



HENNEOUS CARROLL LOMBARDO LLC

October 31, 2025

Via Electronic Mail: jmcglone@psh.com

James P. McGlone, Esq.
Partridge Snow & Hahn LLP
40 Westminister Street, Suite 1100
Providence, RI 02903

Re: Response to Access to Public Records Act Request

Dear Mr. McGlone:

I am writing to you on behalf of the Barrington Public Schools District (the "District") in response to your correspondence dated October 24, 2025 wherein you requested that the District revisit its September 24, 2025 cost estimate associated with the following components of Nicole Solas's Access to Public Records Act requests:

"All curriculum materials of [REDACTED] for all classes including but not limited to: instructional materials, supplementary materials, handouts, dittos, assignments, videos, links, resources, guides, worksheets, workbooks, prompts, and any other record used to teach and/or prepare to teach the young and impressionable minds of other people's children who are entitled to an education free from indoctrination"; and

"This is a public records request for email correspondence of [REDACTED] (the teacher who celebrated the murder of Charlie Kirk on TikTok) since January 1, 2016 containing the word, 'Trump.'"

With respect to the former request, please be advised that the request seeks a variety of sources dating back fifteen (15) years ago, and predating the District's use of a learning management system. As such, in order to locate, retrieve, compile and review responsive documents prior to the fall of 2020, which is when the District began using Canvas (its current



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learning management system) the District would be required to search through approximately ten (10) years' worth of individual computer files, located on two (2) separate drives, match the individual documents to a course, and ascertain whether Mr. [REDACTED] accessed the particular document. Notably, "accessing" a document does not confirm that the document was actually used during class.

As you may be aware, Mr. [REDACTED] is currently on administrative leave, and therefore is not available to assist the District in identifying any or all of the curriculum materials he may have used in the one hundred eleven (111) courses he taught prior to the introduction of Canvas to the District. Similarly, he is not available to identify any sources or materials he may have referenced during his tenure that do not appear on Canvas.

The District has spent a significant amount of time trying to determine a more expeditious way in which to locate and compile the requested records, as to both those records in existence before and after the introduction of the learning management system, but unfortunately, it has not been able to do so.

In consideration of the foregoing, if your client is agreeable to amending her request to "any and all curriculum materials used in all classes taught by [REDACTED] for the period of September 1, 2020 to the present," then the estimated cost for the search, compiling, and reviewing all of the responsive documents in the possession of the District would be as follows:

Location of documents	# of classes	Estimated # of documents per class	# of minutes to locate	# of minutes to review	Total # of hours	Total cost at \$15/hour
Canvas	37*	100	3	3	370	\$ 5,550

*Kindly note that upon further review of the current learning management system, nine (9) of the forty-six (46) courses listed in Canvas were "unpublished" and thus not active courses used by Mr. [REDACTED].



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With respect to Ms. Solas's request for email correspondence of [REDACTED] from January 1, 2016 to the present containing the word "Trump," the District estimated that the amount of time to retrieve, review, redact and compile the 1,438 emails responsive to your client's request equated to two (2) minutes per individual email. As stated by the Office of the Attorney General in *"Three Boys" v. South Kingstown School Department*, and the Supreme Court precedent cited therein, because responsive emails may pertain to school employees and/ or may contain information which is protected from disclosure pursuant to the Family Rights and Privacy Act of 1972 ("FERPA"), such information is deemed non-public by federal statute and therefore is also non-public under the APRA and may not be publicly produced in response to such a request; and the cost of redacting such information shall be borne by the requesting party. 2022 WL 850729 (R.I.A.G. February 11, 2022) citing *DARE v Gannon*, 819 A.2d 651, 661 (R.I. 2003). Notably, the Attorney General deemed three (3) minutes per email to be a reasonable estimate for the process of retrieving, reviewing and redacting the emails. Therefore, the District will not be amending its cost estimate with respect to the request for the eight (8) years' worth of Mr. [REDACTED]'s emails.

In closing, I look forward to your response regarding the foregoing and I thank you for your attention to this matter.

Sincerely,

Deidre E. Carreno

cc: Robert Mitchell, Interim Superintendent