

EXHIBIT 4

Atty. Scott W. Lang

From: Manousos Gregory <GManousos@morganbrown.com>
Sent: Friday, November 29, 2024 9:18 AM
To: Atty. Scott W. Lang
Cc: Manousos Gregory
Subject: Pothier / Greater New Bedford Regional Voc. Tech -- response to presentment letter

Scott,

I hope you had a nice Thanksgiving. I am writing in response to the June 5, 2024 presentment letter in this case. My clients, Greater New Bedford Regional Vocational Technical School (“School”), Michael Watson and Nancy Markey, deny liability for a number of factual and legal reasons, including but limited to the following:

- The School did not engage in any negligent or wrongful acts or omissions.
- The School and its officials took prompt actions to address the alleged inappropriate relationship between Jacob Pothier and Kathleen Martins (“Martins”) as soon as they were on notice of the allegations.
- The School and its officials otherwise acted appropriately at all times once they were on notice of the allegations.
- Both Pothier and Martins denied the existence of an inappropriate relationship.
- Martins was not acting within the scope of her employment and the alleged conduct occurred while she was off duty.
- The fatal car accident occurred at a time that was long after Martins was employed by the School.
- Various potential or threatened claims are barred by the MTCA, and other facts and circumstances in this case are or may be exempt from the waiver of sovereign immunity in the MTCA.

My clients reserve the right to assert all other potential defenses, including the ones set forth above. Thank you for your attention to this matter.

Greg

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