At local FedEx facility	TOPEKA, KS
	8:11 AM	• On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	• At local FedEx facility	TOPEKA, KS
	9:23 AM	• Delay • Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	• At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	① Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimmy Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

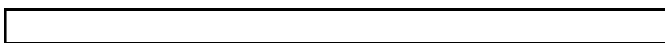
Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmy <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350

Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

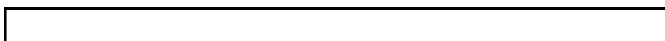
[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

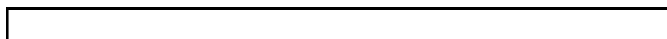
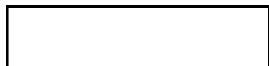
P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

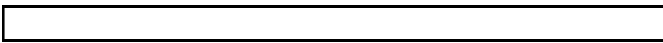
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231  
**F:** (407) 563-8026  
**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kanas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Friday, April 14, 2023 1:01 PM  
**To:** 'Takumyo, Kimmie'; Douglas Acklin x6133  
**Cc:** James Young x6172; Patrick Mathews x4676; EMS-DL-Morgan; Giddie, Neil Sprunith  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I have notified our staff of the Fed Ex on Monday, so we should be good.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Friday, April 14, 2023 12:42 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>; Giddie, Neil Sprunith <NeilSprunith.Giddie@epiqglobal.com>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie and Douglas,

Please note that FedEx updated the scheduled delivery of the return package to Monday, April 17. We will follow up on Monday to confirm receipt and the next steps.

UPDATED DELIVERY

# Monday

4/17/2023 before 4:30 pm  
estimated between  
8:30 am - 12:30 pm

Initially expected: Friday, 4/14/2023

DELAYED

Want updates on this shipment? Enter your email and we will do the rest!

YOUR EMAIL

SUBMIT

MORE OPTIONS

## Alerts (1)



Sign up for [Status Updates](#) to get updated as we have more information.

## Manage Delivery

DELIVERY STATUS

Operational Delay

TRACKING ID

771817378288

- FROM TOPEKA, KS  
Label Create 4/11/2023 1
- PACKAGE RE FEDEX TOPEKA, KS 4/11/2023 1
- OPERATION, FLAGSTAFF, 4/14/2023 9
- OUT FOR DE
- TO PHOENIX, A;  
Updated Del 4/17/2023 k  
estimated be 8:30 am - 12

↓ View tra

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

**From:** Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Sent:** Friday, April 14, 2023 9:03 AM  
**To:** 'Jack, Melanie' <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Takumyo, Kimie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

This is received, Kimmie will circle back in regard to the below.

Thanks,

**Neil Sprunith Giddie**

Project Analyst, Client Services

Epiq | eDiscovery

Email: [neilsprunith.giddie@epiqglobal.com](mailto:neilsprunith.giddie@epiqglobal.com)

People. Partnership. Performance.

[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 8:18 AM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 13, 2023 6:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>



**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

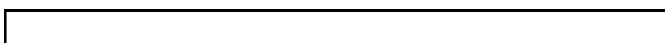
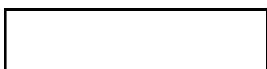
**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmy <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Melanie, we will let you know when it goes back out and get you tracking information.

Kimmy, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**  
Attorney  
  
**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 13, 2023 2:48 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

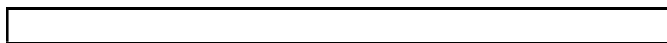
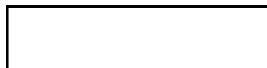
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Thursday, April 13, 2023 3:31 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

# Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	①	Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimmy Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

---

Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

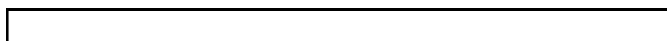
Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350



Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

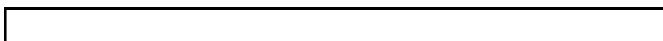
[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

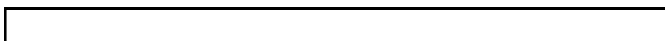
**P:** (407) 563-3231

**Patrick Mathews**  
Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

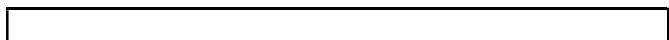
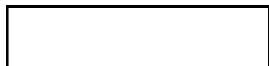
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231  
**F:** (407) 563-8026  
**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kanas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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## Hutchison, Robert

---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Friday, April 14, 2023 1:06 PM  
**To:** Jack, Melanie; Douglas Acklin x6133  
**Cc:** James Young x6172; Patrick Mathews x4676; EMS-DL-Morgan; Giddie, Neil Sprunith  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie,

Please note that the next Monday is when FedEx expects to deliver the returned package back to Epiq Data Center. We will reach out with a new ETC of the package to your office once we receive it.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Friday, April 14, 2023 1:01 PM  
**To:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>; Giddie, Neil Sprunith <NeilSprunith.Giddie@epiqglobal.com>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I have notified our staff of the Fed Ex on Monday, so we should be good.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)



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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Friday, April 14, 2023 12:42 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Melanie and Douglas,

Please note that FedEx updated the scheduled delivery of the return package to Monday, April 17. We will follow up on Monday to confirm receipt and the next steps.

UPDATED DELIVERY

# Monday

4/17/2023 before 4:30 pm  
estimated between  
8:30 am - 12:30 pm

Initially expected: Friday, 4/14/2023

DELAYED

Want updates on this shipment? Enter your email and we will do the rest!

YOUR EMAIL

SUBMIT

MORE OPTIONS

## Alerts (1)



Sign up for [Status Updates](#) to get updated as we have more information.

## Manage Delivery

DELIVERY STATUS

Operational Delay

TRACKING ID

771817378288

- FROM TOPEKA, KS  
Label Create 4/11/2023 1
- PACKAGE RE FEDEX TOPEKA, KS 4/11/2023 1
- OPERATION, FLAGSTAFF, 4/14/2023 9
- OUT FOR DE
- TO PHOENIX, A;  
Updated Del 4/17/2023 k  
estimated be 8:30 am - 12

↓ View tra

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

**From:** Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Sent:** Friday, April 14, 2023 9:03 AM  
**To:** 'Jack, Melanie' <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

This is received, Kimmie will circle back in regard to the below.

Thanks,

**Neil Sprunith Giddie**

Project Analyst, Client Services

Epiq | eDiscovery

Email: [neilsprunith.giddie@epiqglobal.com](mailto:neilsprunith.giddie@epiqglobal.com)

People. Partnership. Performance.

[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 8:18 AM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 13, 2023 6:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimmi Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

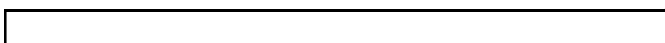
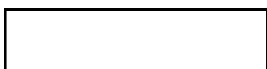
**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Melanie, we will let you know when it goes back out and get you tracking information.

Kimmi, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**  
Attorney  
  
**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 13, 2023 2:48 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

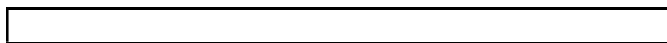
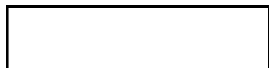
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Thursday, April 13, 2023 3:31 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

# Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	①	Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimie Takumyo**

Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case



Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

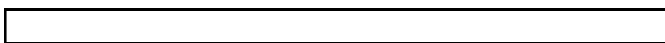
Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmy <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350

Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

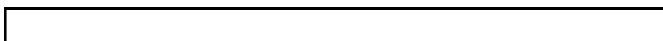
[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

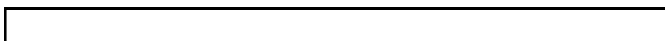
**P:** (407) 563-3231

**Patrick Mathews**  
Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

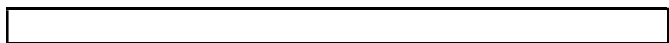
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231  
**F:** (407) 563-8026  
**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kansas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug



**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

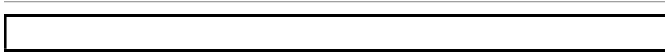
**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Friday, April 14, 2023 1:13 PM  
**To:** 'Takumyo, Kimmie'  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Ah, so I jumped the gun.....

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Friday, April 14, 2023 1:06 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>; Giddie, Neil Sprunith <NeilSprunith.Giddie@epiqglobal.com>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie,

Please note that the next Monday is when FedEx expects to deliver the returned package back to Epiq Data Center. We will reach out with a new ETC of the package to your office once we receive it.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epigglobal.com](mailto:kimiyo.takumyo@epigglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 1:01 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epigglobal.com](mailto:NeilSprunith.Giddie@epigglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I have notified our staff of the Fed Ex on Monday, so we should be good.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>

**Sent:** Friday, April 14, 2023 12:42 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epigglobal.com](mailto:NeilSprunith.Giddie@epigglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie and Douglas,

Please note that FedEx updated the scheduled delivery of the return package to Monday, April 17. We will follow up on Monday to confirm receipt and the next steps.

UPDATED DELIVERY

# Monday

4/17/2023 before 4:30 pm  
estimated between  
8:30 am - 12:30 pm

Initially expected: Friday, 4/14/2023

DELAYED

Want updates on this shipment? Enter your email and we will do the rest!

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SUBMIT

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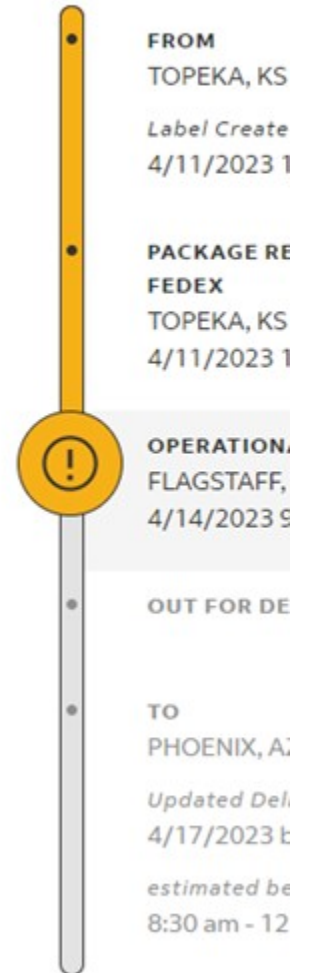
## Manage Delivery

DELIVERY STATUS

Operational Delay

TRACKING ID

771817378288



View tra

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

**From:** Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiglobal.com](mailto:NeilSprunith.Giddie@epiglobal.com)>  
**Sent:** Friday, April 14, 2023 9:03 AM  
**To:** 'Jack, Melanie' <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

This is received, Kimmie will circle back in regard to the below.

Thanks,

**Neil Sprunith Giddie**

Project Analyst, Client Services

Epiq | eDiscovery

Email: [neilsprunith.giddie@epiqglobal.com](mailto:neilsprunith.giddie@epiqglobal.com)

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---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 8:18 AM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 13, 2023 6:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

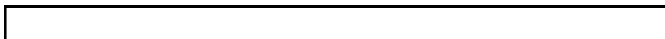
**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmy <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Melanie, we will let you know when it goes back out and get you tracking information.

Kimmy, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**  
Attorney  
  
**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 13, 2023 2:48 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

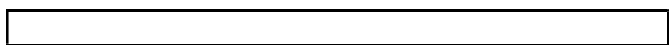
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Thursday, April 13, 2023 3:31 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

# Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	①	Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimmy Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

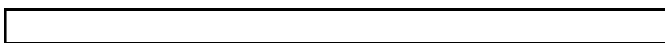
Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350

Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

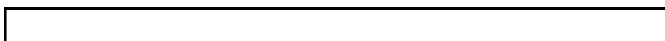
[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)



---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

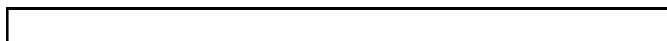
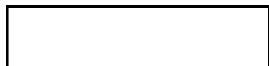
**P:** (407) 563-3231

**Patrick Mathews**  
Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

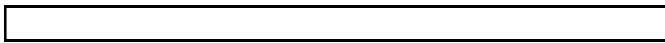
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231  
**F:** (407) 563-8026  
**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kanas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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## Hutchison, Robert

---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Friday, April 14, 2023 1:16 PM  
**To:** Jack, Melanie  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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It is OK, I just wanted you to know that the package is not going to be back to your office Monday, so you will not be looking for it.

Have a great weekend!

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Friday, April 14, 2023 1:13 PM  
**To:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Ah, so I jumped the gun.....

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>  
**Sent:** Friday, April 14, 2023 1:06 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epigglobal.com](mailto:NeilSprunith.Giddie@epigglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie,

Please note that the next Monday is when FedEx expects to deliver the returned package back to Epiq Data Center. We will reach out with a new ETC of the package to your office once we receive it.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epigglobal.com](mailto:kimiyo.takumyo@epigglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Friday, April 14, 2023 1:01 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epigglobal.com](mailto:NeilSprunith.Giddie@epigglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I have notified our staff of the Fed Ex on Monday, so we should be good.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Friday, April 14, 2023 12:42 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiglobal.com](mailto:NeilSprunith.Giddie@epiglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie and Douglas,

Please note that FedEx updated the scheduled delivery of the return package to Monday, April 17. We will follow up on Monday to confirm receipt and the next steps.



UPDATED DELIVERY

# Monday

4/17/2023 before 4:30 pm  
estimated between  
8:30 am - 12:30 pm

Initially expected: Friday, 4/14/2023

DELAYED

Want updates on this shipment? Enter your email and we will do the rest!

YOUR EMAIL

SUBMIT

MORE OPTIONS

## Alerts (1)



Sign up for [Status Updates](#) to get updated as we have more information.


## Manage Delivery

DELIVERY STATUS

Operational Delay

TRACKING ID

771817378288



- FROM TOPEKA, KS  
Label Create 4/11/2023 1
- PACKAGE RE FEDEX TOPEKA, KS 4/11/2023 1
- OPERATION, FLAGSTAFF, 4/14/2023 9
- OUT FOR DE
- TO PHOENIX, A;  
Updated Del 4/17/2023 k  
estimated be 8:30 am - 12

[View tra](#)

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

**From:** Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Sent:** Friday, April 14, 2023 9:03 AM  
**To:** 'Jack, Melanie' <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Takumyo, Kimie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

This is received, Kimmie will circle back in regard to the below.

Thanks,

**Neil Sprunith Giddie**

Project Analyst, Client Services

Epiq | eDiscovery

Email: [neilsprunith.giddie@epiqglobal.com](mailto:neilsprunith.giddie@epiqglobal.com)

People. Partnership. Performance.

[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 8:18 AM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 13, 2023 6:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmy <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

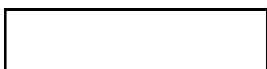
Melanie, we will let you know when it goes back out and get you tracking information.

Kimmy, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 13, 2023 2:48 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

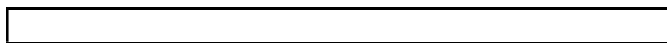
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Thursday, April 13, 2023 3:31 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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---

Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

# Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	①	Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case



Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:



Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

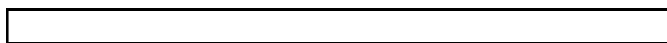
Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmy <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350

Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

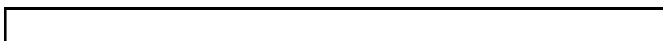
[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of Epiq. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report phishing by using the "Phish Alert Report" button above.

Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

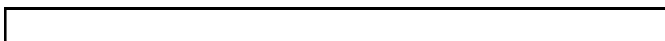
P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

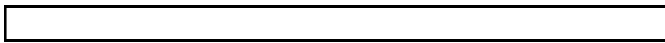
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

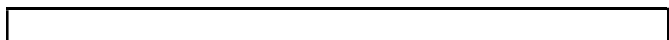
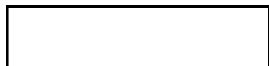
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231  
**F:** (407) 563-8026  
**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kanas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.





Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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## Hutchison, Robert

---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Monday, April 17, 2023 12:46 PM  
**To:** Jack, Melanie; Douglas Acklin x6133  
**Cc:** James Young x6172; Patrick Mathews x4676; EMS-DL-Morgan; Giddie, Neil Sprunith  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Douglas and Melanie,

Please note we received the package back at the Data Center. We will submit for a shipment request and follow up with a tracking number.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Friday, April 14, 2023 1:06 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>; Giddie, Neil Sprunith <NeilSprunith.Giddie@epiqglobal.com>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

Please note that the next Monday is when FedEx expects to deliver the returned package back to Epiq Data Center. We will reach out with a new ETC of the package to your office once we receive it.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Friday, April 14, 2023 1:01 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I have notified our staff of the Fed Ex on Monday, so we should be good.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, April 14, 2023 12:42 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Melanie and Douglas,

Please note that FedEx updated the scheduled delivery of the return package to Monday, April 17. We will follow up on Monday to confirm receipt and the next steps.

UPDATED DELIVERY

# Monday

4/17/2023 before 4:30 pm  
estimated between  
8:30 am - 12:30 pm

Initially expected: Friday, 4/14/2023

DELAYED

Want updates on this shipment? Enter your email and we will do the rest!

YOUR EMAIL

SUBMIT

MORE OPTIONS

## Alerts (1)



Sign up for [Status Updates](#) to get updated as we have more information.

## Manage Delivery

DELIVERY STATUS

Operational Delay

TRACKING ID

771817378288

- FROM TOPEKA, KS  
Label Create 4/11/2023 1
- PACKAGE RE FEDEX TOPEKA, KS 4/11/2023 1
- OPERATION, FLAGSTAFF, 4/14/2023 9
- OUT FOR DE
- TO PHOENIX, A;  
Updated Del 4/17/2023 k  
estimated be 8:30 am - 12

[View tra](#)

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

**From:** Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Sent:** Friday, April 14, 2023 9:03 AM  
**To:** 'Jack, Melanie' <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Takumyo, Kimie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

This is received, Kimmie will circle back in regard to the below.

Thanks,

**Neil Sprunith Giddie**

Project Analyst, Client Services

Epiq | eDiscovery

Email: [neilsprunith.giddie@epiqglobal.com](mailto:neilsprunith.giddie@epiqglobal.com)

People. Partnership. Performance.

[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 8:18 AM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 13, 2023 6:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

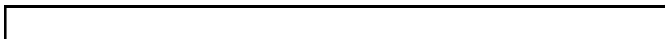
**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmy <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Melanie, we will let you know when it goes back out and get you tracking information.

Kimmy, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**  
Attorney  
  
**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

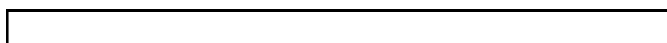
**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 2:48 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 13, 2023 3:31 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.



# Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	①	Returning package to shipper Return tracking number <a href="#">771817378288</a>	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

---

Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

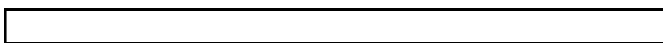
Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350

Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

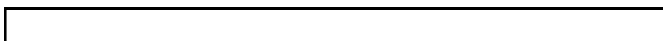
[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of Epiq. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report phishing by using the "Phish Alert Report" button above.

Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

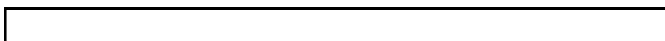
**P:** (407) 563-3231

**Patrick Mathews**  
Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM



**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231  
**F:** (407) 563-8026  
**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kanas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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## Hutchison, Robert

---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Monday, April 17, 2023 2:53 PM  
**To:** Jack, Melanie; Douglas Acklin x6133; Patrick Mathews x4676  
**Cc:** James Young x6172; EMS-DL-Morgan; Giddie, Neil Sprunith  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi All,

Please note that the package has been shipped back to the following address per our discussion. Please find the additional information on the hard drives below.

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612

Tracking Number: **6389 5831 7817**  
SVC Type: FedEx Priority Overnight

EVI Number(s) (If Applicable): 90177785  
Encryption Method: BitLocker  
Encryption Password: SPo+-4rihl

EVI Number(s) (If Applicable): 90165260  
Encryption Method: BitLocker  
Encryption Password: KSNaturalGas22

EVI Number(s) (If Applicable): 90169954  
Encryption Method: BitLocker  
Encryption Password: Super\$ecure19!

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Monday, April 17, 2023 12:46 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>; Giddie, Neil Sprunith <NeilSprunith.Giddie@epiqglobal.com>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Douglas and Melanie,

Please note we received the package back at the Data Center. We will submit for a shipment request and follow up with a tracking number.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, April 14, 2023 1:06 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

Please note that the next Monday is when FedEx expects to deliver the returned package back to Epiq Data Center. We will reach out with a new ETC of the package to your office once we receive it.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Friday, April 14, 2023 1:01 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I have notified our staff of the Fed Ex on Monday, so we should be good.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>  
**Sent:** Friday, April 14, 2023 12:42 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epigglobal.com](mailto:NeilSprunith.Giddie@epigglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Melanie and Douglas,

Please note that FedEx updated the scheduled delivery of the return package to Monday, April 17. We will follow up on Monday to confirm receipt and the next steps.

UPDATED DELIVERY

# Monday

4/17/2023 before 4:30 pm  
estimated between  
8:30 am - 12:30 pm

Initially expected: Friday, 4/14/2023

DELAYED

Want updates on this shipment? Enter your email and we will do the rest!

YOUR EMAIL

SUBMIT

MORE OPTIONS

## Alerts (1)



Sign up for [Status Updates](#) to get updated as we have more information.

## Manage Delivery

DELIVERY STATUS

Operational Delay

TRACKING ID

771817378288

- FROM TOPEKA, KS  
Label Create 4/11/2023 1
- PACKAGE RE FEDEX TOPEKA, KS 4/11/2023 1
- OPERATION, FLAGSTAFF, 4/14/2023 9
- OUT FOR DE
- TO PHOENIX, A;  
Updated Del 4/17/2023 k  
estimated be 8:30 am - 12

[View tra](#)

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

**From:** Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Sent:** Friday, April 14, 2023 9:03 AM  
**To:** 'Jack, Melanie' <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Takumyo, Kimie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case



Hi Melanie,

This is received, Kimmie will circle back in regard to the below.

Thanks,

**Neil Sprunith Giddie**

Project Analyst, Client Services

Epiq | eDiscovery

Email: [neilsprunith.giddie@epiqglobal.com](mailto:neilsprunith.giddie@epiqglobal.com)

People. Partnership. Performance.

[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 8:18 AM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 13, 2023 6:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

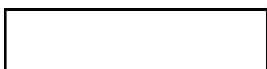
**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmy <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Melanie, we will let you know when it goes back out and get you tracking information.

Kimmy, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**  
Attorney  
  
**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 13, 2023 2:48 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

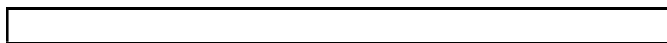
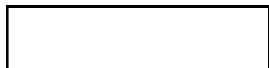
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Thursday, April 13, 2023 3:31 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

# Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	①	Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimmi Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

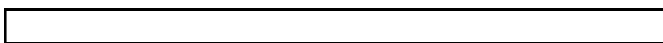
Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case



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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350

Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmathews@forthepeople.com](mailto:pmathews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

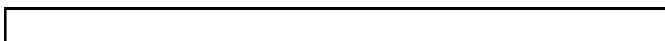
[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION: Use caution when clicking on links or opening attachments in this external email.**

---

Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

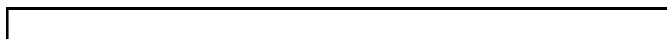
**P:** (407) 563-3231

**Patrick Mathews**  
Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

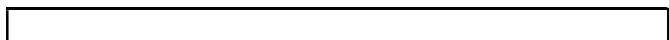
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231  
**F:** (407) 563-8026  
**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kanas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Monday, April 17, 2023 2:57 PM  
**To:** 'Takumyo, Kimmie'  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Monday, April 17, 2023 2:53 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>; Douglas Acklin x6133 <dacklin@forthepeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>; Giddie, Neil Sprunith <NeilSprunith.Giddie@epiqglobal.com>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi All,

Please note that the package has been shipped back to the following address per our discussion. Please find the additional information on the hard drives below.

Melanie Jack  
Assistant Attorney General

Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612

Tracking Number: 6389 5831 7817  
SVC Type: FedEx Priority Overnight

EVI Number(s) (If Applicable): 90177785  
Encryption Method: BitLocker  
Encryption Password: SPo+-4rihl

EVI Number(s) (If Applicable): 90165260  
Encryption Method: BitLocker  
Encryption Password: KSNaturalGas22

EVI Number(s) (If Applicable): 90169954  
Encryption Method: BitLocker  
Encryption Password: Super\$ecure19!

Please feel free to reach out with any questions.

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Monday, April 17, 2023 12:46 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiglobal.com](mailto:NeilSprunith.Giddie@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Douglas and Melanie,

Please note we received the package back at the Data Center. We will submit for a shipment request and follow up with a tracking number.

Best regards,

**Kimmie Takumyo**

Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Friday, April 14, 2023 1:06 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

Please note that the next Monday is when FedEx expects to deliver the returned package back to Epiq Data Center. We will reach out with a new ETC of the package to your office once we receive it.

Best regards,

**Kimmie Takumyo**

Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 1:01 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I have notified our staff of the Fed Ex on Monday, so we should be good.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Friday, April 14, 2023 12:42 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie and Douglas,

Please note that FedEx updated the scheduled delivery of the return package to Monday, April 17. We will follow up on Monday to confirm receipt and the next steps.

UPDATED DELIVERY

# Monday

4/17/2023 before 4:30 pm  
estimated between  
8:30 am - 12:30 pm

Initially expected: Friday, 4/14/2023

DELAYED

Want updates on this shipment? Enter your email and we will do the rest!

YOUR EMAIL

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Sign up for [Status Updates](#) to get updated as we have more information.

## Manage Delivery

DELIVERY STATUS

Operational Delay

TRACKING ID

771817378288

- FROM TOPEKA, KS  
Label Create 4/11/2023 1
- PACKAGE RE FEDEX TOPEKA, KS 4/11/2023 1
- OPERATION, FLAGSTAFF, 4/14/2023 9
- OUT FOR DE
- TO PHOENIX, A;  
Updated Del 4/17/2023 k  
estimated be 8:30 am - 12

[View tra](#)

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

**From:** Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Sent:** Friday, April 14, 2023 9:03 AM  
**To:** 'Jack, Melanie' <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Takumyo, Kimie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

This is received, Kimmie will circle back in regard to the below.

Thanks,

**Neil Sprunith Giddie**

Project Analyst, Client Services

Epiq | eDiscovery

Email: [neilsprunith.giddie@epiqglobal.com](mailto:neilsprunith.giddie@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 8:18 AM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 13, 2023 6:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

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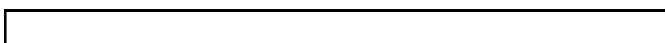
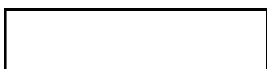
**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmy <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Melanie, we will let you know when it goes back out and get you tracking information.

Kimmy, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**  
Attorney  
  
**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 13, 2023 2:48 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

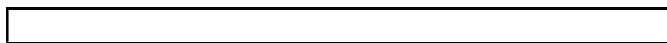
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Thursday, April 13, 2023 3:31 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

# Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	①	Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

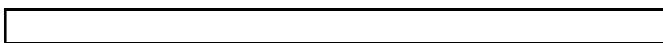
Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350

Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

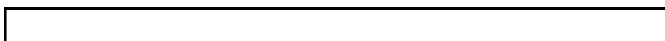
[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION: Use caution when clicking on links or opening attachments in this external email.**

---

Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)



---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

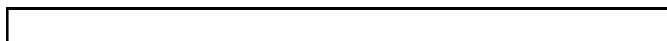
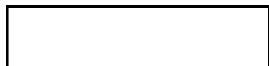
**P:** (407) 563-3231

**Patrick Mathews**  
Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

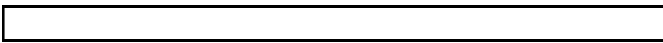
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231  
**F:** (407) 563-8026  
**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kanas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

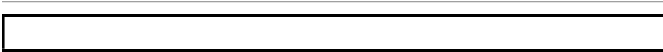
**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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**Hutchison, Robert**

---

**From:** Jack, Melanie  
**Sent:** Monday, April 17, 2023 3:05 PM  
**To:** Schmidt, Rebecca  
**Subject:** Plaintiff's Notice of Withdrawal, 2022 CV-677, Shawnee County  
**Attachments:** Plaintiff's Notice of Withdrawal.pdf

Becky,

Please proof this and let me know if there are edits. If not, please file.

All pro hac vice attorneys need service by email, including the Morgan and Morgan attorneys.

Thanks.

Melanie J.

## Hutchison, Robert

---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Tuesday, April 18, 2023 10:25 AM  
**To:** Jack, Melanie; Douglas Acklin x6133; Patrick Mathews x4676  
**Cc:** James Young x6172; EMS-DL-Morgan; Giddie, Neil Sprunith  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi All,

We are reaching out as the FedEx tracking page indicates that the hard drives have been delivered this morning. Please let us know of any questions or anything else we can assist.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Monday, April 17, 2023 2:53 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>; Douglas Acklin x6133 <dacklin@forthepeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>; Giddie, Neil Sprunith <NeilSprunith.Giddie@epiqglobal.com>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi All,

Please note that the package has been shipped back to the following address per our discussion. Please find the additional information on the hard drives below.

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612

Tracking Number: **6389 5831 7817**  
SVC Type: FedEx Priority Overnight

EVI Number(s) (If Applicable): 90177785  
Encryption Method: BitLocker  
Encryption Password: SPo+-4rihl

EVI Number(s) (If Applicable): 90165260  
Encryption Method: BitLocker  
Encryption Password: KSNaturalGas22

EVI Number(s) (If Applicable): 90169954  
Encryption Method: BitLocker  
Encryption Password: Super\$ecure19!

Please feel free to reach out with any questions.

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmy <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Monday, April 17, 2023 12:46 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Douglas and Melanie,

Please note we received the package back at the Data Center. We will submit for a shipment request and follow up with a tracking number.

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmy <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, April 14, 2023 1:06 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case



Hi Melanie,

Please note that the next Monday is when FedEx expects to deliver the returned package back to Epiq Data Center. We will reach out with a new ETC of the package to your office once we receive it.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 1:01 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I have notified our staff of the Fed Ex on Monday, so we should be good.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Friday, April 14, 2023 12:42 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie and Douglas,

Please note that FedEx updated the scheduled delivery of the return package to Monday, April 17. We will follow up on Monday to confirm receipt and the next steps.

UPDATED DELIVERY

Monday

4/17/2023 before 4:30 pm  
estimated between  
8:30 am - 12:30 pm

Initially expected: Friday, 4/14/2023

DELAYED

Want updates on this shipment? Enter your email and we will do the rest!

YOUR EMAIL

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MORE OPTIONS

Alerts (1)



Sign up for [Status Updates](#) to get updated as we have more information.

Manage Delivery

DELIVERY STATUS

Operational Delay

TRACKING ID

771817378288

FROM  
TOPEKA, KS  
Label Create  
4/11/2023 1

PACKAGE RE  
FEDEX  
TOPEKA, KS  
4/11/2023 1

OPERATION,  
FLAGSTAFF,  
4/14/2023 9

OUT FOR DE

TO  
PHOENIX, A:  
Updated Del  
4/17/2023 t  
estimated be  
8:30 am - 12

↓ View tra

Best regards,

**Kimmi Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>

**Sent:** Friday, April 14, 2023 9:03 AM

**To:** 'Jack, Melanie' <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

This is received, Kimmie will circle back in regard to the below.

Thanks,

**Neil Sprunith Giddie**

Project Analyst, Client Services

Epiq | eDiscovery

Email: [neilsprunith.giddie@epiqglobal.com](mailto:neilsprunith.giddie@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 8:18 AM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Thursday, April 13, 2023 6:07 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Melanie, we will let you know when it goes back out and get you tracking information.

Kimie, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**  
Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

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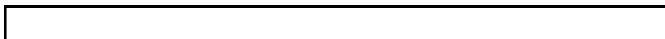
**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 2:48 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

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My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

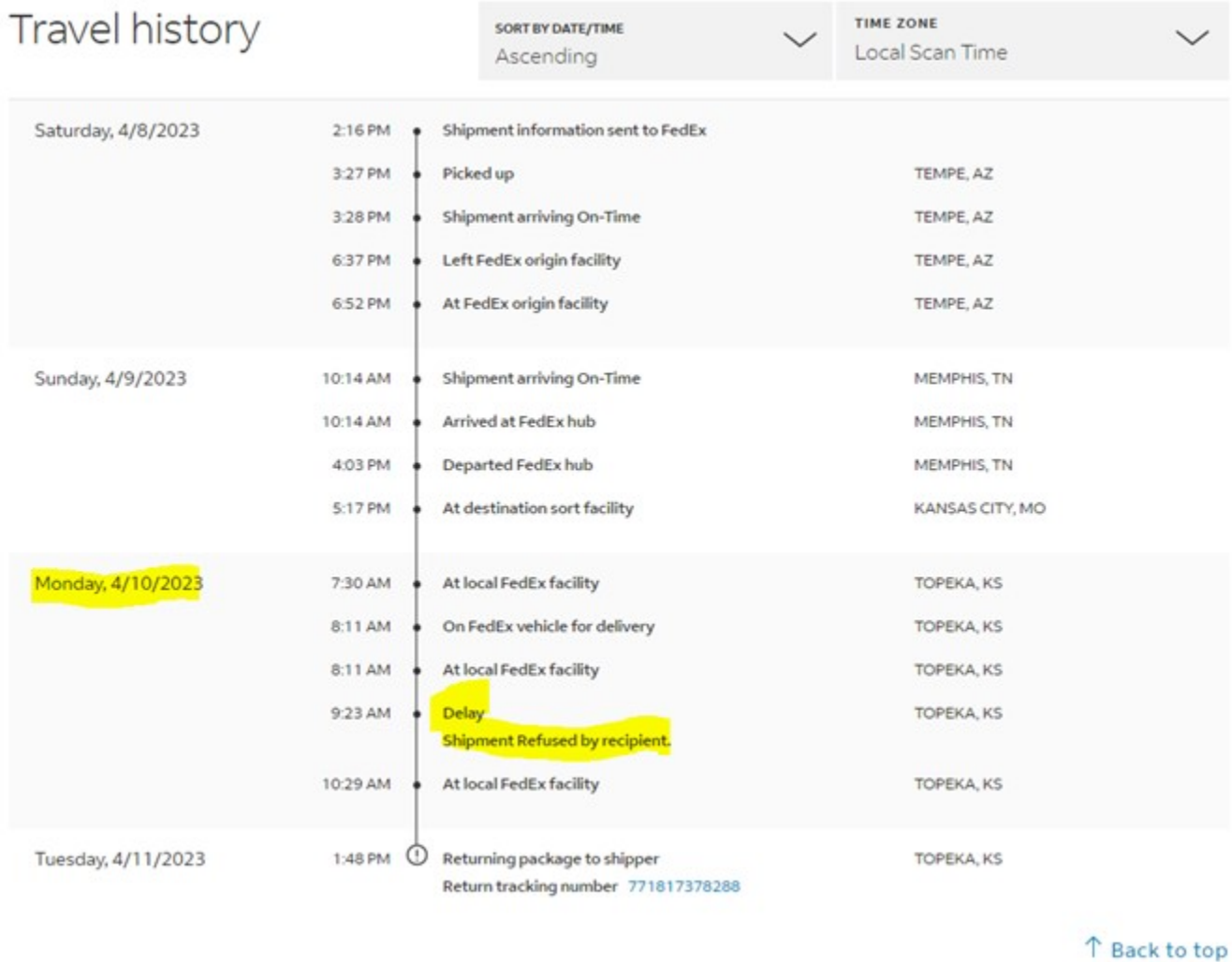
**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 13, 2023 3:31 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.



[↑ Back to top](#)

Best regards,

**Kimmie Takumyo**  
 Epiq | Project Manager  
 311 S. Wacker Dr. Suite 350  
 Chicago, IL 60606  
 Mobile: +1773-359-7797  
 Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Sunday, April 9, 2023 6:00 PM  
**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHag@epiglobal.com](mailto:MohammedRiyazulHag@epiglobal.com)>  
**Cc:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case



Thank you all for the good help!

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)



---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Saturday, April 8, 2023 1:22 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General’s office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be received for at the Kansas Attorney General’s Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

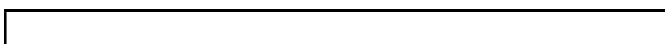
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Thursday, April 6, 2023 1:37 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Friday, March 31, 2023 3:16 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmathews@forthepeople.com](mailto:pmathews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)  
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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084



[Redacted]

*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

[Redacted]

[Redacted]

*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 12:05 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

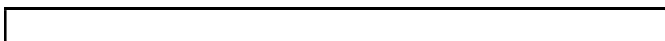
P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kanas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson



Lee Casey

No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

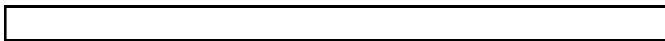
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

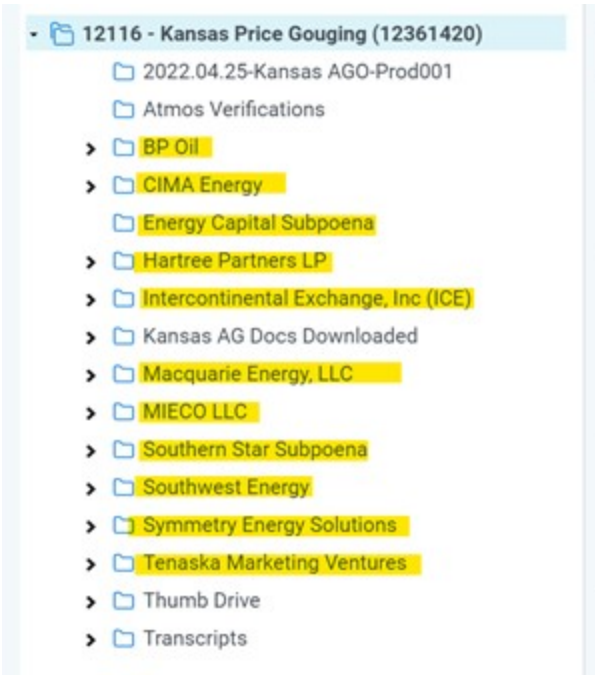
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Tuesday, April 18, 2023 10:51 AM  
**To:** 'Takumyo, Kimmie'; Douglas Acklin x6133; Patrick Mathews x4676  
**Cc:** James Young x6172; EMS-DL-Morgan; Giddie, Neil Sprunith; Oleen, Fran  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Yes, I have located the delivery. Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Tuesday, April 18, 2023 10:25 AM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>; Douglas Acklin x6133 <dacklin@forthepeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>; Giddie, Neil Sprunith <NeilSprunith.Giddie@epiqglobal.com>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi All,

We are reaching out as the FedEx tracking page indicates that the hard drives have been delivered this morning. Please let us know of any questions or anything else we can assist.

Best regards,

**Kimmi Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Monday, April 17, 2023 2:53 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi All,

Please note that the package has been shipped back to the following address per our discussion. Please find the additional information on the hard drives below.

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612

Tracking Number: **6389 5831 7817**  
SVC Type: FedEx Priority Overnight

EVI Number(s) (If Applicable): 90177785  
Encryption Method: BitLocker  
Encryption Password: SPo+-4rihl

EVI Number(s) (If Applicable): 90165260  
Encryption Method: BitLocker  
Encryption Password: KSNaturalGas22

EVI Number(s) (If Applicable): 90169954  
Encryption Method: BitLocker  
Encryption Password: Super\$ecure19!

Please feel free to reach out with any questions.

Best regards,

**Kimmi Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606

Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Monday, April 17, 2023 12:46 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiglobal.com](mailto:NeilSprunith.Giddie@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Douglas and Melanie,

Please note we received the package back at the Data Center. We will submit for a shipment request and follow up with a tracking number.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, April 14, 2023 1:06 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiglobal.com](mailto:NeilSprunith.Giddie@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

Please note that the next Monday is when FedEx expects to deliver the returned package back to Epiq Data Center. We will reach out with a new ETC of the package to your office once we receive it.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Friday, April 14, 2023 1:01 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiglobal.com](mailto:NeilSprunith.Giddie@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I have notified our staff of the Fed Ex on Monday, so we should be good.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, April 14, 2023 12:42 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie and Douglas,

Please note that FedEx updated the scheduled delivery of the return package to Monday, April 17. We will follow up on Monday to confirm receipt and the next steps.

UPDATED DELIVERY

# Monday

4/17/2023 before 4:30 pm  
estimated between  
8:30 am - 12:30 pm

Initially expected: Friday, 4/14/2023

DELAYED

Want updates on this shipment? Enter your email and we will do the rest!

YOUR EMAIL

SUBMIT

MORE OPTIONS

## Alerts (1)



Sign up for [Status Updates](#) to get updated as we have more information.

## Manage Delivery

DELIVERY STATUS

Operational Delay

TRACKING ID

771817378288

- FROM TOPEKA, KS  
Label Create 4/11/2023 1
- PACKAGE RE FEDEX TOPEKA, KS 4/11/2023 1
- OPERATION, FLAGSTAFF, 4/14/2023 9
- OUT FOR DE
- TO PHOENIX, A;  
Updated Del 4/17/2023 k  
estimated be 8:30 am - 12

[View tra](#)

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

**From:** Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Sent:** Friday, April 14, 2023 9:03 AM  
**To:** 'Jack, Melanie' <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Takumyo, Kimie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

This is received, Kimmie will circle back in regard to the below.

Thanks,

**Neil Sprunith Giddie**

Project Analyst, Client Services

Epiq | eDiscovery

Email: [neilsprunith.giddie@epiqglobal.com](mailto:neilsprunith.giddie@epiqglobal.com)

People. Partnership. Performance.

[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 8:18 AM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 13, 2023 6:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>



**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

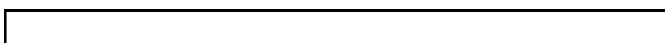
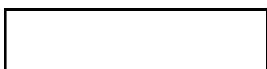
**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmy <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Melanie, we will let you know when it goes back out and get you tracking information.

Kimmy, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**  
Attorney  
  
**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 13, 2023 2:48 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

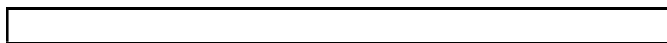
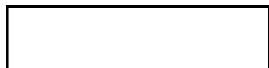
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Thursday, April 13, 2023 3:31 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

# Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	①	Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

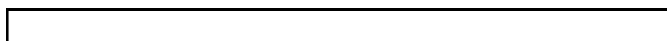
Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350



Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

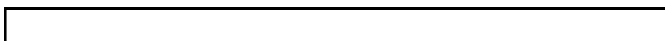
[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

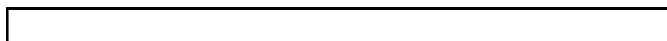
P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

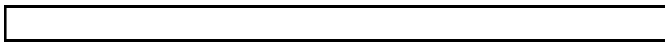
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231  
**F:** (407) 563-8026  
**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kanas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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## Hutchison, Robert

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**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Tuesday, April 18, 2023 10:54 AM  
**To:** Jack, Melanie  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie,

Very good news! Thank you for confirming. Have a great day!

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Tuesday, April 18, 2023 10:51 AM  
**To:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>; Douglas Acklin x6133 <dacklin@forthepeople.com>; Patrick Mathews x4676 <pmatthews@forthepeople.com>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>; Giddie, Neil Sprunith <NeilSprunith.Giddie@epiqglobal.com>; Oleen, Fran <Fran.Oleen@ag.ks.gov>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Yes, I have located the delivery. Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Tuesday, April 18, 2023 10:25 AM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi All,

We are reaching out as the FedEx tracking page indicates that the hard drives have been delivered this morning. Please let us know of any questions or anything else we can assist.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Monday, April 17, 2023 2:53 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi All,

Please note that the package has been shipped back to the following address per our discussion. Please find the additional information on the hard drives below.

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612

Tracking Number: 6389 5831 7817

SVC Type: FedEx Priority Overnight

EVI Number(s) (If Applicable): 90177785

Encryption Method: BitLocker

Encryption Password: SPo+-4rihl

EVI Number(s) (If Applicable): 90165260

Encryption Method: BitLocker

Encryption Password: KSNaturalGas22

EVI Number(s) (If Applicable): 90169954

Encryption Method: BitLocker

Encryption Password: Super\$ecure19!

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1 773-359-7797

Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Monday, April 17, 2023 12:46 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Douglas and Melanie,

Please note we received the package back at the Data Center. We will submit for a shipment request and follow up with a tracking number.

Best regards,

**Kimmie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1 773-359-7797

Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Friday, April 14, 2023 1:06 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-

DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiglobal.com](mailto:NeilSprunith.Giddie@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

Please note that the next Monday is when FedEx expects to deliver the returned package back to Epiq Data Center. We will reach out with a new ETC of the package to your office once we receive it.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Friday, April 14, 2023 1:01 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiglobal.com](mailto:NeilSprunith.Giddie@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I have notified our staff of the Fed Ex on Monday, so we should be good.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, April 14, 2023 12:42 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-

DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiglobal.com](mailto:NeilSprunith.Giddie@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie and Douglas,

Please note that FedEx updated the scheduled delivery of the return package to Monday, April 17. We will follow up on Monday to confirm receipt and the next steps.


**UPDATED DELIVERY**  
**Monday**  
4/17/2023 before 4:30 pm  
estimated between  
8:30 am - 12:30 pm  
*Initially expected: Friday, 4/14/2023*

**DELAYED**


Want updates on this shipment? Enter your email and we will do the rest!


**MORE OPTIONS**

**Alerts (1)** ^

 Sign up for [Status Updates](#) to get updated as we have more information.

**Manage Delivery** v

**DELIVERY STATUS**  
Operational Delay 

**TRACKING ID**  
771817378288 

**FROM**  
TOPEKA, KS  
*Label Create*  
4/11/2023 1

**PACKAGE RE**  
**FEDEX**  
TOPEKA, KS  
4/11/2023 1

**OPERATION.**  
FLAGSTAFF,  
4/14/2023 9

**OUT FOR DE**

**TO**  
PHOENIX, A;  
*Updated Del.*  
4/17/2023 t  
*estimated be*  
8:30 am - 12

[View tra](#)

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350

Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Sent:** Friday, April 14, 2023 9:03 AM  
**To:** 'Jack, Melanie' <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

This is received, Kimmie will circle back in regard to the below.

Thanks,

**Neil Sprunith Giddie**  
Project Analyst, Client Services  
Epiq | eDiscovery  
Email: [neilsprunith.giddie@epiqglobal.com](mailto:neilsprunith.giddie@epiqglobal.com)

People. Partnership. Performance.  
[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Friday, April 14, 2023 8:18 AM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Thursday, April 13, 2023 6:07 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Melanie, we will let you know when it goes back out and get you tracking information.

Kimie, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

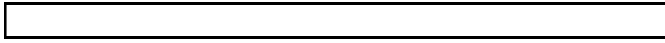
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor



Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

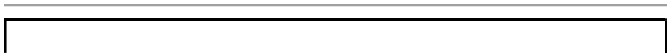
**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 2:48 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

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My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 13, 2023 3:31 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.



Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

## Travel history

SORT BY DATE/TIME  
Ascending

TIME ZONE  
Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	ⓘ	Returning package to shipper Return tracking number <a href="#">771817378288</a>	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

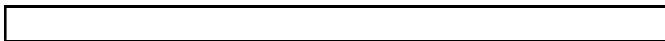
**Cc:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>  
**Sent:** Saturday, April 8, 2023 8:32 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552  
SVC Type: FedEx Priority Overnight  
Recipient Information:  
Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612

Thanks,  
**Riyaz**  
Mohammed Riyaz ul Haq  
Project Analyst | Client Services | Epiq  
E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

**People. Partnership. Performance.**

[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>;

EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email:[kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 6, 2023 3:40 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>;

EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email:[kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 6, 2023 3:26 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General’s office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General’s Office:

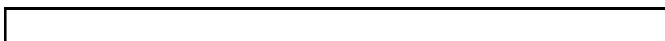
Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:  
Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!  
Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmathews@forthepeople.com](mailto:pmathews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

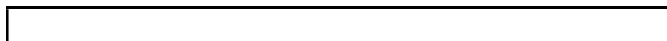
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231

F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

## Shalaka Bhosale

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 11:40 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**

Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084



[Redacted]

[Redacted]

*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.  
Thanks!

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

[Redacted]

[Redacted]

*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 12:05 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](mailto:pmatthews@forthepeople.com)  
[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

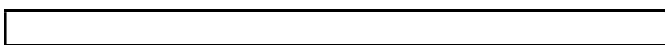
P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Friday, March 31, 2023 8:51 AM

**To:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kanas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack

Shawntelle Hammer

Platts

Kansas AG

SES

Southern Star

Tenaska Marketing Ventures

Macquarie Energy

MIECO

Hartree

ICE

Non-Custodial (Monika Barz)

Which is BP

BP Oil

Bryan Johnson

Lee Casey

No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

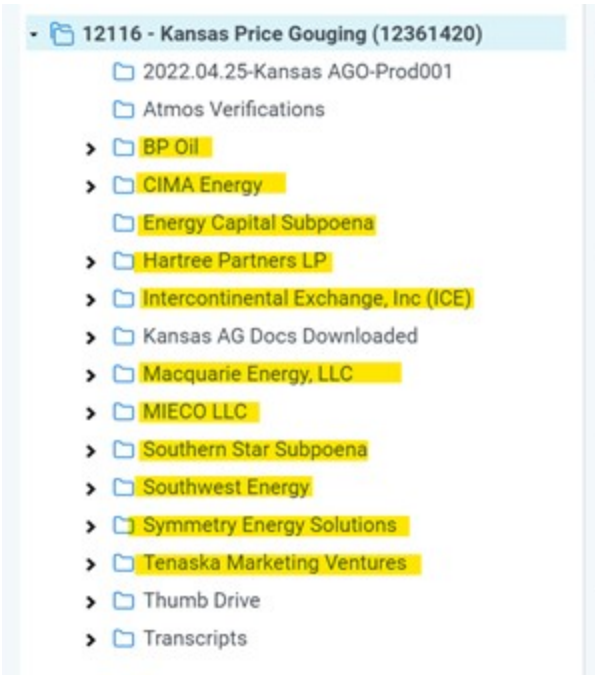
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



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## Hutchison, Robert

---

**From:** Opioids Implementation Administrator <opioidsparticipation@rubris.com>  
**Sent:** Tuesday, April 18, 2023 11:48 AM  
**To:** Deaver, Nancy; Opioids Implementation Administrator  
**Subject:** RE: Action\_Required\_Teva\_Allergen\_CVS\_Walgreens\_Walmart  
**Attachments:** Kansas Subdivisions.xlsx

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

See attached the most recent report for all Kansas Subdivisions as requested.

Thank you,

Opioids Implementation Administrator

*National Teva, Allergan, Walgreens, Walmart, and CVS Settlements*

*The Implementation Administrator is retained to provide the settlement notice required by the respective settlement agreements referenced above and to manage the collection of settlement participation forms for each settlement.*

[opioidsparticipation@rubris.com](mailto:opioidsparticipation@rubris.com)



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---

**From:** Deaver, Nancy <Nancy.Deaver@ag.ks.gov>  
**Sent:** Tuesday, April 18, 2023 9:17 AM  
**To:** Opioids Implementation Administrator <opioidsparticipation@rubris.com>  
**Subject:** Action\_Required\_Teva\_Allergen\_CVS\_Walgreens\_Walmart

Good morning,

Can I get a listing of the Kansas subdivisions?

Thank you,

Nancy Deaver  
Program Consultant  
Opioid Settlement  
Office of Kansas Attorney General Kris Kobach  
120 SW 10<sup>th</sup> Ave, 4<sup>th</sup> Floor  
Topeka, KS 66612-1597  
785-296-3751 (ph)  
785-296-3131 (fax)

[Nancy.Deaver@ag.ks.gov](mailto:Nancy.Deaver@ag.ks.gov)

[www.ag.ks.gov](http://www.ag.ks.gov)

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## Hutchison, Robert

---

**From:** Opioids Implementation Administrator <opioidsparticipation@rubris.com>  
**Sent:** Wednesday, April 19, 2023 10:30 AM  
**To:** Deaver, Nancy; Opioids Implementation Administrator  
**Subject:** RE: Action\_Required\_Teva\_Allergen\_CVS\_Walgreens\_Walmart  
**Attachments:** Kansas Subdivision Update 4.19.xlsx

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

Attached is an updated report for all Kansas Subdivisions.

Thank you,

Opioids Implementation Administrator

*National Teva, Allergan, Walgreens, Walmart, and CVS Settlements*

*The Implementation Administrator is retained to provide the settlement notice required by the respective settlement agreements referenced above and to manage the collection of settlement participation forms for each settlement.*

[opioidsparticipation@rubris.com](mailto:opioidsparticipation@rubris.com)



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---

**From:** Deaver, Nancy <Nancy.Deaver@ag.ks.gov>  
**Sent:** Wednesday, April 19, 2023 11:14 AM  
**To:** Opioids Implementation Administrator <opioidsparticipation@rubris.com>  
**Subject:** Action\_Required\_Teva\_Allergen\_CVS\_Walgreens\_Walmart

Good morning,

Can I get an updated report for the State of Kansas?

Thank you,

Nancy Deaver  
Program Consultant  
Opioid Settlement  
Office of Kansas Attorney General Kris Kobach  
120 SW 10<sup>th</sup> Ave, 4<sup>th</sup> Floor  
Topeka, KS 66612-1597  
785-296-3751 (ph)  
785-296-3131 (fax)

[Nancy.Deaver@ag.ks.gov](mailto:Nancy.Deaver@ag.ks.gov)

[www.ag.ks.gov](http://www.ag.ks.gov)

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Thursday, April 20, 2023 8:05 AM  
**To:** Burrows, Daniel  
**Cc:** Oleen, Fran  
**Subject:** Morgan & Morgan

Dan,

This week we received a hard drive from Epiq, the document management company that had all of the natural gas discovery on its platform. The company, at the request of Morgan and Morgan, removed all the coding on these documents and returned them to us. Also, I know that any memo, graphs, emails, or other work product will not be produced. We were told by James Young at Morgan and Morgan that this is proprietary and they would not be providing it. They even suggested they will bill us of the work done by Equip to return our documents.

I have not had IT look at the hard drive, but it won't provide us with a clear cut view of the CEA documents relevant to that litigation or the subpoena enforcement case against Macquarie. I specifically asked Morgan and Morgan about this and that is when they admitted the documents were uncoded.

His email is: James Young - [JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)

I have filed the notice of withdrawal of Morgan and Morgan in the subpoena enforcement case. We did not enter their appearance in the CEA litigation.

Let me know if you have other questions.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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## Hutchison, Robert

---

**From:** Schmidt, Rebecca  
**Sent:** Thursday, April 20, 2023 9:16 AM  
**To:** 'stephen.mcallister@dentons.com'; 'michael.yuffee@bakerbotts.com';  
'bmerrill@susmangodfrey.com'; 'bfranklin@susmangodfrey.com'  
**Cc:** Jack, Melanie  
**Subject:** Notice filed in Macquarie Energy LLC case Shawnee County (Kansas) District Court Case # 2022-CV-000677  
**Attachments:** FS 2023.04.17 Plaintiff's Notice of Withdrawal.pdf

Tracking:	Recipient	Read
	'stephen.mcallister@dentons.com'	
	'michael.yuffee@bakerbotts.com'	
	'bmerrill@susmangodfrey.com'	
	'bfranklin@susmangodfrey.com'	
	Jack, Melanie	Read: 4/20/2023 10:07 AM

Attached you will find the Plaintiff's Notice of Withdrawal of Appearance in this case that was filed on April 17, 2023.

Thank you,  
Becky

Becky Schmidt  
Legal Assistant Public Protection Division  
Office of Kansas Attorney General Kris W. Kobach  
120 SW 10th Avenue, 2nd Floor  
Topeka, KS 66612-1597  
785-291-3877 (office phone)  
785-291-3699 (fax)  
[rebecca.schmidt@ag.ks.gov](mailto:rebecca.schmidt@ag.ks.gov)  
[www.ag.ks.gov](http://www.ag.ks.gov)

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## Hutchison, Robert

---

**From:** Schmidt, Rebecca  
**Sent:** Thursday, April 20, 2023 9:19 AM  
**To:** 'jyoung@forthepeople.com'; 'tfox@forthepeople.com'; 'mbrowne@brownepelican.com'  
**Cc:** Jack, Melanie  
**Subject:** Notice filed in Macquarie Energy LLC case Shawnee County (Kansas) District Court Case #2022-CV-000677  
**Attachments:** FS 2023.04.17 Plaintiff's Notice of Withdrawal.pdf

Tracking:	Recipient	Read
	'jyoung@forthepeople.com'	
	'tfox@forthepeople.com'	
	'mbrowne@brownepelican.com'	
	Jack, Melanie	Read: 4/20/2023 10:07 AM

Attached you will find the Plaintiff's Notice of Withdrawal of Appearance in this case that was filed on April 17, 2023.  
Thank you,  
Becky

Becky Schmidt  
Legal Assistant Public Protection Division  
Office of Kansas Attorney General Kris W. Kobach  
120 SW 10th Avenue, 2nd Floor  
Topeka, KS 66612-1597  
785-291-3877 (office phone)  
785-291-3699 (fax)  
[rebecca.schmidt@ag.ks.gov](mailto:rebecca.schmidt@ag.ks.gov)  
[www.ag.ks.gov](http://www.ag.ks.gov)

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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, April 20, 2023 9:23 AM  
**To:** Schmidt, Rebecca  
**Subject:** Read: Notice filed in Macquarie Energy LLC case Shawnee County (Kansas) District Court Case #2022-CV-000677  
**Attachments:** Read: Notice filed in Macquarie Energy LLC case Shawnee County (Kansas) District Court Case #2022-CV-000677

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## Hutchison, Robert

---

**From:** Burrows, Daniel  
**Sent:** Thursday, April 20, 2023 10:21 AM  
**To:** 'jyoung@forthepeople.com'  
**Cc:** Oleen, Fran; Jack, Melanie  
**Subject:** File Transfer

Mr. Young:

I am concerned about something one of our attorneys told me recently about the transfer of responsibility for the Kansas natural gas litigation from your firm to our office. Apparently, the hard drive they received from Epiq (the document management company your firm used) lacked any coding on the documents. I'm told Epiq removed all that *at Morgan & Morgan's direction*. Relatedly, I have also been told that you are refusing to provide us with the remainder of the file (such as memos, graphs, and other documents with pertinent case analysis) on the grounds that they are supposedly proprietary work product.

If the above is true, it seems like a violation of attorney ethics rules. Both Florida and Kansas (whose law you subjected yourself to by seeking pro hac admission in our courts), require attorneys to "take steps to the extent reasonably practicable to protect a client's interests" at the termination of representation. Indeed, a recent Florida ethics opinion states that a lawyer "has an ethical obligation to comply with a client's or former client's reasonable request for copies of file material where that information would serve a useful purpose to the client," Fla. Bar Ethics Op. 88-11 (Reconsideration) (Mar. 23, 2021); *see also Fla. Bar v. Varner*, 992 So.2d 224 (Fla. 2008) (attorney disciplined for failing to deliver complete file to successor counsel during ongoing litigation); *Dubose v. Shelnut*, 566 So. 2d 921 (Fla. Dist. Ct. App. 1990) (duty to deliver specifically requested documents to former client); *cf. In re Deines*, 430 P.3d 437 (Kan. 2018); *In re Hawkins*, 373 P.3d 718 (Kan. 2016); *In re Green*, 156 P.3d 628 (Kan. 2007). Given that we are replacing you in the middle of ongoing litigation, our need for those additional items should be plain. How you may feel about the circumstances of the termination is irrelevant. Comment 9 to the Model Rule makes that clear: "Even if the lawyer has been unfairly discharged by the client, a lawyer must take all reasonable steps to mitigate the consequences to the client."

I am especially concerned about your direction to your contractor to remove coding from documents. This not only fails your duty to protect our interests, but seems to actively and maliciously impair our ability to continue with the litigation. Your actions have made it difficult to have a clear-cut view of the CEA documents relevant to that litigation or the enforcement case against Macquarie.

Furthermore, our contract specifically stated that you would "make available at reasonable times all of [your] books, documents, papers, records and other evidence" related to the contract. Section 1.32; *see also* Specifications ("Contractor shall timely provide to the Attorney General's Office: All relevant case information and documents...; suggestions for case strategy and other information needed to determine other case actions"). So your refusal to turn over the file (and apparent spoliation thereof) could be a contract breach as well as an ethical one.

I hope this is all a misunderstanding. Is there a time we can discuss this matter today or tomorrow?

### Dan Burrows

Chief Advisor | Office of the Attorney General  
Topeka, Kansas  
Phone: (785) 368-8435  
Email: daniel.burrows@ag.ks.gov

## Hutchison, Robert

---

**From:** Tim Fox x26041 <tfox@forthepeople.com>  
**Sent:** Thursday, April 20, 2023 11:20 AM  
**To:** Schmidt, Rebecca  
**Subject:** Read: \*EXT\* Notice filed in Macquarie Energy LLC case Shawnee County (Kansas) District Court Case #2022-CV-000677  
**Attachments:** Read: \*EXT\* Notice filed in Macquarie Energy LLC case Shawnee County (Kansas) District Court Case #2022-CV-000677

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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, April 21, 2023 8:51 AM  
**To:** Burrows, Daniel  
**Cc:** Oleen, Fran; Jack, Melanie; Juan Martinez x2192; Tim Fox x26041; dkoval; mbrowne  
**Subject:** Kansas Natural Gas

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Dan,

In addition to the preposterous false narrative your boss previously peddled to the media, you have just made some rather serious ethical accusations. Because these allegations impact my co-counsel and colleagues, I have added them to this thread.

We are not refusing to provide Kansas with anything which you are entitled to.

I disagree with your impression that Kansas is in the middle of on-going litigation. The complaint we drafted was filed a little over two months ago and to our knowledge, discovery has not commenced and motions to dismiss have not been ruled upon.

Our original draft, which was shared with your team, was extensively annotated with citations to relevant documents now in your possession. In light of this, I'm not sure I understand how Kansas is being impaired in the Macquarie litigation. There is still plenty of time for you and your time to create your own coding panel, review the documents and record your mental impressions in a system you pay for.

Perhaps you are referring to our work product related to the other targets of the investigation? If so, surely you would agree that there is no current case which triggers an obligation for us to share our work product or mental impressions.

Fla. Bar Ethics Op. 88-11 (Reconsideration) makes clear that "the file generated by a lawyer is the property of the lawyer rather than the client. See, Dowda and Fields, P.A. v. Cobb, 452 So.2d 1140, 1142 (Fla.5th DCA1984). Therefore, other than original papers and documents given to the lawyer by the client or previously paid for by a client, a lawyer is not obligated to provide a client with the lawyer's original file."

Your team asked for the subpoena response materials, and at our own expense, still wholly unreimbursed by Kansas, after being summarily terminated for what can only be described as suspect reasons, we compiled and shipped you the docs and data which responded to the subpoenas we issued.

I understand that you are now also seeking our work product in the form of the attorney notes and impressions our team created on the system we paid for.

We are happy to have a discussion about an arrangement for providing this material as well, but disagree that somehow you are entitled to our work product and mental impressions of the case.



I am not aware of, nor did I instruct anyone to withhold any materials aside from asking Epiq to quickly compile the subpoena responses in isolation in order to get them to you in timely fashion.

During our representation, we spent considerable time and money on behalf of Kansas. Below is a summary of the time and related lodestar based on our hourly rates:

<u>Firm</u>	<u>Hours</u>	<u>Lodestar</u>
Morgan & Morgan	3,642.83	\$2,120,535.52
Kirby McInerney	797	\$514,482.50
Brown Pelican	160.1	\$128,283

In addition to the above time, we also engaged experts and hosted the document review platform for Kansas' benefit. The expenses of such items are \$39,386.53. This does not include the license fees for Relativity, which we absorbed.

Consistent with the law in Kansas, we believe the above amounts are recoverable under either quantum meruit, or some other claim in contract, law, or equity.

As such, we make claim for this amount (**\$2,802,687.50**) and assert a charging lien over any recovery under K.S.A. 7-108. We will, within the appropriate timeframe, also serve you with notice of same.

Should you engage replacement outside counsel for the Macquarie litigation, pursuant to another RFP or otherwise, please let them know of the existence of this lien.

Should you engage replacement outside counsel for continued investigation or litigation against the other responsible parties, which we certainly encourage, we will be happy to discuss an arrangement with the new counsel to save them the time and expense that we undertook.

You dance dangerously close to the line in alleging spoliation and ethical breaches. But this not the first time your office has uttered falsehoods about our team. In the Wall Street Journal article which was conveniently published on the very same day we received our termination letter, AG Kobach was quoted saying that our firm "engaged subcontractors in violation of the agreement" and that our performance was not up to what he expected.

This falsehood is simply over the top and has publicly harmed our respective reputations. Note, unlike AG Kobach, I have never been sanctioned by a court or disciplined by the bar. Rather, I chair our local bar disciplinary committee, serve on the Bar's standing committee on professionalism, and previously chaired the Jacksonville Ethics Commission.

The truth, as you are no doubt aware, is that each attorney and law firm which was deployed on this project, was **specifically approved by the KSAG both verbally and in writing**. Moreover, the principal attorneys who worked on this matter were actually sworn in as Special Assistant Attorneys General by Kansas AG Schmidt, and received certificates in recognition of this honor. Moreover, the quality of our work product which led to the only AG case filed in this matter, was never called into question by a single employee of the KSAG. In fact, quite the opposite is true.

The quotes provided to the Wall Street Journal, along with AG Kobach's social media posts concerning this matter, imply that our firms operated outside of, or in violation of, the contract terms, and provided subpar work resulting in some harm to Kansas.

The broader implication of the story is that we were fired for cause, which clearly was not the case. We ask that you take appropriate steps to retract these falsehoods in order to correct and clarify the record to avoid further impairing our reputation and character.

Despite the new administration's tone and tenor, we do wish you luck in your mission to protect Kansas consumers and hold the responsible parties accountable for their role in price gouging natural gas. You are lucky to have at least two excellent attorneys in your office to see that through.

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Mr. Young:

I am concerned about something one of our attorneys told me recently about the transfer of responsibility for the Kansas natural gas litigation from your firm to our office. Apparently, the hard drive they received from Epiq (the document management company your firm used) lacked any coding on the documents. I'm told Epiq removed all that *at Morgan & Morgan's direction*. Relatedly, I have also been told that you are refusing to provide us with the remainder of the file (such as memos, graphs, and other documents with pertinent case analysis) on the grounds that they are supposedly proprietary work product.

If the above is true, it seems like a violation of attorney ethics rules. Both Florida and Kansas (whose law you subjected yourself to by seeking pro hac admission in our courts), require attorneys to "take steps to the extent reasonably practicable to protect a client's interests" at the termination of representation. Indeed, a recent Florida ethics opinion states that a lawyer "has an ethical obligation to comply with a client's or former client's reasonable request for copies of file material where that information would serve a useful purpose to the client," Fla. Bar Ethics Op. 88-11 (Reconsideration) (Mar. 23, 2021); *see also Fla. Bar v. Varner*, 992 So.2d 224 (Fla. 2008) (attorney disciplined for failing to deliver complete file to successor counsel during ongoing litigation); *Dubose v. Shelnut*, 566 So. 2d 921 (Fla. Dist. Ct. App. 1990) (duty to deliver specifically requested documents to former client); *cf. In re Deines*, 430 P.3d 437 (Kan. 2018); *In re Hawkins*, 373 P.3d 718 (Kan. 2016); *In re Green*, 156 P.3d 628 (Kan. 2007). Given that we are replacing you in the middle of ongoing litigation, our need for those additional items should be plain. How you may feel about the circumstances of the termination is irrelevant. Comment 9 to the Model Rule makes that clear: "Even if the lawyer has been unfairly discharged by the client, a lawyer must take all reasonable steps to mitigate the consequences to the client."

I am especially concerned about your direction to your contractor to remove coding from documents. This not only fails your duty to protect our interests, but seems to actively and maliciously impair our ability to continue with the litigation. Your actions have made it difficult to have a clear-cut view of the CEA documents relevant to that litigation or the enforcement case against Macquarie.

Furthermore, our contract specifically stated that you would "make available at reasonable times all of [your] books, documents, papers, records and other evidence" related to the contract. Section 1.32; *see also* Specifications ("Contractor shall timely provide to the Attorney General's Office: All relevant case information and documents...; suggestions for case strategy and other information needed to determine other case actions"). So your refusal to turn over the file (and apparent spoliation thereof) could be a contract breach as well as an ethical one.

I hope this is all a misunderstanding. Is there a time we can discuss this matter today or tomorrow?

**Dan Burrows**

Chief Advisor | Office of the Attorney General

Topeka, Kansas

Phone: (785) 368-8435

Email: [daniel.burrows@ag.ks.gov](mailto:daniel.burrows@ag.ks.gov)

**James Young**

Attorney

[My Bio](#)

**P:** (904) 361-0012

**F:** (904) 361-4307

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Monday, May 1, 2023 1:30 PM  
**To:** 'Takumyo, Kimmie'; Douglas Acklin x6133  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

I have misplaced the encryption information for the data send to us by Epiq. Will you kindly remind me how those codes were sent or resend them?

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Monday, April 17, 2023 12:46 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; Patrick Mathews x4676 <pmatthews@forthepeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>; Giddie, Neil Sprunith <NeilSprunith.Giddie@epiqglobal.com>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Please note we received the package back at the Data Center. We will submit for a shipment request and follow up with a tracking number.

Best regards,

**Kimmie Takumyo**

Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Friday, April 14, 2023 1:06 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiglobal.com](mailto:NeilSprunith.Giddie@epiglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

Please note that the next Monday is when FedEx expects to deliver the returned package back to Epiq Data Center. We will reach out with a new ETC of the package to your office once we receive it.

Best regards,

**Kimmie Takumyo**

Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 1:01 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiglobal.com](mailto:NeilSprunith.Giddie@epiglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I have notified our staff of the Fed Ex on Monday, so we should be good.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>

**Sent:** Friday, April 14, 2023 12:42 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epigglobal.com](mailto:NeilSprunith.Giddie@epigglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie and Douglas,

Please note that FedEx updated the scheduled delivery of the return package to Monday, April 17. We will follow up on Monday to confirm receipt and the next steps.

UPDATED DELIVERY

# Monday

4/17/2023 before 4:30 pm  
estimated between  
8:30 am - 12:30 pm

Initially expected: Friday, 4/14/2023

DELAYED

Want updates on this shipment? Enter your email and we will do the rest!

YOUR EMAIL

SUBMIT

MORE OPTIONS

## Alerts (1)



Sign up for [Status Updates](#) to get updated as we have more information.

## Manage Delivery

DELIVERY STATUS

Operational Delay

TRACKING ID

771817378288

- FROM TOPEKA, KS  
Label Create 4/11/2023 1
- PACKAGE RE FEDEX TOPEKA, KS 4/11/2023 1
- OPERATION, FLAGSTAFF, 4/14/2023 9
- OUT FOR DE
- TO PHOENIX, A:
- Updated Del 4/17/2023 k  
estimated be 8:30 am - 12

↓ View tra

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

**From:** Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Sent:** Friday, April 14, 2023 9:03 AM  
**To:** 'Jack, Melanie' <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Takumyo, Kimie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

This is received, Kimmie will circle back in regard to the below.

Thanks,

**Neil Sprunith Giddie**

Project Analyst, Client Services

Epiq | eDiscovery

Email: [neilsprunith.giddie@epiqglobal.com](mailto:neilsprunith.giddie@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 8:18 AM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 13, 2023 6:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>



**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

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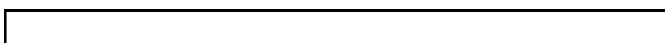
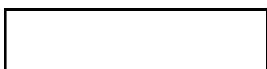
**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmy <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Melanie, we will let you know when it goes back out and get you tracking information.

Kimmy, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**  
Attorney  
  
**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 13, 2023 2:48 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

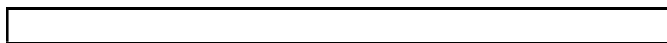
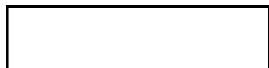
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Thursday, April 13, 2023 3:31 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

# Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	①	Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimmy Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

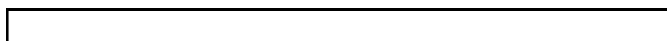
Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmy <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimmy Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350



Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

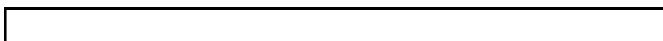
[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

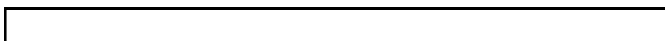
**P:** (407) 563-3231

**Patrick Mathews**  
Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

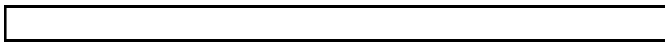
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

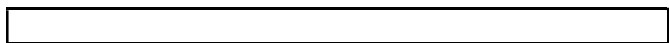
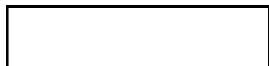
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231  
**F:** (407) 563-8026  
**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kansas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug

**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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## Hutchison, Robert

---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Monday, May 1, 2023 1:43 PM  
**To:** Jack, Melanie; Douglas Acklin x6133  
**Cc:** EMS-DL-Morgan; pmathews@forthepeople.com  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie,

Please find the encryption information below:

EVI Number(s) (If Applicable): 90177785  
Encryption Method: BitLocker  
Encryption Password: **SPo+-4rihl**

EVI Number(s) (If Applicable): 90165260  
Encryption Method: BitLocker  
Encryption Password: **KSNaturalGas22**

EVI Number(s) (If Applicable): 90169954  
Encryption Method: BitLocker  
Encryption Password: **Super\$ecure19!**

Please feel free to reach out with any questions.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Monday, May 1, 2023 1:30 PM  
**To:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,



I have misplaced the encryption information for the data send to us by Epiq. Will you kindly remind me how those codes were sent or resend them?

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Monday, April 17, 2023 12:46 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiglobal.com](mailto:NeilSprunith.Giddie@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Douglas and Melanie,

Please note we received the package back at the Data Center. We will submit for a shipment request and follow up with a tracking number.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, April 14, 2023 1:06 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

Please note that the next Monday is when FedEx expects to deliver the returned package back to Epiq Data Center. We will reach out with a new ETC of the package to your office once we receive it.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Friday, April 14, 2023 1:01 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I have notified our staff of the Fed Ex on Monday, so we should be good.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>

**Sent:** Friday, April 14, 2023 12:42 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epigglobal.com](mailto:NeilSprunith.Giddie@epigglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Melanie and Douglas,

Please note that FedEx updated the scheduled delivery of the return package to Monday, April 17. We will follow up on Monday to confirm receipt and the next steps.

UPDATED DELIVERY

Monday

4/17/2023 before 4:30 pm  
estimated between  
8:30 am - 12:30 pm

Initially expected: Friday, 4/14/2023

DELAYED

Want updates on this shipment? Enter your email and we will do the rest!

YOUR EMAIL

SUBMIT

MORE OPTIONS

Alerts (1)



Sign up for [Status Updates](#) to get updated as we have more information.

Manage Delivery

DELIVERY STATUS

Operational Delay

TRACKING ID

771817378288

FROM  
TOPEKA, KS  
Label Create  
4/11/2023 1

PACKAGE RE  
FEDEX  
TOPEKA, KS  
4/11/2023 1

OPERATION,  
FLAGSTAFF,  
4/14/2023 9

OUT FOR DE

TO  
PHOENIX, A  
Updated Del  
4/17/2023 t  
estimated be  
8:30 am - 12

↓ View tra

Best regards,

**Kimmie Takumyo**

Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>

**Sent:** Friday, April 14, 2023 9:03 AM

**To:** 'Jack, Melanie' <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

This is received, Kimmie will circle back in regard to the below.

Thanks,

**Neil Sprunith Giddie**

Project Analyst, Client Services  
Epiq | eDiscovery  
Email: [neilsprunith.giddie@epiqglobal.com](mailto:neilsprunith.giddie@epiqglobal.com)

People. Partnership. Performance.

[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 8:18 AM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack

First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242

Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Thursday, April 13, 2023 6:07 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Melanie, we will let you know when it goes back out and get you tracking information.

Kimie, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General

Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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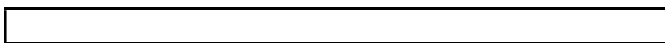
**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 2:48 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case  
**Importance:** High

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My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>  
**Sent:** Thursday, April 13, 2023 3:31 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epigglobal.com](mailto:MohammedRiyazulHaq@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas



Importance: High

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

## Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	• Shipment information sent to FedEx	
	3:27 PM	• Picked up	TEMPE, AZ
	3:28 PM	• Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	• Left FedEx origin facility	TEMPE, AZ
	6:52 PM	• At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	• Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	• Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	• Departed FedEx hub	MEMPHIS, TN
	5:17 PM	• At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	• At local FedEx facility	TOPEKA, KS
	8:11 AM	• On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	• At local FedEx facility	TOPEKA, KS
	9:23 AM	• Delay • Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	• At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	• Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimie Takumyo**

Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)



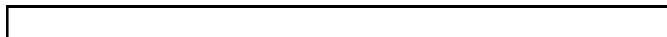
---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Sunday, April 9, 2023 6:00 PM  
**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>  
**Cc:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>  
**Sent:** Saturday, April 8, 2023 8:32 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION: Use caution when clicking on links or opening attachments in this external email.**

---

Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552  
SVC Type: FedEx Priority Overnight  
Recipient Information:  
Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612

Thanks,

## Riyaz

Mohammed Riyaz ul Haq  
Project Analyst | Client Services | Epiq  
E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Saturday, April 8, 2023 1:22 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 6, 2023 3:26 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>;

EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

Mr. James Young

Morgan & Morgan

Attn: Ms. Andrea Gauthier

501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202





A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 6, 2023 1:37 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION: Use caution when clicking on links or opening attachments in this external email.**

Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Friday, March 31, 2023 3:16 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epigglobal.com](mailto:ShalakaSudhir.Bhosale@epigglobal.com)>;  
EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG -  
Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email:[kimiyo.takumyo@epigglobal.com](mailto:kimiyo.takumyo@epigglobal.com)

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epigglobal.com](mailto:ShalakaSudhir.Bhosale@epigglobal.com)>;  
EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG -  
Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmathews@forthepeople.com](mailto:pmathews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

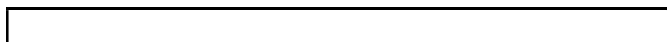
P: (407) 563-3231

**Patrick Mathews**  
Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Friday, March 31, 2023 1:58 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**

Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>

**Sent:** Friday, March 31, 2023 1:15 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>;

EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

**People. Partnership. Performance.**

[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 11:40 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

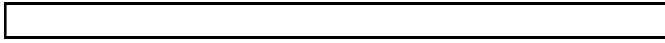
P: (407) 563-3231

**Patrick Mathews**  
Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Friday, March 31, 2023 11:28 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

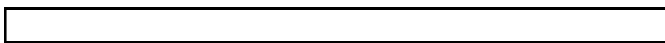
Thanks!

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,



Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**

Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Friday, March 31, 2023 8:51 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kansas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack

Shawntelle Hammer

Platts

Kansas AG

SES

Southern Star

Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.  
Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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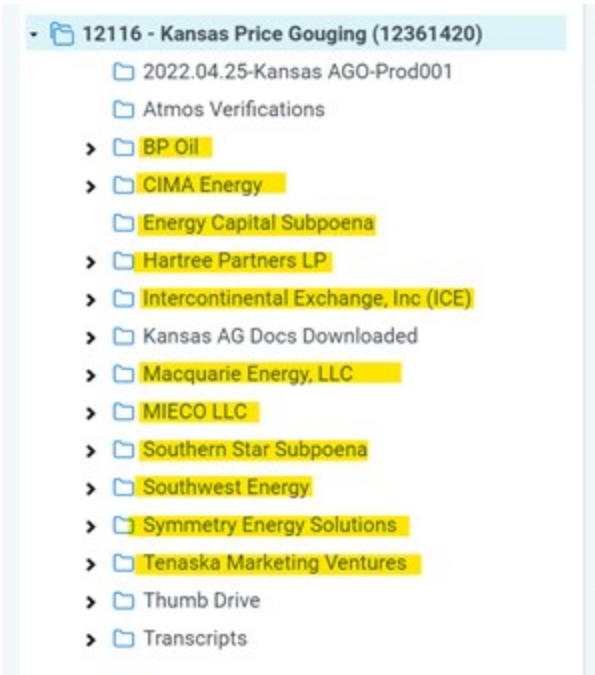
**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Wednesday, March 29, 2023 4:39 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Monday, May 1, 2023 1:46 PM  
**To:** Williamson, Allison  
**Subject:** - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Allison,

See the codes below.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Monday, May 1, 2023 1:43 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Cc:** EMS-DL-Morgan <Morgan@epiqglobal.com>; pmathews@forthepeople.com  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie,

Please find the encryption information below:

EVI Number(s) (If Applicable): 90177785  
Encryption Method: BitLocker

Encryption Password: **SPo+-4rihl**

EVI Number(s) (If Applicable): 90165260

Encryption Method: BitLocker

Encryption Password: **KSNaturalGas22**

EVI Number(s) (If Applicable): 90169954

Encryption Method: BitLocker

Encryption Password: **Super\$ecure19!**

Please feel free to reach out with any questions.

Best regards,

**Kimie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1 773-359-7797

Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

sage. Thank you.

## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Monday, May 1, 2023 1:46 PM  
**To:** 'Takumyo, Kimmie'  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <Kimiyo.Takumyo@epiqglobal.com>  
**Sent:** Monday, May 1, 2023 1:43 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Cc:** EMS-DL-Morgan <Morgan@epiqglobal.com>; pmathews@forthepeople.com  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Melanie,

Please find the encryption information below:

EVI Number(s) (If Applicable): 90177785  
Encryption Method: BitLocker  
Encryption Password: **SPo+-4rihl**

EVI Number(s) (If Applicable): 90165260

Encryption Method: BitLocker

Encryption Password: **KSNaturalGas22**

EVI Number(s) (If Applicable): 90169954

Encryption Method: BitLocker

Encryption Password: **Super\$ecure19!**

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1 773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Monday, May 1, 2023 1:30 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

I have misplaced the encryption information for the data send to us by Epiq. Will you kindly remind me how those codes were sent or resend them?

Thank you.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>  
**Sent:** Monday, April 17, 2023 12:46 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epigglobal.com](mailto:NeilSprunith.Giddie@epigglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Please note we received the package back at the Data Center. We will submit for a shipment request and follow up with a tracking number.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epigglobal.com](mailto:kimiyo.takumyo@epigglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>  
**Sent:** Friday, April 14, 2023 1:06 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epigglobal.com](mailto:NeilSprunith.Giddie@epigglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

Please note that the next Monday is when FedEx expects to deliver the returned package back to Epiq Data Center. We will reach out with a new ETC of the package to your office once we receive it.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epigglobal.com](mailto:kimiyo.takumyo@epigglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Friday, April 14, 2023 1:01 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-



DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epigglobal.com](mailto:NeilSprunith.Giddie@epigglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I have notified our staff of the Fed Ex on Monday, so we should be good.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>  
**Sent:** Friday, April 14, 2023 12:42 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>; Giddie, Neil Sprunith <[NeilSprunith.Giddie@epigglobal.com](mailto:NeilSprunith.Giddie@epigglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie and Douglas,

Please note that FedEx updated the scheduled delivery of the return package to Monday, April 17. We will follow up on Monday to confirm receipt and the next steps.

UPDATED DELIVERY

# Monday

4/17/2023 before 4:30 pm  
estimated between  
8:30 am - 12:30 pm

Initially expected: Friday, 4/14/2023

DELAYED

Want updates on this shipment? Enter your email and we will do the rest!

YOUR EMAIL

SUBMIT

MORE OPTIONS

## Alerts (1)



Sign up for [Status Updates](#) to get updated as we have more information.

Manage Delivery

DELIVERY STATUS

Operational Delay

TRACKING ID

771817378288



- FROM TOPEKA, KS  
Label Create 4/11/2023 1
- PACKAGE RE FEDEX TOPEKA, KS 4/11/2023 1
- OPERATION, FLAGSTAFF, 4/14/2023 9
- OUT FOR DE
- TO PHOENIX, A;  
Updated Del 4/17/2023 k  
estimated be 8:30 am - 12

↓ View tra

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

**From:** Giddie, Neil Sprunith <[NeilSprunith.Giddie@epiqglobal.com](mailto:NeilSprunith.Giddie@epiqglobal.com)>

**Sent:** Friday, April 14, 2023 9:03 AM

**To:** 'Jack, Melanie' <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Takumyo, Kimie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie,

This is received, Kimmie will circle back in regard to the below.

Thanks,

**Neil Sprunith Giddie**

Project Analyst, Client Services

Epiq | eDiscovery

Email: [neilsprunith.giddie@epiqglobal.com](mailto:neilsprunith.giddie@epiqglobal.com)

People. Partnership. Performance.

[www.epiqglobal.com](http://www.epiqglobal.com)

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Friday, April 14, 2023 8:18 AM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

I do think the package needs to be signed for. The situation with Fed Ex may have been just bad luck.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Thursday, April 13, 2023 6:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Douglas and Melanie,

Thanks for your messages and updates on what had happened. Our data center has not received the returned package at this time, and we confirmed that it is still in transit per FedEx tracking page. We will circle back tomorrow on the delivery.

One question, do you have any preference on shipping method?

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 13, 2023 4:14 PM  
**To:** melanie.Jack <[melanie.Jack@ag.ks.gov](mailto:melanie.Jack@ag.ks.gov)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

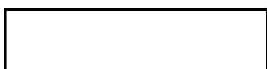
Melanie, we will let you know when it goes back out and get you tracking information.

Kimmie, it looks like Fed Ex was quick to leave the office. Please make sure they know we have counsel on the Topeka, KS end looking for this package.

Thank you.

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, April 13, 2023 5:07 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Fed Ex asked for a driver's license to be scanned in order to leave the package. We don't want state employees providing their DL to Fed Ex. Fed Ex has another option/policy to manually enter the date of birth and first and last name of the person accepting the package. The Fed Ex driver decided not to ask for or obtain this information manually and evidently decided the package was refused.

We will remind our staff to offer the manual entry of the DOB and name taken from an ID.

Please resend. Let me know when it will arrive and I will send out an alert and/or ask that I be called when it arrives. We have security at our building which is where the package would arrive.

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Thursday, April 13, 2023 2:48 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Subject:** FW: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My understanding is we had your name and the address supplied on the shipping label? Mistake or did your office intentionally refuse the hard drive shipment?

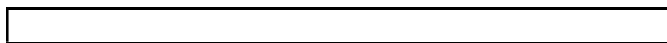
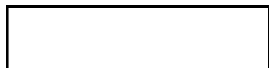
**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Thursday, April 13, 2023 3:31 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Cc:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**Importance:** High

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

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Hi Douglas and Patrick,

We noticed that the hard drives have been shipped back to Epiq Data Center. There were a few delays and exceptions per FedEx tracking site for the original tracking #: 6389 5831 7552. FedEx generated a new tracking number, 771817378288, and the hard drives are due for delivery at Epiq Data Center today before 4:30PM. Please see below screenshot. We will be on a lookout for the hard drives and inform you once we receive them.

# Travel history

SORT BY DATE/TIME

Ascending

TIME ZONE

Local Scan Time

Saturday, 4/8/2023	2:16 PM	•	Shipment information sent to FedEx	
	3:27 PM	•	Picked up	TEMPE, AZ
	3:28 PM	•	Shipment arriving On-Time	TEMPE, AZ
	6:37 PM	•	Left FedEx origin facility	TEMPE, AZ
	6:52 PM	•	At FedEx origin facility	TEMPE, AZ
Sunday, 4/9/2023	10:14 AM	•	Shipment arriving On-Time	MEMPHIS, TN
	10:14 AM	•	Arrived at FedEx hub	MEMPHIS, TN
	4:03 PM	•	Departed FedEx hub	MEMPHIS, TN
	5:17 PM	•	At destination sort facility	KANSAS CITY, MO
Monday, 4/10/2023	7:30 AM	•	At local FedEx facility	TOPEKA, KS
	8:11 AM	•	On FedEx vehicle for delivery	TOPEKA, KS
	8:11 AM	•	At local FedEx facility	TOPEKA, KS
	9:23 AM	•	Delay Shipment Refused by recipient.	TOPEKA, KS
	10:29 AM	•	At local FedEx facility	TOPEKA, KS
Tuesday, 4/11/2023	1:48 PM	①	Returning package to shipper Return tracking number 771817378288	TOPEKA, KS

[↑ Back to top](#)

Best regards,

**Kimie Takumyo**

Epiq | Project Manager

311 S. Wacker Dr. Suite 350

Chicago, IL 60606

Mobile: +1773-359-7797

Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Sent:** Sunday, April 9, 2023 6:00 PM

**To:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiglobal.com](mailto:MohammedRiyazulHaq@epiglobal.com)>

**Cc:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you all for the good help!

**Douglas Acklin**

Attorney

P: (904) 361-4498



F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** ul Haq, Mohammed Riyaz <[MohammedRiyazulHaq@epiqglobal.com](mailto:MohammedRiyazulHaq@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 8:32 PM

**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Hello Patrick and Douglas,

We have copied the data and the shipped the hard drives. Please see the below details:

Tracking Number: 6389 5831 7552

SVC Type: FedEx Priority Overnight

Recipient Information:

Melanie Jack

Assistant Attorney General

Consumer Protection Division

Office of Attorney General Derek Schmidt

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Thanks,

**Riyaz**

Mohammed Riyaz ul Haq

Project Analyst | Client Services | Epiq

E: [mohammedriyazulhaq@epiqglobal.com](mailto:mohammedriyazulhaq@epiqglobal.com)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>

**Sent:** Saturday, April 8, 2023 1:22 PM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case



Hi Patrick and Douglas,

Please note that we expect to complete the copying process of the identified data sometimes this afternoon. We also expect the hard drives to ship out this evening for a delivery on Monday. We will follow up with a tracking number once the shipment is ready.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 3:40 PM  
**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Doug,

Thanks for your message and confirmation. We will get the data copied and shipped out to the provided address. We will send another update to keep you abreast of the status.

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Thursday, April 6, 2023 3:26 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Andrea Gauthier x6229 <[agauthier@forthepeople.com](mailto:agauthier@forthepeople.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Kimmie and Patrick – James Young and I have discussed this and agree to getting the 9 highlighted volumes that do not contain our Relativity Coding placed on a physical drive and sent out to the Kansas Attorney General's office. Also, you will be sending back the original two hard drives.

Please forward this package expeditiously so it can be receipted for at the Kansas Attorney General's Office:

Melanie Jack  
Assistant Attorney General  
Consumer Protection Division  
Office of Attorney General Derek Schmidt  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

Please send a copy of the billing for all costs and mailing to:

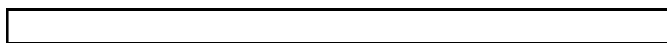
Mr. James Young  
Morgan & Morgan  
Attn: Ms. Andrea Gauthier  
501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

I will leave additional details on password protection to usual methods Patrick and you would suggest. Let me know when it is mailed out. Thank you for your help!

Doug

**Douglas Acklin**  
Attorney

**P:** (904) 361-4498  
**F:** (904) 361-4479  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Thursday, April 6, 2023 1:37 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** David Neff 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

<[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick and Doug,

Thanks for your time on the call earlier this week. As discussed, please find the attached breakdown of the data received for this Kansas Price Gouging matter. A few things we would like to raise to your attention and/or your input:

1. We were able to confirm that original data for all volumes are available.
2. This list includes all third-party documents with or without Bates numbers. **Please review the highlighted 9 volumes and advise whether to return these data sets.**
3. Two volumes, indicated by Yes in Column I (Hard Drive Received?), were shipped on hard drive and the physical media are being stored at our data center. **Please confirm we can return these 2 hard drives separately from the rest of the data.**
4. The estimated total data size (unzipped) is around 38.25 GB. If we return the hard drives mentioned in #2, the remaining data to be copied and shipped will be less than 10GB.
  - o Timeline estimate: We expect to be able to complete the copy and ship within 24 hours from the time we receive your confirmation on what volumes to return.
  - o Cost estimate: 1 hour of Project Manager time \$175 (\$175/hour), and pass-through cost for hard drive(s) and shipping fees.
5. **Please confirm the shipping address for this data return.**

Please feel free to reach out with any questions. Happy to hop on a call. Thanks for your patience while we collected the details for the volumes.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Takumyo, Kimie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Sent:** Friday, March 31, 2023 3:16 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

Thanks for confirming. I just sent a meeting invite for Monday, April 3 at 2PM CST/3PM EST. Looking forward to connecting with you!

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350

Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiglobal.com](mailto:kimiyo.takumyo@epiglobal.com)

---

**From:** Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 2:29 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiglobal.com](mailto:ShalakaSudhir.Bhosale@epiglobal.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Sounds great. Can you send out an invitation for Monday, 04/03 at 2:00 PM CST (3:00 PM EST)?

Participants:

Patrick Mathews – [pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com) (required)  
Doug Acklin - [dacklin@forthepeople.com](mailto:dacklin@forthepeople.com) (required)  
David Neff - [dneff@forthepeople.com](mailto:dneff@forthepeople.com) (optional)

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

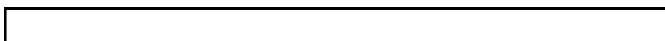
[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:58 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>; Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Patrick,

Happy Friday! Thank you for following up on this case closure/data transfer request. I am available anytime after 1:30PM Eastern on this coming Monday.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

---

**From:** Bhosale, Shalaka Sudhir <[ShalakaSudhir.Bhosale@epiqglobal.com](mailto:ShalakaSudhir.Bhosale@epiqglobal.com)>  
**Sent:** Friday, March 31, 2023 1:15 PM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** Re: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick,

This has been received and we will update this to our team.

Thanks,

**Shalaka Bhosale**

Project Coordinator, Client Services

Epiq | eDiscovery

Email: [shalakasudhir.bhosale@epiqglobal.com](mailto:shalakasudhir.bhosale@epiqglobal.com)

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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:40 PM  
**To:** Takumyo, Kimmie <[Kimiyo.Takumyo@epigglobal.com](mailto:Kimiyo.Takumyo@epigglobal.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>  
**Cc:** David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Hi Kimmie – As I mentioned in our touchpoint call yesterday, we have a request to return documents to the Kansas AG office.

I was hoping to set up a call with you, Epiq, and Doug Acklin regarding the details of this request. I think it would cut down on confusion if you can ask Doug questions directly. Can we set up a call on Monday? What times would you be available?

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)  
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

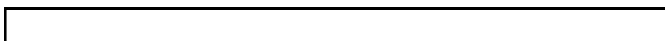
**P:** (407) 563-3231

**Patrick Mathews**  
Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 11:28 AM

**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick - My Mondays are wide open, so Monday late morning or afternoon. Tuesday before an 11:00am meeting and before or after your monthly meeting. Wednesday before a 2:00 pm meeting. Better if we can do it first part of the week.

Thanks!

**Douglas Acklin**

Attorney

**P:** (904) 361-4498

**F:** (904) 361-4479

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Friday, March 31, 2023 12:05 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

Doug, since I am the middleman in the process, I think it would be more expedient and ensure greater accuracy if I set up a meeting with you, myself, and Epiq to discuss the parameters of this request.

What is your availability next week for a call?

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

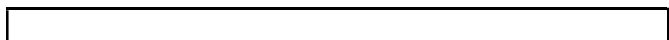
[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231  
**F:** (407) 563-8026  
**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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---

**From:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Sent:** Friday, March 31, 2023 8:51 AM  
**To:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Patrick - We have a database of 10,980 documents obtained from Kansas Subpoenas under authority of the Kansas Attorney General. From your list I think 22022.04.25-Kansas AGO-Prod001 and Atmos Verification, would also be included.

Looking at it from a different angle:

We would return base uncoded source products that we listed under these custodians unless James thinks of a reason not to give them back some documents from a particular energy company. But I don't think it makes too much difference. At the last meeting Melanie Jack mentioned British Petroleum and if Kanas brought an action against them, Morgan would, I assume, claim part of any successful judgement. We have work product we are not returning in the form of spreadsheets, deficiency notices, and transcripts which you placed in a few folders for us and are also located in our share drives.

So, we should return all original uncoded documents associated with all these custodians:

Melanie Jack  
Shawntelle Hammer  
Platts  
Kansas AG  
SES  
Southern Star  
Tenaska Marketing Ventures  
Macquarie Energy  
MIECO  
Hartree  
ICE  
Non-Custodial (Monika Barz)      Which is BP  
BP Oil  
Bryan Johnson  
Lee Casey  
No custodian listed but small group of documents CE\_000001 and up which is CIMA

Please let me know if I can help by getting on a call with the Epiq folks and you. We have been most appreciative of all the help you provided working with Epiq during this case.

Doug



**Douglas Acklin**

Attorney

P: (904) 361-4498

F: (904) 361-4479

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Wednesday, March 29, 2023 4:39 PM

**To:** Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; David Neff x8756 <[dneff@forthepeople.com](mailto:dneff@forthepeople.com)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good afternoon,

Doug – A good starting point is if you could look at the Relativity folder list and let me know which folder collections need to be exported out (as provided with no M&M attorney work product coding included).

I've taken a snapshot and have highlighted the folders which I think are the target folders (energy company productions), but would appreciate your eyes on this as you are much more familiar with the document population than I am.

We'll start with identifying what needs to be exported and from there I can work with Epiq to determine prospective costs for those exports, drives, and other expenses for shipping.



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)

**P:** (407) 563-3231

**Patrick Mathews**

Project Manager

**P:** (407) 563-3231

**F:** (407) 563-8026

**A:** 16225 Park Ten Place Suite 500, Houston, TX 77084



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## Hutchison, Robert

---

**From:** Williamson, Allison  
**Sent:** Monday, May 1, 2023 2:01 PM  
**To:** Jack, Melanie  
**Cc:** Wood, Allison  
**Subject:** RE: - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie: were you trying to reach Allison Wood or me? I have added her to this communication since I am not sure what this email is referring to. Thanks.

Allison M. Williamson  
Assistant Attorney General  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Avenue, 2nd Floor  
Topeka, Kansas 66612-1597  
785-291-3797 phone  
785-291-3767 fax  
allison.williamson@ag.ks.gov  
www.ag.ks.gov

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---

**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Monday, May 1, 2023 1:46 PM  
**To:** Williamson, Allison <Allison.Williamson@ag.ks.gov>  
**Subject:** - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Allison,

See the codes below.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>  
**Sent:** Monday, May 1, 2023 1:43 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; [pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie,

Please find the encryption information below:

EVI Number(s) (If Applicable): 90177785  
Encryption Method: BitLocker  
Encryption Password: **SPo+-4rihl**

EVI Number(s) (If Applicable): 90165260  
Encryption Method: BitLocker  
Encryption Password: **KSNaturalGas22**

EVI Number(s) (If Applicable): 90169954  
Encryption Method: BitLocker  
Encryption Password: **Super\$ecure19!**

Please feel free to reach out with any questions.

Best regards,

**Kimmie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

sage. Thank you.

## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Monday, May 1, 2023 3:13 PM  
**To:** Williamson, Allison  
**Subject:** RE: - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Sorry, yes, Allison Wood.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Williamson, Allison <Allison.Williamson@ag.ks.gov>  
**Sent:** Monday, May 1, 2023 2:01 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Cc:** Wood, Allison <Allison.Wood@ag.ks.gov>  
**Subject:** RE: - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Hi Melanie: were you trying to reach Allison Wood or me? I have added her to this communication since I am not sure what this email is referring to. Thanks.

Allison M. Williamson  
Assistant Attorney General  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Avenue, 2nd Floor  
Topeka, Kansas 66612-1597  
785-291-3797 phone  
785-291-3767 fax  
[allison.williamson@ag.ks.gov](mailto:allison.williamson@ag.ks.gov)  
[www.ag.ks.gov](http://www.ag.ks.gov)

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---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Monday, May 1, 2023 1:46 PM

**To:** Williamson, Allison <[Allison.Williamson@ag.ks.gov](mailto:Allison.Williamson@ag.ks.gov)>

**Subject:** - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Allison,

See the codes below.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
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---

**From:** Takumyo, Kimmie <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>

**Sent:** Monday, May 1, 2023 1:43 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; [pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Hi Melanie,

Please find the encryption information below:

EVI Number(s) (If Applicable): 90177785  
Encryption Method: BitLocker  
Encryption Password: SPo+-4rihl

EVI Number(s) (If Applicable): 90165260  
Encryption Method: BitLocker  
Encryption Password: KSNaturalGas22

EVI Number(s) (If Applicable): 90169954  
Encryption Method: BitLocker  
Encryption Password: Super\$ecure19!

Please feel free to reach out with any questions.

Best regards,

**Kimie Takumyo**  
Epiq | Project Manager  
311 S. Wacker Dr. Suite 350  
Chicago, IL 60606  
Mobile: +1 773-359-7797  
Email: [kimiyo.takumyo@epiqglobal.com](mailto:kimiyo.takumyo@epiqglobal.com)

sage. Thank you.

## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Wednesday, May 3, 2023 9:19 AM  
**To:** 'Takumyo, Kimmie'; Douglas Acklin x6133  
**Cc:** James Young x6172; Patrick Mathews x4676; EMS-DL-Morgan; Oleen, Fran  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Good morning,

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CE_001	9/16/2022 4:39 PM	DAT File	39 KB
CE_001	9/16/2022 4:30 PM	OPT File	51 KB
MEL001B	9/8/2022 6:02 PM	DAT File	651 KB
MEL001B	9/8/2022 5:57 PM	OPT File	358 KB

Please clarify if these file are the uncoded documents from Relativity.

Also, it appears the documents returned to us do not contain the full investigation conducted by Morgan and Morgan.

Specifically, I am unable to locate any documents related to the Macquarie investigation/litigation. Please advise.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach



120 SW 10th Ave., 2nd Floor  
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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Wednesday, May 3, 2023 9:43 AM  
**To:** Jack, Melanie; 'Takumyo, Kimmie'; Douglas Acklin x6133  
**Cc:** Patrick Mathews x4676; EMS-DL-Morgan; Oleen, Fran  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Doug will you please look into this and let us know what you find.

Melanie, can you be more specific about the documents in Macquarie? Do you mean documents that were produced by Macquarie or something else?

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Wednesday, May 3, 2023 10:19 AM  
**To:** 'Takumyo, Kimmie' <Kimiyo.Takumyo@epiqglobal.com>; Douglas Acklin x6133 <dacklin@forthepeople.com>  
**Cc:** James Young x6172 <JYoung@ForThePeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>; Fran.Oleen <Fran.Oleen@ag.ks.gov>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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## Hutchison, Robert

---

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**Sent:** Thursday, May 4, 2023 9:54 AM  
**To:** 'James Young x6172'  
**Cc:** Oleen, Fran  
**Subject:** Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

James,

Due to the two Macquarie litigation cases, it is imperative I have access to all investigation, research and litigation documents including communications with counsel for Macquarie.

For example, at the meet and confer(s) did you offer to limit a subpoena request in some way? The most pressing case is the subpoena enforcement litigation.

I can't know what is missing in the documents if I don't know they exist. The documents that form the basis of the CEA petition are subject to discovery. It is impossible for me to know the perimeters of discovery without some guidance.

Your help is appreciated.

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**From:** James Young x6172 <JYoung@ForThePeople.com>

**Sent:** Wednesday, May 3, 2023 9:43 AM

**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>; 'Takumyo, Kimmie' <Kimiyo.Takumyo@epiqglobal.com>; Douglas Acklin x6133 <dacklin@forthepeople.com>

**Cc:** Patrick Mathews x4676 <pmathews@forthepeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>; Oleen, Fran <Fran.Oleen@ag.ks.gov>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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**James Young**

Attorney

[My Bio](#)

**P:** (904) 361-0012

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**Sent:** Wednesday, May 3, 2023 10:19 AM

**To:** 'Takumyo, Kimmie' <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>

**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Thursday, May 4, 2023 9:54 AM  
**To:** 'James Young x6172'  
**Cc:** Oleen, Fran  
**Subject:** Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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**Sent:** Wednesday, May 3, 2023 9:43 AM

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**Cc:** Patrick Mathews x4676 <pmathews@forthepeople.com>; EMS-DL-Morgan <Morgan@epiqglobal.com>; Oleen, Fran <Fran.Oleen@ag.ks.gov>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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**James Young**

Attorney

[My Bio](#)

**P:** (904) 361-0012

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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 9:58 AM  
**To:** Jack, Melanie  
**Cc:** Oleen, Fran; Juan Martinez x2192  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Sure. Adding Juan, as he was party to some communications as well.

We will begin forwarding you any and all emails to and from counsel.

We had two discussions about narrowing subpoena requests if they agreed to produce. They never agreed to produce so there are no agreements.

I will send you everything in my electronic file.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Thursday, May 4, 2023 10:54 AM  
**To:** James Young x6172 <JYoung@ForThePeople.com>  
**Cc:** Fran.Oleen <Fran.Oleen@ag.ks.gov>  
**Subject:** \*EXT\* Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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James,

Due to the two Macquarie litigation cases, it is imperative I have access to all investigation, research and litigation documents including communications with counsel for Macquarie.

For example, at the meet and confer(s) did you offer to limit a subpoena request in some way? The most pressing case is the subpoena enforcement litigation.

I can't know what is missing in the documents if I don't know they exist. The documents that form the basis of the CEA petition are subject to discovery. It is impossible for me to know the perimeters of discovery without some guidance.

Your help is appreciated.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Sent:** Wednesday, May 3, 2023 9:43 AM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; 'Takumyo, Kimmie' <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Doug will you please look into this and let us know what you find.

Melanie, can you be more specific about the documents in Macquarie? Do you mean documents that were produced by Macquarie or something else?

**James Young**

Attorney

[My Bio](#)

**P:** (904) 361-0012

**F:** (904) 361-4307

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Wednesday, May 3, 2023 10:19 AM

**To:** 'Takumyo, Kimmie' <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>





**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>



**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

Good morning,

After review of the three thumb drives sent to us, I am having problems opening some of the files. I am not a tech person, but my IT person tells me we need a key or some other way to open these files:

 2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	DAT File	210
 2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	OPT File	856
 CE_001	9/16/2022 4:39 PM	DAT File	39 KB
 CE_001	9/16/2022 4:30 PM	OPT File	51 KB

 MEL001B	9/8/2022 6:02 PM	DAT File	651 KB
 MEL001B	9/8/2022 5:57 PM	OPT File	358 KB

Please clarify if these file are the uncoded documents from Relativity.

Also, it appears the documents returned to us do not contain the full investigation conducted by Morgan and Morgan.

Specifically, I am unable to locate any documents related to the Macquarie investigation/litigation. Please advise.

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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 10:00 AM  
**To:** Jack, Melanie; Oleen, Fran  
**Cc:** Juan Martinez x2192  
**Subject:** Macquarie Emails from Beatrice Franklin  
**Attachments:** \*EXT\* RE: KSAG Natural Gas Investigation; \*EXT\* RE: Kansas AG investigation; \*EXT\* RE: Kansas AG investigation; \*EXT\* RE: Kansas AG investigation; \*EXT\* RE: Kansas ex rel. Schmidt v. Macquarie Energy, No. 2022-cv-000677; \*EXT\* RE: Kansas ex rel. Schmidt v. Macquarie Energy, No. 2022-cv-000677; \*EXT\* Kansas ex rel. Schmidt v. Macquarie Energy, No. 2022-cv-000677; \*EXT\* RE: Kansas ex rel. Schmidt v. Macquarie Energy, No. 2022-cv-000677; \*EXT\* RE: Kansas ex rel. Schmidt v. Macquarie Energy, No. 2022-cv-000677; \*EXT\* RE: Kansas ex rel. Schmidt v. Macquarie Energy, No. 2022-cv-000677; \*EXT\* RE: Kansas ex rel. Schmidt v. Macquarie Energy, No. 2022-cv-000677; \*EXT\* RE: Kansas ex rel. Schmidt v. Macquarie Energy, No. 2022-cv-000677; \*EXT\* RE: Kansas ex rel. Schmidt v. Macquarie Energy, No. 2022-cv-000677

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## Hutchison, Robert

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**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 10:03 AM  
**To:** Oleen, Fran; Jack, Melanie  
**Cc:** Juan Martinez x2192  
**Subject:** Emails from Macquarie- Michael Yuffee  
**Attachments:** \*EXT\* KS AG - Macquarie Discovery; RE: \*EXT\* State of Kansas v. Macquarie Energy LLC, CA 2022-CV-000677; RE: \*EXT\* State of Kansas v. Macquarie Energy LLC, CA 2022-CV-000677; \*EXT\* State of Kansas v. Macquarie Energy LLC, CA 2022-CV-000677; \*EXT\* RE: Kansas Gas - CIMA Subpoena Deficiency Spreadsheet; \*EXT\* RE: Natural Gas Pricing, Winter Storm Uri, our file CP-21-002300

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## Hutchison, Robert

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**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 10:04 AM  
**To:** Oleen, Fran; Jack, Melanie  
**Cc:** Juan Martinez x2192  
**Subject:** Emails from SWE- Andrew Hofland  
**Attachments:** \*EXT\* Southwest Energy, L.P. - KSAG File No. CP-21-002300 - Prior KSAG Production; \*EXT\* RE: SWE - KSAG CP-21-002300 - Uri - Debrief of Meeting on Production Status; \*EXT\* SWE - KSAG CP-21-002300 - Uri - Debrief of Meeting on Production Status; \*EXT\* Kansas Gas - Southwest Subpoena Deficiency Spreadsheet; \*EXT\* RE: Kansas Gas - Southwest Subpoena Deficiency Spreadsheet; \*EXT\* Southwest Energy, L.P. - Kansas AG Invest. Uri - File No. CP-21-002300 - Response to Subpoena Production Password; \*EXT\* Southwest Energy, L.P. - Kansas AG Invest. Uri - File No. CP-21-002300 - Response to Subpoena; RE: \*EXT\* Southwest Energy, L.P. - Kansas AG Invest. Uri - File No. CP-21-002300 - Notice of Representation; RE: \*EXT\* Southwest Energy, L.P. - Kansas AG Invest. Uri - File No. CP-21-002300 - Notice of Representation; \*EXT\* Southwest Energy, L.P. - Kansas AG Invest. Uri - File No. CP-21-002300 - Notice of Representation; RE: \*EXT\* Southwest Energy, L.P. - Kansas AG Invest. Uri - File No. CP-21-002300 - Notice of Representation; RE: \*EXT\* Southwest Energy, L.P. - Kansas AG Invest. Uri - File No. CP-21-002300 - Notice of Representation; \*EXT\* Southwest Energy, L.P. - Kansas AG Invest. Uri - File No. CP-21-002300 - Notice of Representation

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## Hutchison, Robert

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**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 10:07 AM  
**To:** Oleen, Fran; Jack, Melanie  
**Cc:** Juan Martinez x2192  
**Subject:** Emails from Symmetry- Frank Caro  
**Attachments:** \*EXT\* Re: Kansas Gas; \*EXT\* RE: Kansas Gas; \*EXT\* RE: Kansas Gas; \*EXT\* RE: Kansas Gas; \*EXT\* RE: Kansas AG Natural Gas Investigation; \*EXT\* Re: Kansas AG Natural Gas Investigation; \*EXT\* RE: Kansas Natural Gas Investigation- Subpoenas; \*EXT\* RE: Kansas AG In the Matter of the Investigation of Natural Gas Pricing Subpoena; \*EXT\* RE: Kansas AG In the Matter of the Investigation of Natural Gas Pricing Subpoena; \*EXT\* RE: Kansas AG In the Matter of the Investigation of Natural Gas Pricing Subpoena; \*EXT\* RE: Kansas AG In the Matter of the Investigation of Natural Gas Pricing Subpoena; \*EXT\* Accepted: Symmetry Meeting; \*EXT\* RE: Symmetry (winter storm Uri); \*EXT\* RE: Symmetry (winter storm Uri); \*EXT\* RE: Symmetry (winter storm Uri); \*EXT\* RE: Symmetry (winter storm Uri)

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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 10:11 AM  
**To:** Jack, Melanie; Oleen, Fran  
**Cc:** Juan Martinez x2192  
**Subject:** Emails from Symmetry- John Doyle  
**Attachments:** \*EXT\* Symmetry's August 22, 2022 Production - Instructions; \*EXT\* Symmetry's August 22, 2022 Production; \*EXT\* Symmetry's August 5, 2022 Production - Instructions; \*EXT\* Symmetry's August 5, 2022 Production; \*EXT\* Symmetry's July 15, 2022 Production - Instructions; \*EXT\* Symmetry's July 15, 2022 Production; \*EXT\* Symmetry's July 8, 2022 Production; \*EXT\* Symmetry's July 8, 2022 Production; \*EXT\* Symmetry's Objections to Kansas Subpoena; RE: \*EXT\* Symmetry's June 6, 2022 Production; \*EXT\* Symmetry's June 6, 2022 Production - Password; \*EXT\* Symmetry's June 6, 2022 Production

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## Hutchison, Robert

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**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 10:02 AM  
**To:** Oleen, Fran; Jack, Melanie  
**Cc:** Juan Martinez x2192  
**Subject:** Emails from BP Kamil Shields  
**Attachments:** \*EXT\* Kansas AG\_bp presentation; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; \*EXT\* RE: Winter Storm Uri; \*EXT\* Winter Storm Uri; \*EXT\* Kansas AG\_bp Meeting; \*EXT\* RE: Kansas AG\_BP call; \*EXT\* Canceled: Kansas AG\_BP call; \*EXT\* RE: Kansas AG\_BP call; \*EXT\* RE: Kansas AG\_BP call; RE: \*EXT\* RE: Kansas AG\_BP call; RE: \*EXT\* RE: Kansas AG\_BP call; \*EXT\* RE: Kansas AG\_BP call; RE: \*EXT\* RE: Kansas AG\_BP call; \*EXT\* RE: Kansas AG\_BP call; \*EXT\* RE: Kansas AG\_BP call; \*EXT\* RE: In the Matter of the Investigation of Natural Gas Pricing Winter Storm Uri--File No. CP-21-002300; \*EXT\* RE: In the Matter of the Investigation of Natural Gas Pricing Winter Storm Uri--File No. CP-21-002300

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## Hutchison, Robert

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**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 10:15 AM  
**To:** Oleen, Fran; Jack, Melanie  
**Cc:** Juan Martinez x2192  
**Subject:** Emails from BP Morgan Knutsen  
**Attachments:** \*EXT\* RE: BP Energy - Winter Storm Uri; \*EXT\* BP Energy - Winter Storm Uri; \*EXT\* Knudtsen, Morgan R. has invited you to collaborate on Box

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## Hutchison, Robert

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**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 10:10 AM  
**To:** Oleen, Fran; Jack, Melanie  
**Cc:** Juan Martinez x2192  
**Subject:** Emails from our expert John Broyles  
**Attachments:** Re: \*EXT\* Re: KS presentation; Re: \*EXT\* Re: KS presentation; Re: \*EXT\* Re: KS presentation; Re: \*EXT\* Re: KS presentation; \*EXT\* Production Cuts on Southern Star; \*EXT\* Atmos Energy Transportation; \*EXT\* Some Statements and Questions to ask; RE: \*EXT\* Re: Symmetry Presentation 8/30; Re: \*EXT\* Re: Symmetry Presentation 8/30; \*EXT\* Re: Symmetry Presentation 8/30; \*EXT\* Re: Symmetry Presentation 8/30; \*EXT\* Re: Symmetry Presentation 8/30; \*EXT\* Re: Kansas Gas - gas supplier subpoena targets; \*EXT\* Re: Kansas Gas - gas supplier subpoena targets; \*EXT\* Re: Kansas Gas - gas supplier subpoena targets; \*EXT\* Re: Southern Star Data Sheets and KOAG Subpoena Responses; \*EXT\* Re: Southern Star Data Sheets and KOAG Subpoena Responses

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## Hutchison, Robert

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**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 10:18 AM  
**To:** Oleen, Fran; Jack, Melanie  
**Cc:** Juan Martinez x2192  
**Subject:** Emails from Symmetry- Steve Bauer  
**Attachments:** \*EXT\* RE: Kansas AG Natural Gas Investigation; \*EXT\* Letter; \*EXT\* RE: Symmetry's Subpoena Response

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### James Young

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## Hutchison, Robert

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**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 10:18 AM  
**To:** Jack, Melanie; Oleen, Fran  
**Cc:** Juan Martinez x2192  
**Subject:** Emails from BP- Kamil Shields  
**Attachments:** \*EXT\* Kansas AG\_bp presentation; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; RE: [EXTERNAL] Re: \*EXT\* RE: Winter Storm Uri; \*EXT\* RE: Winter Storm Uri; \*EXT\* Winter Storm Uri; \*EXT\* Kansas AG\_bp Meeting; \*EXT\* RE: Kansas AG\_BP call; \*EXT\* Canceled: Kansas AG\_BP call; \*EXT\* RE: Kansas AG\_BP call; \*EXT\* RE: Kansas AG\_BP call; RE: \*EXT\* RE: Kansas AG\_BP call; RE: \*EXT\* RE: Kansas AG\_BP call; \*EXT\* Kansas AG\_BP call; RE: \*EXT\* RE: Kansas AG\_BP call; \*EXT\* RE: Kansas AG\_BP call; \*EXT\* RE: In the Matter of the Investigation of Natural Gas Pricing Winter Storm Uri--File No. CP-21-002300; \*EXT\* RE: In the Matter of the Investigation of Natural Gas Pricing Winter Storm Uri--File No. CP-21-002300; \*EXT\* RE: In the Matter of the Investigation of Natural Gas Pricing Winter Storm Uri--File No. CP-21-002300; \*EXT\* RE: In the Matter of the Investigation of Natural Gas Pricing Winter Storm Uri--File No. CP-21-002300; \*EXT\* RE: In the Matter of the Investigation of Natural Gas Pricing Winter Storm Uri--File No. CP-21-002300; \*EXT\* RE: In the Matter of the Investigation of Natural Gas Pricing Winter Storm Uri--File No. CP-21-002300; \*EXT\* RE: In the Matter of the Investigation of Natural Gas Pricing Winter Storm Uri--File No. CP-21-002300; \*EXT\* RE: In the Matter of the Investigation of Natural Gas Pricing Winter Storm Uri--File No. CP-21-002300; \*EXT\* BP: Kansas AG subpoena discussion; RE: \*EXT\* In the Matter of the Investigation of Natural Gas Pricing Winter Storm Uri--File No. CP-21-002300; \*EXT\* In the Matter of the Investigation of Natural Gas Pricing Winter Storm Uri--File No. CP-21-002300

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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 10:23 AM  
**To:** Oleen, Fran; Jack, Melanie  
**Cc:** Juan Martinez x2192  
**Subject:** Research- Part 1  
**Attachments:** 2021-09-22 CPS-ET - 1st Am. Orig. Pet. FS - No Exhibits.pdf; 20210712 - Lawsuits Allege Price Gouging, Market Manipulation By Gas Companies During Texas Freeze \_ KUT Radio, Austin's NPR Station.pdf; Bexar CPS Case Dockets.pdf; La Quinta Lawsuit Complaint.pdf; 2-14-2021-Extreme-Weather-Disaster-Declaration-Executed.pdf; 050\_006\_0027\_k.pdf; 050\_006\_0032\_k.pdf; 050\_006\_0034\_k.pdf; 050\_006\_0036\_k.pdf; 050\_006\_0038\_k.pdf; CPS - BP - 2021-03-22 Original Petition Against BP ENERGY.PDF; CPS - Castleton - 2021-03-22 Original Petition Against CASTLETON.PDF; CPS - Chevron - 2021-03-22 Original Petition Against CHEVRON.PDF; CPS - CIMA - 2021-03-22 Original Petition Against CIMA.PDF; CPS - EDF Petition (1).pdf; CPS - EDF Petition.pdf; CPS - Macquarie - 2021-03-22 Original Petition Against MACQUARIE.PDF; CPS - Original Petition Against TENASKA.PDF; CPS - Original Petition Against VITOL.PDF; CPS Original Petition Against KOCH.PDF; CPS Petition Against OCCIDENTAL.PDF; CPS-Original Petition Against SEQUENT.PDF; CPS-Original Petition Against SYMMETRY.PDF; CPS-Original Petition Against TWIN EAGLE.PDF; CPS-Original Petition Against UPSTREAM.PDF; CRP-2021-CV-000014 - Notice to the District Court of Removal to Federal Court.pdf; Inoculating Consumers Against Unconscionable Business Practices--.pdf; Joint Motion to Approve Nonunanimous Settlement Agreement S202110081605008224.pdf; MulberryKan\_BPEnergy-COMPLAINT.pdf; ONEOK v Learjet.pdf; RFP for Bid Event EVT0008212 for BDR0009083 (1).pdf; Unconscionable Acts Statute 050\_006\_0106\_k.pdf

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**James Young**

Attorney

[My Bio](#)

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**F:** (904) 361-4307

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**Sent:** Thursday, May 4, 2023 10:33 AM  
**To:** Jack, Melanie; Oleen, Fran  
**Cc:** Juan Martinez x2192  
**Subject:** Research Part 3  
**Attachments:** Cert Roses v Symmetry Class Action 04.15.2022.pdf; Certified Roses v Symmetry Motion to stay 04.14.2022.pdf; CPS v Energy Transfer - Original Petition 03.19.2021.pdf; CPS v Koch - original petition 03.23.2021.pdf; CPS v Maquarie - original petition 03.22.2021.pdf; CPS v Occidental - petition 03.23.2021.pdf; CPS v Sequent - petition 03.23.2021.pdf; CPS v Symmetry - original petition 03.22.2021.pdf; CPS v Tenaska - petition 03.22.2021.pdf; CPS v Twin Eagle - petition 03.23.2021.pdf; CPS v Upstream - petition 03.22.2021.pdf; MIECO v Pioneer - Mico answer to counterclaims 10.19.2021.pdf; MIECO v Pioneer Civil 08.09.2021.pdf; MIECO v Vitol Civil 11.12.2021.pdf; Motion for Sanctions.pdf; Mulberry v BP 08.09.2021.pdf; Symmetry and Clearwater v Spire 06.10.2022.pdf; Symmetry v. USA 04.20.2022.pdf; Targa v. Koch Energy Civil 04.15.2021.pdf; Targa v. MIECO Civil 04.07.2021.pdf; Texas Griddy AGO 02.28.2021.pdf; Texas Griddy Class Action 02.22.2021.pdf; Texas MDL 14 23 00095 CV Petition.pdf; Texas MDL 14 23 00096 CV Petition.pdf; Texas MDL 14 23 00097 CV Petition.pdf; Vacquero v MIECO - notice of removal 07.12.2021.pdf; Vaquero v MIECO - MIECO answer to counterclaim 07.19.2021.pdf; Vaquero v MIECO - motion to transfer 07.19.2021.pdf

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**From:** Jack, Melanie  
**Sent:** Thursday, May 4, 2023 10:46 AM  
**To:** 'James Young x6172'  
**Cc:** Oleen, Fran; Juan Martinez x2192  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Thank you

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
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**Sent:** Thursday, May 4, 2023 9:58 AM  
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**Cc:** Oleen, Fran <Fran.Oleen@ag.ks.gov>; Juan Martinez x2192 <juanmartinez@forthepeople.com>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Sure. Adding Juan, as he was party to some communications as well.

We will begin forwarding you any and all emails to and from counsel.

We had two discussions about narrowing subpoena requests if they agreed to produce. They never agreed to produce so there are no agreements.

I will send you everything in my electronic file.

**James Young**  
Attorney  
[My Bio](#)

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**Sent:** Thursday, May 4, 2023 10:54 AM  
**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Subject:** \*EXT\* Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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James,

Due to the two Macquarie litigation cases, it is imperative I have access to all investigation, research and litigation documents including communications with counsel for Macquarie.

For example, at the meet and confer(s) did you offer to limit a subpoena request is some way? The most pressing case is the subpoena enforcement litigation.

I can't know what is missing in the documents if I don't know they exist. The documents that form the basis of the CEA petition are subject to discovery. It is impossible for me to know the perimeters of discovery without some guidance.

Your help is appreciated.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division

Office of Kansas Attorney General Kris Kobach  
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Topeka, KS 66612  
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**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Sent:** Wednesday, May 3, 2023 9:43 AM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; 'Takumyo, Kimmie' <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Doug will you please look into this and let us know what you find.

Melanie, can you be more specific about the documents in Macquarie? Do you mean documents that were produced by Macquarie or something else?

**James Young**  
Attorney  
[My Bio](#)

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**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Wednesday, May 3, 2023 10:19 AM  
**To:** 'Takumyo, Kimmie' <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

Cc: James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
Subject: \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good morning,

After review of the three thumb drives sent to us, I am having problems opening some of the files. I am not a tech person, but my IT person tells me we need a key or some other way to open these files:

NAME	DATE MODIFIED	TYPE	SIZE
2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	DAT File	210
2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	OPT File	856
CE_001	9/16/2022 4:39 PM	DAT File	39 KB
CE_001	9/16/2022 4:30 PM	OPT File	51 KB
MEL001B	9/8/2022 6:02 PM	DAT File	651 KB
MEL001B	9/8/2022 5:57 PM	OPT File	358 KB

Please clarify if these file are the uncoded documents from Relativity.

Also, it appears the documents returned to us do not contain the full investigation conducted by Morgan and Morgan.

Specifically, I am unable to locate any documents related to the Macquarie investigation/litigation. Please advise.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
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Topeka, KS 66612  
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## Hutchison, Robert

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**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 10:47 AM  
**To:** Jack, Melanie  
**Cc:** Oleen, Fran; Juan Martinez x2192  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Also, let me know if the data/docs we sent previously are still not able to load. I talked to our folks and Epiq and they say you have the correct load files, but they can walk you through it.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**To:** James Young x6172 <JYoung@ForThePeople.com>  
**Cc:** Fran.Oleen <Fran.Oleen@ag.ks.gov>; Juan Martinez x2192 <juanmartinez@forthepeople.com>  
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## Thank you

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**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>

**Subject:** \*EXT\* Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>

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	2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	OPT File	856
<b>CE_001</b>				
	CE_001	9/16/2022 4:39 PM	DAT File	39 KB
	CE_001	9/16/2022 4:30 PM	OPT File	51 KB
<b>MEL001B</b>				
	MEL001B	9/8/2022 6:02 PM	DAT File	651 KB
	MEL001B	9/8/2022 5:57 PM	OPT File	358 KB

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Specifically, I am unable to locate any documents related to the Macquarie investigation/litigation. Please advise.

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## Hutchison, Robert

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**From:** Jack, Melanie  
**Sent:** Thursday, May 4, 2023 11:30 AM  
**To:** 'James Young x6172'  
**Cc:** Oleen, Fran; Juan Martinez x2192  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Will you provide the name and phone number for the person at Epiq to assist us with the files? Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
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James Young  
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## My Bio

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## Thank you

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Consumer Protection

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**Cc:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Melanie, can you be more specific about the documents in Macquarie? Do you mean documents that were produced by Macquarie or something else?

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**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>

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Good morning,

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 2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	DAT File	210
 2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	OPT File	856
<hr/>			
 CE_001	9/16/2022 4:39 PM	DAT File	39 KB
 CE_001	9/16/2022 4:30 PM	OPT File	51 KB
<hr/>			
 MEL001B	9/8/2022 6:02 PM	DAT File	651 KB
 MEL001B	9/8/2022 5:57 PM	OPT File	358 KB

Please clarify if these file are the uncoded documents from Relativity.

Also, it appears the documents returned to us do not contain the full investigation conducted by Morgan and Morgan.



Specifically, I am unable to locate any documents related to the Macquarie investigation/litigation. Please advise.

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Consumer Protection  
Public Protection Division  
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## Hutchison, Robert

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**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 12:48 PM  
**To:** Jack, Melanie  
**Cc:** Oleen, Fran; Juan Martinez x2192; Patrick Mathews x4676  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Patrick Mathews is copied here. He is our principle contact with Epiq.

I believe he can help you get these load issues resolved. I think Epiq charges us to talk to them, so would like to see if we can handle it in house first.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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MEL001B	9/8/2022 5:57 PM	OPT File	358 KB

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Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Thursday, May 4, 2023 2:30 PM  
**To:** 'James Young x6172'  
**Cc:** Oleen, Fran; Juan Martinez x2192; Patrick Mathews x4676; Sprague, Bart  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Patrick,

My IT person, Bart, is available tomorrow (Friday) to discuss these files. Is there a good time for you?

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
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**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Thursday, May 4, 2023 12:48 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Cc:** Oleen, Fran <Fran.Oleen@ag.ks.gov>; Juan Martinez x2192 <juanmartinez@forthepeople.com>; Patrick Mathews x4676 <pmathews@forthepeople.com>  
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Patrick Mathews is copied here. He is our principle contact with Epiq.

I believe he can help you get these load issues resolved. I think Epiq charges us to talk to them, so would like to see if we can handle it in house first.

**James Young**

Attorney

[My Bio](#)

**P:** (904) 361-0012

**F:** (904) 361-4307

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Will you provide the name and phone number for the person at Epiq to assist us with the files? Thank you.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

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**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Sent:** Thursday, May 4, 2023 10:47 AM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>  
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Also, let me know if the data/docs we sent previously are still not able to load. I talked to our folks and Epiq and they say you have the correct load files, but they can walk you through it.

**James Young**  
Attorney  
[My Bio](#)

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**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Thursday, May 4, 2023 11:46 AM  
**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>  
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Thank you

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**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Sent:** Thursday, May 4, 2023 9:58 AM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Sure. Adding Juan, as he was party to some communications as well.

We will begin forwarding you any and all emails to and from counsel.

We had two discussions about narrowing subpoena requests if they agreed to produce. They never agreed to produce so there are no agreements.

I will send you everything in my electronic file.

**James Young**  
Attorney  
[My Bio](#)

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**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Thursday, May 4, 2023 10:54 AM  
**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Subject:** \*EXT\* Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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James,

Due to the two Macquarie litigation cases, it is imperative I have access to all investigation, research and litigation documents including communications with counsel for Macquarie.

For example, at the meet and confer(s) did you offer to limit a subpoena request is some way? The most pressing case is the subpoena enforcement litigation.

I can't know what is missing in the documents if I don't know they exist. The documents that form the basis of the CEA petition are subject to discovery. It is impossible for me to know the perimeters of discovery without some guidance.

Your help is appreciated.

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---

**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Sent:** Wednesday, May 3, 2023 9:43 AM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; 'Takumyo, Kimmie' <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Doug will you please look into this and let us know what you find.

Melanie, can you be more specific about the documents in Macquarie? Do you mean documents that were produced by Macquarie or something else?

**James Young**  
Attorney  
[My Bio](#)

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**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Wednesday, May 3, 2023 10:19 AM  
**To:** 'Takumyo, Kimmie' <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good morning,

After review of the three thumb drives sent to us, I am having problems opening some of the files. I am not a tech person, but my IT person tells me we need a key or some other way to open these files:

 2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	DAT File	210
 2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	OPT File	856
<b>FILENAME</b>	<b>DATE RECEIVED</b>	<b>TYPE</b>	<b>SIZE</b>
 CE_001	9/16/2022 4:39 PM	DAT File	39 KB
 CE_001	9/16/2022 4:30 PM	OPT File	51 KB

 MEL001B	9/8/2022 6:02 PM	DAT File	651 KB
 MEL001B	9/8/2022 5:57 PM	OPT File	358 KB

Please clarify if these file are the uncoded documents from Relativity.

Also, it appears the documents returned to us do not contain the full investigation conducted by Morgan and Morgan.

Specifically, I am unable to locate any documents related to the Macquarie investigation/litigation. Please advise.

Melanie Jack  
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Consumer Protection  
Public Protection Division  
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## Hutchison, Robert

---

**From:** Patrick Mathews x4676 <pmathews@forthepeople.com>  
**Sent:** Thursday, May 4, 2023 2:41 PM  
**To:** Jack, Melanie; James Young x6172  
**Cc:** Oleen, Fran; Juan Martinez x2192; Sprague, Bart  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Sure. My day is flexible for scheduling a call. I am available during the following time periods:

9:00 AM CST – 10:00 AM CST – Free  
11:30 AM CST – 3:30 PM CST - Free

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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**Subject:** \*EXT\* RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Attorney

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---

**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Sent:** Thursday, May 4, 2023 9:58 AM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Sure. Adding Juan, as he was party to some communications as well.

We will begin forwarding you any and all emails to and from counsel.

We had two discussions about narrowing subpoena requests if they agreed to produce. They never agreed to produce so there are no agreements.

I will send you everything in my electronic file.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**Sent:** Thursday, May 4, 2023 10:54 AM  
**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Subject:** \*EXT\* Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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James,

Due to the two Macquarie litigation cases, it is imperative I have access to all investigation, research and litigation documents including communications with counsel for Macquarie.

For example, at the meet and confer(s) did you offer to limit a subpoena request in some way? The most pressing case is the subpoena enforcement litigation.

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**Cc:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Doug will you please look into this and let us know what you find.

Melanie, can you be more specific about the documents in Macquarie? Do you mean documents that were produced by Macquarie or something else?

**James Young**  
Attorney  
[My Bio](#)

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**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good morning,

After review of the three thumb drives sent to us, I am having problems opening some of the files. I am not a tech person, but my IT person tells me we need a key or some other way to open these files:

 2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	DAT File	210
 2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	OPT File	856
<b>FILENAME</b>	<b>DATE MODIFIED</b>	<b>TYPE</b>	<b>SIZE</b>
 CE_001	9/16/2022 4:39 PM	DAT File	39 KB
 CE_001	9/16/2022 4:30 PM	OPT File	51 KB

 MEL001B	9/8/2022 6:02 PM	DAT File	651 KB
 MEL001B	9/8/2022 5:57 PM	OPT File	358 KB

Please clarify if these file are the uncoded documents from Relativity.

Also, it appears the documents returned to us do not contain the full investigation conducted by Morgan and Morgan.

Specifically, I am unable to locate any documents related to the Macquarie investigation/litigation. Please advise.

Melanie Jack  
 First Assistant Attorney General  
 Consumer Protection  
 Public Protection Division  
 Office of Kansas Attorney General Kris Kobach  
 120 SW 10th Ave., 2nd Floor  
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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Thursday, May 4, 2023 3:15 PM  
**To:** 'Patrick Mathews x4676'  
**Cc:** Sprague, Bart  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

How about tomorrow at 1:30 PM?

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Thursday, May 4, 2023 2:41 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>; Sprague, Bart <[Bart.Sprague@ag.ks.gov](mailto:Bart.Sprague@ag.ks.gov)>  
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Good afternoon,

Sure. My day is flexible for scheduling a call. I am available during the following time periods:

9:00 AM CST – 10:00 AM CST – Free  
11:30 AM CST – 3:30 PM CST - Free



Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**

Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, May 4, 2023 2:30 PM

**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Sprague, Bart <[Bart.Sprague@ag.ks.gov](mailto:Bart.Sprague@ag.ks.gov)>

**Subject:** \*EXT\* RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Patrick,

My IT person, Bart, is available tomorrow (Friday) to discuss these files. Is there a good time for you?

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
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**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Sent:** Thursday, May 4, 2023 12:48 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
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Patrick Mathews is copied here. He is our principle contact with Epiq.

I believe he can help you get these load issues resolved. I think Epiq charges us to talk to them, so would like to see if we can handle it in house first.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

Will you provide the name and phone number for the person at Epiq to assist us with the files? Thank you.

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First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
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Also, let me know if the data/docs we sent previously are still not able to load. I talked to our folks and Epiq and they say you have the correct load files, but they can walk you through it.

**James Young**  
Attorney  
[My Bio](#)

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## Thank you

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**Cc:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
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**Sent:** Wednesday, May 3, 2023 10:19 AM

To: 'Takumyo, Kimmie' <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
Cc: James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
Subject: \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION: Use caution when clicking on links or opening attachments in this external email.**

Good morning,

After review of the three thumb drives sent to us, I am having problems opening some of the files. I am not a tech person, but my IT person tells me we need a key or some other way to open these files:

name	Date modified	type	size
2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	DAT File	210
2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	OPT File	856
CE_001	9/16/2022 4:39 PM	DAT File	39 KB
CE_001	9/16/2022 4:30 PM	OPT File	51 KB
MEL001B	9/8/2022 6:02 PM	DAT File	651 KB
MEL001B	9/8/2022 5:57 PM	OPT File	358 KB

Please clarify if these file are the uncoded documents from Relativity.

Also, it appears the documents returned to us do not contain the full investigation conducted by Morgan and Morgan.

Specifically, I am unable to locate any documents related to the Macquarie investigation/litigation. Please advise.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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## Hutchison, Robert

---

**From:** Sprague, Bart  
**Sent:** Thursday, May 4, 2023 3:39 PM  
**To:** Jack, Melanie; 'Patrick Mathews x4676'  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

Perfect.

Bart

Bart Sprague  
IT Special Projects Coordinator  
Office of Kansas Attorney General Kris W. Kobach  
120 SW 10<sup>th</sup> Avenue, 2<sup>nd</sup> Floor  
Topeka, Kansas 66612  
785.296.7743  
[bart.sprague@ag.ks.gov](mailto:bart.sprague@ag.ks.gov)  
[www.ag.ks.gov](http://www.ag.ks.gov)

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---

**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Thursday, May 4, 2023 3:15 PM  
**To:** 'Patrick Mathews x4676' <pmathews@forthepeople.com>  
**Cc:** Sprague, Bart <Bart.Sprague@ag.ks.gov>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

How about tomorrow at 1:30 PM?

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
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**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>

**Sent:** Thursday, May 4, 2023 2:41 PM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>; Sprague, Bart <[Bart.Sprague@ag.ks.gov](mailto:Bart.Sprague@ag.ks.gov)>

**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Sure. My day is flexible for scheduling a call. I am available during the following time periods:

9:00 AM CST – 10:00 AM CST – Free

11:30 AM CST – 3:30 PM CST - Free

Respectfully,

Patrick

**Patrick Mathews, CEDS**

SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**

Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>; Sprague, Bart <[Bart.Sprague@ag.ks.gov](mailto:Bart.Sprague@ag.ks.gov)>

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Respectfully,

Patrick

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---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Thursday, May 4, 2023 2:30 PM  
**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; Sprague, Bart <[Bart.Sprague@ag.ks.gov](mailto:Bart.Sprague@ag.ks.gov)>  
**Subject:** \*EXT\* RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Patrick,

My IT person, Bart, is available tomorrow (Friday) to discuss these files. Is there a good time for you?

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
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---

**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Sent:** Thursday, May 4, 2023 12:48 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Patrick Mathews is copied here. He is our principle contact with Epiq.

I believe he can help you get these load issues resolved. I think Epiq charges us to talk to them, so would like to see if we can handle it in house first.

**James Young**

Attorney

[My Bio](#)

**P:** (904) 361-0012

**F:** (904) 361-4307

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, May 4, 2023 12:30 PM

**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>

**Subject:** \*EXT\* RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Will you provide the name and phone number for the person at Epiq to assist us with the files? Thank you.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Sent:** Thursday, May 4, 2023 10:47 AM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Also, let me know if the data/docs we sent previously are still not able to load. I talked to our folks and Epiq and they say you have the correct load files, but they can walk you through it.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Thursday, May 4, 2023 11:46 AM  
**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>  
**Subject:** \*EXT\* RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

## Thank you

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242

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**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Sent:** Thursday, May 4, 2023 9:58 AM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>  
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Sure. Adding Juan, as he was party to some communications as well.

We will begin forwarding you any and all emails to and from counsel.

We had two discussions about narrowing subpoena requests if they agreed to produce. They never agreed to produce so there are no agreements.

I will send you everything in my electronic file.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Thursday, May 4, 2023 10:54 AM  
**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

Cc: Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>

Subject: \*EXT\* Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

James,

Due to the two Macquarie litigation cases, it is imperative I have access to all investigation, research and litigation documents including communications with counsel for Macquarie.

For example, at the meet and confer(s) did you offer to limit a subpoena request in some way? The most pressing case is the subpoena enforcement litigation.

I can't know what is missing in the documents if I don't know they exist. The documents that form the basis of the CEA petition are subject to discovery. It is impossible for me to know the perimeters of discovery without some guidance.

Your help is appreciated.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
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Cc: Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epigglobal.com](mailto:Morgan@epigglobal.com)>; Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>

Subject: RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Doug will you please look into this and let us know what you find.

Melanie, can you be more specific about the documents in Macquarie? Do you mean documents that were produced by Macquarie or something else?

**James Young**  
Attorney  
[My Bio](#)

P: (904) 361-0012  
F: (904) 361-4307  
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**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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 2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	OPT File	856

NAME	DATE MODIFIED	TYPE	SIZE
 CE_001	9/16/2022 4:39 PM	DAT File	39 KB
 CE_001	9/16/2022 4:30 PM	OPT File	51 KB
 MEL001B	9/8/2022 6:02 PM	DAT File	651 KB
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 First Assistant Attorney General  
 Consumer Protection  
 Public Protection Division  
 Office of Kansas Attorney General Kris Kobach  
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## Hutchison, Robert

---

**From:** Patrick Mathews x4676 <pmathews@forthepeople.com>  
**Sent:** Thursday, May 4, 2023 3:51 PM  
**To:** Sprague, Bart; Jack, Melanie  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

That will work for me. Please send an invite and I'll accept.

I look forward to talking with you tomorrow.

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231  
F: (407) 563-8026  
A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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---

**From:** Sprague, Bart <Bart.Sprague@ag.ks.gov>  
**Sent:** Thursday, May 4, 2023 3:39 PM

**To:** melanie.Jack <melanie.Jack@ag.ks.gov>; Patrick Mathews x4676 <pmatthews@forthepeople.com>  
**Subject:** \*EXT\* RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

---

Perfect.

Bart

Bart Sprague  
IT Special Projects Coordinator  
Office of Kansas Attorney General Kris W. Kobach  
120 SW 10<sup>th</sup> Avenue, 2<sup>nd</sup> Floor  
Topeka, Kansas 66612  
785.296.7743  
[bart.sprague@ag.ks.gov](mailto:bart.sprague@ag.ks.gov)  
[www.ag.ks.gov](http://www.ag.ks.gov)

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---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Thursday, May 4, 2023 3:15 PM  
**To:** 'Patrick Mathews x4676' <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Cc:** Sprague, Bart <[Bart.Sprague@ag.ks.gov](mailto:Bart.Sprague@ag.ks.gov)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

How about tomorrow at 1:30 PM?

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>  
**Sent:** Thursday, May 4, 2023 2:41 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>; Sprague, Bart <[Bart.Sprague@ag.ks.gov](mailto:Bart.Sprague@ag.ks.gov)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good afternoon,

Sure. My day is flexible for scheduling a call. I am available during the following time periods:

9:00 AM CST – 10:00 AM CST – Free  
11:30 AM CST – 3:30 PM CST - Free

Respectfully,

Patrick

**Patrick Mathews, CEDS**  
SLS Project Operations Manager

[Book time with Patrick Mathews x4676](#)

[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)

P: (407) 563-3231

**Patrick Mathews**  
Project Manager

P: (407) 563-3231

F: (407) 563-8026

A: 16225 Park Ten Place Suite 500, Houston, TX 77084

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---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Thursday, May 4, 2023 2:30 PM  
**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>; Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>; Sprague, Bart <[Bart.Sprague@ag.ks.gov](mailto:Bart.Sprague@ag.ks.gov)>  
**Subject:** \*EXT\* RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

---

Patrick,

My IT person, Bart, is available tomorrow (Friday) to discuss these files. Is there a good time for you?

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Sent:** Thursday, May 4, 2023 12:48 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>; Patrick Mathews x4676 <[pmatthews@forthepeople.com](mailto:pmatthews@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Patrick Mathews is copied here. He is our principle contact with Epiq.

I believe he can help you get these load issues resolved. I think Epiq charges us to talk to them, so would like to see if we can handle it in house first.

**James Young**

Attorney

[My Bio](#)

**P:** (904) 361-0012

**F:** (904) 361-4307

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>

**Sent:** Thursday, May 4, 2023 12:30 PM

**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>

**Subject:** \*EXT\* RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

Will you provide the name and phone number for the person at Epiq to assist us with the files? Thank you.

Melanie Jack

First Assistant Attorney General

Consumer Protection

Public Protection Division

Office of Kansas Attorney General Kris Kobach

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

(785)368-8242

Fax: 785-291-3699

[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)

[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Sent:** Thursday, May 4, 2023 10:47 AM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Also, let me know if the data/docs we sent previously are still not able to load. I talked to our folks and Epiq and they say you have the correct load files, but they can walk you through it.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Thursday, May 4, 2023 11:46 AM  
**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>  
**Subject:** \*EXT\* RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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---

## Thank you

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)



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---

**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Sent:** Thursday, May 4, 2023 9:58 AM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>  
**Subject:** RE: Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Sure. Adding Juan, as he was party to some communications as well.

We will begin forwarding you any and all emails to and from counsel.

We had two discussions about narrowing subpoena requests if they agreed to produce. They never agreed to produce so there are no agreements.

I will send you everything in my electronic file.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Thursday, May 4, 2023 10:54 AM  
**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Subject:** \*EXT\* Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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James,

Due to the two Macquarie litigation cases, it is imperative I have access to all investigation, research and litigation documents including communications with counsel for Macquarie.

For example, at the meet and confer(s) did you offer to limit a subpoena request in some way? The most pressing case is the subpoena enforcement litigation.

I can't know what is missing in the documents if I don't know they exist. The documents that form the basis of the CEA petition are subject to discovery. It is impossible for me to know the perimeters of discovery without some guidance.

Your help is appreciated.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
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---

**From:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Sent:** Wednesday, May 3, 2023 9:43 AM

**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>; 'Takumyo, Kimmie' <[Kimiyo.Takumyo@epiglobal.com](mailto:Kimiyo.Takumyo@epiglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>

**Cc:** Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiglobal.com](mailto:Morgan@epiglobal.com)>; Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>

**Subject:** RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Doug will you please look into this and let us know what you find.

Melanie, can you be more specific about the documents in Macquarie? Do you mean documents that were produced by Macquarie or something else?

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---



**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Wednesday, May 3, 2023 10:19 AM  
**To:** 'Takumyo, Kimmie' <[Kimiyo.Takumyo@epiqglobal.com](mailto:Kimiyo.Takumyo@epiqglobal.com)>; Douglas Acklin x6133 <[dacklin@forthepeople.com](mailto:dacklin@forthepeople.com)>  
**Cc:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>; Patrick Mathews x4676 <[pmathews@forthepeople.com](mailto:pmathews@forthepeople.com)>; EMS-DL-Morgan <[Morgan@epiqglobal.com](mailto:Morgan@epiqglobal.com)>; Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Subject:** \*EXT\* RE: 12116 - Kansas Price Gouging (12361420): Return of Uncoded Original Form Productions to Kansas AG - Kansas Gas Price Gouging Case

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Good morning,

After review of the three thumb drives sent to us, I am having problems opening some of the files. I am not a tech person, but my IT person tells me we need a key or some other way to open these files:

 2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	DAT File	210
 2022.04.25-SPKSAG-PROD001_export	4/25/2022 4:47 PM	OPT File	856
<b>FILENAME</b>	<b>DATE RECEIVED</b>	<b>TYPE</b>	<b>SIZE</b>
 CE_001	9/16/2022 4:39 PM	DAT File	39 KB
 CE_001	9/16/2022 4:30 PM	OPT File	51 KB

 MEL001B	9/8/2022 6:02 PM	DAT File	651 KB
 MEL001B	9/8/2022 5:57 PM	OPT File	358 KB

Please clarify if these file are the uncoded documents from Relativity.

Also, it appears the documents returned to us do not contain the full investigation conducted by Morgan and Morgan.

Specifically, I am unable to locate any documents related to the Macquarie investigation/litigation. Please advise.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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## Hutchison, Robert

---

**Subject:** Morgan and Morgan docs  
**Location:** Melanie's office

**Start:** Fri 5/5/2023 1:30 PM  
**End:** Fri 5/5/2023 2:00 PM

**Recurrence:** (none)

**Meeting Status:** Meeting organizer

**Organizer:** Jack, Melanie  
**Required Attendees:** Sprague, Bart; Patrick Mathews x4676

Patrick by phone. Please call 785 368-8242

## Hutchison, Robert

---

**Subject:** Morgan and Morgan docs  
**Location:** Melanie's office

**Start:** Fri 5/5/2023 1:30 PM  
**End:** Fri 5/5/2023 2:00 PM  
**Show Time As:** Tentative

**Recurrence:** (none)

**Meeting Status:** Not yet responded

**Organizer:** Jack, Melanie  
**Required Attendees:** Sprague, Bart; Patrick Mathews x4676

Patrick by phone. Please call 785 368-8242

## Hutchison, Robert

---

**Subject:** Morgan and Morgan docs  
**Location:** Melanie's office

**Start:** Fri 5/5/2023 1:30 PM  
**End:** Fri 5/5/2023 2:00 PM

**Recurrence:** (none)

**Meeting Status:** Accepted

**Organizer:** Jack, Melanie  
**Required Attendees:** Sprague, Bart; Patrick Mathews x4676

Patrick by phone. Please call 785 368-8242

## Hutchison, Robert

---

**From:** Patrick Mathews x4676 <pmathews@forthepeople.com>  
**Sent:** Thursday, May 4, 2023 3:55 PM  
**To:** Jack, Melanie  
**Subject:** Accepted: Morgan and Morgan docs

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Friday, May 5, 2023 10:33 AM  
**To:** jyoung@forthepeople.com  
**Cc:** Oleen, Fran  
**Subject:** Macquarie subpoena

Good morning,

The August 18, 2022 subpoena issued to Macquarie references an Exhibit A, a template for data. May I have a copy of that.

Will you kindly provide the entire Macquarie response to this subpoena?

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, May 5, 2023 12:33 PM  
**To:** Jack, Melanie; Oleen, Fran  
**Cc:** Juan Martinez x2192  
**Subject:** FW: In the Matter of the Investigation of Natural Gas Pricing Winter Storm Uri-Response of CIMA Energy, LP  
**Attachments:** CP-21-002300\_CIMA Energy LP\_9.16.22 Production Transmittal-CONFIDENTIAL.pdf; CP-21-002300\_CIMA Energy LP Response to KSAG Subpoena-CONFIDENTIAL 9.16.22.pdf

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Here is the production letter and response from Macquarie. The documents were all loaded into relativity and you should have them. I am looking for the exhibit to the subpoena, but don't see it. I will send a separate email on that one shortly.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Yuffee, Michael <michael.yuffee@bakerbotts.com>  
**Sent:** Friday, September 16, 2022 8:27 PM  
**To:** James Young x6172 <JYoung@ForThePeople.com>  
**Cc:** Lipe, Justin <justin.lipe@bakerbotts.com>; Layrisson, Louie <louie.layrisson@bakerbotts.com>; Jim Stinson (jstinson@cima-energy.com) <jstinson@cima-energy.com>  
**Subject:** \*EXT\* In the Matter of the Investigation of Natural Gas Pricing Winter Storm Uri- Response of CIMA Energy, LP

**CAUTION:** Use caution when clicking on links or opening attachments in this external email.

---

**CONTAINS CONFIDENTIAL INFORMATION -- DO NOT RELEASE PURSUANT TO K.S.A. 60-3320(4) & AUGUST 5, 2021 CONFIDENTIALITY AGREEMENT**

Mr. Young-

Attached please find:

- 1) Transmittal letter
- 2) Narrative responses to information requests contained in the subpoena
- 3) A link to a datasite containing the data provided in the above responses.

You will be receiving a separate email with a hyperlink to the datasite. The hyperlink password is **9b66t5hugy**

The zip file password is **Ch@rlie\_Ech0**

Please contact me if you have any questions.

Regards-  
Michael Yuffee

**Michael Yuffee**

*Partner*

**Baker Botts L.L.P.**

[michael.yuffee@bakerbotts.com](mailto:michael.yuffee@bakerbotts.com)

T +1.202.639.1132

F +1.202.585.1013

M +1.202.320.4245

700 K Street, NW  
Washington, DC 20001  
USA



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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, May 5, 2023 12:40 PM  
**To:** Jack, Melanie  
**Cc:** Oleen, Fran; Juan Martinez x2192; mbrowne; dkovel; Orié Braun  
**Subject:** RE: Macquarie subpoena

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Melanie:

I don't see an exhibit A in my files, but adding others to confirm. Not sure what to make of that. Maybe Juan, Orié or Matt will recall.

Also, for the non-AG folks, I sent the KSAG folks the Macquarie production letter and cover email moments ago. Does anyone recall subsequent production from them? I do not have record of any.

**James Young**  
Attorney  
[My Bio](#)

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---

**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Friday, May 5, 2023 11:33 AM  
**To:** James Young x6172 <JYoung@ForThePeople.com>  
**Cc:** Fran.Oleen <Fran.Oleen@ag.ks.gov>  
**Subject:** \*EXT\* Macquarie subpoena

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---

Good morning,

The August 18, 2022 subpoena issued to Macquarie references an Exhibit A, a template for data. May I have a copy of that.

Will you kindly provide the entire Macquarie response to this subpoena?

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, May 5, 2023 12:54 PM  
**To:** Oleen, Fran; Jack, Melanie  
**Subject:** FW: \*EXT\* Response of Macquarie Energy, LLC to Subpoena in In The Matter of the Investigation of Natural Gas Pricing Winter Storm Uri- KSAG File No: CP21-002300

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This was also part of the production email

**James Young**

Attorney

[My Bio](#)

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---

**From:** Michael Yuffee <michael.yuffee@bakerbotts.com>  
**Sent:** Friday, September 9, 2022 6:26 PM  
**To:** James Young x6172 <JYoung@ForThePeople.com>  
**Subject:** \*EXT\* Response of Macquarie Energy, LLC to Subpoena in In The Matter of the Investigation of Natural Gas Pricing Winter Storm Uri- KSAG File No: CP21-002300

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The following file(s) have been sent to you from  
[michael.yuffee@bakerbotts.com](mailto:michael.yuffee@bakerbotts.com)

[MEL001.zip](#) 1.28 GB

**Password: 4iv3d7cw3i**

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The secure message expires on 9/23/22 5:25:43 PM

If the link above does not open, please copy and paste the following URL into your browser:  
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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, May 5, 2023 12:56 PM  
**To:** Oleen, Fran; Jack, Melanie  
**Cc:** Orié Braun; Juan Martinez x2192; mbrowne; dkovel  
**Subject:** FW: Macquarie subpoena  
**Attachments:** Gas Supplier Subpoean Exhibit A.xlsx

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We believe this was not included in the subpoena that was served. No one recalls Macquarie mentioning it though.

### James Young

Attorney

[My Bio](#)

P: (904) 361-0012

F: (904) 361-4307

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Friday, May 5, 2023 11:33 AM  
**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Subject:** \*EXT\* Macquarie subpoena

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---

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Will you kindly provide the entire Macquarie response to this subpoena?

Thank you.



Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
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(785)368-8242  
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[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Friday, May 5, 2023 2:25 PM  
**To:** 'James Young x6172'  
**Cc:** Oleen, Fran; Juan Martinez x2192; mbrowne; dkovel; Orié Braun  
**Subject:** RE: Macquarie subpoena

James,

The production you sent me is from CIMA, not Macquarie.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, May 5, 2023 12:40 PM  
**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Cc:** Oleen, Fran <Fran.Oleen@ag.ks.gov>; Juan Martinez x2192 <juanmartinez@forthepeople.com>; mbrowne <mbrowne@brownepelican.com>; dkovel <dkovel@kmlp.com>; Orié Braun <obraun@kmlp.com>  
**Subject:** RE: Macquarie subpoena

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Melanie:

I don't see an exhibit A in my files, but adding others to confirm. Not sure what to make of that. Maybe Juan, Orié or Matt will recall.

Also, for the non-AG folks, I sent the KSAG folks the Macquarie production letter and cover email moments ago. Does anyone recall subsequent production from them? I do not have record of any.

**James Young**

Attorney

[My Bio](#)

P: (904) 361-0012

F: (904) 361-4307

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Friday, May 5, 2023 11:33 AM  
**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>  
**Cc:** Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>  
**Subject:** \*EXT\* Macquarie subpoena

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---

Good morning,

The August 18, 2022 subpoena issued to Macquarie references an Exhibit A, a template for data. May I have a copy of that.

Will you kindly provide the entire Macquarie response to this subpoena?

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Friday, May 5, 2023 2:27 PM  
**To:** 'James Young x6172'; Oleen, Fran  
**Subject:** RE: \*EXT\* Response of Macquarie Energy, LLC to Subpoena in In The Matter of the Investigation of Natural Gas Pricing Winter Storm Uri- KSAG File No: CP21-002300

I am not able to open these files. I can't log in with the password.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
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**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, May 5, 2023 12:54 PM  
**To:** Oleen, Fran <Fran.Oleen@ag.ks.gov>; Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Subject:** FW: \*EXT\* Response of Macquarie Energy, LLC to Subpoena in In The Matter of the Investigation of Natural Gas Pricing Winter Storm Uri- KSAG File No: CP21-002300

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**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Michael Yuffee <[michael.yuffee@bakerbotts.com](mailto:michael.yuffee@bakerbotts.com)>

**Sent:** Friday, September 9, 2022 6:26 PM

**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Subject:** \*EXT\* Response of Macquarie Energy, LLC to Subpoena in In The Matter of the Investigation of Natural Gas Pricing Winter Storm Uri- KSAG File No: CP21-002300

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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Monday, May 8, 2023 7:27 AM  
**To:** Jack, Melanie  
**Cc:** Oleen, Fran; Juan Martinez x2192; mbrowne; dkovel; Orié Braun  
**Subject:** RE: Macquarie subpoena

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I believe that is because they shared the same counsel.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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**From:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Sent:** Friday, May 5, 2023 3:25 PM  
**To:** James Young x6172 <JYoung@ForThePeople.com>  
**Cc:** Fran.Oleen <Fran.Oleen@ag.ks.gov>; Juan Martinez x2192 <juanmartinez@forthepeople.com>; mbrowne <mbrowne@brownepelican.com>; dkovel <dkovel@kmlp.com>; Orié Braun <obraun@kmlp.com>  
**Subject:** \*EXT\* RE: Macquarie subpoena

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James,

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Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach



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**Sent:** Friday, May 5, 2023 12:40 PM  
**To:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Cc:** Oleen, Fran <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>; Juan Martinez x2192 <[juanmartinez@forthepeople.com](mailto:juanmartinez@forthepeople.com)>; mbrowne <[mbrowne@brownepelican.com](mailto:mbrowne@brownepelican.com)>; dkovel <[dkovel@kmlp.com](mailto:dkovel@kmlp.com)>; Orié Braun <[obraun@kmlp.com](mailto:obraun@kmlp.com)>  
**Subject:** RE: Macquarie subpoena

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Melanie:

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**From:** Jack, Melanie <[Melanie.Jack@ag.ks.gov](mailto:Melanie.Jack@ag.ks.gov)>  
**Sent:** Friday, May 5, 2023 11:33 AM

To: James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

Cc: Fran.Oleen <[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)>

Subject: \*EXT\* Macquarie subpoena

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Good morning,

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[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
[WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Monday, May 8, 2023 7:30 AM  
**To:** Oleen, Fran; Jack, Melanie  
**Cc:** Juan Martinez x2192  
**Subject:** FW: Response of Macquarie Energy, LLC to Subpoena in In The Matter of the Investigation of Natural Gas Pricing Winter Storm Uri- KSAG File No: CP21-002300  
**Attachments:** CP-21-002300\_Macquarie Energy LLC\_9.9.22 Production Transmittal-CONFIDENTIAL.pdf; CP-21-002300\_Macquarie Energy LLC Response to KSAG Subpoena-CONFIDENTIAL 9.9.22.pdf

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James Young  
Attorney  
[My Bio](#)

P: (904) 361-0012  
F: (904) 361-4307  
A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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---

**From:** Yuffee, Michael <michael.yuffee@bakerbotts.com>  
**Sent:** Friday, September 9, 2022 6:27 PM  
**To:** James Young x6172 <JYoung@ForThePeople.com>  
**Cc:** Norfolk, Ryan <ryan.norfolk@bakerbotts.com>; O'Neill, Sean <sean.oneill@bakerbotts.com>; kevin.pooler@macquarie.com  
**Subject:** \*EXT\* Response of Macquarie Energy, LLC to Subpoena in In The Matter of the Investigation of Natural Gas Pricing Winter Storm Uri- KSAG File No: CP21-002300

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Mr. Young-

Attached please find:

- 1) Transmittal letter
- 2) Narrative responses to information requests contained in the subpoena
- 3) A link to a datasite containing the data provided in the above responses.

You will be receiving a separate email with a hyperlink to the datasite. The hyperlink password is **4iv3d7cw3i**

The zip file password is **Mike\_Ech0)**

Please contact me if you have any questions.

Regards-  
Michael Yuffee

**Michael Yuffee**  
*Partner*

**Baker Botts L.L.P.**  
[michael.yuffee@bakerbotts.com](mailto:michael.yuffee@bakerbotts.com)

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Washington, DC 20001  
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## Hutchison, Robert

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**From:** Jack, Melanie  
**Sent:** Monday, May 8, 2023 8:52 AM  
**To:** 'James Young x6172'; Oleen, Fran  
**Cc:** Juan Martinez x2192  
**Subject:** RE: Response of Macquarie Energy, LLC to Subpoena in In The Matter of the Investigation of Natural Gas Pricing Winter Storm Uri- KSAG File No: CP21-002300

Thank you.

Melanie Jack  
First Assistant Attorney General  
Consumer Protection  
Public Protection Division  
Office of Kansas Attorney General Kris Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612  
(785)368-8242  
Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov)  
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**Sent:** Monday, May 8, 2023 7:30 AM  
**To:** Oleen, Fran <Fran.Oleen@ag.ks.gov>; Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Cc:** Juan Martinez x2192 <juanmartinez@forthepeople.com>  
**Subject:** FW: Response of Macquarie Energy, LLC to Subpoena in In The Matter of the Investigation of Natural Gas Pricing Winter Storm Uri- KSAG File No: CP21-002300

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**To:** James Young x6172 <[JYoung@ForThePeople.com](mailto:JYoung@ForThePeople.com)>

**Cc:** Norfolk, Ryan <[ryan.norfolk@bakerbotts.com](mailto:ryan.norfolk@bakerbotts.com)>; O'Neill, Sean <[sean.oneill@bakerbotts.com](mailto:sean.oneill@bakerbotts.com)>;  
[kevin.pooler@macquarie.com](mailto:kevin.pooler@macquarie.com)

**Subject:** \*EXT\* Response of Macquarie Energy, LLC to Subpoena in In The Matter of the Investigation of Natural Gas Pricing Winter Storm Uri- KSAG File No: CP21-002300

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The zip file password is **Mike\_Ech0)**

Please contact me if you have any questions.

Regards-  
Michael Yuffee

**Michael Yuffee**  
*Partner*

**Baker Botts L.L.P.**  
[michael.yuffee@bakerbotts.com](mailto:michael.yuffee@bakerbotts.com)

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USA



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## Hutchison, Robert

---

**From:** Burrows, Daniel  
**Sent:** Thursday, May 18, 2023 3:48 PM  
**To:** James Young x6172  
**Cc:** Oleen, Fran; Jack, Melanie; Juan Martinez x2192; Tim Fox x26041; dkovel; mbrowne  
**Subject:** RE: Kansas Natural Gas

Mr. Young:

My apologies for the delay in getting back to you.

I thought that we could have a reasonable discussion about the issues here. Despite your vituperative e-mail, I remain hopeful that we can discuss this as professionals and not name-calling children. That's why I requested a phone call to sort out whether there was some misunderstanding. I still think a phone call would be useful.

But let me address a few of your points. First, we have not, to this point, contested that your firm may be entitled to some sort of fee somewhere along the line. Any such fee, however, would be under the contract that you and your firm agreed to when the representation began. And that contract was contingent on a recovery. At best, then, your claim is unripe. *If* any such recovery is obtained, we would be happy to discuss whether and what compensation may be appropriate under section 1.12 of the contract, which says you shall receive a prorated fee. But your resort to other methods of determining your compensation is unsupportable. Early termination was clearly contemplated in the contract and you agreed to the terms of section 1.12. You have no grounds to go back on it now. As long as we are talking about section 1.12, however, I should point out that any fee paid under that provision is subject to offset for the state's damages. Insofar as you hinder our ability to continue pursuing this case, we will consider the additional costs incurred as an appropriate offset.

Second, I'm not sure where you are getting your idiosyncratic definition of "on-going litigation." Two cases are filed in court. They are moving forward. That you may think we have "plenty of time... to create [our] own coding panel, review the documents and record [our] mental impressions in a system [we] pay for" is not particularly relevant. *In re Docking*, 196 P.3d 1149, 1152 (Kan. 2008) (client's ability to avoid harm using successor counsel does not relieve ethical violation; merely delaying client's case is sufficient to violate ethics rules). And, even setting aside ethical duties, your agreement entitled us to even work product as I pointed out in my original email. If you want to be paid, you will provide it to us. You cannot withhold valuable consideration and then turn around and demand a fee. That is not how contracts work.

Again, I believe a phone call could be useful in sorting all this out. In the end, we probably do not want or need your *entire* file on this matter. But we do need to be able to access and review the documents received in the investigation in a way that doesn't require us to start from scratch.

### Dan Burrows

Chief Deputy Attorney General | Office of the Attorney General  
Topeka, Kansas  
Phone: (785) 368-8435  
Email: daniel.burrows@ag.ks.gov

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, April 21, 2023 8:51 AM  
**To:** Burrows, Daniel <Daniel.Burrows@ag.ks.gov>  
**Cc:** Oleen, Fran <Fran.Oleen@ag.ks.gov>; Jack, Melanie <Melanie.Jack@ag.ks.gov>; Juan Martinez x2192 <juanmartinez@forthepeople.com>; Tim Fox x26041 <tfox@forthepeople.com>; dkovel <dkovel@kmlp.com>;



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Dan,

In addition to the preposterous false narrative your boss previously peddled to the media, you have just made some rather serious ethical accusations. Because these allegations impact my co-counsel and colleagues, I have added them to this thread.

We are not refusing to provide Kansas with anything which you are entitled to.

I disagree with your impression that Kansas is in the middle of on-going litigation. The complaint we drafted was filed a little over two months ago and to our knowledge, discovery has not commenced and motions to dismiss have not been ruled upon.

Our original draft, which was shared with your team, was extensively annotated with citations to relevant documents now in your possession. In light of this, I'm not sure I understand how Kansas is being impaired in the Macquarie litigation. There is still plenty of time for you and your time to create your own coding panel, review the documents and record your mental impressions in a system you pay for.

Perhaps you are referring to our work product related to the other targets of the investigation? If so, surely you would agree that there is no current case which triggers an obligation for us to share our work product or mental impressions.

Fla. Bar Ethics Op. 88-11 (Reconsideration) makes clear that "the file generated by a lawyer is the property of the lawyer rather than the client. See, Dowda and Fields, P.A. v. Cobb, 452 So.2d 1140, 1142 (Fla.5th DCA1984). Therefore, other than original papers and documents given to the lawyer by the client or previously paid for by a client, a lawyer is not obligated to provide a client with the lawyer's original file."

Your team asked for the subpoena response materials, and at our own expense, still wholly unreimbursed by Kansas, after being summarily terminated for what can only be described as suspect reasons, we compiled and shipped you the docs and data which responded to the subpoenas we issued.

I understand that you are now also seeking our work product in the form of the attorney notes and impressions our team created on the system we paid for.

We are happy to have a discussion about an arrangement for providing this material as well, but disagree that somehow you are entitled to our work product and mental impressions of the case.

I am not aware of, nor did I instruct anyone to withhold any materials aside from asking Epiq to quickly compile the subpoena responses in isolation in order to get them to you in timely fashion.

During our representation, we spent considerable time and money on behalf of Kansas. Below is a summary of the time and related lodestar based on our hourly rates:

<b>Firm</b>	<b>Hours</b>	<b>Lodestar</b>
Morgan & Morgan	3,642.83	\$2,120,535.52

Kirby McInerney	797	\$514,482.50
Brown Pelican	160.1	\$128,283

In addition to the above time, we also engaged experts and hosted the document review platform for Kansas' benefit. The expenses of such items are \$39,386.53. This does not include the license fees for Relativity, which we absorbed.

Consistent with the law in Kansas, we believe the above amounts are recoverable under either quantum meruit, or some other claim in contract, law, or equity.

As such, we make claim for this amount **(\$2,802,687.50)** and assert a charging lien over any recovery under K.S.A. 7-108. We will, within the appropriate timeframe, also serve you with notice of same.

Should you engage replacement outside counsel for the Macquarie litigation, pursuant to another RFP or otherwise, please let them know of the existence of this lien.

Should you engage replacement outside counsel for continued investigation or litigation against the other responsible parties, which we certainly encourage, we will be happy to discuss an arrangement with the new counsel to save them the time and expense that we undertook.

You dance dangerously close to the line in alleging spoliation and ethical breaches. But this not the first time your office has uttered falsehoods about our team. In the Wall Street Journal article which was conveniently published on the very same day we received our termination letter, AG Kobach was quoted saying that our firm "engaged subcontractors in violation of the agreement" and that our performance was not up to what he expected.

This falsehood is simply over the top and has publicly harmed our respective reputations. Note, unlike AG Kobach, I have never been sanctioned by a court or disciplined by the bar. Rather, I chair our local bar disciplinary committee, serve on the Bar's standing committee on professionalism, and previously chaired the Jacksonville Ethics Commission.

The truth, as you are no doubt aware, is that each attorney and law firm which was deployed on this project, was **specifically approved by the KSAG both verbally and in writing**. Moreover, the principal attorneys who worked on this matter were actually sworn in as Special Assistant Attorneys General by Kansas AG Schmidt, and received certificates in recognition of this honor. Moreover, the quality of our work product which led to the only AG case filed in this matter, was never called into question by a single employee of the KSAG. In fact, quite the opposite is true.

The quotes provided to the Wall Street Journal, along with AG Kobach's social media posts concerning this matter, imply that our firms operated outside of, or in violation of, the contract terms, and provided subpar work resulting in some harm to Kansas.

The broader implication of the story is that we were fired for cause, which clearly was not the case. We ask that you take appropriate steps to retract these falsehoods in order to correct and clarify the record to avoid further impairing our reputation and character.

Despite the new administration's tone and tenor, we do wish you luck in your mission to protect Kansas consumers and hold the responsible parties accountable for their role in price gouging natural gas. You are lucky to have at least two excellent attorneys in your office to see that through.

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Mr. Young:

I am concerned about something one of our attorneys told me recently about the transfer of responsibility for the Kansas natural gas litigation from your firm to our office. Apparently, the hard drive they received from Epiq (the document management company your firm used) lacked any coding on the documents. I'm told Epiq removed all that *at Morgan & Morgan's direction*. Relatedly, I have also been told that you are refusing to provide us with the remainder of the file (such as memos, graphs, and other documents with pertinent case analysis) on the grounds that they are supposedly proprietary work product.

If the above is true, it seems like a violation of attorney ethics rules. Both Florida and Kansas (whose law you subjected yourself to by seeking pro hac admission in our courts), require attorneys to "take steps to the extent reasonably practicable to protect a client's interests" at the termination of representation. Indeed, a recent Florida ethics opinion states that a lawyer "has an ethical obligation to comply with a client's or former client's reasonable request for copies of file material where that information would serve a useful purpose to the client," Fla. Bar Ethics Op. 88-11 (Reconsideration) (Mar. 23, 2021); *see also Fla. Bar v. Varner*, 992 So.2d 224 (Fla. 2008) (attorney disciplined for failing to deliver complete file to successor counsel during ongoing litigation); *Dubose v. Shelnett*, 566 So. 2d 921 (Fla. Dist. Ct. App. 1990) (duty to deliver specifically requested documents to former client); *cf. In re Deines*, 430 P.3d 437 (Kan. 2018); *In re Hawkins*, 373 P.3d 718 (Kan. 2016); *In re Green*, 156 P.3d 628 (Kan. 2007). Given that we are replacing you in the middle of ongoing litigation, our need for those additional items should be plain. How you may feel about the circumstances of the termination is irrelevant. Comment 9 to the Model Rule makes that clear: "Even if the lawyer has been unfairly discharged by the client, a lawyer must take all reasonable steps to mitigate the consequences to the client."

I am especially concerned about your direction to your contractor to remove coding from documents. This not only fails your duty to protect our interests, but seems to actively and maliciously impair our ability to continue with the litigation. Your actions have made it difficult to have a clear-cut view of the CEA documents relevant to that litigation or the enforcement case against Macquarie.

Furthermore, our contract specifically stated that you would "make available at reasonable times all of [your] books, documents, papers, records and other evidence" related to the contract. Section 1.32; *see also* Specifications ("Contractor shall timely provide to the Attorney General's Office: All relevant case information and documents...; suggestions for case strategy and other information needed to determine other case actions"). So your refusal to turn over the file (and apparent spoliation thereof) could be a contract breach as well as an ethical one.

I hope this is all a misunderstanding. Is there a time we can discuss this matter today or tomorrow?

**Dan Burrows**

Chief Advisor | Office of the Attorney General

Topeka, Kansas

Phone: (785) 368-8435

Email: [daniel.burrows@ag.ks.gov](mailto:daniel.burrows@ag.ks.gov)

**James Young**

Attorney

[My Bio](#)

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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, May 19, 2023 5:50 AM  
**To:** Burrows, Daniel  
**Cc:** Oleen, Fran; Jack, Melanie; Juan Martinez x2192; Tim Fox x26041; dkovel; mbrowne  
**Subject:** Re: \*EXT\* RE: Kansas Natural Gas

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Dan:

Your email does not address and your office has not yet corrected the falsehoods about our work on the case and mischaracterizations about our use of third parties. Please let us know when that will be done. As you are aware, the appropriate mechanism for unringing such a bell is to deploy the same medium used to create the falsehoods in the first place. If you'd like to coordinate with our PR team, I'd be happy to connect them with your comms person.

Also, please have your public records folks work on getting a fulsome response to my pending request, which is now over a month old. I need those records to evaluate our position on this contract and your related request.

Your presumption that any fee owed to us is limited to the contract overlooks or misconstrues the remedies attendant to quantum meruit as well as the damages for breach of the duty of good faith and fair dealing. I believe both claims are recognized under Kansas law but I'm sure your next email will make it all clear for me.

Once we have the complete record, including the outstanding public records, we will be in a position to determine next steps.

It's my belief that the surreptitious termination of our agreement was not done in good faith or for convenience, as that term is used in the agreement. Rather, it was a piece of coordinated political hackery at the behest of the Oil and Gas industry, US Chamber of Commerce and Federalist Society, likely organized at a fancy RAGA event. The immediate reposting of the RFP and snarky e-mail communication between your office and procurement undermines the idea that this was anything else. I'm happy to consider alternative theories supported by evidence, should you have any.

Despite such shenanigans, and as relayed in my prior email, I am available to talk anytime. I believe in this project and want very much to protect the good people of Kansas because they deserve better.

During the engagement, we met weekly with your people and remained available the entire 30 days post termination to talk about such things. The only time you joined us was when we had to beg you to let us file this case and explain how the natural gas market worked. But I'm still not sure you fully understand what you are even complaining about. You have all of the responses to all of the subpoenas issued. We have not withheld a single document. If I'm wrong about that, let me know and let's focus on solving that.

What you do not have is our work product, our mental impressions, the classification/triage and relevance attribution of some of the documents. There is a glimmer of hope in your e-mail though. We did extensive work on this matter. We spent considerable time and money on Kansas' behalf. If you have a proposal on how

our firms will be compensated, I'm all ears. If you want to reduce to writing how you intend to satisfy our lien, I'm all ears.

I trust that the replacement firm selected for this next month will be made aware of such things prior to contract execution, but leave that to you. Side note: +1 for use of vituperative. The judges would have also accepted invective, calumniating or opprobrious.

In keeping with your narrative that my actions are childlike and unprofessional, I'll close with a joke.

Why did the Lesser Prarie Chicken cross the road?

To escape oil and gas exploration, naturally.

Sent from my iPhone

**James Young**

Attorney

[My Bio](#)

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F: (904) 361-4307

A: 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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On May 18, 2023, at 4:48 PM, Burrows, Daniel <Daniel.Burrows@ag.ks.gov> wrote:

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---

Mr. Young:

My apologies for the delay in getting back to you.

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**Dan Burrows**

Chief Deputy Attorney General | Office of the Attorney General  
Topeka, Kansas  
Phone: (785) 368-8435  
Email: daniel.burrows@ag.ks.gov

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Friday, April 21, 2023 8:51 AM  
**To:** Burrows, Daniel <Daniel.Burrows@ag.ks.gov>  
**Cc:** Oleen, Fran <Fran.Oleen@ag.ks.gov>; Jack, Melanie <Melanie.Jack@ag.ks.gov>; Juan Martinez x2192 <juanmartinez@forthepeople.com>; Tim Fox x26041 <tfox@forthepeople.com>; dkovel <dkovel@kmlp.com>; mbrowne <mbrowne@brownepelican.com>  
**Subject:** Kansas Natural Gas

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We are not refusing to provide Kansas with anything which you are entitled to.

I disagree with your impression that Kansas is in the middle of on-going litigation. The complaint we drafted was filed a little over two months ago and to our knowledge, discovery has not commenced and motions to dismiss have not been ruled upon. Our original draft, which was shared with your team, was extensively annotated with citations to relevant documents now in your possession. In light of this, I'm not sure I understand how Kansas is being impaired in the Macquarie litigation. There is still plenty of time for you and your time to create your own coding panel, review the documents and record your mental impressions in a system you pay for.

Perhaps you are referring to our work product related to the other targets of the investigation?

If so, surely you would agree that there is no current case which triggers an obligation for us to share our work product or mental impressions.

Fla. Bar Ethics Op. 88-11 (Reconsideration) makes clear that "the file generated by a lawyer is the property of the lawyer rather than the client. See, Dowda and Fields, P.A. v. Cobb, 452 So.2d 1140, 1142 (Fla.5th DCA1984). Therefore, other than original papers and documents given to the lawyer by the client or previously paid for by a client, a lawyer is not obligated to provide a client with the lawyer's original file."

Your team asked for the subpoena response materials, and at our own expense, still wholly unreimbursed by Kansas, after being summarily terminated for what can only be described as suspect reasons, we compiled and shipped you the docs and data which responded to the subpoenas we issued.

I understand that you are now also seeking our work product in the form of the attorney notes and impressions our team created on the system we paid for.

We are happy to have a discussion about an arrangement for providing this material as well, but disagree that somehow you are entitled to our work product and mental impressions of the case.

I am not aware of, nor did I instruct anyone to withhold any materials aside from asking Epiq to quickly compile the subpoena responses in isolation in order to get them to you in timely fashion.

During our representation, we spent considerable time and money on behalf of Kansas. Below is a summary of the time and related lodestar based on our hourly rates:

<b>Firm</b>	<b>Hours</b>	<b>Lodestar</b>
Morgan & Morgan	3,642.83	\$2,120,535.52
Kirby McInerney	797	\$514,482.50
Brown Pelican	160.1	\$128,283

In addition to the above time, we also engaged experts and hosted the document review platform for Kansas' benefit. The expenses of such items are \$39,386.53. This does not include the license fees for Relativity, which we absorbed.

Consistent with the law in Kansas, we believe the above amounts are recoverable under either quantum meruit, or some other claim in contract, law, or equity.



As such, we make claim for this amount (**\$2,802,687.50**) and assert a charging lien over any recovery under K.S.A. 7-108. We will, within the appropriate timeframe, also serve you with notice of same.

Should you engage replacement outside counsel for the Macquarie litigation, pursuant to another RFP or otherwise, please let them know of the existence of this lien. Should you engage replacement outside counsel for continued investigation or litigation against the other responsible parties, which we certainly encourage, we will be happy to discuss an arrangement with the new counsel to save them the time and expense that we undertook.

You dance dangerously close to the line in alleging spoliation and ethical breaches. But this not the first time your office has uttered falsehoods about our team. In the Wall Street Journal article which was conveniently published on the very same day we received our termination letter, AG Kobach was quoted saying that our firm “engaged subcontractors in violation of the agreement” and that our performance was not up to what he expected.

This falsehood is simply over the top and has publicly harmed our respective reputations. Note, unlike AG Kobach, I have never been sanctioned by a court or disciplined by the bar. Rather, I chair our local bar disciplinary committee, serve on the Bar’s standing committee on professionalism, and previously chaired the Jacksonville Ethics Commission.

The truth, as you are no doubt aware, is that each attorney and law firm which was deployed on this project, was **specifically approved by the KSAG both verbally and in writing**. Moreover, the principal attorneys who worked on this matter were actually sworn in as Special Assistant Attorneys General by Kansas AG Schmidt, and received certificates in recognition of this honor. Moreover, the quality of our work product which led to the only AG case filed in this matter, was never called into question by a single employee of the KSAG. In fact, quite the opposite is true.

The quotes provided to the Wall Street Journal, along with AG Kobach’s social media posts concerning this matter, imply that our firms operated outside of, or in violation of, the contract terms, and provided subpar work resulting in some harm to Kansas. The broader implication of the story is that we were fired for cause, which clearly was not the case. We ask that you take appropriate steps to retract these falsehoods in order to correct and clarify the record to avoid further impairing our reputation and character.

Despite the new administration’s tone and tenor, we do wish you luck in your mission to protect Kansas consumers and hold the responsible parties accountable for their role in price gouging natural gas. You are lucky to have at least two excellent attorneys in your office to see that through.

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Mr. Young:

I am concerned about something one of our attorneys told me recently about the transfer of responsibility for the Kansas natural gas litigation from your firm to our office. Apparently, the hard drive they received from Epiq (the document management company your firm used) lacked any coding on the documents. I'm told Epiq removed all thatat *Morgan & Morgan's direction*. Relatedly, I have also been told that you are refusing to provide us with the remainder of the file (such as memos, graphs, and other documents with pertinent case analysis) on the grounds that they are supposedly proprietary work product.

If the above is true, it seems like a violation of attorney ethics rules. Both Florida and Kansas (whose law you subjected yourself to by seeking pro hac admission in our courts), require attorneys to "take steps to the extent reasonably practicable to protect a client's interests" at the termination of representation. Indeed, a recent Florida ethics opinion states that a lawyer "has an ethical obligation to comply with a client's or former client's reasonable request for copies of file material where that information would serve a useful purpose to the client," Fla. Bar Ethics Op. 88-11 (Reconsideration) (Mar. 23, 2021); *see also* Fla. Bar v. Varner, 992 So.2d 224 (Fla. 2008) (attorney disciplined for failing to deliver complete file to successor counsel during ongoing litigation); *Dubose v. Shelnut*, 566 So. 2d 921 (Fla. Dist. Ct. App. 1990) (duty to deliver specifically requested documents to former client); *cf. In re Deines*, 430 P.3d 437 (Kan. 2018); *In re Hawkins*, 373 P.3d 718 (Kan. 2016); *In re Green*, 156 P.3d 628 (Kan. 2007). Given that we are replacing you in the middle of ongoing litigation, our need for those additional items should be plain. How you may feel about the circumstances of the termination is irrelevant. Comment 9 to the Model Rule makes that clear: "Even if the lawyer has been unfairly discharged by the client, a lawyer must take all reasonable steps to mitigate the consequences to the client."

I am especially concerned about your direction to your contractor to remove coding from documents. This not only fails your duty to protect our interests, but seems to actively and maliciously impair our ability to continue with the litigation. Your actions have made it difficult to have a clear-cut view of the CEA documents relevant to that litigation or the enforcement case against Macquarie.

Furthermore, our contract specifically stated that you would "make available at reasonable times all of [your] books, documents, papers, records and other evidence" related to the contract. Section 1.32; *see also* Specifications ("Contractor shall timely provide to the Attorney General's Office: All relevant case information and documents...; suggestions for case strategy and other information needed to determine other case actions"). So your refusal to turn over the file (and apparent spoliation thereof) could be a contract breach as well as an ethical one.

I hope this is all a misunderstanding. Is there a time we can discuss this matter today or tomorrow?

**Dan Burrows**

Chief Advisor | Office of the Attorney General

Topeka, Kansas

Phone: (785) 368-8435

Email: [daniel.burrows@ag.ks.gov](mailto:daniel.burrows@ag.ks.gov)

**James Young**

Attorney

[My Bio](#)

**P:** (904) 361-0012

**F:** (904) 361-4307

**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Wednesday, May 24, 2023 9:12 AM  
**To:** jyoung@forthepeople.com  
**Cc:** Oleen, Fran  
**Subject:** conference call on June 8, 2023 at 10 AM

Good morning,

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We would like to discuss documents production. Let me know your availability.  
Thank you.

Melanie Jack | First Assistant Attorney General  
**Office of Kansas Attorney General Kris Kobach**  
120 SW 10th Avenue, 2<sup>nd</sup> Floor | Topeka, KS 66612  
Office: (785)368-8242 | Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov) | [WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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## Hutchison, Robert

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**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Wednesday, May 24, 2023 9:45 AM  
**To:** Jack, Melanie  
**Cc:** Oleen, Fran; Douglas Acklin x6133; Juan Martinez x2192  
**Subject:** RE: conference call on June 8, 2023 at 10 AM

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It may help to understand the issues better in advance.

**James Young**  
Attorney  
[My Bio](#)

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**Sent:** Wednesday, May 24, 2023 10:12 AM  
**To:** James Young x6172 <JYoung@ForThePeople.com>  
**Cc:** Fran.Oleen <Fran.Oleen@ag.ks.gov>  
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## Hutchison, Robert

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**Sent:** Wednesday, May 24, 2023 10:19 AM  
**To:** 'James Young x6172'  
**Cc:** Oleen, Fran; Douglas Acklin x6133; Juan Martinez x2192  
**Subject:** RE: conference call on June 8, 2023 at 10 AM

James,

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**To:** Jack, Melanie <Melanie.Jack@ag.ks.gov>  
**Cc:** Oleen, Fran <Fran.Oleen@ag.ks.gov>; Douglas Acklin x6133 <dacklin@forthepeople.com>; Juan Martinez x2192 <juanmartinez@forthepeople.com>  
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Attorney  
[My Bio](#)

P: (904) 361-0012  
F: (904) 361-4307  
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## Hutchison, Robert

---

**From:** James Young x6172 <JYoung@ForThePeople.com>  
**Sent:** Wednesday, May 24, 2023 11:44 AM  
**To:** Jack, Melanie  
**Cc:** Oleen, Fran; Douglas Acklin x6133; Juan Martinez x2192  
**Subject:** RE: conference call on June 8, 2023 at 10 AM

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Next week is better for me. I'm pretty good Wednesday or Thursday before 3:00 eastern. Can do Friday too, but Wed or Thurs is better.

**James Young**  
Attorney  
[My Bio](#)

**P:** (904) 361-0012  
**F:** (904) 361-4307  
**A:** 501 Riverside Ave, Suite 1200, Jacksonville, FL 32202

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Attorney

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Thursday, May 25, 2023 10:14 AM  
**To:** Teters, Chris  
**Subject:** FS 2023.03.03 Plaintiff's Opposition to Defendant's Motion to Dismiss Petition and\_or Quash Subpoena(6969770.1).pdf  
**Attachments:** FS 2023.03.03 Plaintiff's Opposition to Defendant's Motion to Dismiss Petition and\_or Quash Subpoena(6969770.1).pdf

Thanks

## Hutchison, Robert

---

**Subject:** Conference call to discuss document production

**Start:** Thu 6/1/2023 1:30 PM  
**End:** Thu 6/1/2023 2:00 PM

**Recurrence:** (none)

**Meeting Status:** Meeting organizer

**Organizer:** Jack, Melanie

**Required Attendees:** Oleen, Fran; Burrows, Daniel; jyoung@forthepeople.com; Juan Martinez x2192; Douglas Acklin x6133

**Optional Attendees:** Patrick Mathews x4676

I have updated the number to call:

785 368-8407

## Hutchison, Robert

---

**Subject:** Conference call to discuss document production

**Start:** Thu 6/1/2023 1:30 PM  
**End:** Thu 6/1/2023 2:00 PM  
**Show Time As:** Tentative

**Recurrence:** (none)

**Meeting Status:** Not yet responded

**Organizer:** Jack, Melanie  
**Required Attendees:** Oleen, Fran; Burrows, Daniel; jyoung@forthepeople.com; Juan Martinez x2192; Douglas Acklin x6133

Call 785 368-8435

## Hutchison, Robert

---

**Subject:** Conference call to discuss document production

**Start:** Thu 6/1/2023 1:30 PM  
**End:** Thu 6/1/2023 2:00 PM

**Recurrence:** (none)

**Meeting Status:** Accepted

**Organizer:** Jack, Melanie

**Required Attendees:** Oleen, Fran; Burrows, Daniel; jyoung@forthepeople.com; Juan Martinez x2192; Douglas Acklin x6133

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**Optional Attendees:** Patrick Mathews x4676

I have updated the number to call:

785 368-8407



## Hutchison, Robert

---

**From:** Juan Martinez x2192 <juanmartinez@forthepeople.com>  
**Sent:** Friday, May 26, 2023 8:49 AM  
**To:** Jack, Melanie  
**Subject:** Declined: Conference call to discuss document production

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## Hutchison, Robert

---

**From:** Hutchison, Robert  
**Sent:** Friday, May 26, 2023 9:01 AM  
**To:** 'JYoung@ForThePeople.com'  
**Subject:** RE: Kansas Open Records Request  
**Attachments:** kansas-attorney-general's-record-request-policy.pdf

Mr. Young,

I have completed the extensive email and document review necessary to respond to your KORA request. There are 178 pages of responsive documents. Under the attached records request policy, the cost for producing the responsive documents will be \$58.50. I have not billed for the time required for the search and no redaction time will be needed. Please see the policy for directions on remittance of payment. Once received, I will send the documents out. Have a great weekend.

Robert C. Hutchison | Deputy Attorney General – Civil Division  
**Office of Kansas Attorney General Kris W. Kobach**  
120 SW 10<sup>th</sup> Avenue, 2<sup>nd</sup> Floor | Topeka, Kansas 66612  
Phone: (785) 368-8401 | Fax: (785) 296-2420  
[robert.hutchison@ag.ks.gov](mailto:robert.hutchison@ag.ks.gov) | [www.ag.ks.gov](http://www.ag.ks.gov)

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---

**From:** Hutchison, Robert  
**Sent:** Friday, April 14, 2023 11:49 AM  
**To:** 'JYoung@ForThePeople.com' <JYoung@ForThePeople.com>  
**Subject:** Kansas Open Records Request

Mr. Young,

Please see the attached letter. Thank you.

Robert C. Hutchison  
Associate Deputy Attorney General – Civil Division  
Legal Oversight and Government Counsel Section  
Office of Kansas Attorney General Kris Kobach  
120 SW 10<sup>th</sup> Avenue, 2<sup>nd</sup> Floor  
Topeka, Kansas 66612-1597  
Phone: (785) 368-8401  
Cell: (785) 213-9334

Fax: (785) 296-2420  
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## Hutchison, Robert

---

**From:** Patrick Mathews x4676 <pmathews@forthepeople.com>  
**Sent:** Friday, May 26, 2023 12:10 PM  
**To:** Jack, Melanie  
**Subject:** Accepted: Conference call to discuss document production

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

## Hutchison, Robert

---

**From:** Oleen, Fran  
**Sent:** Tuesday, May 30, 2023 1:37 PM  
**To:** 'Tim Fox x26041'  
**Subject:** call

Tim, could I have about 30 minutes of your time in the next couple of days? What is the best phone number for you?

Thanks

Fran

Fran Oleen | Deputy Attorney General, Public Protection Division  
**Office of Kansas Attorney General Kris Kobach**  
120 SW 10th Avenue, 2nd Floor | Topeka, Kansas 66612-1597  
Office: (785) 296-3751 | Fax: (785) 291-3699  
[fran.oleen@ag.ks.gov](mailto:fran.oleen@ag.ks.gov) | [www.ag.ks.gov](http://www.ag.ks.gov)

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## Hutchison, Robert

---

**From:** Tim Fox x26041 <tfox@forthepeople.com>  
**Sent:** Tuesday, May 30, 2023 8:48 PM  
**To:** Oleen, Fran  
**Subject:** Re: \*EXT\* call

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Hi Fran. It's good to hear from you. I'm available for a call any time in the next two days. I'm an hour earlier than you. Thanks. Tim

**Tim Fox**  
Attorney

**P:** (689) 219-2220  
**F:** (689) 219-2250  
**A:** 20 N Orange Ave, Suite 1600, Orlando, FL 32801

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## Hutchison, Robert

---

**From:** Tim Fox x26041 <tfox@forthepeople.com>  
**Sent:** Wednesday, May 31, 2023 1:50 PM  
**To:** Oleen, Fran  
**Subject:** Re: \*EXT\* call

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Hi Fran. I am circling back to make sure that you received my reply to your message. Please let me know when you'd like to have that phone call. Thank you. Tim

Sent from my iPhone

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## Hutchison, Robert

---

**From:** Oleen, Fran  
**Sent:** Wednesday, May 31, 2023 3:34 PM  
**To:** Tim Fox x26041  
**Subject:** RE: \*EXT\* call

I did, thanks Tim. Stuck in meeting for another hour or so.

Fran

----- Original message -----

**From:** Tim Fox x26041 <tfox@forthepeople.com>  
**Date:** 5/31/23 1:50 PM (GMT-06:00)  
**To:** "Oleen, Fran" <Fran.Oleen@ag.ks.gov>  
**Subject:** Re: \*EXT\* call

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Hi Fran. I am circling back to make sure that you received my reply to your message. Please let me know when you'd like to have that phone call. Thank you. Tim

Sent from my iPhone

**Tim Fox**  
Attorney

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## Hutchison, Robert

---

**From:** Tim Fox x26041 <tfox@forthepeople.com>  
**Sent:** Wednesday, May 31, 2023 5:32 PM  
**To:** Oleen, Fran  
**Subject:** Re: \*EXT\* call

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Hi Fran. I see that I missed a call from you. Here's my personal cell phone number: 406-439-2609. Tim

Sent from my iPhone

**Tim Fox**  
Attorney

**P:** (689) 219-2220  
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On May 31, 2023, at 2:34 PM, Oleen, Fran <Fran.Oleen@ag.ks.gov> wrote:

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---

I did, thanks Tim. Stuck in meeting for another hour or so.

Fran

----- Original message -----

**From:** Tim Fox x26041 <tfox@forthepeople.com>  
**Date:** 5/31/23 1:50 PM (GMT-06:00)  
**To:** "Oleen, Fran" <Fran.Oleen@ag.ks.gov>  
**Subject:** Re: \*EXT\* call

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Thanks

Fran

Fran Oleen | Deputy Attorney General, Public Protection Division  
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## Hutchison, Robert

---

**From:** Tim Fox x26041 <tfox@forthepeople.com>  
**Sent:** Thursday, June 1, 2023 10:07 AM  
**To:** Oleen, Fran  
**Subject:** Re: \*EXT\* call

**CAUTION:** This email originated from outside of the Office of The Attorney General of Kansas organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Fran. Is there a time we can shoot for today to have that call? Thank you. Tim

Sent from my iPhone

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On May 31, 2023, at 4:31 PM, Tim Fox x26041 <tfox@forthepeople.com> wrote:

Hi Fran. I see that I missed a call from you. Here's my personal cell phone number: 406-439-2609. Tim

Sent from my iPhone

On May 31, 2023, at 2:34 PM, Oleen, Fran <Fran.Oleen@ag.ks.gov> wrote:

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---

I did, thanks Tim. Stuck in meeting for another hour or so.

Fran

----- Original message -----

From: Tim Fox x26041 <tfox@forthepeople.com>  
Date: 5/31/23 1:50 PM (GMT-06:00)  
To: "Oleen, Fran" <Fran.Oleen@ag.ks.gov>  
Subject: Re: \*EXT\* call

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Sent from my iPhone

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## Hutchison, Robert

---

**From:** Jack, Melanie  
**Sent:** Thursday, June 1, 2023 10:44 AM  
**To:** 'Patrick Mathews x4676'  
**Subject:** conf call this afternoon

Patrick,

Will you give me a call about the conference call this afternoon? 785-368-8242

Melanie Jack | First Assistant Attorney General  
**Office of Kansas Attorney General Kris Kobach**  
120 SW 10th Avenue, 2<sup>nd</sup> Floor | Topeka, KS 66612  
Office: (785)368-8242 | Fax: 785-291-3699  
[Melanie.jack@ag.ks.gov](mailto:Melanie.jack@ag.ks.gov) | [WWW.AG.KS.GOV](http://WWW.AG.KS.GOV)

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## Hutchison, Robert

---

**From:** Oleen, Fran  
**Sent:** Thursday, June 1, 2023 11:12 AM  
**To:** Tim Fox x26041  
**Subject:** RE: \*EXT\* call

Thanks

At an appointment now. Can call at 11:45 my time

Fran

----- Original message -----

From: Tim Fox x26041 <tfox@forthepeople.com>  
Date: 6/1/23 10:08 AM (GMT-06:00)  
To: "Oleen, Fran" <Fran.Oleen@ag.ks.gov>  
Subject: Re: \*EXT\* call

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Sent from my iPhone

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Fran

----- Original message -----

From: Tim Fox x26041 <tfox@forthepeople.com>

Date: 5/31/23 1:50 PM (GMT-06:00)

To: "Oleen, Fran" <Fran.Oleen@ag.ks.gov>

Subject: Re: \*EXT\* call

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On May 30, 2023, at 12:37 PM, Oleen, Fran  
<[Fran.Oleen@ag.ks.gov](mailto:Fran.Oleen@ag.ks.gov)> wrote:

**CAUTION: Use caution when clicking on links or opening attachments in this external email.**

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Tim, could I have about 30 minutes of your time in the next couple of days? What is the best phone number for you?

Thanks

Fran

Fran Oleen | Deputy Attorney General, Public  
Protection Division  
**Office of Kansas Attorney General Kris Kobach**  
120 SW 10th Avenue, 2nd Floor | Topeka, Kansas  
66612-1597  
Office: (785) 296-3751 | Fax: (785) 291-3699  
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## Hutchison, Robert

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**Subject:** Conference call to discuss document production

**Start:** Thu 6/1/2023 1:30 PM  
**End:** Thu 6/1/2023 2:00 PM  
**Show Time As:** Tentative

**Recurrence:** (none)

**Meeting Status:** Not yet responded

**Organizer:** Jack, Melanie  
**Required Attendees:** Oleen, Fran; Burrows, Daniel; jyoung@forthepeople.com; Juan Martinez x2192; Douglas Acklin x6133

Call 785 368-8435



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