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and BARBARA FERRER, Ph.D., MPH, M.Ed

9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 IN AND FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT

12 ALLIANCE OF LOS ANGELES COUNTY
PARENTS, an unincorporated association,

13 Petitioner and Plaintiff,

14 v.

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

20 Respondents and Defendants.

Case No. 22STCP02772

Assigned for All Purposes to:
Hon. William F. Fahey, Dep't 69

**DEFENDANTS COUNTY OF LOS
ANGELES DEPARTMENT OF PUBLIC
HEALTH'S, MUNTU DAVIS, M.D.'S, AND
BARBARA FERRER, PH.D.. MPH, M.ED'S
EX PARTE APPLICATION FOR
PROTECTIVE ORDER – CONFIDENTIAL
DESIGNATION ONLY**

*[Declaration of Kent R. Raygor and Proposed
Order submitted concurrently herewith]*

Hearing

Date: September 21, 2023
Time: 8:30 a.m.
Dep't: 69

Petition Filed: July 26, 2022
Verified FAP filed: January 13, 2023
FSC: October 4, 2023
Trial Date: October 16, 2023

1 TO THE ABOVE-CAPTIONED COURT, ALL PARTIES, AND THEIR ATTORNEYS OF
2 RECORD:

3 **PLEASE TAKE NOTICE THAT** on September 21, 2023 at 8:30 a.m., or as soon
4 thereafter as this matter may be heard in Department 69 of the above-captioned Court, located at 111
5 North Hill Street, Los Angeles, California 90012, defendants County of Los Angeles Department of
6 Public Health, Muntu Davis, M.D., in his official capacity as Health Officer for the County of Los
7 Angeles, and Barbara Ferrer, Ph.D., MPH, M.Ed, in her official capacity as the Director of the
8 County of Los Angeles Department of Public Health (collectively “**LACDPH**”) will and hereby do
9 apply to the Court *ex parte* for issuance of a protective order (“**Protective Order**”) governing the
10 use of discovery-related materials designated as confidential in this action. LACDPH is informed
11 that non-Party X Corp. (formerly known as Twitter) joins in this request for entry of such a
12 Protective Order.

13 This *ex parte* application, made pursuant to CALIFORNIA RULES OF COURT 3.1200, *et seq.*, is
14 authorized by CALIFORNIA CODE OF CIVIL PROCEDURE § 2031.060(b), and is supported by good
15 cause. This application has become necessary because of repeated attacks by counsel for Plaintiff,
16 Julie Hamill, on LACDPH and its counsel in extra-judicial commentary—primarily posts on
17 Plaintiff’s website and Ms. Hamill’s Twitter account and statements by her to the media. This
18 matter should be litigated in the courtroom, not in the media, and such commentary interferes with
19 the orderly litigation of this matter. Ms. Hamill has repeatedly used documents and information
20 obtained in discovery to raise her own political profile, generate business for her law practice, and
21 generate donations from the public via crowdfunding solicitations. Her posts and commentary
22 repeatedly and falsely accuse LACDPH and its counsel of harassment, abuse, intimidation, threats,
23 and other malicious schemes intended to harm the public. Ms. Hamill’s extra-judicial attacks often
24 inflame her followers to, in turn, harass and threaten LACDPH and its counsel. Plaintiff and its
25 counsel should know better. CALIFORNIA RULE OF PROFESSIONAL CONDUCT 3.6(a) provides as
26 follows:

27 “A lawyer who is participating or has participated in the investigation or
28 litigation of a matter shall not make an extrajudicial statement that the lawyer

1 knows* or reasonably should know* will (i) be disseminated by means of
2 public communication and (ii) have a substantial likelihood of materially
3 prejudicing an adjudicative proceeding in the matter.”

4 LACDPH only has three (3) additional documents consisting of six (6) pages in total to
5 produce by September 21, 2023 that it intends to mark as confidential and which thereby would be
6 subject to the Protective Order if it is issued; other documents to be produced will not be designated
7 confidential. LACDPH does not object to their use in this litigation, but they should only be used
8 for the purposes of this litigation. LACDPH is not asking that any commentary made or posted by
9 Plaintiff or its counsel to date be de-posted or otherwise be removed or designated
10 CONFIDENTIAL pursuant to the requested Protective Order.

11 LACDPH respectfully requests that this Court issue the proposed *Protective Order –*
12 *Confidential Designation Only* that is attached as **EXHIBIT A** to the proposed order submitted
13 concurrently herewith. LACDPH has based that *Protective Order – Confidential Designation Only*
14 on the Court’s protective order template found at
15 https://www.lacourt.org/division/civil/pdf/formprotectiveorder1confidential_1.pdf. A redline
16 showing the changes made to that template is attached to the *Raygor Declaration* as **EXHIBIT C**.
17 [See *Raygor Decl.*, § 16.]

18 **EX PARTE NOTICE**

19 As set forth in the attached *Declaration of Kent R. Raygor*, notice of this *ex parte* application
20 was timely provided to Petitioner’s counsel by e-mail on September 18, 2023 in accordance with
21 CALIFORNIA RULE OF COURT 3.1203(a) and Plaintiff stated it intended to oppose this application.
22 [*Declaration of Kent Raygor* (“**Raygor Decl.**”), ¶ 2; **Ex. A.**]

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Department of Public Health, Muntu Davis, M.D.,
and Barbara Ferrer, Ph.D., MPH, M.Ed*

12
13 This *ex parte* application is based on this application, the attached Memorandum of Points
14 and Authorities, the accompanying *Declaration of Kent Raygor*, all pleadings and papers on file
15 herein, any matter of which the Court may take judicial notice and upon such oral argument as may
16 be presented at the hearing on the application.

17 Dated: September 20, 2023

SHEPPARD MULLIN RICHTER & HAMPTON LLP

18
19
20 By


KENT R. RAYGOR

21
22 Attorneys for Defendants
COUNTY OF LOS ANGELES DEPARTMENT OF
23 PUBLIC HEALTH, MUNTU DAVIS, M.D., and
BARBARA FERRER, Ph.D., MPH, M.Ed
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1 I.

2 **INTRODUCTION**

3 Defendants County of Los Angeles Department of Public Health, Muntu Davis, M.D., in his
4 official capacity as Health Officer for the County of Los Angeles, and Barbara Ferrer, Ph.D., MPH,
5 M.Ed, in her official capacity as the Director of the County of Los Angeles Department of Public
6 Health (collectively “**LACDPH**”) request that the Court issue a Protective Order a protective order
7 (“**Protective Order**”) governing the use of discovery-related materials designated as confidential in
8 this action. LACDPH is informed that non-Party X Corp. (formerly known as Twitter) joins in this
9 request for entry of such a Protective Order.

10 LACDPH’s *ex parte* application is supported by good cause. This application has become
11 necessary because of repeated attacks by counsel for Plaintiff, Julie Hamill, on LACDPH and its
12 counsel in extra-judicial commentary—primarily posts on Plaintiff’s website and Ms. Hamill’s
13 Twitter account and statements by her to the media. This matter should be litigated in the
14 courtroom, not in the media, and such commentary interferes with the orderly litigation of this
15 matter. Ms. Hamill has repeatedly used documents and information obtained in discovery to raise
16 her own political profile, generate business for her law practice, and generate donations from the
17 public via crowdfunding solicitations. Her posts and commentary repeatedly and falsely accuse
18 LACDPH and its counsel of harassment, abuse, intimidation, threats, and other malicious schemes
19 intended to harm the public. Ms. Hamill’s extra-judicial attacks often inflame her followers to, in
20 turn, harass and threaten LACDPH and its counsel.

21 LACDPH only has three (3) additional documents consisting of six (6) pages in total to
22 produce by September 21, 2023 that it intends to mark as confidential and which thereby would be
23 subject to the Protective Order if it is issued; other documents to be produced will not be designated
24 confidential. LACDPH does not object to their use in this litigation, but they should only be used
25 for the purposes of this litigation. LACDPH is not asking that any commentary made or posted by
26 Plaintiff or its counsel to date be de-posted or otherwise be removed or designated
27 CONFIDENTIAL pursuant to the requested Protective Order.

28

1 Ms. Hamill’s conduct lacks any semblance of professionalism and decorum. Civil discovery
2 is intended to facilitate the pursuit of truth and the resolution of claims on the merits in a *civil*
3 manner—not a trial by soap box where attorneys can cherry-pick arguments and misrepresent the
4 facts to rile their fanbase into threats.

5 LACDPH anticipates that Plaintiff will object that the Protective Order sought by this *ex*
6 *parte* application would violate the right to public access to courts under the First Amendment or the
7 free speech provision in the California Constitution. In fact, Ms. Hamill has stated in her social
8 media posts that she would make this argument. Plaintiff’s anticipated argument, however, lacks
9 merit because LACDPH does not seek an order prohibiting use and dissemination of any
10 information that is relied upon at trial, or otherwise has been advanced by a party as necessary to
11 adjudicate Plaintiff’s claims. Under well-established authorities, a party can be prohibited from use
12 or dissemination of documents or information obtained in discovery if the documents and/or
13 information do not enter the record, and are not used at trial. Because the Protective Order would
14 only apply to Discovery Documents (which are defined to exclude documents in the trial record) and
15 information derived solely from them, a prohibition against use or dissemination for purposes
16 unrelated to litigation of this matter would not violate the First Amendment or other free speech
17 protections.

18 II.

19 FACTUAL BACKGROUND

20 A. Ms. Hamill Consistently Uses Discovery Documents To Advance Personal Interests 21 Over The Resolution Of This Matter.

22 To be clear, counsel for LACDPH has never threatened Ms. Hamill, or any Plaintiff-related
23 witnesses. Yet, from the beginning of this case, Ms. Hamill has accused LACDPH and its counsel
24 of harassment, abuse, intimidation and threats, and has used documents and information obtained in
25 discovery for purposes having nothing to do with litigating the matter.

26 Initially, Ms. Hamill posted and discussed documents produced in this matter to her personal
27 Twitter/X account, and Plaintiff’s own website. She has since also made guest interview
28 appearances on talk shows, podcasts, and news programs to discuss documents and testimony

1 produced in this case. [*Raygor Decl.*, ¶ 4.] Instead of using the discovery process to advance to a
2 trial on the merits, Ms. Hamill has abused it to instead advance her own political profile, generate
3 business for her law practice, and solicit crowdfunding financial support. [*Id.*]

4 The benefits to Ms. Hamill’s reputation and business come at a direct cost to LACDPH and
5 its counsel—Ms. Hamill’s posts have generated repeated harassment of LACDPH witnesses,
6 counsel, and even potential death or injury threats specifically directed at LACDPH’s counsel. [*Id.*
7 ¶ 5.] For example, Ms. Hamill posted on her Twitter/X page that taxpayers “are paying government
8 lawyers to stalk and harass women and their families[.]” [*Raygor Decl.*, pp. 4-5, and **Exh. B**
9 (images showing several consecutive posts by Ms. Hamill reflecting similar accusations).] Ms.
10 Hamill described the attacks on LACDPH as being more than an attempt at “personal revenge,” and
11 in fact claimed to be “educating the public about what is happening to moms who filed a lawsuit to
12 enforce their constitutional rights.” [*Id.*, p. 4.] These incendiary comments—asserted without any
13 foundation or connection to this matter—lack any professionalism or decorum expected of attorneys
14 in litigation.

15 The accusations against LACDPH’s counsel have not been limited to Ms. Hamill’s social
16 media commentary, but rather have become a repeated mantra throughout the litigation of this
17 matter—despite the Court’s continued rejection of that characterization. [*Raygor Decl.*, ¶¶ 8-11
18 (collecting similar accusations made during communications between counsel throughout this
19 litigation).]

20 Ms. Hamill does not limit her attacks to just the attorneys litigating this matter; she has
21 accused Sheppard Mullin Richter & Hampton of spoliating evidence [*Raygor Decl.* ¶ 7], and
22 described counsel for LACDPH and for non-party Twitter/X, White & Case, as “an incestual
23 cesspool” that should be investigated. [*Id.*, p. 5 (bottom image on page).] The repeated attacks
24 against LACDPH, its counsel, and even a non-party do nothing but impede the efficient resolution
25 of this matter on the merits. [*Id.*, ¶ 7.]

1 **B. Ms. Hamill Misrepresents The Claims Asserted By Plaintiff When Posting Documents**
2 **Produced In This Matter.**

3 Ms. Hamill also generates clout among her social media fans by mischaracterizing
4 LACDPH’s witness deposition testimony during interviews [*Raygor Decl.* ¶ 13], and accusing
5 LACDPH’s counsel of trying to “kick out” Plaintiff’s witness during a deposition—even though the
6 transcript of the deposition directly refutes the claim. [*Id.* ¶ 12.] Ms. Hamill has appeared on talk
7 shows to describe LACDPH witnesses as “incredibly incompetent and stupid,” and lacking “the
8 intellectual capacity” for their duties, among myriad similar statements. [*Id.* ¶¶ 14-15.]

9 **III.**

10 **GOOD CAUSE EXISTS TO LIMIT PLAINTIFF’S USE OF DOCUMENTS PRODUCED IN**
11 **DISCOVERY BUT NOT USED AS A BASIS FOR ADJUDICATION**

12 **A. A Protective Order May Issue Upon A Showing Of Good Cause. And Good Cause**
13 **Exists Because Ms. Hamill Is Inciting Threats Against LACDPH’s Counsel.**

14 A court may issue a protective order limiting the use of documents produced during
15 discovery if the moving party demonstrates good cause for the order. *Fairmont Ins. Co. v. Superior*
16 *Court* (2000) 22 Cal.4th 245, 255. A trial court must balance the interests of the parties, and the
17 public interest in deciding whether to restrict use of information obtained during discovery. *Nativi*
18 *v. Deutsche Bank Nat’l Tr. Co.* (2014) 223 Cal.App.4th 261, 317. “Further, even where a motion
19 for a protective order is denied in whole or in part, the trial court may still impose ‘terms and
20 conditions that are just.’” *Id.* (citing CAL. CODE CIV. PROC. §§ 2025.420(g), 2031.060(g)).

21 The availability of protective orders effectuate the state’s dual interests in pre-trial
22 discovery—to facilitate the search for truth and promote justice through liberal discovery of
23 information, and to protect legitimate privacy interests restricting the use of information disclosed
24 during discovery where there is good cause. *Nativi, supra*, 223 Cal.App.4th at 317. Maintaining
25 confidentiality of information obtained during discovery promotes disclosure of information:
26 “parties having arguable grounds to resist discovery are more likely to turn over their information if
27 they know that the audience is limited[.]” *Mercury Interactive v. Klein* (2007) 158 Cal.App.4th 60,
28 94. If the information is used at trial, or otherwise becomes the basis of decision, it enters the public

1 record—“Secrecy persists only if the court does not use the information to reach a decision on the
2 merits.” *Id.* Accordingly, protective orders “that initially seem to support secrecy thus turn out to
3 be about the timing of disclosure.” *Id.*

4 As set forth above, good cause exists to issue the Protective Order because Ms. Hamill has
5 repeatedly used testimony and discovery documents and information obtained from them for
6 advancing personal motives unrelated to the merits of this litigation. Ms. Hamill has accused
7 LACDPH and its counsel numerous times of stalking, abuse, harassment, intimidation, threats, and
8 even attacking the rights of mothers specifically, in order to advance her own stature. This level of
9 unprofessionalism prejudices LACDPH’s attempts to resolve this case on the merits, and is a
10 lingering threat that Ms. Hamill will continue to use discovery documents to fuel her personal
11 advertising through attacks on LACDPH and/or its counsel. Ms. Hamill should not be permitted to
12 use discovery documents and information solely obtained through the discovery documents to
13 continue lodging baseless attacks on LACDPH’s witnesses and counsel.

14 Plaintiff and its counsel should know better. CALIFORNIA RULE OF PROFESSIONAL CONDUCT
15 3.6(a) provides as follows:

16 “A lawyer who is participating or has participated in the investigation or
17 litigation of a matter shall not make an extrajudicial statement that the
18 lawyer knows*or reasonably should know* will (i) be disseminated by
19 means of public communication and (ii) have a substantial likelihood of
20 materially prejudicing an adjudicative proceeding in the matter.”

21 **B. Protective Orders Limiting The Use Of Documents Produced During Discovery But**
22 **Not Used At Trial Do Not Violate The Public’s Right Of Access To Court Records.**

23 After LACDPH gave notice of its intent to file this *ex parte* application, Ms. Hamill posted
24 to Twitter/X a statement that “gag orders on trial participants” violate the First Amendment.
25 Accordingly, LACDPH anticipates that Plaintiff will contend that the Protective Order violates the
26 First Amendment or free speech rights by limiting the use and dissemination of discovery materials.
27 If Plaintiff raises an objection to the Protective Order under the First Amendment or other free
28 speech protections, it should be rejected because LACDPH does not seek to prevent disclosure of

1 any information that is offered by either party at trial, unless the Court determines that it should be
2 sealed as confidential on another independent basis. The Protective Order would only prohibit Ms.
3 Hamill from publicizing a handful of documents obtained in discovery that are not used at trial.

4 The First Amendment does not prohibit courts from limiting “public access to discovery
5 materials that are *neither used at trial nor submitted as a basis for adjudication.*” *NBC Subsidiary*
6 *(KNBC-TV), Inc. v. Superior Court* (1999) 20 Cal.4th 1178, 1209 n.25 (emphasis added). Indeed,
7 the U.S. Supreme Court has “been careful not to extend the public’s right of access beyond the
8 adjudicative proceedings and filed documents of trial and appellate courts.” *Id.* at 1212 (citing, *inter*
9 *alia*, *Press-Enterprise Co. v. Superior Court* (1986) 478 U.S. 1, 8-9). Accordingly, the Protective
10 Order prohibiting Plaintiff and Ms. Hamill from use and dissemination of the Discovery Documents
11 and information solely available therein would not violate the First Amendment—the documents
12 covered by the order are, by its terms, not adjudicative documents or filed with the Court.

13 Plaintiff might specifically cite *Hurvitz v. Hoefflin* (2000) 84 Cal.App.4th 1232, for the
14 argument that: “Gag orders on *trial* participants are unconstitutional unless (1) the speech sought to
15 be restrained poses a clear and present danger or serious and imminent threat to a protected
16 competing interest; (2) the order is narrowly tailored to protect that interest; and (3) no less
17 restrictive alternatives are available.” *Id.* at 1241-42 (emphasis added). However, the quoted
18 language is inapposite because the Protective Order would not make any discovery documents
19 protected from use or disclosure at trial—it only applies to discovery-related documents and
20 testimony produced that neither party uses at trial. Moreover, *Hurvitz* expressly affirmed the
21 decision to maintain secrecy of confidential information obtained during discovery, overturning only
22 the portion of the protective order prohibiting disclosure of information that was publicly available.
23 *Id.* at 1247. Thus, to the extent it is relevant at all, *Hurvitz* favors granting the Protective Order
24 because it held that the protective order was properly granted as to documents obtained only during
25 discovery.

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IV.

CONCLUSION

For the foregoing reasons, LACDPH respectfully requests that this Court issue the proposed *Protective Order – Confidential Designation Only* that is attached as **EXHIBIT A** to the proposed order submitted concurrently herewith. LACDPH has based that *Protective Order – Confidential Designation Only* on the Court’s protective order template found at https://www.lacourt.org/division/civil/pdf/formprotectiveorder1confidential_1.pdf. A redline showing the changes made to that template is attached to the *Raygor Declaration* as **EXHIBIT C**. [See *Raygor Decl.*, § 16.]

Dated: September 20, 2023 SHEPPARD MULLIN RICHTER & HAMPTON LLP

By  _____
KENT R. RAYGOR

Attorneys for Defendants
COUNTY OF LOS ANGELES DEPARTMENT OF
PUBLIC HEALTH, MUNTU DAVIS, M.D., and
BARBARA FERRER, Ph.D., MPH, M.Ed

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PROOF OF SERVICE

**Alliance of Los Angeles County Parents v. County of Los Angeles, et al.
Case No. 22STCP02772**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 1901 Avenue of the Stars, Suite 1600, Los Angeles, CA 90067-6055.

On September 20, 2023, I served true copies of the following document(s) described as: **DEFENDANTS COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH’S, MUNTU DAVIS, M.D.’S, AND BARBARA FERRER, PH.D.. MPH, M.ED’S EX PARTE APPLICATION FOR PROTECTIVE ORDER – CONFIDENTIAL DESIGNATION ONLY** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address lchu@sheppardmullin.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 20, 2023, at Los Angeles, California.

Lily Young Chu

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PARENTS