

EXHIBIT 3

From: [Jennifer S. Wagner](#)
To: [Jay Arceneaux](#); [Rachel Kincaid](#); [Lydia C. Milnes](#)
Cc: [Briana J. Marino](#); [Valerie H. Raupp](#); [James C. Stebbins](#); [Richard Gottlieb](#); [Anna Casto](#)
Subject: RE: Baxley v Jividen
Date: Monday, March 23, 2020 5:50:50 PM
Attachments: [image001.png](#)

Jay,

[REDACTED]

Also, in regard to the ID/COVID-19 plan, we appreciate you sending us the 2016 policy. We understand, however, that a specific policy was put in place for the pandemic on March 20, which you have not provided. Obviously, such a policy is very much in the public interest; even if you believe that it is subject to security or privacy concerns, it should be provided under the protective order in this case. Without the plan, we cannot know what (if anything) DCR is doing, and we will be forced to assume that any efforts are inadequate and to ask the Court to intervene. This seems like a lot of wasted time and effort if there is an adequate plan in place that you can share with us under the protective order.

We look forward to hearing from you regarding these matters.

Thanks,

Jennifer

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Pronouns: she/her/hers

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From: Jay Arceneaux [mailto:wjarceneaux@lewisglasser.com]

Sent: Monday, March 23, 2020 2:48 PM

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Subject: Baxley v Jividen

I wanted to update you on the status of this case and what I am working on for tomorrow's court ordered deadline.

- 1) [REDACTED]

Thanks for your attention to this email. I appreciate your cooperation in this difficult time.



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