

March 23, 2015

**VIA ELECTRONIC MAIL to**  
**rlancaster@pierceatwood.com**

Honorable Ralph I. Lancaster  
Pierce Atwood LLP  
Merrill's Wharf  
254 Commercial Street  
Portland, ME 04101

**Re: State of Florida vs. State of Georgia (U.S. Supreme Court No. 142, Original):  
Subpoena for Production of Documents to The Nature Conservancy**

Dear Special Master Lancaster:

The referenced subpoena establishes today as the deadline for The Nature Conservancy to inform the Special Master if the Conservancy will be unable to complete its production in response to Florida's subpoena in 120 days. The Nature Conservancy is a non-profit corporation and is in the process of engaging pro bono litigation counsel to assist with responding to the subpoena. It is also working to identify staff members that might have information responsive to the subpoena. Thus, we are unable to determine now whether 120 days will be sufficient for submitting our response, but think it would be premature to have a call with you.

I spoke today with Vanessa Silke, counsel for the State of Florida, and we agreed to schedule a call soon to confer on the scope of the information the State of Florida requests in the subpoena. This will help us to analyze whether 120 days will be sufficient time to produce the requested information. We intend to cooperate with the State of Florida's counsel to narrow and refine the scope of the subpoena so as to avoid undue burden and expense as we begin the document production process. Accordingly, we request an extension until **April 13, 2015**, to inform you whether we anticipate that full production will require more than 120 days from service of the subpoena.


Separately, we wanted to disclose that Philip F. W. Ahrens is a member of The Nature Conservancy's Maine Chapter Board of Trustees (BOT) and is also of counsel at the Pierce Atwood law firm. Although the Conservancy's BOT is an advisory board with no fiduciary obligations to the Conservancy, we wanted to make you aware of this relationship between the Conservancy and the Pierce Atwood law firm. Mr. Ahrens sits on the Governance, External

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Affairs and North Woods and Waters committees of the Maine BOT. To our knowledge, Mr. Ahrens is unaware of this Supreme Court action and the subpoena the Conservancy received from the State of Florida. He will not be involved in the Conservancy's work on the subpoena.

Please confirm whether our requested April 13 extension is approved, or if you need additional information to consider our request.

Sincerely,



Joan T. Dwoskin  
Senior Attorney

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