

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

5 Attorney for Petitioner and Plaintiff
6 ALLIANCE OF LOS ANGELES COUNTY PARENTS

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
18 through 25, inclusive,

19 Respondents and Defendants.
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Case No.: 22STCP02772

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

Date: May 5, 2023
Time: 9:30 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 BRETT MORROW, in his official capacity as Director of Communications
5 for DEFENDANT AND RESPONDENT County of Los Angeles Department of Public Health,
6 under oath and before a duly authorized court reporter, on May 5, 2023, commencing at 9:30 a.m.
7 The deposition will continue to May 8, 2023, if necessary, and/or day to day thereafter as agreed to
8 by counsel.

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

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

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

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

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

23 **REQUEST FOR PRODUCTION OF DOCUMENTS**

24 1. Any and all DOCUMENTS (as used herein, the term "DOCUMENTS" shall mean
25 any handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by
26 electronic mail or facsimile, and every other means of recording upon any tangible thing, any form
27 of communication or representation, including letters, words, pictures, sounds, or symbols, or
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1 combinations thereof, and any record thereby created, regardless of the manner in which the record
2 has been stored, as set forth in Evidence Code section 250) reflecting any communications between
3 YOU (as used herein, the terms “YOU” and “YOUR” shall refer to the deponent described in this
4 deposition notice) and Barbara Ferrer regarding COUNTY OF LOS ANGELES COUNTY
5 DEPARTMENT OF PUBLIC HEALTH’s (“DPH”) social media posts, including but not limited to
6 any emails, text messages, or any other written correspondence.

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

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

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

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

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

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

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

27 9. Any and all DOCUMENTS reflecting communications between YOU and Twitter,
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1 Inc., its employees, officers, and/or agents.

2 10. Any and all DOCUMENTS reflecting communications between YOU and Meta
3 Platforms, Inc., its employees, officers, and/or agents.

4 11. Any and all DOCUMENTS reflecting communications between YOU and Kaitlin
5 Barnes, including but not limited to any emails, text messages, or any other written correspondence.

6 12. Any and all DOCUMENTS reflecting DPH policies relating to communications with
7 the public.

8 13. Any and all DOCUMENTS reflecting DPH policies relating to social media.

9 14. Any and all DOCUMENTS reflecting DPH’s determinations regarding who may be
10 tagged in the County’s social media posts.

11 15. Any and all DOCUMENTS reflecting “misinformation regarding public health
12 guidance” in comments on DPH social media posts.

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

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

17 18. Any and all DOCUMENTS reflecting “threats” in comments on DPH social media
18 posts.

19 19. Any and all DOCUMENTS reflecting DPH’s organization chart.

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

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

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

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

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

3 25. Any and all DOCUMENTS reflecting alternative avenues for communication
4 between members of the public following the disabling of comments on County’s social media
5 posts.

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7 Dated: April 13, 2023

Hamill Law & Consulting

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9 By: /s/ Julie A. Hamill
10 Julie A. Hamill
11 Attorney for Petitioner
12 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 BRETT MORROW 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.

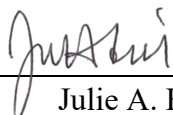
(BY PERSONAL SERVICE) I delivered such envelope by hand to the office of the addressee(s).

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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