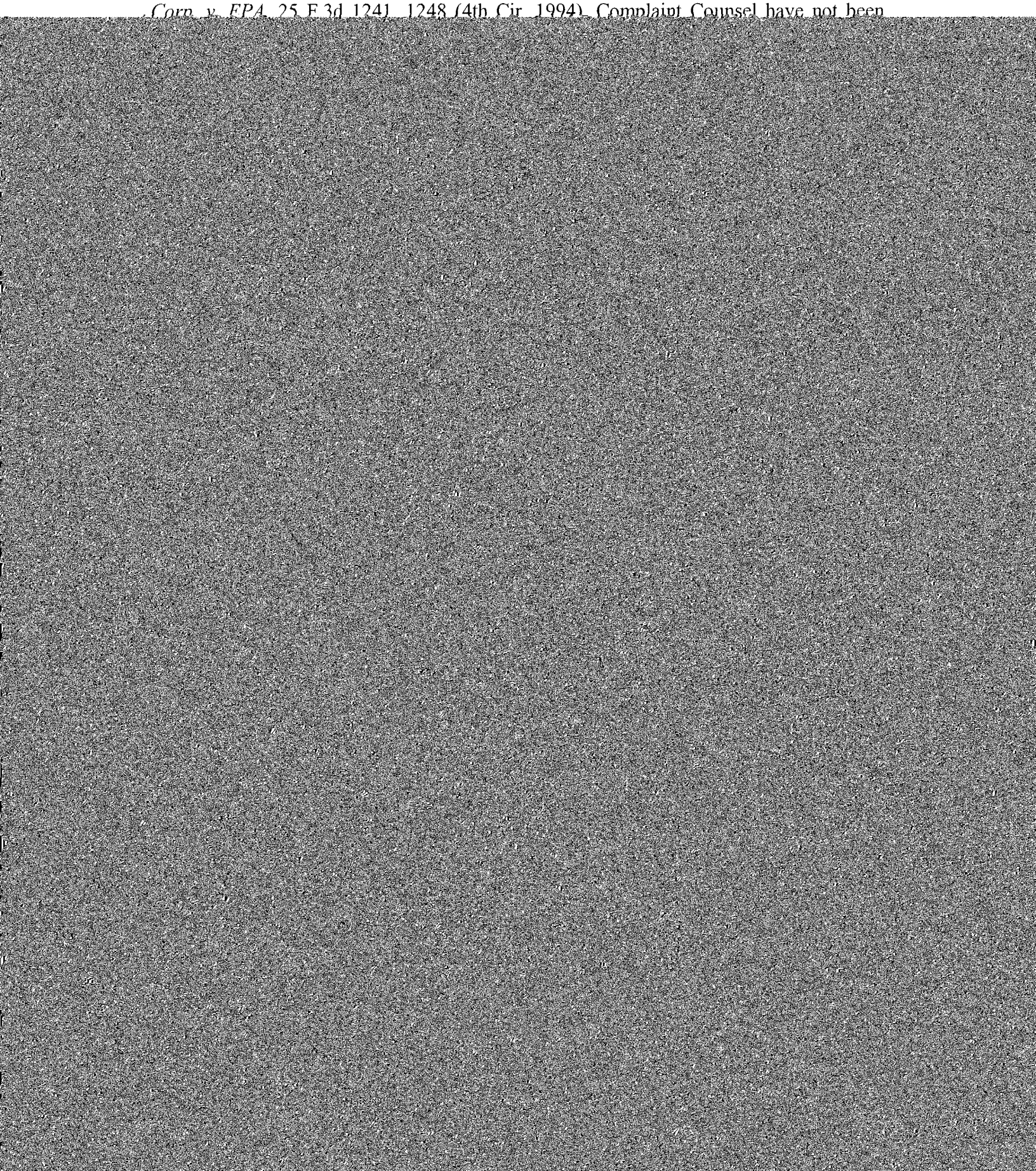
ARGUMENT

not protect a document which is merely peripheral to actual policy formation." *Ethyl Corp. v. EPA*, 25 F.3d 1241, 1248 (4th Cir. 1994). Complaint Counsel have not been



CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2011, I electronically filed the foregoing with