

STATE OF VERMONT

SUPERIOR COURT  
ORLEANS UNIT

CIVIL DIVISION  
DOCKET NO. 22-CV-00597

MICHAEL DESAUTELS, *et al.*, )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 NORTH COUNTRY SUPERVISORY )  
 UNION, )  
 )  
 Defendant. )

**DEFENDANT’S MOTION TO DISMISS PLAINTIFFS’ VERIFIED COMPLAINT**

Defendant, North Country Supervisory Union (“NCSU”), through its attorneys, Lynn, Lynn, Blackman & Manitsky, P.C., pursuant to V.R.C.P. 12(b)(6), respectfully submits this Motion to Dismiss Plaintiffs’ Verified Complaint. NCSU relies on the Memorandum of Law herein in support of its Motion. Plaintiffs take issue with NCSU requiring facemasks in schools during the Covid-19 pandemic. Given the failure of Plaintiff’s Verified Complaint (“Complaint”) to state a claim upon which relief can be granted, Plaintiff’s Complaint should be dismissed.

**I. Factual Background**

NCSU is a supervisory union of more than 2,600 students and staff. *See* Ex. A, Pls.’ Compl. at ¶ 6. During the Covid-19 pandemic, NCSU implemented a policy requiring students and staff to wear face coverings in NCSU buildings. *Id.* at ¶ 44. Plaintiffs, Michael Desautels & Amy Ladeau, for themselves and as legal guardians and next friends to R.D., Health Choice Vermont, Inc., and Children’s Health Defense, bring claims against NCSU based on NCSU’s policy requiring students and staff to wear face coverings in NCSU buildings. *See generally id.*

Plaintiffs' lengthy Verified Complaint can be boiled down to a handful of central factual allegations giving rise to Plaintiff's claims. First, Plaintiffs allege NCSU lacked "the authority to implement a requirement that students wear masks in schools." *Id.* at ¶ 32; *see also id.* at ¶¶ 23-36 (expanding allegation that NCSU lacked authority to require masks). Based on their allegation that NCSU does not have the power to require students to wear masks, Plaintiffs request the Court "declare that [NCSU] lacked the authority to issue face mask mandates, and, therefore, the mandates, including any extension or implementation of their requirements for the remainder of this school year and future school years, are void." *Id.* at ¶ 102; *see also id.* at ¶¶ 99-102 (detailing request for declaratory judgment in Count I). Plaintiffs also ask the Court to issue an injunction "prohibiting [NCSU] from enforcing and continuing [its] mask mandate[]." *Id.* at ¶ 121; *see also id.* at ¶¶ 116-121 (detailing request for injunctive relief in Count IV).

Second, Plaintiffs allege the Vermont Department of Health's "comprehensive statutory and regulatory framework concerning communicable diseases preempts any local measure that requires masks in schools," including NCSU's face mask requirement. *Id.* at ¶ 42; *see also id.* at ¶¶ 37-44. Since the Vermont Department of Health's framework allegedly preempts NCSU's mask requirement, Plaintiffs request the Court "declare [NCSU's mask mandate is] null and void . . . ." *Id.* at ¶ 107; *see also id.* at ¶¶ 103-107 (detailing request for declaratory judgment in Count II).

Third, Plaintiffs allege "the coronavirus has had no impact on children in Vermont or in [NCSU]," and that "face masks do not prevent the spread of Covid-19." *Id.* at ¶ 45 (first quotation); *id.* at ¶ 66 (second quotation). Additionally, Plaintiffs allege "face masks are harmful to children." *Id.* at ¶ 111. Based on these allegations, Plaintiffs assert NCSU requiring face masks violates Plaintiffs' "fundamental right in the care, upbringing, and education of their

children, including the right to make healthcare and medical decisions for their children . . . .” *Id.* at ¶ 114. Plaintiffs claim this “violates their rights under the Vermont Constitution.” *Id.* at ¶ 115; *see also id.* at ¶¶ 108-115 (detailing constitutional claim in Count III).

Fourth, Plaintiffs Desautels, Ladeau, and R.D. allege NCSU “banished” R.D., an elementary school student, from school for not wearing a mask. *See id.* at ¶¶ 86-98. Desautels, Ladeau, and R.D. claim NCSU “refused to provide R.D. with a medical exemption from the mask mandate despite being provided with a doctor’s note from R.D.’s medical provider.” *Id.* at ¶ 88. R.D.’s refusal to wear a mask allegedly “resulted in a *de facto* expulsion from school” for R.D. *Id.* at ¶ 93. “Ultimately, Desautels and Ladeau were forced to return R.D. to [NCSU] for in-person learning while wearing a mask,” which allegedly caused emotional injuries to Desautels, Ladeau, and R.D. *Id.* at ¶¶ 96-99.

Based on these facts, and building upon their earlier allegation that NCSU lacks the authority to require face masks, Desautels, Ladeau, and R.D. ask the Court to issue an injunction “enjoining NCSU from barring R.D. from [NCSU].” *Id.* at ¶¶ 122-127 (detailing claim for injunctive relief in Count V). Desautels, Ladeau, and R.D. also allege “NCSU’s intentional conduct in requiring R.D. to wear a face mask to attend school was extreme and outrageous,” which Desautels, Ladeau, and R.D. contend amounts to intentional infliction of emotional distress. *Id.* at ¶¶ 128-137 (detailing IIED claim in Count VI).

In sum, Plaintiffs bring six claims against NCSU seeking declaratory, injunctive, and monetary relief. *See generally id.* Since NCSU had the authority to require face masks in schools, and for the additional reasons discussed below, Plaintiffs’ six claims will all fail.

## II. Memorandum of Law

A motion to dismiss should be granted when “it appears beyond doubt that there exist no facts or circumstances that would entitle the plaintiff to relief.” *Amiot v. Ames*, 166 Vt. 288, 291, (1997) (internal quotation marks omitted) (citation omitted). In reviewing a motion to dismiss, the court assumes all factual allegations to be true and accepts as true all reasonable inferences from the plaintiff’s pleadings. *Union Mut. Fire Ins. Co. v. Joerg*, 175 Vt. 196, 198 (2003). The “threshold a plaintiff must cross in order to meet [Vermont’s] notice-pleading standard is exceedingly low.” *Bock v. Gold*, 184 Vt. 575, 576 (2008) (internal quotation marks omitted) (citation omitted). Here, even with that low threshold, it is beyond doubt there exist no facts or circumstances that would entitle Plaintiffs to relief on their claims against NCSU, such that Plaintiffs’ claims should be dismissed.

### **A. NCSU Has the Authority to Require Face Masks In Schools, So Count I, Count IV, & Count V of Plaintiffs’ Complaint Will Fail**

Plaintiffs’ assertion that NCSU lacks the authority to require face masks in schools is incorrect as a matter of law. As Plaintiffs note in their Complaint, Vermont statute confers powers to school boards. *See* Ex. A at ¶ 31 (*citing* 16 V.S.A. § 563(1)-(32)). Plaintiffs go on to explicitly enumerate most of the powers conferred to school boards by Vermont statute in their Complaint. *See id.* (listing most powers conferred to school board). After enumerating most of the statutory authority conferred to school boards, Plaintiffs assert none of those provisions gave NCSU the power to require face masks in schools. *See id.* at ¶ 32. Plaintiffs, however, ignore two critical statutory provisions which are unhelpful to Plaintiffs’ claims.

Vermont law explicitly provides school boards with the authority to “take any action that is required for the sound administration of the school district.” 16 V.S.A. § 563(2). The same

statute also explicitly provides a school board “[s]hall exercise the general powers given to a legislative branch of a municipality.” 16 V.S.A. § 563(15).

It is disappointing that Plaintiffs identified the statute, listed the specific powers conferred that would not apply here, and then failed to acknowledge two provisions that directly address the issues in question in this case. Plaintiffs then argued “none of these provisions [listed in Plaintiffs’ Complaint]” gave NCSU the power to require face masks in schools, but that is true only because Plaintiffs omitted from their list the two provisions that give NCSU the authority to require face masks in schools. See Ex. A at ¶ 32.

Vermont courts have long recognized the power of a school board “to prescribe rules and regulations for the conduct and management of their respective schools.” *Rutz v. Essex Junction Prudential Comm.*, 142 Vt. 400, 405 (1983); *Cyr v. Addison Rutland Supervisory Union*, 60 F. Supp. 3d 536, 554 (D. Vt. 2014) (“Under Vermont law, the board of a school district may take any action which is required for the sound administration of the school district.”). Vermont courts have also long recognized Vermont school boards can “exercise . . . the broad general powers given to a legislative branch of a municipality.” *Leopold v. Young*, 340 F. Supp. 1014, 1017 (D. Vt. 1972); *Barnes v. Bd. of Directors, Mount Anthony Union High Sch. Dist. (No. 14)*, 418 F. Supp. 845, 848–49 (D. Vt. 1975). The authority given to school boards to conduct their affairs has been “generously delegated” by the Vermont legislature. *Barnes*, 418 F. Supp. at 848. This is particularly true during a pandemic where reasonable health and safety measure were both suggested by the Agency of Education and necessary to protect the largely unvaccinated children attending Vermont schools. Reinforcing the broad, statutory grant of authority to school boards, the Agency of Education notified schools that local board do have the authority to

establish masking policies. See <https://education.vermont.gov/document/School-District-Authority-to-Require-Masks>.

Against this background, there are no circumstances that will entitle Plaintiffs to relief on Count I, Count IV, or Count V of their Complaint. Each of those claims depends on Plaintiffs' assertion NCSU lacks the authority to require face masks in schools. See Ex. A at ¶¶ 102, 117, 124. In Count I, Plaintiffs ask the Court to “declare that [NCSU] lacked the authority to issue face mask mandates . . . .” *Id.* at ¶ 102. In Count IV, Plaintiffs request injunctive relief because NCSU “lacked the authority to issue mask mandates . . . .” *Id.* at ¶ 117. In Count V, Plaintiff request additional injunctive relief because “NCSU . . . lacks authority to adopt and enforce a mask mandate . . . .” *Id.* at ¶ 124. As NCSU has the authority to require face masks in schools, Count I, Count IV, and Count V in Plaintiffs' Complaint will fail.

NCSU has the statutory authority to prescribe rules and regulations for the conduct of its schools. See 16 V.S.A. § 563(2); *Rutz*, 142 Vt. at 405. NCSU also has the statutory authority to exercise the broad general powers of the legislative branch of a municipality. See 16 V.S.A. § 563(15); *Leopold*, 340 F. Supp. at 1017. NCSU requiring face masks in schools falls well within the ambit of these grants of authority, as the Agency of Education itself has confirmed. See *id.*; see also <https://education.vermont.gov/document/School-District-Authority-to-Require-Masks>.

In short, requiring face masks in schools was necessary to promote the safe and sound administration of in-person education during the Covid-19 pandemic, and it was within NCSU's authority to impose that requirement. It was also within NCSU's authority to enforce that requirement against R.D.

Since Vermont statute grants NCSU the authority to require face masks in schools and to enforce that requirement, there are no circumstances that will entitle Plaintiffs to relief on Count

I, Count IV, or Count V – all of which are grounded in the assertion NCSU lacks the authority to require face masks in schools – of their Complaint. Accordingly, Count I, Count IV, and Count V should be dismissed.

**B. NCSU’s Rule Requiring Face Masks In Schools Is Not Preempted, So Count II of Plaintiffs’ Complaint Will Fail**

In Count II of their Complaint, Plaintiffs ask the Court to declare NCSU’s face mask requirement “null and void because the Department [of Health’s] . . . scheme concerning communicable diseases preempts [NCSU’s face mask requirement].” Ex. A at ¶ 107. Plaintiff’s proposed application of the doctrine of preemption is legally baseless. As a result, there are no circumstances that will entitle Plaintiffs to relief on Count II of their Complaint.

Preliminarily, as the Vermont Supreme Court has explained, the “doctrine of preemption must be carefully invoked.” *In re Patch*, 140 Vt. 158, 176 (1981). The doctrine is triggered “when [a] local law is a barrier to what the state has required to be done, or allows what the state has said must be prohibited.” *Id.* at 177. The doctrine operates to make sure a municipal entity does “not exercise [its] grant of power in a manner inconsistent with State law . . . .” *In re Richards*, 174 Vt. 416, 423 (2002) (alteration in original) (superseded by statute on other grounds).

Here, Plaintiffs allege the Department of Health’s “framework concerning communicable diseases preempts [NCSU’s face mask requirement] because [NCSU’s face mask requirement] conflict[s] with the Department’s scheme that does not require masks in schools to prevent the transmission of Covid-19.” Ex. A at ¶ 42. That the Department of Health has not mandated a particular measure, however, does not mean a municipal entity cannot choose to take that measure.

Plaintiffs fail to identify any way in which NCSU’s face mask requirement acts as a “barrier to” the Department of Health’s plan or “allows what the [Department of Health] has said must be prohibited.” *See In re Patch*, 140 Vt. at 177. Nor do Plaintiffs identify a way in which NCSU’s face mask requirement is inconsistent with, or conflicts with, the Department of Health’s approach. *See In re Richards*, 174 Vt. at 423. This is unsurprising, as there is no conflict between NCSU’s face mask requirement and the Department of Health’s approach to communicable disease. Indeed, the Department of Health has neither articulated a face mask requirement for schools nor prohibited schools from implementing a face mask requirement.

Reinforcing the lack of any conflict between NCSU’s face mask requirement and the State’s approach to communicable disease, the Vermont Agency of Education has informed school districts they “may adopt a policy requiring students to wear a mask at school and may enforce the policy by refusing to admit a student who does not comply” with the mask requirement. *See* <https://education.vermont.gov/sites/aoe/files/documents/edu-memo-school-district-mask-authority.pdf> (emphasis added). The Agency has also issued a Memorandum in which face coverings are suggested to Vermont’s public schools, depending on vaccination rates in schools. *See* [https://education.vermont.gov/sites/aoe/files/documents/edu-vdh-memo-french-levine-advisory-covid19-prevention-measures-fall-2021-updated-10-26\\_0.pdf](https://education.vermont.gov/sites/aoe/files/documents/edu-vdh-memo-french-levine-advisory-covid19-prevention-measures-fall-2021-updated-10-26_0.pdf).

Ultimately, NCSU has exercised its statutory authority to implement a measure, in the form of a face mask requirement, the Department of Health chose not to address. Given the absence of any conflict between NCSU’s face mask requirement and the State’s approach to communicable disease, NCSU’s face mask requirement is not preempted by the Department of Health’s plan or any other aspect of Vermont law. *See In re Patch*, 140 Vt. at 177; *In re Richards*, 174 Vt. at 423. As a result, Count II of Plaintiffs’ Complaint – which seeks relief



solely on the basis NCSU's face mask requirement is preempted – will fail. Accordingly, Count II of Plaintiffs' Complaint should be dismissed.

**C. NCSU's Face Mask Requirement Does Not Violate Plaintiffs' Constitutional Rights, So Count III of Plaintiffs' Complaint Will Fail**

Count III of Plaintiffs' Complaint asserts NCSU's face mask requirement violates Plaintiffs' "rights under the Vermont Constitution." Ex. A at ¶ 115. Specifically, Plaintiffs' claim a violation of their "fundamental right to care for their children . . . includ[ing] the right to make medical and healthcare decisions for them." *Id.* at ¶ 109. Count III of Plaintiffs' Complaint will fail because there is no legal support for the existence of such a right and, alternatively, because even if such a right exists, Plaintiffs will not be able to demonstrate NCSU's face mask requirement violates that right.

Plaintiffs are correct the Vermont Supreme Court has recognized the "right to care for one's children" as a "fundamental liberty interest." *See Boisvert v. Harrington*, 173 Vt. 285, 292 (2002) (citations omitted). None of the cases cited by Plaintiffs in their Complaint, however, hold that a parent has a constitutional right to "make medical and healthcare decisions" for their children. *See generally* Ex. A at ¶¶ 80-84. The first case cited by Plaintiffs in their Complaint in support of the existence of a constitutional right to "make medical and healthcare decisions" involved the termination of a mother's guardianship of her child. *See* Ex. A at ¶ 81 (*citing Boisvert*, 173 Vt. at 286). The Vermont Supreme Court did not hold in *Boisvert* that parents "have a fundamental right to raise and care for their children and make medical and healthcare decisions for them." *See generally id.* Nor does the Vermont Supreme Court appear to have held in any other decision that such a constitutional right exists.

Plaintiffs' Complaint cites decisions from other jurisdictions, not one of which holds a parent has a constitutional right to make medical and healthcare decisions for their children. *See*

Ex. A at ¶¶ 82-84. Indeed, if anything, the decisions cited by Plaintiffs support that a parent does not have the right to make medical and healthcare decisions that are potentially harmful to the parent’s child. *See, e.g., id.* at ¶ 82 (citing *Matter of McCauley*, 565 N.E.2d 411, 414 (Mass. 1991)).

In *McCauley*, one of the cases cited by Plaintiffs, a child’s parents objected to their child receiving a blood transfusion. 565 N.E.2d at 414. The court issued an order authorizing the blood transfusion to be performed over the parents’ objection because the child’s “best interests and welfare, coupled with the strong interests of the State, must outweigh her parents’ objections to the blood transfusions.” *Id.* Plaintiffs also cite to *Curtis v. Sch. Comm. of Falmouth*, in which parents objected to their child being exposed to a condom-availability program at school. *See* Ex. A at ¶ 82 (citing *Curtis v. Sch. Comm. of Falmouth*, 652 N.E.2d 580, 585 (Mass. 1995)). In granting summary judgment for the defendant school, the *Curtis* court noted the parents “failed to demonstrate how [the parents’] interests are burdened by the condom-availability program to an extent which would constitute an unconstitutional interference by the State.” 652 N.E.2d at 585. The rest of the cases cited by Plaintiffs involve guardianship, custody, and/or §1983 claims. *See* Ex. A at ¶¶ 82-84 (citing multiple cases).

Ultimately, there is no legal support for Plaintiffs’ assertion a parent has an unequivocal right, provided by the Vermont Constitution, to “make medical and healthcare decisions” for their child. Since the constitutional right Plaintiffs claim NCSU violated does not exist, there are no circumstances in which Plaintiffs will prevail on Count III of their Complaint. Accordingly, Count III of Plaintiffs’ Complaint should be dismissed.

Second, as an alternate basis for the dismissal of Count III, even if Plaintiffs were able to demonstrate the existence of the constitutional right they claim – which Plaintiffs cannot –

Plaintiffs will be unable to establish NCSU's face mask requirement violates that right. As the authority cited by Plaintiffs makes clear, that a parent objects to a component of their child's educational experience does not mean the parent's right to care for their child has been violated. *See, e.g., Curtis*, 652 N.E.2d at 585 (finding condom-availability program did not violate parent's right to raise child). While it is clear Plaintiffs disagree with NCSU's face mask requirement, that disagreement does not mean NCSU's face mask requirement violates Plaintiffs' constitutional rights. *See id.* As such, even if the constitutional right Plaintiffs claim does exist, Plaintiffs will not be able to demonstrate NCSU's face mask requirement violates that right.

Ultimately, for two independent reasons, there are no circumstances that will entitle Plaintiffs to relief on Count III of their Complaint. Plaintiffs will not be able to demonstrate the existence of the constitutional right which they claim to have been violated, and Plaintiffs will not be able to prove NCSU's face mask requirement violated that nonexistent right. Accordingly, Count III of Plaintiffs' Complaint should be dismissed.

**D. NCSU Exercising Its Statutory Authority to Require Face Masks In Schools Cannot Amount to Intentional Infliction of Emotional Distress, So Count VI Will Fail**

In Count VI of their Complaint, Plaintiffs allege NCSU's "intentional conduct in requiring R.D. to wear a face mask . . . was extreme and outrageous" and caused Plaintiffs emotional distress. Ex. A at ¶¶ 135-36. Count VI of Plaintiffs' Complaint fails to state a claim upon which relief can be granted, first, because Plaintiffs have not pled the facts necessary to sustain an IIED claim and, second, because NCSU exercising statutorily-granted authority to require face masks to protect students and staff during a deadly pandemic is not the type of conduct that gives rise to an IIED claim.

To substantiate an IIED claim, a “plaintiff must demonstrate outrageous conduct, done intentionally or with reckless disregard of the probability of causing emotional distress, resulting in the suffering of extreme emotional distress, actually or proximately caused by the outrageous conduct.” *Boulton v. CLD Consulting Engineers, Inc.*, 175 Vt. 413, 427 (2003) (internal quotation marks and citation omitted); *see also Baptie v. Bruno*, 195 Vt. 308, 318 (2013) (detailing elements of IIED claim). For a defendant’s conduct rise to the level necessary to sustain an IIED claim, the conduct must be “so outrageous in character and so extreme in degree as to go beyond all possible bounds of decent and tolerable conduct in a civilized community and be regarded as atrocious and utterly intolerable.” *Fromson v. State*, 176 Vt. 395, 399 (2004) (internal quotation marks and citation omitted); *Cate v. City of Burlington*, 194 Vt. 265, 277 (2013). Vermont courts have recognized the burden a plaintiff carries when bringing an IIED claim is a “heavy one.” *Fromson*, 176 Vt. at 399 (citation omitted).

Here, Plaintiffs’ IIED claim must fail, first, because Plaintiffs have not pled facts to support NCSU acted “intentionally or with reckless disregard of the probability of causing emotional distress” when NCSU required face masks in schools. *Boulton*, 175 Vt. at 427; *see also* Ex. A at ¶¶ 128-37 (attempting to plead IIED claim). Plaintiffs have pled, and NCSU does not dispute, “NCSU acted intentionally to impose a mask mandate,” and that NCSU acted intentionally “in requiring R.D. to wear a face mask . . . .” Ex. A at ¶¶ 129, 135. That NCSU intentionally required face masks in schools to keep students and staff safe during the Covid-19 pandemic does not, however, mean NCSU acted with the intention of causing, or with reckless disregard of the probability of causing, emotional distress. Similarly, that NCSU acted intentionally in enforcing its face mask requirement against R.D. does not mean NCSU acted

with the intention of causing, or with reckless disregard of the probability of causing, emotional distress.

An IIED claim requires more than just an intentional action; the action must be undertaken with the intention of causing, or with reckless disregard of the probability of causing, emotional distress. *See Boulton*, 175 Vt. at 427. In Count VI of their Complaint, Plaintiffs allege only that NCSU acted intentionally; they do not allege Plaintiffs acted intentionally to cause, or with reckless disregard of the probability of causing, emotional distress. *See Ex. A* at ¶¶ 128-137. Accordingly, Count VI fails to state a claim upon which relief can be granted and should be dismissed.

Alternatively, Plaintiff's IIED claim must fail because NCSU exercising its statutory authority by requiring face masks in schools and by enforcing that requirement against R.D., as a means of keeping students and staff safe during a deadly pandemic, does not amount to the type of outrageous conduct required to sustain an IIED claim. As discussed above, NCSU has the authority to require face masks in its schools. *See* § (II)(A), *supra*. NCSU exercising that authority to keep students and staff safe is not conduct "so outrageous in character and so extreme in degree as to go beyond all possible bounds of decent and tolerable conduct in a civilized community and be regarded as atrocious and utterly intolerable," as required to sustain an IIED claim. *See Fromson*, 176 Vt. at 399. In short, there is nothing atrocious or utterly intolerable about NCSU taking steps to keep its students and staff safe. As such, NCSU requiring face masks in schools and enforcing that requirement is not the type of conduct that gives rise to an IIED claim. *See id.* Accordingly, Count VI of Plaintiffs' Complaint should be dismissed.

### III. Conclusion

NCSU has the statutory authority to require face masks in its schools and to enforce that requirement. Plaintiffs almost certainly recognize NCSU has this statutory authority, as Plaintiffs took the time to list dozens of the powers conferred on NCSU by statute but omitted from their list the two powers that enable NCSU to require face masks in schools and to enforce that requirement. Here, NCSU exercised its statutory authority by requiring face masks and by enforcing its face mask requirement to keep its students and staff safe during a deadly pandemic. Nothing about NCSU implementing and enforcing a face mask requirement to keep its students and staff safe during a deadly pandemic was unauthorized, preempted, atrocious, or intolerable. As such, there are no circumstances in which Plaintiffs will be entitled to relief on any of their claims.

Given Plaintiffs' failure to state a claim upon which relief can be granted, NCSU respectfully requests the Court grant NCSU's Motion and enter an Order dismissing Plaintiffs' Complaint.

Dated at Burlington, Vermont this 23<sup>rd</sup> day of March 2022.

NORTH COUNTRY SUPERVISORY  
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