

March 11, 2019

Via Email: r2_ro_e-foia@fs.fed.us; sfitzwilliams@fs.fed.us; awmayville@fs.fed.us

Scott Fitzwilliams
Forest Supervisor
White River National Forest
900 Grand Avenue
Glenwood Springs, CO 80401

Re: Freedom of Information Act Request

Dear Forest Supervisor Fitzwilliams and FOIA Custodian:

This is a request under the Freedom of Information Act filed on behalf of Berlaimont Estates, LLC. Pursuant to 5 U.S.C. § 552(a), please provide a full and complete copy of the following records:

All records the United States Department of Agriculture or the United States Forest Service already provided, or agreed to provide, to Wilderness Workshop in the settlement agreement between those parties (the "Settlement Agreement"), filed with the court on April 7, 2019 in the litigation styled *Wilderness Workshop v. United States Department of Agriculture et al.*, Civil Action No. 18-cv-00887-RBJ, U.S. District Court for the District of Colorado. By way of illustration rather than limitation, this FOIA request seeks the records listed in paragraph 9 of the Settlement Agreement, the "Rolling Production of Records" described in paragraph 7 of the Settlement Agreement, the "Completion Letter" (when it is available), and the *Vaughn* index.

Berlaimont Estates, LLC will reimburse you for any copying costs associated with this request. Please contact me to discuss payment of such fees and to arrange for production of the requested records. Thank you.

Sincerely,



Ezekiel J. Williams
Counsel for Berlaimont Estates, LLC

cc: Andy Hensler