

STATE OF VERMONT

SUPERIOR COURT  
Orleans Unit

CIVIL DIVISION  
Docket No. 108-4-14 Oscv

Seymour Lake Association,  
Plaintiff,

v.

State of Vermont, Agency of Natural Resources,  
Department of Environmental Conservation,  
Defendants.

**Motion to Amend**

Now comes the Plaintiff, by and through counsel in the above captioned matter and hereby respectfully requests that, pursuant to V.R.C.P. 15, V.R.C.P. 75(b) and 12 V.S.A. 4711 that Plaintiff be granted leave to amend their complaint under "Request for Relief" by adding the following language:

- 4) *And furthermore the Plaintiff requests that this Court declare the legal relationship of the parties pursuant to 30 V.S.A. 401 and 402 and the Vermont Public Service Board's directives pursuant thereto and whether or not Defendant's are subject to those laws and whether or not Plaintiffs are entitled to the benefit and protection of those laws.*

Dated at Greensboro, Vermont, this \_\_\_\_\_ day of May, 2015.

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David F. Kelley