

## Attachment 4 - Comparison of East Bridgewater and Natick Petitions

**Purpose and limit of this exhibit.** This comparison does not assert access to counsel's internal template, drafting process, or attorney-client communications. It compares two public fee/time petitions filed on September 28, 2026 and identifies distinctive language, errors, rates, and workload rationales that appear in both filings. The relevance is whether East Bridgewater's petition supplies the request-specific facts required by the Supervisor's petition guidance.

| Point                           | East Bridgewater petition                                                                                                                                                                                                                                            | Natick petition                                                                                                                                                                                        |
|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Responsive universe             | Approximately 6 documents. Five hours claimed for search; three hours estimated for review.                                                                                                                                                                          | Approximately 300 pages of agreements. Two hours claimed for search; review calculated from one minute per page, with Natick applying a two-hour credit.                                               |
| Distinctive typo                | "To produce these records south in the request..." (p. 5)                                                                                                                                                                                                            | Same wording: "To produce these records south in the request..." (p. 6)                                                                                                                                |
| Wrong record type               | "Each page of the invoices sought in the request must be reviewed..." (p. 6). The underlying request seeks settlement/resolution agreements, not invoices.                                                                                                           | Same wording: "Each page of the invoices sought in the request must be reviewed..." (p. 7). The underlying request seeks settlement/resolution agreements, not invoices.                               |
| Attorney-rate theory            | Says settlement agreements were negotiated with attorneys; attorney rate is about \$270; asks to charge \$75/hour; says Office of District Counsel is the lowest-paid person/vendor with the necessary skill for privilege review.                                   | Materially identical language and figures: about \$270/hour, requested \$75/hour, and Office of District Counsel described as the lowest-paid person/vendor with necessary skill for privilege review. |
| Other-district-client rationale | Says Parent Data Force made an identical request to numerous districts; counsel must complete redactions for each district it represents; counsel cannot review all clients within 10 business days; attorneys must respond to similar requests for other districts. | The same multi-district/shared-client paragraph appears in Natick's petition.                                                                                                                          |
| Requested time relief           | Additional 30 business days.                                                                                                                                                                                                                                         | Additional 30 business days.                                                                                                                                                                           |

## **Exact shared-client language**

**East Bridgewater, p. 6:** Parent Data Force appears to have made an identical request to numerous school districts in the state. As a result, legal counsel will have to complete the necessary redactions for each of the districts it represents. It is not possible for legal counsel to review and redact the responsive documents of all its clients within 10 business days. The District will be unable to produce the records during normal business hours of operation without an extension in light of the fact that its attorneys will have to respond to similar requests for other districts and only counsel is able to review the responsive documents to determine the application of the student record confidentiality exception.

**Natick, p. 7:** The same paragraph appears in Natick's petition, including the statements that counsel must handle records for "each of the districts it represents," cannot review the documents of "all its clients" within 10 business days, and must respond to similar requests for "other districts."

**Why this comparison is offered.** The petitions concern very different responsive universes, yet use the same distinctive errors and the same cross-district counsel-capacity rationale. This does not prove improper coordination or improper template use. It supports a narrower request: that East Bridgewater's fee and time petition be evaluated on East Bridgewater-specific evidence of necessity, burden, staffing capacity, and the work actually required for its six identified documents.

Source documents attached separately: East Bridgewater Fee & Time Petition (September 28, 2026) and Natick Fee & Time Petition (September 28, 2026).