

1 Julie A. Hamill (272742)  
Hamill Law & Consulting  
2 904 Silver Spur Road, #287  
Rolling Hills Estates, California, 90274  
3 (424) 265-0529  
4 julie@juliehamill-law.com

5 Attorney for Petitioner and Plaintiff  
ALLIANCE OF LOS ANGELES COUNTY PARENTS  
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7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **FOR THE COUNTY OF LOS ANGELES**

9 ALLIANCE OF LOS ANGELES COUNTY  
10 PARENTS, an unincorporated association

11 Petitioner and Plaintiff,

12 vs.

13 COUNTY OF LOS ANGELES COUNTY  
14 DEPARTMENT OF PUBLIC HEALTH;  
15 MUNTU DAVIS, in his official capacity as  
Health Officer for the County of Los Angeles;  
16 BARBARA FERRER, in her official capacity as  
Director of the County of Los Angeles  
17 Department of Public Health; and DOES 1  
through 25, inclusive,  
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19 Respondents and Defendants.  
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Case No.: 22STCP02772

**ALLIANCE OF LOS ANGELES COUNTY  
PARENTS NOTICE OF TAKING  
DEPOSITION OF BARBARA FERRER  
AND DEMAND TO PRODUCE  
DOCUMENTS AT DEPOSITION**

Date: May 3, 2023  
Time: 11:30 a.m.  
Place: SHEPPARD MULLIN  
333 South Hope Street  
Forty-Third Floor  
Los Angeles, CA 90071

Complaint Filed: 7/26/2022  
Trial Date: 10/16/2023

1 TO: ALL PARTIES HEREIN AND TO THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to California Code of Civil Procedure Section  
3 2025.430, Petitioner and Plaintiff, ALLIANCE OF LOS ANGELES COUNTY PARENTS, shall  
4 take the deposition of Defendant and Respondent BARBARA FERRER, in her official capacity as  
5 Director of the County of Los Angeles Department of Public Health, under oath and before a duly  
6 authorized court reporter, on May 3, 2023, commencing at 11:30 a.m. The deposition will continue  
7 to May 4, 2023, if necessary, and/or day to day thereafter as agreed to by counsel.

8 Said deposition will be taken at SHEPPARD MULLIN offices located at 333 South Hope  
9 Street, Forty-Third Floor, Los Angeles, CA 90071, before a certified shorthand reporter for the  
10 State of California.

11 Pursuant to Cal. Code Civ. Proc. §2025.220(a)(8), ALLIANCE OF LOS ANGELES  
12 COUNTY PARENTS and their attorneys state that they are aware of no contract or other written or  
13 oral agreement between the noticing parties and the court reporter. Further, the noticing parties  
14 were not directed to use any particular reporter or entity to provide the deposition services.

15 PLEASE TAKE FURTHER NOTICE that said deposition may be recorded by video and the  
16 videotape may be used at the trial of this matter in lieu of live testimony.

17 PLEASE TAKE FURTHER NOTICE that if an interpreter is required to translate  
18 deponent's testimony, notice of same must be given at least five (5) working days prior to the  
19 deposition date, and the specific language and/or dialect requested.

20 IT IS FURTHER REQUESTED that Defendant produce the following documents at the  
21 time of deposition:

22 **REQUEST FOR PRODUCTION OF DOCUMENTS**

23 1. Any and all DOCUMENTS (as used herein, the term "DOCUMENTS" shall mean  
24 any handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by  
25 electronic mail or facsimile, and every other means of recording upon any tangible thing, any form  
26 of communication or representation, including letters, words, pictures, sounds, or symbols, or  
27 combinations thereof, and any record thereby created, regardless of the manner in which the record

1 has been stored, as set forth in Evidence Code section 250) reflecting any communications between  
2 YOU (as used herein, the terms “YOU” and “YOUR” shall refer to the deponent described in this  
3 deposition notice) and Brett Morrow regarding COUNTY OF LOS ANGELES COUNTY  
4 DEPARTMENT OF PUBLIC HEALTH’s (“DPH”) social media posts, including but not limited to  
5 any emails, text messages, or any other written correspondence.

6 2. Any and all DOCUMENTS reflecting the identification of all social media accounts  
7 used by DPH.

8 3. Any and all DOCUMENTS reflecting communications between YOU and the LAC  
9 + USC Medical Center, including but not limited to any emails, text messages, or any other written  
10 correspondence.

11 4. Any and all DOCUMENTS reflecting communications between YOU and Health  
12 Services of Los Angeles County, including but not limited to any emails, text messages, or any  
13 other written correspondence.

14 5. Any and all DOCUMENTS reflecting communications between YOU and Sheila  
15 Kuehl regarding DPH social media, including but not limited to any emails, text messages, or any  
16 other written correspondence.

17 6. Any and all DOCUMENTS reflecting communications between YOU and Holly  
18 Mitchell regarding DPH social media, including but not limited to any emails, text messages, or any  
19 other written correspondence.

20 7. Any and all DOCUMENTS reflecting communications between YOU and Hilda  
21 Solis regarding DPH social media, including but not limited to any emails, text messages, or any  
22 other written correspondence.

23 8. Any and all DOCUMENTS reflecting communications between YOU and any other  
24 person regarding a Twitter account identified as @ALT\_lacph, including but not limited to any  
25 emails, text messages, or any other written correspondence.

26 9. Any and all DOCUMENTS reflecting communications between YOU and Kaitlin  
27 Barnes regarding DPH social media, including but not limited to any emails, text messages, or any  
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1 other written correspondence.

2 10. Any and all DOCUMENTS reflecting DPH policies relating to communications with  
3 the public.

4 11. Any and all DOCUMENTS reflecting DPH policies relating to social media.

5 12. Any and all DOCUMENTS reflecting DPH’s determinations regarding who may be  
6 tagged in the County’s social media posts.

7 13. Any and all DOCUMENTS reflecting “misinformation regarding public health  
8 guidance” in comments on DPH social media posts.

9 14. Any and all DOCUMENTS reflecting “bullying” in comments on DPH social media  
10 posts.

11 15. Any and all DOCUMENTS reflecting “harassment” in comments on DPH social  
12 media posts.

13 16. Any and all DOCUMENTS reflecting “threats” in comments on DPH social media  
14 posts.

15 17. Any and all DOCUMENTS reflecting DPH’s organization chart.

16 18. Any and all DOCUMENTS reflecting DPH’s decision to disable public comments  
17 on its social media posts on or about August 4, 2022.

18 19. Any and all DOCUMENTS reflecting an archive of DPH’s data from Twitter  
19 showing the @lapublichealth account’s activity from March 1, 2020 through the present.

20 20. Any and all DOCUMENTS reflecting information relied upon to determine whether  
21 a comment on DPH’s social media posts is “misinformation.”

22 21. Any and all DOCUMENTS reflecting DPH’s objective in disabling comments on its  
23 social media posts.

24 22. Any and all DOCUMENTS reflecting DPH’s consideration of alternatives to  
25 disabling comments on its social media posts.

26 23. Any and all DOCUMENTS reflecting alternative avenues for communication  
27 between members of the public following the disabling of comments on County’s social media  
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1 posts.

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3 Dated: April 13, 2023

Hamill Law & Consulting

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By:         /s/ Julie A. Hamill\_\_\_\_\_

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Julie A. Hamill

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Attorney for Petitioner

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Alliance of Los Angeles County Parents

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**PROOF OF SERVICE**  
**(Non-attorney -- State and Federal)**

I am employed in the County of Los Angeles, State of California, I am over the age of 18 and not a party to the within action. My business address is 904 Silver Spur Road, #287, Rolling Hills Estates, California 90274. My e-service address is julie@juliehamill-law.com..

On April 13, 2023 I served the foregoing document: **NOTICE OF TAKING DEPOSITION OF BARBARA FERRER AND DEMAND TO PRODUCE DOCUMENTS AT DEPOSITION** on the interested parties in this action

- By placing a true copy thereof enclosed in a sealed envelope addressed as follows:
- By attaching a true copy via electronic transmission addressed as follows:

Valerie Alter, VAlter@sheppardmullin.com  
 Kent Raygor, KRaygor@sheppardmullin.com  
 Zachary Golda, zgolda@sheppardmullin.com  
 Sheppard Mullin  
 1901 Avenue of the Stars, Suite 1600  
 Los Angeles, California 90067-6055  
 Attorneys for Respondents and Defendants  
 County of Los Angeles Department of Public Health  
 Barbara Ferrer  
 Muntu Davis

**ONLY BY ELECTRONIC TRANSMISSION.** Only by emailing the document(s) to the persons at the e-mail address(es). This is necessitated during the declared National Emergency due to the Coronavirus (COVID-19) pandemic because this office will be working remotely, not able to send physical mail as usual, and is therefore using only electronic mail. No electronic message or other indication that the transmission was unsuccessful was received within a reasonable time after the transmission. We will provide a physical copy, upon request only, when we return to the office at the conclusion of the national emergency.

**BY ELECTRONIC MAIL:** I caused said document to be delivered by electronic mail to the e-mail address(es) as listed on the attached service list.

**By FACSIMILE TRANSMISSION:** I caused all pages of the above-entitled document to be sent to the recipients by facsimile at the respective telephone numbers as indicated.

**(BY MAIL)** As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Rancho Palos Verdes, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

**(BY OVERNIGHT DELIVERY)** By: Federal Express, to be delivered on next business day.

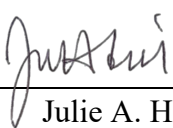
**(BY PERSONAL SERVICE)** I delivered such envelope by hand to the office of the addressee(s).

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(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on April 13, 2023 at Rancho Palos Verdes, California.

  
\_\_\_\_\_  
Julie A. Hamill