

MCDONALD LAMOND CANZONERI
ATTORNEYS AT LAW

352 Turnpike Road, Suite 210
Southborough, MA 01772-1756
www.masslaborlawyers.com

Alan J. McDonald
James F. Lamond*
Jack J. Canzoneri
Jason R. Powalisz
Dennis M. Coyne**
Kristen A. Barnes**
John O. Killian
Summar C. Sparks

Tel: 508-485-6600
617-928-0080

Fax: 508-485-4477
617-928-0081

Of Counsel
Michael Kantrovitz

In Memoriam
Vida K. Berkowitz
(1994-2005)

*Also Licensed in New Hampshire

**Also Licensed in New York

October 15, 2021

VIA ELECTRONIC FILING

The Honorable Timothy S. Hillman
Judge
U.S. District Court
District of Massachusetts
595 Main Street
Worcester, Massachusetts 01608

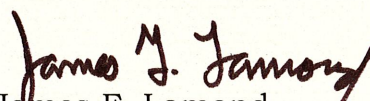
Re: MCOFU et al. v. Baker et al., USDA Case No. 4:21-cv-11599

Dear Judge Hillman:

During oral argument in this matter, you asked for the number of unvaccinated correction officers in the bargaining unit represented by MCOFU. While our client does not have that precise information, I can report that during a labor-management meeting on October 13, 2021, the DOC represented to MCOFU that the number was 1,411. This represents approximately 40% of bargaining unit members.

Thank you.

Very truly yours,

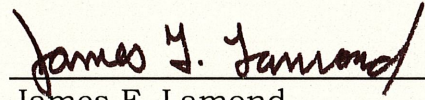

James F. Lamond

JFL/sh

CERTIFICATE OF SERVICE

I, James F. Lamond, hereby certify that I have this day caused to be served by the Court's electronic filing system a copy of the foregoing on counsel of record for the Defendants.

Dated: October 15, 2021



James F. Lamond