

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 DEPARTMENT
14 OF PUBLIC HEALTH; MUNTU DAVIS, in his
15 official capacity as Health Officer for the County
16 of Los Angeles; BARBARA FERRER, in her
17 official capacity as Director of the County of Los
18 Angeles Department of Public Health; and DOES
19 1 through 25, inclusive,

20 Respondents and Defendants.
21

Case No.: 22STCP02772

**ALLIANCE OF LOS ANGELES COUNTY
PARENTS' DEMANDS FOR
PRODUCTION TO COUNTY OF LOS
ANGELES DEPARTMENT OF PUBLIC
HEALTH**

COMPLAINT FILED: July 26, 2022
TRIAL DATE: Not set

1 **PROPOUNDING PARTY:** **ALLIANCE OF LOS ANGELES COUNTY**
2 **PARENTS, Petitioner and Plaintiff**

3
4 **RESPONDING PARTY:** **COUNTY OF LOS ANGELES**
5 **DEPARTMENT OF PUBLIC HEALTH,**
6 **Defendant and Respondent**

7
8 **SET NO:** **ONE**

9
10 Plaintiff and Petitioner Alliance of Los Angeles County Parents (“Alliance”) hereby requests
11 pursuant to CALIFORNIA CODE OF CIVIL PROCEDURE §§ 2031.010, et seq., that County Of
12 Los Angeles Department Of Public Health (“LADPH”) produce the following DOCUMENTS,
13 electronically stored information, and tangible things for inspection and copying at the offices of
14 Hamill Law & Consulting, 904 Silver Spur Road, #287 Rolling Hills Estates, California, 90274, by
15 no later than 5:00 p.m. on Tuesday, August 29, 2023.

16
17 ***PLEASE NOTE THAT IN LIGHT OF THE TRIAL AND PRETRIAL SCHEDULE SET FOR***
18 ***THIS CASE, ALLIANCE WILL NOT BE ABLE TO GRANT EXTENSIONS OF TIME IN***
19 ***WHICH TO PROVIDE THE RESPONSES TO THE DEMANDS FOR PRODUCTION***
20 ***BELOW.***

21
22 **DEFINITIONS AND INSTRUCTIONS**

23 1. NOTE: Pursuant to CALIFORNIA CODE OF CIVIL PROCEDURE §2031.280(a),
24 “[a]ny documents or category of documents produced in response to a demand for inspection,
25 copying, testing, or sampling shall be identified with the specific request number to which the
26 documents respond.”

1 2. These demands call for all DOCUMENTS, electronically stored information, and tangible
2 things on the subject of the particular request in the possession, custody, or control of:

3 (a) County Of Los Angeles Department Of Public Health; and

4 (b) County Of Los Angeles Department Of Public Health’s agents
5 representatives, attorneys, and other PERSONS acting on its or its members’
6 behalf or under its or its members’ authorization, employment, direction,
7 instruction, or control.

8 3. If County Of Los Angeles Department Of Public Health withholds DOCUMENTS,
9 tangible things, or information by claiming they are or it is privileged or attorney work product,
10 then County Of Los Angeles Department Of Public Health must provide a privilege and work
11 product log in accordance with CALIFORNIA CODE OF CIVIL PROCEDURE § 2031.240(c).

12 4. As used herein, the terms “PERSON” and “PERSONS”, and the possessive forms of
13 those terms, mean and include natural persons, corporations, partnerships, limited partnerships,
14 associations, organizations, joint ventures, governmental units or entities, and any other kind of
15 business or other entity.

16 5. As used herein, the term “DOCUMENTS” means and refers to all forms of “writings” as
17 defined in CALIFORNIA EVIDENCE CODE § 250 and includes, but is not limited to,
18 “electronically stored information”, as that phrase is used in CALIFORNIA CODE OF CIVIL
19 PROCEDURE §§ 2031.010(a) and 2031.030(a)(2).

20 6. Pursuant to CALIFORNIA CODE OF CIVIL PROCEDURE §§ 2031.010(a) and
21 2031.030(a)(2), electronically stored information includes, but is not limited to, metadata reflecting
22 the creation and editing of an electronic DOCUMENT, and must be produced in response to these
23 demands in native format.

24 7. “LADPH,” “YOU” and “YOUR” shall mean Defendant and Respondent herein
25 COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH and all of its employees
26 and agents, including attorneys, or other persons acting on its behalf.

1 **DEMAND FOR PRODUCTION NO. 1**

2 All DOCUMENTS reflecting communications between Brett Morrow and Coral Itzcalli
3 from June 1, 2022 through October 31, 2022.

4
5 **DEMAND FOR PRODUCTION NO. 2**

6 All DOCUMENTS reflecting communications between Brett Morrow and Sal Rodriguez
7 from June 1, 2022 through October 31, 2022.

8
9 **DEMAND FOR PRODUCTION NO. 3**

10 All DOCUMENTS reflecting communications between Brett Morrow and Patrick Boland
11 from June 1, 2022 through October 31, 2022.

12
13 **DEMAND FOR PRODUCTION NO. 4**

14 A legible copy of the text contained in the thumbnail screenshot on page 1 of Exhibit 13 to
15 the Deposition of Brett Morrow.

16
17 **DEMAND FOR PRODUCTION NO. 5**

18 A legible copy of the text contained in the thumbnail screenshot on page 12 of Exhibit 14 to
19 the Deposition of Brett Morrow.

20
21 **DEMAND FOR PRODUCTION NO. 6**

22 All DOCUMENTS reflecting communications from notify@twitter.com to LADPH from
23 June 1, 2022 through October 31, 2022.

24
25 **DEMAND FOR PRODUCTION NO. 7**

26 All DOCUMENTS reflecting communications between Brett Morrow and Ryan Carter of
27 Southern California News Group from June 1, 2022 through October 31, 2022.

28

1 **DEMAND FOR PRODUCTION NO. 8**

2 All DOCUMENTS reflecting communications between LADPH and David Huerta from
3 June 1, 2022 through October 31, 2022.

4
5 **DEMAND FOR PRODUCTION NO. 9**

6 All DOCUMENTS reflecting communications between LADPH and David Green from
7 June 1, 2022 through October 31, 2022.

8
9 **DEMAND FOR PRODUCTION NO. 10**

10 All DOCUMENTS reflecting communications between LADPH and Cecily Myart-Cruz
11 from June 1, 2022 through October 31, 2022.

12
13 **DEMAND FOR PRODUCTION NO. 11**

14 All DOCUMENTS reflecting communications between LADPH and Health Services
15 regarding Dr. Brad Spellberg from June 1, 2022 through October 31, 2022.

16
17 **DEMAND FOR PRODUCTION NO. 12**

18 All DOCUMENTS reflecting communications between LADPH and Health Services
19 regarding Dr. Paul Holtom from June 1, 2022 through October 31, 2022.

20
21 **DEMAND FOR PRODUCTION NO. 13**

22 All DOCUMENTS reflecting communications between Brett Morrow and Zack Gregory
23 from June 1, 2022 through October 31, 2022.

24
25 **DEMAND FOR PRODUCTION NO. 14**

26 All DOCUMENTS reflecting communications between Barbara Ferrer and Christina Ghaly
27 from June 1, 2022 through October 31, 2022.

28

1 **DEMAND FOR PRODUCTION NO. 15**

2 A legible copy of the email sent by Barbara Ferrer to DPH Colleagues on July 29, 2022, that
3 states: "...Also, with the frequent dissemination of misinformation regarding public health
4 protective guidance, it is essential that we stay aligned with the Department's Public Health
5 messaging and guidance when serving in our official public health capacity. As Public Health
6 ambassadors, you are encouraged to stay up to date on our COVID-19 efforts on our website and
7 refer your clients and residents to the available information and resources. As a reminder, per
8 Departmental policy, all media requests for information should be relayed to and vetted by the
9 Office of Communications and Public Affairs at media@ph.lacounty.gov."

10
11 **DEMAND FOR PRODUCTION NO. 16**

12 A legible copy of the July 19, 2022 communication from Liza E. Frias to All Environmental
13 Health Specialist Team Members requesting volunteers to work overtime in anticipation of the
14 reinstatement of the indoor mask mandate.

15
16
17
18 Dated: July 27, 2023

Hamill Law & Consulting

19
20 By: /s/ Julie A. Hamill
21 Julie A. Hamill
22 Attorney for Petitioner
23 Alliance of Los Angeles County Parents
24
25
26
27
28