

IN THE SECOND JUDICIAL DISTRICT COURT OF DAVIS COUNTY  
FARMINGTON DEPARTMENT, STATE OF UTAH

ACLU of UTAH FOUNDATION, INC.  
and DISABILITY LAW CENTER,

Petitioners,

vs.

DAVIS COUNTY, a political subdivision  
of the State of Utah, and the UTAH  
STATE RECORDS COMMITTEE,

Respondents.

**RULING AND ORDER**

Case No. 180700511

Judge: David Connors

This matter came before the Court for a bench trial on January 6, 7, and 29, 2021. Petitioners were represented at trial by counsel David Reymann and Jeremy Brodis; Respondents were represented at trial by counsel Blake Hamilton, Ashley Gregson, Michael Kendall, and Paul Tonks. Having considered all of the evidence and arguments presented, being fully advised in the premises, and for the reasons set forth below, the Court rules and orders as follows:

**BACKGROUND**

On October 31, 2017, Petitioners submitted a request under the Government Records Access and Management Act, Utah Code §§ 63G-2-101, *et seq.* ("GRAMA"), to Davis County, requesting to inspect and/or receive copies of various records including: (i) "All written standards used or relied upon by Davis County in its administration and operation of the Davis County Jail at any time during the past five (5) years, including but not limited to the Utah Jail Standards" (hereinafter, the "Utah Jail Standards"), and (ii) certain audit reports documenting the Jail's compliance with those standards (hereinafter the "Audit Reports").

On December 6, 2017, the County denied access to some of the requested documents, including the Utah Jail Standards and the Audit Reports. With regard to the Utah Jail Standards, the County stated in the denial that "these standards are copyrighted and proprietary and that they are owned by DeLand and Associates."

By way of background, Gary DeLand wrote a work he called the Model Standards for Prison Management and, in 1996, registered that work with the U.S. Copyright Office. Around the same time, the Utah Sheriffs' Association and others initiated discussions with Mr. DeLand regarding DeLand writing legal-based jail standards to which Utah sheriffs' offices could refer. The Utah Association of Counties paid DeLand for writing such legal-based jail standards applicable to Utah jails, which came to be known as the Utah Jail Standards. DeLand retained ownership of the copyright for the standards.<sup>1</sup> In January 2020, DeLand sold the Utah Jail Standards and all of his rights thereto to National Institute of Jail Operations ("NIJO"). Mr. DeLand and a representative from NIJO testified at trial.<sup>2</sup>

On January 5, 2018, Petitioners appealed the County's denial to the Chief Administrative Officer for GRAMA appeals for Davis County. The Chief Administrative Officer affirmed Davis County's decision and stated that the Utah Jail Standards "are not records under GRAMA" as defined under Utah Code § 63G-2-103(22)(a). On February 16, 2018, Petitioners appealed to the State Records Committee. The Records Committee held a hearing on the matter then issued a written decision upholding the County's denial.

Petitioners filed a petition for judicial review on May 21, 2018. On October 3, 2019, the Court entered an Order Partially Granting Petitioners' Motion for Summary Judgment, and some of the requested documents, including the Audit Reports, were released to Petitioners. The Court, however, denied Petitioners' summary judgment motion with regard to the Utah Jail Standards and reserved for trial whether the Utah Jail Standards are subject to release under GRAMA to these two Petitioners.

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<sup>1</sup> All parties seem to agree, without specifically addressing the issue, that the Utah Jail Standards are a derivative work from DeLand's Model Standards for Prison Management. The County has never provided evidence that the Utah Jail Standards were separately registered for copyright protection with the U.S. Copyright Office, either by Mr. DeLand or by anyone else.

<sup>2</sup> It is not clear to the Court as to why neither Mr. DeLand nor NIJO intervened in this matter; however, both parties had the opportunity and invitation to do so. They participated as, or through, witnesses, but neither actually intervened as a party to the action.

## ANALYSIS

“District courts review record denials under GRAMA de novo.” *Deseret News Pub. Co. v. Salt Lake Cty.*, 2008 UT 26, ¶ 11, 182 P.3d 372; *See* Utah Code Ann. § 63-2-404(7)(a). “In the course of conducting its review of the disputed record, a court may consider and weigh interests and public policies bearing on whether the record should be disclosed.” *Id.* At trial, the Court was asked to determine 1) whether the materials requested, the Utah Jail Standards, are considered “records” under GRAMA; and 2) if these materials are considered “records,” whether they are subject to release to these two Petitioners.

### **I. THE UTAH JAIL STANDARDS ARE “RECORDS” UNDER GRAMA BECAUSE RELEASE TO THESE PETITIONERS CONSTITUTES FAIR USE UNDER COPYRIGHT LAW.**

Under GRAMA the definition of a “record” does not include “material to which access is limited by the laws of copyright or patent unless the copyright or patent is owned by a governmental entity or political subdivision.” Utah Code Ann. § 63G-2-103(22)(b)(iv).<sup>3</sup> This definition of a “record” presents two questions: a) does this definition exclude all materials potentially protected by copyright from release under GRAMA; and b) if some copyrighted materials can be released under GRAMA, do the laws of copyright place any restrictions on the release of the Utah Jail Standards to these Petitioners.

#### ***A. The phrase “limited by the laws of copyright” does not exclude all materials protected by copyright from release under GRAMA.***

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<sup>3</sup> A “record” under GRAMA also does not include “material that is legally owned by an individual in the individual's private capacity.” Utah Code Ann. § 63G-2-103(22)(b)(iii). At trial, Respondents were unable to show by a preponderance of the evidence that the materials at issue are or were legally owned by Gary DeLand as an individual in his private capacity at the time of the Petitioners’ GRAMA request. The County’s partial denial states: “these standards are copyrighted and proprietary and that they are owned by DeLand and Associates.” Joint Stipulated Facts, ¶ 3. Additionally, the introduction to the standards provides that, before the standards could be released to others, “prior written consent from DeLand & Associates, Inc. was required[.]” *Id.* ¶ 22. Although Mr. DeLand asserted during his testimony that he believed he owned the copyright to the Utah Jail Standards in his individual capacity, even his testimony was not definitive and conflicted with the documentary evidence. Moreover, as mentioned above, he never intervened in the action to assert an ownership interest. For purposes of this proceeding only, the Court finds that the standards were owned, in the pertinent time frame, by DeLand & Associates, Inc. rather than by Mr. DeLand in his private capacity.

It is a general presumption that, when interpreting statutory language, “the legislature used each word advisedly” and courts read “each term according to its ordinary and accepted meaning.” *Martinez v. Media-Paymaster Plus/Church of Jesus Christ of Latter-Day Saints*, 2007 UT 42, ¶ 46, 164 P.3d 384. Respondents interpret the phrase “limited by the laws of copyright” as a prohibition on any materials being released under GRAMA that are, or potentially could be, protected by copyright. On the other hand, according to Petitioners, this phrase does not allow a government agency to withhold disclosure of all copyrighted, or potentially copyrighted, materials if those materials would, under applicable copyright law, not be entitled to protection for the uses contemplated. In other words, Petitioners argue that the reference to copyright protection in GRAMA incorporates the entire body of federal copyright law, including the fair use doctrine. The Court agrees with Petitioners’ position on this point.

Since there is no apparent case law from Utah interpreting the phrase “limited by the laws of copyright” in the context of a public records request, the Court looks to case law from other jurisdictions addressing this issue. In considering a governmental record request, the Supreme Court of Wisconsin interpreted a statute almost identical to GRAMA, which states that the definition of a record “does not include ... materials to which access is limited by copyright, patent, or bequest....” *Zellner v. Cedarburg Sch. Dist.*, 2007 WI 53, ¶ 26, 300 Wis. 2d 290, 304, 731 N.W.2d 240. The Court in *Zellner* found that the phrase “limited by copyright” is not ambiguous, and to determine whether a copyright exception applies, it was necessary “to look to federal copyright law.” *Id.* The United States Court of Appeals for the District of Columbia Circuit made a similar conclusion stating: “that the mere existence of copyright, by itself, does not automatically render [the Freedom of Information Act] inapplicable to materials that are clearly agency records.” *Weisberg v. U.S. Department of Justice*, 631 F.2d 824, 825 (D.C.Cir.1980). Interpreting the Freedom of Information Act to exclude from release any material that has been copyrighted “would allow an agency to mask its processes or functions from public scrutiny simply by asserting a third party’s copyright.” *Id.* at 828 (internal quotations omitted).

Under Pennsylvania's "Right to Know Law," comparable to GRAMA in Utah, a "public record" is defined as a record that "is not exempt from being disclosed under any other Federal or State law or regulation or judicial order or decree." *Ali v. Philadelphia City Planning Comm'n*, 125 A.3d 92, 99 (Pa. Commw. Ct. 2015); see 65 P.S. § 67.102. In *Ali*, the court was asked to decide whether a federal law, specifically the federal copyright act, made copyrighted material exempt from disclosure under the state's Right to Know Law. *Id.* The court concluded that the copyright act "is not a federal law that exempts materials from disclosure under the [Right to Know Law]." *Id.* at 101. "It neither expressly makes copyrighted material private or confidential, nor does it expressly preclude a government agency, lawfully in possession of the copyrighted material, from disclosing that material to the public." *Id.* Duplication of the record may be limited by the laws of copyright but, under the state's law, the record must at least be available for inspection which would allow "the public to scrutinize a local agency's reliance on or consideration of the copyrighted material." *Id.* at 105.

Incorporating the laws of copyright into a GRAMA request under Utah law necessitates taking extra steps and analysis that Respondents argue are impractical and contrary to the purpose of GRAMA. A request for copyrighted materials would require the requesting party to show how their intended use of the materials is consistent with the laws of copyright. In *National Council on Teacher Quality v. Minnesota State Colleges & Universities*, 837 N.W.2d 314 (Minn. Ct. App. 2013) the court encountered this same issue. The court found that the state law governing records requests did not prohibit a government agency "from requiring a data requestor to justify its access request" but state law also did not "expressly or implicitly prohibit an agency from considering a justification that the requestor has provided voluntarily." *Id.* at 318. Here, Davis County did not request that Petitioners explain their intended use of the copyrighted materials but Petitioners voluntarily provided this information in response to the County's copyright concerns. The Minnesota court stated that "[t]hese circumstances provide safe footing between the data-access mandate embodied in the data practices act and the fair-use-only provisions embodied in the

copyright act.” *Id.* at 319. “[T]his footing allows for a nonconflicting interpretation and application of federal and state law: although state law prohibits a data-practices respondent from demanding a fair-use justification, it does not prohibit it from recognizing that one exists.” *Id.*

The Court has determined that it is consistent with the plain language of GRAMA, and with persuasive reasoning from relevant case law in other jurisdictions, that copyrighted material may be released under GRAMA if the release of said materials to the persons specifically requesting such materials falls within the fair use doctrine of federal copyright law.

***B. The laws of copyright do not restrict the release of the Utah Jail Standards to Petitioners.***

Copyrighted material is considered a record under GRAMA if the laws of copyright do not limit the requesting party’s access to these materials. Under the federal copyright act, the copyright owner has “exclusive rights” to approve any of the following:

- (1) to reproduce the copyrighted work in copies or phonorecords;
- (2) to prepare derivative works based upon the copyrighted work;
- (3) to distribute copies or phonorecords of the copyrighted work to the public by sale or other transfer of ownership, or by rental, lease, or lending;
- (4) in the case of literary, musical, dramatic, and choreographic works, pantomimes, and motion pictures and other audiovisual works, to perform the copyrighted work publicly;
- (5) in the case of literary, musical, dramatic, and choreographic works, pantomimes, and pictorial, graphic, or sculptural works, including the individual images of a motion picture or other audiovisual work, to display the copyrighted work publicly; and
- (6) in the case of sound recordings, to perform the copyrighted work publicly by means of a digital audio transmission

17 U.S.C.A. § 106. The copyright act also enumerates certain exceptions to the copyright owner’s exclusive rights, one of which applies here: the fair use exception.

A copyright owner's exclusive rights are not infringed if the reproduction or distribution of the materials at issue constitutes "fair use." The copyright act provides a four-part test to aid in the determination of when and where the fair use exception applies:

Notwithstanding the provisions of sections 106 and 106A, the fair use of a copyrighted work, including such use by reproduction in copies or phonorecords or by any other means specified by that section, for purposes such as criticism, comment, news reporting, teaching (including multiple copies for classroom use), scholarship, or research, is not an infringement of copyright. In determining whether the use made of a work in any particular case is a fair use the factors to be considered shall include--

- (1) the purpose and character of the use, including whether such use is of a commercial nature or is for nonprofit educational purposes;
- (2) the nature of the copyrighted work;
- (3) the amount and substantiality of the portion used in relation to the copyrighted work as a whole; and
- (4) the effect of the use upon the potential market for or value of the copyrighted work.

17 U.S.C.A. § 107. The fair use doctrine "calls for case-by-case analysis" and, upon examination, the four statutory factors are to be "weighed together," not "treated in isolation, one from another." *Campbell v. Acuff-Rose Music, Inc.*, 510 U.S. 569, 577-78 (1994) (internal citations omitted).

The first factor to consider is "the purpose and character of the use, including whether such use is of a commercial nature or is for nonprofit educational purposes." Petitioners state that they are both nonprofit organizations and seek the Utah Jail Standards for purposes of criticism, comment, education, research, and advocacy. Respondents argue that the first factor weighs against a finding of fair use because any documents that Petitioners receive in response to their GRAMA request are not limited to any particular use. But if the materials are released to Petitioners and then used by the Petitioners in a manner not considered "fair use" the Petitioners will have violated the laws of copyright, for which the copyright owner would have a remedy:

The Copyright Act provides the owner of a copyright with a potent arsenal of remedies against an infringer of his work, including an injunction to restrain the infringer from violating his rights, the impoundment and destruction of all reproductions of his work made in violation of his rights, a recovery of his actual damages and any additional profits realized by the infringer or a recovery of statutory damages, and attorneys fees.

*Sony Corp. of Am. v. Universal City Studios, Inc.*, 464 U.S. 417, 433–34 (1984) (internal citations omitted). The evidence at trial supported Petitioners’ assertions that their GRAMA request was made for nonprofit educational purposes, which weighs in favor of the fair use exception.

Next, the Court must consider “the nature of the copyrighted work.” “This factor calls for recognition that some works are closer to the core of intended copyright protection than others, with the consequence that fair use is more difficult to establish when the former works are copied.” *Campbell*, 510 U.S. at 58. Typically, under this factor, “fair use is more likely to be found in factual works than in fictional works.” *Stewart v. Abend*, 495 U.S. 207, 237 (1990). Another “critical element” in establishing the “nature” of the copyrighted work is whether it is published or unpublished. *Harper & Row Publishers, Inc. v. Nation Enterprises*, 471 U.S. 539, 564 (1985). An unpublished work is less likely to constitute fair use because “the author’s right to control the first public appearance of his expression weighs against such use of the work before its release.” *Id.* Petitioners have shown that the Utah Jail Standards are generally factual in nature and have been published.<sup>4</sup> Respondents argue that releasing the Utah Jail Standards is not fair use because the standards essentially constitute a treatise on all things jail-related. But finding that the jail standards function as a treatise only

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<sup>4</sup> From the evidence presented, it is clear that the jail standards have regularly been available for sale and licensing. Access to the Utah Jail Standards was given to the Utah Sheriffs’ Association and various counties in Utah that were paying members of the association. Local law enforcement in states such as Alabama, Arizona, Hawaii, Michigan, and Oregon, among other states, have also purchased access to similar standards from DeLand and his successors, including NIJO. Given these facts, which were not disputed, the Court finds and concludes that the Utah Jail Standards have been published.



strengthens the conclusion that the nature of this copyrighted work is factual and weighs in favor of applying the fair use exception.

The third factor analyzes “the amount and substantiality of the portion used in relation to the copyrighted work as a whole.” This factor considers the “justification for the particular copying done” because “the extent of permissible copying varies with the purpose and character of the use.” *Campbell*, 510 U.S. at 586–87 (internal citation omitted). Depending on the nature of the work, “the fact that the entire work is reproduced” does not necessarily have the “effect of militating against a finding of fair use.” *Sony*, 464 U.S. at 449–50. Petitioners seek the entirety of the Utah Jail Standards and have presented a substantial and compelling justification to support the release of these records.<sup>5</sup> Jails perform an essential public function. There is a significant public interest that detainees, many of whom are pretrial and have not been convicted of a crime, receive proper care and treatment. The justifications for Petitioners’ request are proportional to the substantial amount of the copyrighted work they seek to examine.<sup>6</sup>

The final factor is “the effect of the use upon the potential market for or value of the copyrighted work.” If a copyright owner can establish “with reasonable probability the existence of a causal connection between the infringement and a loss of revenue” then “the burden properly shifts to the infringer to show that this damage would have occurred had there been no taking of copyrighted expression.” *Harper & Row*, 471 U.S. at 567. A finding of fair use is negated by a showing “that if the challenged use should become widespread, it would adversely affect the potential market for the copyrighted work.” *Id.* at 568 (internal citations omitted). At trial, Petitioners demonstrated that for Utah Jail Standards to be the

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<sup>5</sup> “Notwithstanding the reasonable implication of Factor Three that fair use is more likely to be favored by the copying of smaller, rather than larger, portions of the original, courts have rejected any categorical rule that a copying of the entirety cannot be a fair use. Complete unchanged copying has repeatedly been found justified as fair use when the copying was reasonably appropriate to achieve the copier’s transformative purpose and was done in such a manner that it did not offer a competing substitute for the original.” *Authors Guild v. Google, Inc.*, 804 F.3d 202, 221 (2d Cir. 2015).

<sup>6</sup> It is also noted that both parties recognize that, even though Petitioners seek the release of the entirety of the Utah Jail Standards, certain provisions may be redacted following in camera review by the Court.

most useful, they must be continuously updated; otherwise, they cannot be relied upon for qualified immunity. Petitioners seek the 2017 version of the Utah Jail Standards and state that this outdated version would be relatively useless to jails and could not serve as a market substitute for updated versions. Respondents claim that the Utah Jail Standards, even the outdated versions, are valued by correctional facilities precisely because they are not publicly available. The evidence, however, did not show, and this Court specifically does not find, that the release of the Utah Jail Standards to these Petitioners, for their noncommercial use of education and advocacy, would impact the market for or value of the copyrighted work. “The purpose of copyright is to create incentives for creative effort.” *Sony*, 464 U.S. at 450–51. “But a use that has no demonstrable effect upon the potential market for, or the value of, the copyrighted work need not be prohibited in order to protect the author's incentive to create.” *Id.* The incentive to continually create updated standards for jails would not be impacted by the release of the 2017 version of the Utah Jail Standards to Petitioners for the purposes they have outlined. Indeed, evidence suggests that because the law is constantly changing, there will always be an incentive to continuously create and update the jail standards. Additionally, as more time passes by, the value of older versions of the jail standards will decrease, and the likelihood that the release of said versions will have any effect upon the market for jail standards will likewise decrease.

Therefore, the Court finds that, after weighing the four statutory factors of the fair use doctrine together, the type of use envisioned by these Petitioners falls easily within the fair use doctrine of federal copyright law. Therefore the Court concludes that the laws of copyright do not limit the release of the Utah Jail Standards to these Petitioners for the uses they have outlined.

**II. THE REQUESTED MATERIALS MAY BE RELEASED TO THESE PETITIONERS AFTER THE DISTRICT COURT REVIEWS THE RECORDS IN CAMERA AND APPROPRIATE REDACTIONS ARE MADE.**

The Legislature recognized two constitutional rights when enacting GRAMA, “(a) the public's right of access to information concerning the conduct of the public's business;

and (b) the right of privacy in relation to personal data gathered by governmental entities.” Utah Code Ann. § 63G-2-102(1). The Legislature also acknowledged “a public policy interest in allowing a government to restrict access to certain records, as specified in this chapter, for the public good.” *Id.* In accordance with the intended purposes of GRAMA, records may be classified as public, private, controlled, or protected. Utah Code Ann. § 63G-2-305, *et seq.* Furthermore, “[a] record is public unless otherwise expressly provided by statute.” Utah Code Ann. § 63G-2-201(2).<sup>7</sup>

Respondents argue that even if the Utah Jail Standards are considered records under GRAMA, they are protected from disclosure because they contain trade secrets and commercial information. If properly classified by a governmental entity, trade secrets and commercial information may be prevented from disclosure under GRAMA if certain criteria are met:

- (1) trade secrets as defined in Section 13-24-2 if the person submitting the trade secret has provided the governmental entity with the information specified in Section 63G-2-309;
- (2) commercial information or nonindividual financial information obtained from a person if:
  - (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future;
  - (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access; and
  - (c) the person submitting the information has provided the governmental entity with the information specified in Section 63G-2-309

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<sup>7</sup> After this case was initiated, the Legislature made additions to GRAMA, effective May 12, 2020, and records that are “normally public” now include “records that disclose a standard, regulation, policy, guideline, or rule regarding the operation of a correctional facility or the care and control of inmates committed to the custody of a correctional facility.” Utah Code Ann. § 63G-2-301(3)(u)(i). The Court does not find that retroactive application of this amendment is appropriate and the parties seem to agree as neither side has argued that it should be applied.

Utah Code Ann. § 63G-2-305. Any individual who “provides to a governmental entity a record” which that individual “believes should be protected” as a trade secret or commercial information under Subsection 63G-2-305(1) or (2) is required to provide, along with the record “(A) a written claim of business confidentiality; and (B) a concise statement of reasons supporting the claim of business confidentiality.” Utah Code Ann. § 63G-2-309(1). Therefore, trade secrets and commercial information would only be “protected” under GRAMA if the individual who provided the record to the government followed the procedures outlined in Section 63G-2-309.

At trial, Respondents did not establish that the Utah Jail Standards qualify as a trade secret or commercial information under Utah law. Moreover, no evidence was presented showing that whoever provided the Utah Jail Standards to Davis County submitted a “written claim of business confidentiality” or a “statement of reasons supporting the claim of business confidentiality.” Failure to satisfy these requirements means that the Utah Jail Standards cannot be protected as trade secrets or commercial information under GRAMA.

Other records that are “protected if properly classified by a governmental entity” include:

[R]ecords that, if disclosed, would jeopardize the security or safety of a correctional facility, or records relating to incarceration, treatment, probation, or parole, that would interfere with the control and supervision of an offender's incarceration, treatment, probation, or parole

Utah Code Ann. § 63G-2-305(13).

The Court agrees with Respondents that any information in the Utah Jail Standards that would implicate Section 63G-2-305(13) should not be released to Petitioners. This, however, does not bar the release of the remainder of the Utah Jail Standards to Petitioners. Under GRAMA “[t]he district court may review the disputed records” and “[t]he review shall be in camera.” Utah Code Ann. § 63G-2-404(5). Following a review of the records, the Court can restrict access to or redact information that would jeopardize any correctional facility's safety or security. Section 63G-2-404 allows the Court to order the disclosure or nondisclosure of private, controlled, or even protected records:

(a) Except as provided in Section 63G-2-406, the court may, upon consideration and weighing of the various interests and public policies pertinent to the classification and disclosure or nondisclosure, order the disclosure of information properly classified as private, controlled, or protected if the interest favoring access is greater than or equal to the interest favoring restriction of access.

(b) The court shall consider and, where appropriate, limit the requester's use and further disclosure of the record in order to protect privacy interests in the case of private or controlled records, business confidentiality interests in the case of records protected under Subsections 63G-2-305(1) and (2), and privacy interests or the public interest in the case of other protected records.

Utah Code Ann. § 63G-2-404(7).

Here, the right of access to information that concerns the conduct surrounding an essential public function outweighs the interest favoring restriction of access to the Utah Jail Standards. Accordingly, after redacting information related to safety or security, the requested materials may be released to these two Petitioners, but only for the specific purposes they have outlined. Nothing in this ruling allows any further use, or republication or distribution of the Utah Jail Standards by these Petitioners, or anyone else, outside the boundaries of the fair use exception to federal copyright protection.

### **ORDER**

Based upon the foregoing, the Court directs Respondents to provide the Court a complete copy of the Utah Jail Standards for in camera review so that any information that would jeopardize the safety and security of correctional facilities or that would interfere with the control and supervision of an offender's incarceration, treatment, probation, or parole can be redacted. Specific information that the County believes will actually jeopardize the safety and security of its correctional facility or interfere with the control and supervision of an offender's incarceration, treatment, probation, or parole must be specifically identified by the County for the Court's in camera review. After the appropriate redactions have been made, the Court orders that the requested materials be released to these Petitioners for the limited uses they have requested. The Court concludes that this

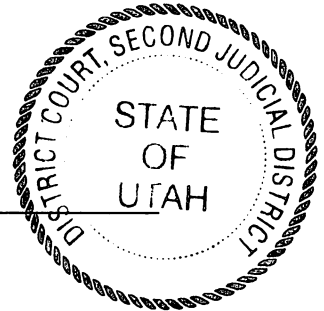
appropriately limited release to these Petitioners is in accordance with the terms and provisions of GRAMA.

Dated this 25th day of March, 2021.

BY THE COURT

*David M. Connors*

David M. Connors  
District Court Judge



**CERTIFICATE OF NOTIFICATION**

I certify that a copy of the attached document was sent to the following people for case 180700511 by the method and on the date specified.

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03/25/2021

/s/ JACLYN BRISCOE

Date: \_\_\_\_\_

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Signature