

**From:** [Matt Manahan](#)  
**To:** ["Stacy Laughton"](#); [Burke, Ruth A](#); [Bertocci, Cynthia S](#)  
**Cc:** [Hinkel, Bill](#); [Bensinger, Peggy](#); [Boak, Scott](#); [Parker, Lauren](#); [Miller, Susanne](#); [DEP, NECEC](#); [Livesay, Nick](#); [James T. Kilbreth](#); [David M. Kallin](#); [Joanna Tourangeau](#); [Emily Howe](#); [Elizabeth Boepple](#); [Kelsey Peterson](#); [Gerry Mirabile](#); [Dave Publicover](#); [Jeffrey.Reardon@tu.org](#); [Bob Weingarten](#); [Anthony Buxton](#); [Robert Borowski](#); [Gerald Petruccelli](#); [Tim Burgess](#); [Bob Haynes](#); [Ben Smith](#); [Corkum, Tina](#); [Stratton, Robert D](#); [Puryear, Kristen](#); [Rideout, Megan M](#); [Clement, Jay L CIV USARMY CENAE \(US\)](#); [Melissa Pauley](#); [mahoosucguides@gmail.com](#); [Steve Zuretti](#); [Jeff Talbert](#); [Rob Wood](#); [Bryan Emerson](#); [mark.berry@tnc.org](#); [Kaitlyn Bernard](#); [Sean Mahoney](#); [Phelps Turner](#); [Taylor Walker](#); [dibiasi.tony@gmail.com](#); [Hobbins, Barry](#); [Landry, Andrew](#); [Lisa A. Gilbreath](#); [Carrie Beedle](#)  
**Subject:** RE: West Forks Plantation, et al.-Supplement to Motion and Appeal  
**Date:** Friday, October 16, 2020 4:52:55 PM

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CMP objects to the West Forks Petitioners' purported Supplement to its renewed motion for a stay. In his October 7, 2020 letter to the West Forks Petitioners and petitioner NRCM, Chair Draper invited "from the **other parties** to the appeal proceeding legal arguments in support of, or in opposition to, the renewed applications for a stay" (emphasis added) by 5:00 p.m. on October 16, 2020. No additional comment or supplement from the petitioners was requested and, indeed, the West Forks Petitioners' Supplement to its renewed motion – filed at 4:18 p.m. on the day the responses of the other parties are due – is highly inappropriate and should be stricken. CMP notes that this is not the West Forks Petitioners' first attempt to slip additional argument and evidence into the record just before the close of the response deadline, as it purported to supplement its initial stay motion just one day prior to the June 26, 2020 deadline for responses from non-moving parties.

CMP further objects to the supplemental evidence included in the West Forks Petitioners' Supplement, and requests that it be stricken from the record even in the event that the Supplement itself is accepted into the record.

**Matthew D. Manahan**

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**From:** Stacy Laughton <Laughton@nhlandlaw.com>

**Sent:** Friday, October 16, 2020 4:18 PM

**To:** [Burke, Ruth A](#) <Ruth.A.Burke@maine.gov>; [Bertocci, Cynthia S](#) <Cynthia.S.Bertocci@maine.gov>

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**Subject:** West Forks Plantation, et al.-Supplement to Motion and Appeal

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Good afternoon,

Please find attached, on behalf of West Forks Plantation, Town of Caratunk, Kennebec River Anglers, Maine Guide Service, LLC, Hawks Nest Lodge, Ed Buzzell, Kathy Barkley, Kim Lyman, Noah Hale, Eric Sherman, Mike Pilsbury, Matt Wagner, Mandy Farrar and Carrie Carpenter, a Supplement to Petitioners' September 25, 2020 Motion and Appeal of the Commissioner of the DEP's August 26, 2020 denial of Petitioner's June 5, 2020 Application for Stay of the Commissioner's May 11, 2020 Finding of Facts and Order.

Original of the filing is being sent this afternoon via FedEx for delivery on Monday morning.

Thank you and have a nice weekend.

Stacy

**Stacy B. Laughton, Paralegal**

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