

**PYLE, ROME & LICHTEN, P.C.**

Attorneys at Law  
90 Canal Street, 4th Floor, Boston, MA 02114

June 4, 1999

**Sister Janet Eisner, President  
Emmanuel College  
400 The Fenway  
Boston MA 02115**

**Re: Dr. Richard Beauchesne**

**Dear Sister Eisner:**

**We represent Dr. Beauchesne in connection with the termination of his tenured appointment at Emmanuel College.**

**On behalf of Dr. Beauchesne, and pursuant to the provisions of Massachusetts General Laws, Chapter 149, section 52C, as most recently amended by Chapter 231 of the Acts and Resolves of 1998, I request a complete copy of his personnel record. The copy should be mailed to me at above address within the five day period allowed by the statute.**

**Please note that the statute requires that the personnel record to be provided includes all documents relating to disciplinary action regarding the employee, as well as written warnings of substandard performance and dated termination notices. Therefore the personnel record should include, among other things, all communications concerning his removal from the appeal committees in 1999 and/or his suspension or termination. The record should also include a copy of documents, including but not limited to handwritten notes, from which you read or to which you referred in a meeting with Dr. Beauchesne at a meeting in your office on Friday, May 7, 1999 concerning his performance, suspension, termination or severance.**

**Very truly yours,  
Warren H. Pyle**