

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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TOGETHER EMPLOYEES, by Individual	)	
Representatives, ROBERTA LANCIONE,	)	
JOYCE MILLER, MARIA DIFRONZO,	)	
MICHAEL SACCOCCIO, ELIZABETH BIGGER,	)	
NATASHA DICICCO, NICHOLAS ARNO and	)	
RUBEN ALMEIDA,	)	Civil Action No. 1:21-cv-11686
Plaintiffs,	)	
v.	)	
	)	
MASS GENERAL BRIGHAM, INCORPORATED.	)	
Defendant.	)	
	)	
	)	
_____	)	

Defendant's Exhibit List

- Exhibit 1.** June 24, 2021 MGB Communication COVID-19 Vaccine Requirement for Employees
- Exhibit 2.** August 10, 2021 MGB Communication A Message from Anne Klibanski, MD
- Exhibit 3.** September 29, 2021 MGB Communication Advanced Notice: Employees will be vaccine compliant with first dose of Moderna or Pfizer by October 15
- Exhibit 4.** September 8, 2021 Updated MGB HR COVID 19 Vaccination Policy
- Exhibit 5.** The Case for Mandating COVID-19 Vaccines for Health Care Workers, Annals of Internal Medicine
- Exhibit 6.** Joint Statement in Support of COVID-19 Vaccine Mandates for All Workers in Health and Long-Term Care
- Exhibit 7.** COVID Vaccine Medical Exemption Request Form 2021
- Exhibit 8.** October 22, 2021 Vaccine Policy
- Exhibit 9.** August 11, 2021 Maria DiFronzo Medical Exemption Request
- Exhibit 10.** August 24, 2021 MGB email to Maria DiFrozone that her request for medical exemption from the vaccination requirement had been denied
- Exhibit 11.** September 2, 2021 Roberta Lancione Medical Exemption Request

- Exhibit 12.** September 9, 2021 MGB email to Roberta Lancione that her request for medical exemption from the vaccination requirement had been denied
- Exhibit 13.** August 17, 2021 Joyce Miller Medical Exemption Request
- Exhibit 14.** September 9, 2021 MGB email to Joyce Miller that her request for medical exemption from the vaccination requirement had been denied
- Exhibit 15.** August 19, 2021 Michael Saccoccio Medical Exemption Request
- Exhibit 16.** September 9, 2021 MGB email to Michael Saccoccio that his request for medical exemption from the vaccination requirement had been denied
- Exhibit 17.** September 13, 2021 Michael Saccoccio email supplementing his Medical Exemption Request
- Exhibit 18.** September 17, 2021 Michael Saccoccio med letter further supplementing his Medical Exemption Request
- Exhibit 19.** September 24, 2021 MGB email to Michael Saccoccio confirming that his request for medical exemption from the vaccination requirement had been denied
- Exhibit 20.** Flu and COVID-19 Religious Exemption Form 2021
- Exhibit 21.** September 1, 2021 Ruben Almeida Religious Exemption Request
- Exhibit 22.** September 10, 2021 MGB email requesting additional information from Ruben Almeida
- Exhibit 23.** September 12 2021 Ruben Almeida email response to MGB's request for additional information
- Exhibit 24.** September 23, 2021 MGB email notification to Ruben Almeida that his request for a religious exemption from the vaccination requirement had been denied
- Exhibit 25.** August 24, 2021 Nicholas Arno Religious Exemption Request
- Exhibit 26.** September 4, 2021 MGB email requesting additional information from Nicholas Arno
- Exhibit 27.** September 7, 2021 Nicholas Arno email response to MGB's request for additional information
- Exhibit 28.** September 14, 2021 MGB email notification to Nicholas Arno that his request for a religious exemption from the vaccination requirement had been denied
- Exhibit 29.** September 3, 2021, Elizabeth Bigger Religious Exemption Request

- Exhibit 30.** September 10, 2021 MGB email requesting additional information from Elizabeth Bigger
- Exhibit 31.** September 13, 2021 Elizabeth Bigger email response to MGB's request for additional information
- Exhibit 32.** September 14, 2021 MGB email notification to Elizabeth Bigger that her request for a religious exemption from the vaccination requirement had been denied
- Exhibit 33.** September 2, 2021 Natasha DiCicco Religious Exemption Form
- Exhibit 34.** September 10, 2021 MGB email requesting additional information from Natasha DiCicco
- Exhibit 35.** September 10, 2021 Natasha DiCicco email response to MGB's request for additional information
- Exhibit 36.** September 14, 2021 MGB email notification to Natasha DiCicco that her request for a religious exemption from the vaccination requirement had been denied
- Exhibit 37.** September 1, 2021 Maria DiFronzo Religious Exemption Form
- Exhibit 38.** September 10, 2021 MGB email requesting additional information from Maria DiFronzo
- Exhibit 39.** September 13, 2021 Maria DiFronzo email response to MGB's request for additional information
- Exhibit 40.** September 14, 2021 MGB email notification to Maria DiFronzo that her request for a religious exemption from the vaccination requirement had been denied
- Exhibit 41.** September 3, 2021, Roberta Lancione Religious Exemption Form
- Exhibit 42.** September 9, 2021 MGB email requesting additional information from Roberta Lancione
- Exhibit 43.** September 12, 2021 Roberta Lancione email response to MGB's request for additional information
- Exhibit 44.** September 16, 2021 MGB email notification to Roberta Lancione that her request for a religious exemption from the vaccination requirement had been denied
- Exhibit 45.** August 20, 2021 Joyce Miller Religious Exemption Form
- Exhibit 46.** September 4, 2021 MGB email requesting additional information from Joyce Miller
- Exhibit 47.** September 7, 2021 Joyce Miller email response to MGB's request for additional information

- Exhibit 48.** September 14, 2021 MGB email notification to Joyce Miller that her request for a religious exemption from the vaccination requirement had been denied
- Exhibit 49.** August 22, 2021 Michael Saccoccio Religious Exemption Form
- Exhibit 50.** September 2, 2021 MGB email requesting additional information from Michael Saccoccio
- Exhibit 51.** September 7, 2021 Michael Saccoccio email response to MGB's request for additional information
- Exhibit 52.** September 11, 2021 MGB email notification to Michael Saccoccio that his request for a religious exemption from the vaccination requirement had been denied

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2021, a copy of the foregoing document was filed electronically through the Court's electronic filing system ("ECF system") and that counsel for Plaintiffs is a registered user of the ECF system. Notice of this filing will be sent by operation of the Court's ECF system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's ECF system.

/s/ Katherine A. Perrelli

Katherine A. Perrelli