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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  
through 25, inclusive,

18 Respondents and Defendants.  
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Case No.: 22STCP02772

**ALLIANCE OF LOS ANGELES COUNTY  
PARENTS' NOTICE OF MOTION AND  
MOTION FOR MONETARY SANCTIONS  
AND CONTEMPT AGAINST KENT  
RAYGOR; MEMORANDUM OF POINTS  
AND AUTHORITIES IN SUPPORT  
THEREOF**

Date: June 26, 2023  
Time: 9:30 a.m.  
Dept: 69  
Judge: William F. Fahey

**RESERVATION # 663120536233**

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 on June 26, 2023, at 9:30 a.m., or as soon thereafter as  
3 counsel may be heard, in Department 69 of the above-entitled Court, located at 111 North Hill  
4 Street, Los Angeles, California, pursuant to California Code of Civil Procedure Section 2023.030,  
5 Petitioner and Plaintiff, ALLIANCE OF LOS ANGELES COUNTY PARENTS (“Alliance”) will  
6 move this Court of an order of monetary sanctions against Kent Raygor, counsel for Defendants  
7 COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH; MUNTU DAVIS, in his  
8 official capacity as Health Officer for the County of Los Angeles; BARBARA FERRER, in her  
9 official capacity as Director of the County of Los Angeles Department of Public Health, as a result  
10 of his conduct at the deposition of Barbara Ferrer on May 3, 2023.

11 Good cause exists to grant this motion because:

- 12 1. Mr. Raygor used building security at his law firm’s office to physically lock Alliance’s  
13 party representative out of the deposition.
- 14 2. Mr. Raygor’s bypassing the protective order process required under Code of Civ. Proc. §  
15 2025.420(b)(12) and using building security to lock out a party representative from  
16 attending a deposition is use of a discovery method in a manner that does not comply with  
17 its specified procedures in violation of Code of Civ. Proc. § 2023.010(b).
- 18 3. Mr. Raygor’s conduct caused unwarranted annoyance, embarrassment, or oppression, or  
19 undue burden and expense to Ms. Burwick and counsel for Alliance in violation of Code of  
20 Civ. Proc. § 2023.010(c).
- 21 4. Mr. Raygor’s conduct violated the civility guidelines set forth in Local Rule 3.26  
22 Appendix 3.A(e)(11), as it would not be allowed in the presence of a judicial officer.

23 This motion is brought pursuant to *Code of Civil Procedure* Section 2023.030, and is based  
24 upon this notice, the attached Declarations of Julie A. Hamill and Sarah Beth Burwick, the attached  
25 memorandum of points and authorities, upon all of the pleadings, papers and documents in the  
26 Court’s file, and upon such further oral and documentary evidence as may be offered at the time of  
27 hearing.

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2 **MEMORANDUM OF POINTS AND AUTHORITIES**

3 **I. Introduction**

4 Petitioner and Plaintiff Alliance of Los Angeles County Parents (“Alliance”) seeks  
5 injunctive relief for violations of constitutional rights by the County of Los Angeles Department of  
6 Public Health (“LADPH”) and its Directors through this action. The Alliance is an unincorporated  
7 association composed of and supported by parents of children in Los Angeles County who attend  
8 childcare programs, K-12 schools, and/or play youth sports in the County. Alliance is a community  
9 group organized for the purpose of representing the interests of Los Angeles County children  
10 subjected to harsh and restrictive mandates by local education agencies, the County of Los Angeles  
11 (“County”), and the State of California.

12 The remaining cause of action in this case is a violation of the free speech clause of the  
13 California Constitution based on LADPH’s disabling of public comments on their social media  
14 pages and censorship of critics. This motion for sanctions arises out of counsel for LADPH’s  
15 abusive attempts to harass and intimidate Alliance members into further silence.

16 Alliance seeks no damages in this action, only declaratory and injunctive relief to restore  
17 constitutional rights of speech and assembly, and now as a result of having to litigate and engage in  
18 excessive discovery propounded by defendants, to recover reasonable attorney’s fees for the time  
19 spent by counsel for the Alliance to enforce an important public right.

20 This motion for sanctions is brought to curb abuse of the discovery process by defense  
21 counsel Kent Raygor, who wrongfully excluded party representative Sarah Beth Burwick from  
22 attending the deposition of Barbara Ferrer on May 3, 2023. Mr. Raygor locked Ms. Burwick out of  
23 the deposition using building security, and after making her wait outside for three hours, alleged that  
24 security deemed her “not a good liability risk.” Ms. Burwick was ultimately sent home without ever  
25 having entered the deposition.

26 Counsel for Alliance cannot conceive of any valid reason for Mr. Raygor’s conduct, aside  
27 from wasting time on the record to avoid having his client testify, and to harass and intimidate both  
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1 Ms. Burwick and Ms. Hamill.

2 This motion seeks an order of monetary sanctions and contempt against Mr. Raygor for his  
3 abusive conduct.

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5 **II. Statement of Facts**

6 On May 2, 2023, at 8:55 p.m. on the eve of the deposition of Barbara Ferrer, Defendants’  
7 counsel Kent Raygor stated he would not allow Alliance party representative Sarah Beth Burwick to  
8 attend the deposition. (Decl. of Julie A. Hamill, ¶ 3, Exh. B). Mr. Raygor claimed he was excluding  
9 Ms. Burwick because the Alliance “failed to identify Ms. Burwick” in discovery responses, and  
10 Alliance “cannot have it both ways.” (Hamill Decl., ¶ 4, Exh. B).

11 Counsel for Alliance responded that Ms. Burwick was a member of the Alliance, that she  
12 was identified in the Alliance’s discovery responses, and that she would attend. (Hamill Decl., ¶ 5,  
13 Exh. B).

14 In fact, Ms. Burwick was identified as a member of the association in Alliance’s responses  
15 to the County’s written discovery at least thirty times. (Hamill Decl., ¶ 7, Exhs. C-E). However,  
16 even if Ms. Burwick had not been identified in Alliance’s discovery responses, Mr. Raygor had no  
17 legal authority to exclude a party representative from attending the deposition, and if Mr. Raygor  
18 wanted to exclude a non-party from the deposition, his recourse would be through a motion for  
19 protective order pursuant to Cal. Code Civ. Proc., section 2025.420(b)(12).

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21 On May 3, 2023, Ms. Burwick arrived at 333 South Hope in downtown Los Angeles at  
22 11:25 a.m. and checked in at the security desk. Security staff told Ms. Burwick to wait and that  
23 someone from Sheppard Mullin would come down to see her. (Declaration of Sarah Beth Burwick,  
24 ¶¶ 4-7).

25 Meanwhile, in the Sheppard Mullin conference room where the deposition was held, Mr.  
26 Raygor was flanked by Public Health Director Barbara Ferrer and County Counsel William Birnie.  
27 (Hamill Decl., ¶ 8). Counsel for Alliance sat alone, with no co-counsel or client present. (Hamill  
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1 Decl., ¶ 8). Counsel for Alliance asked Mr. Raygor to allow Ms. Burwick in to the deposition. Mr.  
2 Raygor refused. (Hamill Decl., ¶ 9)

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4 Once the deposition began, counsel for Alliance asked Mr. Raygor to explain his refusal to  
5 allow Ms. Burwick in. (Hamill Decl., ¶ 10). Mr. Raygor refused to discuss his exclusion of Ms.  
6 Burwick on the record. (Hamill Decl., ¶ 11, Exh. F, 8:3-25, 9:1-9). In an off-record discussion, Mr.  
7 Raygor demanded that counsel for Alliance sign an agreement to identify all petitioner members in  
8 order to allow Ms. Burwick to enter the room. Counsel refused to sign an agreement and confirmed  
9 the same on the record. (Hamill Decl., ¶ 11, Exh. F, 8:3-25, 9:1-9).

10 As stated in Alliance’s discovery responses, identification of all members of the Alliance is  
11 unnecessary and overly burdensome. (Hamill Decl., ¶ 7 Exhs. C-E). Many Alliance members  
12 provided information about harm to their children using first and last initials in order to protect  
13 privacy and avoid retaliation by employers, government agencies, labor unions, and social  
14 networks. (Hamill Decl., ¶ 7 Exhs. C-E). Further, the Alliance does not seek any damages – they  
15 simply seek injunctive relief to rectify constitutional violations. Finally, the Alliance already  
16 identified sufficient witnesses for Defendants to ascertain standing. (Hamill Decl., ¶ 7 Exhs. C-E).  
17 The identification of all members of the Alliance is accordingly irrelevant, unwarranted, and  
18 unreasonably cumulative. Regardless of these facts, Mr. Raygor has no authority to exclude a party  
19 representative from a deposition.

20 At 1:09 pm, counsel for Alliance emailed Mr. Raygor stating “[m]y client is still in the  
21 lobby. I intend to seek sanctions against you for wrongfully excluding my client from the  
22 deposition. You may exclude members of the public, but not a party, per CCP 2025.420(b)(12). If  
23 you allow her up now, I will not seek sanctions.” (Hamill Decl., ¶ 13, Exh. G).

24 At 1:13 p.m., Mr. Raygor attempted to reframe his conduct via email, stating that counsel  
25 “renege” on an agreement. Counsel for Alliance responded that she would not sign any agreement,  
26 and reiterated that the Alliance would seek sanctions for Mr. Raygor’s conduct. (Hamill Decl., ¶ 14,  
27 Exh. H).  
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1           Around 1:19 p.m., Mr. Raygor stated that he would permit Ms. Burwick to enter the  
2 building if she would state on the record that she is a member of the Alliance. (Hamill Decl., ¶ 15,  
3 Exh. F, 52:3-25, 53:1-25, 55:1-25). However, instead of allowing Ms. Burwick to come upstairs, he  
4 continued to stall and delay.

5           At approximately 1:34 p.m., after going off the record again to confer with his client about  
6 Ms. Burwick, Mr. Raygor stated that he would allow Ms. Burwick into the deposition, but that he  
7 needed “to have a security officer approve it.” (Hamill Decl., ¶ 16, Exh. F, 55:14-18). Mr. Raygor  
8 then feigned inability to find a security officer. (Hamill Decl., ¶ 17 Exh. F, 55:18).

9           Counsel for Alliance asked Mr. Raygor to expedite the security authorization process and to  
10 contact reception to allow Ms. Burwick upstairs. (Hamill Decl., ¶18, Exh. F, 55:23-25, 56:4-6). Mr.  
11 Raygor asked to go off the record yet again and wandered away to “talk to the receptionist.”  
12 (Hamill Decl., ¶19, Exh. F, 56:13-16).

13           After more stalling, Mr. Raygor returned to the deposition and sat silently. Counsel for  
14 Alliance resumed the deposition. (Hamill Decl., ¶20, Exh. F, 56:18-19).

15           Approximately 20 minutes later, Ms. Burwick still hadn’t been let into the deposition.  
16 Counsel for Alliance once again asked Mr. Raygor whether Ms. Burwick had been authorized to  
17 enter. (Hamill Decl., ¶21 Exh. F, 60:5-6).

18           Mr. Raygor stated that he was “overruled” by security due to Ms. Burwick’s “conduct in the  
19 lobby and on Twitter.” (Hamill Decl., ¶22, Exh. F, 60:7-13). Mr. Raygor refused to provide any  
20 explanation, evidence, or details. (Hamill Decl., ¶ 23, Exh. F, 60:14-25, 61:1-7). Again, counsel for  
21 Alliance advised Mr. Raygor that she would seek sanctions for his conduct. (Hamill Decl., ¶ 23  
22 Exh. F, 61:5-7).

23           In the three hours that Ms. Burwick was made to wait in the lobby, she did not speak to  
24 anyone aside from the security desk staff, and she sat quietly by herself, only occasionally moving  
25 to use the public restroom. (Burwick Decl., ¶ 15). Security staff advised Ms. Burwick that they did  
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1 not consider her a “liability risk,” and that it was Sheppard Mullin who had made the decision to  
2 prevent her from entering and attending the deposition. (Burwick Decl., ¶¶ 12, 13). Ms. Burwick  
3 tweeted about her experience in the lobby, because this case involves a matter of significant public  
4 interest, including the silencing and censorship of Los Angeles citizens by Defendants. (Burwick  
5 Decl., ¶ 8). A full copy of the Twitter thread upon which Mr. Raygor’s accusation is based is  
6 attached to Ms. Burwick’s declaration. (Burwick Decl., 8, Exh. A).

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8 At the conclusion of the deposition, counsel for Alliance asked Mr. Raygor for the name of  
9 the managing partner of Sheppard Mullin’s office. He responded that he did not know who the  
10 managing partner is. (Hamill Decl. ¶ 24). Later that evening, counsel for the Alliance took the  
11 deposition of Brett Morrow, noticed for May 5, 2023, off calendar in order to allow Alliance to seek  
12 relief from the Court regarding discovery abuse. (Hamill Decl., ¶ 25, Exh. I).

13 **III. Mr. Raygor is Subject to Sanctions as a Result of his Misuse of the Discovery Process and**  
14 **Harassment of Alliance Members and Counsel**

15 Mr. Raygor had no legal grounds to exclude Ms. Burwick from attending the deposition,  
16 and by doing so, he engaged in conduct that is a misuse of the discovery process in violation of Cal.  
17 Code of Civ. Proc. § 2023.010(b)-(c), and conduct that would not be allowed in the presence of a  
18 judicial officer in violation of Local Rule 3.26 Appendix 3.A(e)(11).

19 Bypassing the motion for protective order process required under Code of Civ. Proc. §  
20 2025.420(b)(12) and using building security to exclude a party representative from attending a  
21 deposition is use of a discovery method in a manner that does not comply with its specified  
22 procedures in violation of Code of Civ. Proc. § 2023.010(b), and caused unwarranted annoyance,  
23 embarrassment, or oppression, or undue burden and expense to Ms. Burwick and counsel for  
24 Alliance in violation of Code of Civ. Proc. § 2023.010(c). (Burwick Decl., ¶ 16). Further, this  
25 conduct violated Local Rule 3.26 Appendix 3.A(e)(11) as it would not be allowed in the presence of  
26 a judicial officer.  
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1 Under Code of Civ. Proc. § 2023.030(a), the court may impose a monetary sanction ordering  
2 that one engaging in the misuse of the discovery process, or any attorney advising that conduct, or  
3 both pay the reasonable expenses, including attorney's fees, incurred by anyone as a result of that  
4 conduct. Further, the court may impose a contempt sanction by an order treating the misuse of the  
5 discovery process as a contempt of court. § 2023.030(e).

6 Accordingly, Alliance requests this Court exercise its discretion to issue sanctions sufficient  
7 to curb misuse of the discovery process by counsel for Defendants. *Padron v. Watchtower Bible &*  
8 *Tract Society of New York, Inc.* (2017) 16 Cal.App.5th 1246, 1259-1260, *quoting Doppes v. Bentley*  
9 *Motors, Inc.* (2009) 174 Cal.App.4th 967, 992. (If a lesser discovery sanction fails to curb misuse of  
10 the discovery process, a greater sanction is warranted: continuing misuses of the discovery process  
11 warrant incrementally harsher sanctions until the sanction is reached that will curb the abuse.). In  
12 choosing among its various options for imposing a discovery sanction, a trial court exercises  
13 discretion, subject to reversal only for manifest abuse exceeding the bounds of reason. *Miranda v.*  
14 *21st Century Ins. Co.* (2004) 117 Cal.App.4th 913.

15 At a minimum, Alliance seeks an order from the Court prohibiting Mr. Raygor from  
16 engaging in similar abusive and harassing conduct in the future, and specifically prohibiting Mr.  
17 Raygor from excluding any person from the deposition of Brett Morrow absent a protective order  
18 from the court. Further, the Alliance seeks monetary sanctions in the amount of \$5,327,  
19 representing the cost of parking for Ms. Burwick (Burwick Decl., ¶ 14), approximately one hour of  
20 attorney time wasted on the record, and \$4,800 for the time spent bringing this motion (Hamill  
21 Decl., ¶ 26).

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23 **IV. Conclusion**

24 For the reasons set forth above, Alliance respectfully requests this Court exercise its  
25 discretion to impose sanctions against Mr. Raygor.

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Dated: May 26, 2023

Hamill Law & Consulting

By:  /s/ Julie A. Hamill  
Julie A. Hamill  
Attorney for Petitioner  
Alliance of Los Angeles County Parents

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**DECLARATION OF SARAH BETH BURWICK**

I, Sarah Beth Burwick, hereby declare:

1. I am a founding member of the Alliance of Los Angeles County Parents (“Alliance”), Plaintiff and Petitioner in this action. I make this declaration of my own personal knowledge, except for those matters stated on the basis of information and belief, and if called to testify in Court on these matters, I could do so competently.

2. I helped found the Alliance in February 2022 as a result of the harm and trauma inflicted upon my children by public health policies.

3. Shortly after this lawsuit was filed, the County of Los Angeles Department of Public Health (“LADPH”) disabled public comment on all of their social media accounts, thereby eliminating my ability to connect with other community members in the public space where people go to get public health information. My ability to share data and connect with other citizens of Los Angeles suffering under public health orders in the last remaining central community forum was eliminated.

4. On May 3, 2023, I drove from my home in the San Fernando Valley to Sheppard Mullin’s offices at 333 South Hope in downtown Los Angeles to attend the deposition of Barbara Ferrer in this case.

5. I parked in the building garage, arrived in the lobby of the building located at 333 South Hope around 11:25 a.m., and showed my ID to building security.

6. I observed building security call upstairs to Sheppard Mullin, and then security told me to have a seat in the lobby waiting area. After about five minutes of waiting, I returned to the security desk and asked what was happening.

7. The security officer told me to continue waiting, and advised me that someone from

1 Sheppard Mullin would come down to see me.

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3 8. Because this case involves a matter of significant public interest, including the  
4 silencing and censorship of Los Angeles residents by LADPH, I began tweeting about my  
5 experience in the lobby at approximately 11:43 a.m. A copy of the Twitter thread I posted on May  
6 3, 2023 describing my experience is attached hereto as Exhibit A.

7 9. At approximately 11:46 a.m., I posted a video of myself on my Twitter account, in  
8 which I stated the following:

9 “OK, so its 11:46. I arrived 20 minutes ago, on time for the deposition of Barbara Ferrer in  
10 the case of Alliance of Los Angeles County Parents, of which I’m a member, versus Los  
11 Angeles County Department of Public Health. The security guard has said he can’t let me in,  
12 and that someone from Sheppard Mullin would be coming down to talk to me. That has not  
13 happened yet. It is my understanding that the deposition has probably begun, without me in  
14 attendance, and I’m just still waiting. We’ll see what happens.”

15 10. At 11:57 a.m., after 30 minutes of waiting, I again asked the security guard what was  
16 going on. He called up to Sheppard Mullin and again said someone would come down to “talk to  
17 me.”

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19 11. By approximately 12:49 p.m., I had been waiting in the lobby for an hour and twenty  
20 minutes. Building security told me that someone from Sheppard Mullin would come down and let  
21 me in, but no one came down to the lobby and I was forced to continue waiting.

22 12. At approximately 2:30 p.m., after three hours of waiting in the lobby, security staff  
23 approached me and informed me that Sheppard Mullin was not allowing me into their offices for  
24 the deposition. I took down the names of the security staff, and informed them that counsel for the  
25 County of Los Angeles, Kent Raygor, claimed they had decided that I was a liability risk and could  
26 not be allowed upstairs.

27  
28 13. The security guard named Daron informed me that this was not true, and that it was

1 Sheppard Mullin who had made the decision to prevent me from entering and attending the  
2 deposition.

3 14. Accordingly, at approximately 2:30 p.m., I paid \$47 in parking fees and departed the  
4 building at 333 South Hope without ever having entered the deposition. I then drove 45 minutes  
5 back to my home.

6 15. Aside from the security desk staff, I did not speak to anyone during the entire time  
7 that I sat waiting in the lobby of 333 South Hope Street. I sat quietly by myself, only occasionally  
8 moving to use the public restroom.

9 16. In my experience of over a decade of practicing law, I have never witnessed or  
10 experienced such egregious conduct by an attorney. Mr. Raygor's conduct caused me unwarranted  
11 annoyance, embarrassment, oppression, undue burden and expense.

12 I declare under penalty of perjury under the laws of the State of California that the foregoing  
13 is true and correct.  
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17 Signed this 26 day of May, 2023 at Los Angeles, California.

18 DocuSigned by:  
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A11B8145967F40A...

20 Sarah Beth Burwick

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**DECLARATION OF JULIE A. HAMILL**

I, Julie A. Hamill, hereby declare:

1. I am an attorney licensed to practice law in the State of California and I am a sole practitioner with the law firm of Hamill Law & Consulting, counsel of record for Plaintiff and Petitioner Alliance of Los Angeles County Parents (“Alliance”) in the above-captioned action. I make this declaration of my own personal knowledge and am competent to testify thereto if called upon to do so in a court of law.

2. I noticed the deposition of Defendant Director of County of Los Angeles Department of Public Health to take place on May 3, 2023, in Sheppard Mullins’ office located on the 43<sup>rd</sup> floor of 333 South Hope, Los Angeles, California.

3. On May 2, 2023, at 8:55 p.m. on the eve of the deposition of Barbara Ferrer, counsel for Defendants, Kent Raygor, emailed to tell me he would not allow Alliance client representative Sarah Beth Burwick to attend the deposition. A true and correct copy of my email exchange with Mr. Raygor is attached hereto as Exhibit B.

4. Mr. Raygor claimed he was prohibiting Ms. Burwick from attending because I “failed to identify Ms. Burwick” in discovery responses, and I “cannot have it both ways.”

5. I responded to Mr. Raygor that Ms. Burwick was a member of the Alliance, that she was identified in the Alliance’s discovery responses, and that she would be in attendance.

6. Mr. Raygor again stated that Ms. Burwick wasn’t identified as a member in the discovery responses.

7. In fact, Ms. Burwick *was* identified as a member of the organization in Alliance’s responses to the County’s written discovery, at least thirty times. For example, see Alliance Responses to County Form Interrogatories No. 12.1, Special Interrogatories Nos. 1- 12, 14-18, and

1 Demands for Production Nos. 33-44, 56-58. A copy of the Alliance’s discovery responses are  
2 attached hereto as Exhibits C, D, and E, respectively.

3           8.       On May 3, 2023, in the Sheppard Mullin conference room where the deposition was  
4 held, Mr. Raygor was flanked by Public Health Director Barbara Ferrer and County Counsel  
5 William Birnie. I sat alone, with no co-counsel or client present.

6           9.       Before the deposition commenced, I asked Mr. Raygor to let Ms. Burwick into the  
7 deposition. He refused.

8           10.      At the outset of the deposition, I attempted to discuss on the record Mr. Raygor’s  
9 refusal to allow Ms. Burwick inside. A true and correct copy of excerpts from the transcript of the  
10 Deposition of Barbara Ferrer are attached hereto as Exhibit F.

11           11.      Mr. Raygor refused to discuss his exclusion of my client from the deposition on the  
12 record, and insisted on an off-record discussion. (Exh. F, 8:3-25, 9:1-9).

13           12.      In an off-record discussion, Mr. Raygor demanded that I sign an agreement to  
14 identify all petitioner members in order to allow Ms. Burwick to enter the room. I refused to sign an  
15 agreement. I confirmed the same on the record.( Exh. F, 9:13-21).

16           13.      At 1:09 pm, I sent an email to Mr. Raygor stating “[m]y client is still in the lobby. I  
17 intend to seek sanctions against you for wrongfully excluding my client from the deposition. You  
18 may exclude members of the public, but not a party, per CCP 2025.420(b)(12). If you allow her up  
19 now, I will not seek sanctions.” A true and correct copy of this email is attached as Exhibit G.

20           14.      At 1:13 p.m., Mr. Raygor attempted to reframe his conduct via email, stating that I  
21 “renege” on an agreement. I responded that I would not sign any sort of agreement, and reiterated  
22 that we would be seeking sanctions for his conduct. A true and correct copy of this email exchange  
23 is attached as Exhibit H.

24           15.      Around 1:19 p.m., Mr. Raygor stated that he would permit Ms. Burwick to enter the  
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1 building if she would state on the record that she is a member of the Alliance. (Exh. F, 52:3-25,  
2 53:1-25, 55:1-25).

3 16. At approximately 1:34 p.m., after going off the record again to confer with his client,  
4 Mr. Raygor stated that he would allow Ms. Burwick into the deposition, but that he needed “to have  
5 a security officer approve it.” (Exh. F, 55:14-18).

6 17. Mr. Raygor then feigned inability to find a security officer. (Exh. F, 55:18).

7 18. I asked Mr. Raygor to expedite the security authorization process and to contact  
8 reception to allow Ms. Burwick upstairs. (Exh. F, 55:23-25, 56:4-6).

9 19. Mr. Raygor asked to go off the record yet again and wandered away to “talk to the  
10 receptionist”. (Exh. F, 56:13-16)

11 20. After more stalling, Mr. Raygor returned to the deposition and sat silently. I resumed  
12 the deposition. (Exh. F, 56:18-19).

13 21. Approximately 20 minutes later, Ms. Burwick still hadn’t been let into the  
14 deposition. I once again asked Mr. Raygor whether Ms. Burwick had been authorized to enter.  
15 (Exh. F, 60:5-6).

16 22. Mr. Raygor stated that he was “overruled” by security due to Ms. Burwick’s  
17 “conduct in the lobby and on Twitter.” (Exh. F, 60:7-13).

18 23. When asked for details, Mr. Raygor refused to provide any explanation or details.  
19 (Exh. F, 60:14-25, 61:1-7). Again, I advised Mr. Raygor that we would seek sanctions for his  
20 conduct. (Exh. F, 61:5-7).

21 24. At the conclusion of the deposition, I asked Mr. Raygor for the name of the  
22 managing partner of Sheppard Mullin’s office. Mr. Raygor responded that he did not know who the  
23 managing partner is.  
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# EXHIBIT A



**Sarah Beth Burwick**  [@sarahbeth345](#)



Live thread from Sheppard Mullin

I arrived in the lobby around 11:25 am

I showed my ID to security. They made a call upstairs to Sheppard Mullin and told me to have a seat.

After about 5 minutes I returned to the security desk and asked what was happening.

11:43 AM · May 3, 2023 · **79.4K** Views

**31** Retweets **8** Quotes **297** Likes **8** Bookmarks



**Sarah Beth Burwick**  [@sarahbeth345](#) · May 3



The security guy said to wait and Kent Raygor would come down to see me.

It is now 11:43. I'm sitting here waiting.



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10.5K



**Sarah Beth Burwick**  [@sarahbeth345](#) · May 3



All dressed up with nowhere to go



7 7 176 11.7K



**Sarah Beth Burwick** @sarahbeth345 · May 3

At 11:57, after 30 minutes of waiting, I again asked the security guard what was going on. He called up to Sheppard Mullin and again said someone would come down to "talk to me."

So... I wait.

3 2 110 9,025



**Sarah Beth Burwick** @sarahbeth345 · May 3

I should note, that if Kent Raygor did come down to the lobby to talk to me directly, it would be a violation of his professional ethics, which do not permit an attorney in a matter to communicate directly with a represented party.

4 4 114 8,547



**Sarah Beth Burwick** @sarahbeth345 · May 3

The Alliance of LA County Parents (and therefore my) lawyer @hamill\_law was permitted entrance into Sheppard Mullin and had no choice but to begin the deposition, with a statement on the record reflecting that Kent Raygor will not let me in.

1 8 133 10.9K



**Sarah Beth Burwick** @sarahbeth345 · May 3

In other words, not only is Kent Raygor baselessly barring a litigant from attending a deposition, but he and/or his office is also directing the building security staff to lie to me, as for 45 minutes now, the security desk has told me "someone is coming down."

2 8 172 8,991



**Sarah Beth Burwick** @sarahbeth345 · May 3

It's 12:20 and nobody from Sheppard Mullin has come down. I've been here almost an hour.

3 5 120 9,008



**Sarah Beth Burwick** @sarahbeth345 · May 3

It's 12:49 pm. I've been here in the lobby of Sheppard Mullin's bldg in downtown LA for an hour and 20 minutes. The security staff have told me three times that someone would come down and let me in. That has not happened.

This is one of the most unprofessional things I've seen.

7 8 138 8,243



**Sarah Beth Burwick** @sarahbeth345 · May 3

It's 1:41 pm. I am still in the lobby.





**Sarah Beth Burwick** @sarahbeth345 · May 3

It's 1:41 pm. I am still in the lobby.

My understanding is that Sheppard Mullin is now allowing me to enter their office to attend the deposition, but they have not let me up yet.

2   4   92   7,020  



**Sarah Beth Burwick** @sarahbeth345 · May 3

Apparently, Sheppard Mullin attorney Kent Raygor is now claiming security will not allow me up because of my “tweets and conduct in the lobby.”

This is obviously a lie.

The security guy just came over and told me Sheppard Mullin is still denying me access to the office.

5   9   135   7,637  



**Sarah Beth Burwick** @sarahbeth345 · May 3

I have been sitting here calmly for two and a half hours. I've approached security a couple times to politely ask if they heard from SM yet, and once to ask for the nearest restroom.

6   3   89   6,234  



**Sarah Beth Burwick** @sarahbeth345 · May 3

I have taken down the names of the security staff, who have observed me waiting for nearly three hours. I informed them that Mr. Raygor claims that security will not allow me up; all three security staff on duty say that's not true.

3   3   97   6,590  



**Sarah Beth Burwick** @sarahbeth345 · May 3

In fact, I have stood by the security desk multiple times today and observed the staff call up to Sheppard Mullin to ask if they can let me in. Each time, security has said, “sorry, someone from SM will come down.”

5   2   85   7,933  



**Sarah Beth Burwick** @sarahbeth345 · May 3

After three hours of waiting in the lobby of Sheppard Mullin's DTLA office, I paid the \$47 parking fee (which the firm would/should have validated, had they let me in), and drove home.

6   1   85   5,315

# EXHIBIT B

---

## Re: Sarah Beth Burwick

1 message

---

Julie Hamill <julie@juliehamill-law.com>

Wed, May 3, 2023 at 9:07 AM

To: Kent Raygor <KRaygor@sheppardmullin.com>

Cc: Valerie Alter <VAlter@sheppardmullin.com>, Zachary Golda <zgolda@sheppardmullin.com>

OK. We also explained to you in the responses to your 58 production demands and special interrogatories that we will identify the members necessary for the purpose of establishing standing, and that we will do so under protective order. I am not going to allow you to abuse and harass the parents in this organization.

Either way, there is no rule to support the arguments you are making now. Sarah will be in attendance. If you insist on excluding her, you can explain yourself on the record.

Best regards,

Julie Hamill  
Hamill Law & Consulting  
[julie@juliehamill-law.com](mailto:julie@juliehamill-law.com)  
(424) 265-0529  
[www.juliehamill-law.com](http://www.juliehamill-law.com)

The information contained in this e-mail and any attachments to it may be legally privileged and include confidential information. If you have received this e-mail in error, please notify the sender immediately of that fact by return e-mail and permanently delete the e-mail and any attachments. Thank you.

On Wed, May 3, 2023 at 8:40AM Kent Raygor <KRaygor@sheppardmullin.com> wrote:

Julie,

We did not miss your responses to LACDPH's form interrogatories. You identified Burwick merely as a "witness" – in fact you specifically called her a "witness" eight times in your April 17, 2023 amended responses following our April 11, 2023 meet-and-confer letter. She was not identified as a member of Plaintiff Alliance of Los Angeles County Parents or as a client representative.

**Kent Raygor**

+1 (310) 228-3730 | direct

[KRaygor@sheppardmullin.com](mailto:KRaygor@sheppardmullin.com) | [Bio](#)

**SheppardMullin**

1901 Avenue of the Stars, Suite 1600

Los Angeles, CA 90067-6017

+1 (310) 228-3700 | main

[www.sheppardmullin.com](http://www.sheppardmullin.com) | [LinkedIn](#) | [Twitter](#)

**From:** Julie Hamill <[julie@juliehamill-law.com](mailto:julie@juliehamill-law.com)>  
**Sent:** Tuesday, May 2, 2023 9:50 PM  
**To:** Kent Raygor <[KRaygor@sheppardmullin.com](mailto:KRaygor@sheppardmullin.com)>  
**Cc:** Valerie Alter <[VALter@sheppardmullin.com](mailto:VALter@sheppardmullin.com)>; Zachary Golda <[zgolda@sheppardmullin.com](mailto:zgolda@sheppardmullin.com)>  
**Subject:** Re: Sarah Beth Burwick

Perhaps you missed the form rog responses. She will be there. You can discuss your objections on the record if you'd like.

Sent from my iPhone

On May 2, 2023, at 8:55 PM, Kent Raygor <[KRaygor@sheppardmullin.com](mailto:KRaygor@sheppardmullin.com)> wrote:

Julie,

We understand that you informed Valerie's assistant that you intend to bring Sarah Beth Burwick to the deposition tomorrow as a purported client representative.

On March 30, 2023, LACDPH served document demands and special interrogatories on you. LACDPH's Special Interrogatory Nos. 1, 9, 10, and 11 and Document Demand Nos. 1, 9, 10, and 11 specifically asked you to identify the members of Plaintiff Alliance of Los Angeles County Parents and produce documents disclosing their identities. You refused to provide substantive responses, even though Judge Fahey made clear on March 27, 2023 that Alliance's membership would be important for standing purposes. Now you want to bring Ms. Burwick as a client rep. You cannot have it both ways, and having failed to identify Ms. Burwick, she may not attend as a client rep.

**Kent Raygor**

+1 (310) 228-3730 | direct

[KRaygor@sheppardmullin.com](mailto:KRaygor@sheppardmullin.com) | [Bio](#)

**SheppardMullin**

1901 Avenue of the Stars, Suite 1600

Los Angeles, CA 90067-6017

+1 (310) 228-3700 | main

[www.sheppardmullin.com](http://www.sheppardmullin.com) | [LinkedIn](#) | [Twitter](#)

**Attention:** This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.



# EXHIBIT C

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  
6

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **FOR THE COUNTY OF LOS ANGELES**

9  
10 ALLIANCE OF LOS ANGELES COUNTY  
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,  
18

19 Respondents and Defendants.  
20

Case No.: 22STCP02772

**AMENDED ALLIANCE OF LOS  
ANGELES COUNTY PARENTS  
RESPONSE TO COUNTY OF LOS  
ANGELES, ET AL FORM  
INTERROGATORIES, SET ONE**

1 **PROPOUNDING PARTY: COUNTY OF LOS ANGELES et al**

2 **RESPONDING PARTY: ALLIANCE OF LOS ANGELES COUNTY PARENTS**

3 **SET NUMBER: ONE**

4 Plaintiff and petitioner hereby provides the following responses to interrogatories without  
5 prejudice to further discovery, reserving the right to present evidence of any subsequently  
6 discovered facts at the time of trial of this action. Each of the following responses is rendered and  
7 based upon information and belief at the time of the preparation of these answers, after diligent  
8 inquiry. Discovery will continue as long as permitted by statute or stipulation of the parties and the  
9 investigation of this responding party's attorneys and agents will continue to and throughout the trial  
10 of this action. Defendant, therefore, specifically reserves the right, at the time of trial, to introduce  
11 any evidence from any source which may hereinafter be discovered and testimony from any  
12 witnesses whose identities may hereafter be discovered.

13 If any information has unintentionally been omitted from these responses, the interrogated  
14 party reserves the right to apply for relief so as to permit the insertion of the omitted information  
15 from these responses.

16 These introductory paragraphs shall apply to each and every response given herein and shall  
17 be incorporated by this reference a though fully set forth in each and every following interrogatory  
18 response.

19

20 **FORM INTERROGATORIES**

21 **RESPONSE TO 1.1:**

22 Julie A. Hamill, Counsel for Plaintiff and Petitioner

23 904 Silver Spur Road, #287

24 Rolling Hills Estates, CA 90274

25

26 **RESPONSE TO 3.1**

No

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28 **RESPONSE TO 3.2**

No

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**RESPONSE TO 3.3**

No

**RESPONSE TO 3.4**

No

**RESPONSE TO 3.5**

Yes

- (a) Alliance of Los Angeles County Parents
- (b) N/A; and
- (c) 904 Silver Spur Road, #287, Rolling Hills Estates CA 90274

**RESPONSE TO 3.6**

No

**RESPONSE TO 3.7**

No

**RESPONSE TO 9.1**

No

**RESPONSE TO 9.2**

N/A

**RESPONSE TO 12.1**

Objection: Plaintiff's investigation and development of all facts and circumstances relating to this action is ongoing. These responses and objections are made without prejudice to, and are not a waiver of, Plaintiff's right to rely on other facts or documents at trial. The term "INCIDENT" is overbroad, compound, vague and ambiguous. Due to the public nature of Defendant/Respondent's acts, the number of potential witnesses is limitless, and Plaintiff/Petitioner is under no obligation to identify every witness with knowledge of "the INCIDENT" – an unduly burdensome and impossible task. This matter was brought as a petition for writ of mandate, and "personal injury"-type discovery, like the questions in the Form Interrogatories propounded by Defendant/Respondent, does not lend itself to actions seeking non-monetary relief for violations of constitutional protections by a government agency. Defendants/Respondents have failed to demonstrate that the information they demand will yield any information relevant to the claims and defenses asserted in this matter. If Defendant/Respondent persists with fishing expeditions designed to harass and intimidate citizens attempting to enforce an important public right, Plaintiff/Petitioner will move for a protective order. Plaintiff/Petitioner again requests an IDC with Judge Fahey to avoid unnecessary motion practice and further waste of public resources by Defendants/Respondents.

Without waiving and subject to the foregoing objection, Responding Party answers as follows:

State the name, ADDRESS, and telephone number of each individual:  
 (a) who witnessed the INCIDENT or the events occurring immediately before or after the INCIDENT;

1 The “Incident” involves public social media accounts, and it is accordingly impossible to identify  
2 everyone with knowledge of the elimination of public comments on Propounding Party’s accounts  
and the suspension of the @ALT\_lacph Twitter account.

3 Without waiving any objections, the witnesses with the most direct knowledge of incidents  
4 involving the @ALT\_lacph Twitter account are: Cynthia Rojas, Sarah Beth Burwick, Roxanne  
Hoge, and Margaret Orenstein. Each witness can be reached through counsel for Petitioner/Plaintiff:  
5 Julie A. Hamill, Counsel for Plaintiff and Petitioner  
904 Silver Spur Road, #287  
6 Rolling Hills Estates, CA 90274

7 With respect to witnesses with knowledge of Defendant/Respondent’s disabling public comments  
8 on social media, the same witnesses identified above have such knowledge.

9 With respect to witnesses with knowledge of Defendant/Respondent’s creation and use of social  
10 media as a public forum prior to its disabling public comments, the same witnesses identified above  
have such knowledge.

11 With respect to witnesses with knowledge of Defendant/Respondent’s deletion of its entire Twitter  
12 history prior to September 2022 during the course of this litigation and refusal to reinstate or  
provide an archive of the deleted history, the same witnesses identified above have such knowledge.

13 (b) who made any statement at the scene of the INCIDENT;  
14 N/A

15 (c) who heard any statements made about the INCIDENT by any individual at the scene; and  
16 N/A

17 (d) who YOU OR ANYONE ACTING ON YOUR BEHALF claim has knowledge of the  
18 INCIDENT (except for expert witnesses covered by Code of Civil Procedure section 2034).

19 The “Incident” involves public social media accounts, and it is accordingly impossible to identify  
20 everyone with knowledge of the elimination of public comments on Propounding Party’s accounts  
and the suspension of the @ALT\_lacph Twitter account.

21 Without waiving any objections, the witnesses with the most direct knowledge of incidents  
22 involving the @ALT\_lacph Twitter account are: Cynthia Rojas, Sarah Beth Burwick, Roxanne  
Hoge, and Margaret Orenstein. Each witness can be reached through counsel for Petitioner/Plaintiff:  
23 Julie A. Hamill, Counsel for Plaintiff and Petitioner  
904 Silver Spur Road, #287  
24 Rolling Hills Estates, CA 90274

25 With respect to witnesses with knowledge of Defendant/Respondent’s disabling public comments  
26 on social media, the same witnesses identified above have such knowledge.

27 With respect to witnesses with knowledge of Defendant/Respondent’s creation and use of social  
28 media as a public forum prior to its disabling public comments, the same witnesses identified above  
have such knowledge.

1 With respect to witnesses with knowledge of Defendant/Respondent's deletion of its entire Twitter  
2 history prior to September 2022 during the course of this litigation and refusal to reinstate or  
3 provide an archive of the deleted history, the same witnesses identified above have such knowledge.

4 **RESPONSE TO 12.2**

No

5 **RESPONSE TO 12.3**

6 No

7 **RESPONSE TO 12.4**

8 Yes

9 **RESPONSE TO 12.5**

10 No

11 **RESPONSE TO 12.6**

12 No

13 **RESPONSE TO 12.7**

No

14 **RESPONSE TO 13.1**

15 No

16 **RESPONSE TO 13.2**

17 No

18 **RESPONSE TO 14.1**

19 No

20 **RESPONSE TO 14.2**

No

21  
22 Dated: April 17, 2023

Hamill Law & Consulting

23  
24 By:         /s/ Julie A. Hamill \_\_\_\_\_

Julie A. Hamill

25 Attorney for Petitioner

26 Alliance of Los Angeles County Parents

1 **VERIFICATION**

2 **ALLIANCE OF LOS ANGELES COUNTY PARENTS v. COUNTY OF LOS ANGELES**  
3 **DEPARTMENT OF PUBLIC HEALTH, et al., Case No.: 21GDCV00784**

4 I have read the foregoing AMENDED ALLIANCE OF LOS ANGELES COUNTY  
5 PARENTS RESPONSE TO COUNTY OF LOS ANGELES, ET AL FORM  
6 INTERROGATORIES, SET ONE and know its contents.

7 I am a founding member of the Alliance of Los Angeles County Parents, an unincorporated  
8 association, a party to this action, and am authorized to make this verification for and on its behalf,  
9 and I make this verification for that reason.

10 I am informed and believe and on that ground allege that the matters stated in the foregoing  
11 document are true.

12 Executed on April 17, 2023, at Los Angeles, California.

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

15 \_\_\_\_\_  
16 Margaret Orenstein, on behalf of  
17 Alliance of Los Angeles County Parents  
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# EXHIBIT D



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

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,

18  
19 Respondents and Defendants.  
20

Case No.: 22STCP02772

**ALLIANCE OF LOS ANGELES COUNTY  
PARENTS RESPONSE TO COUNTY OF  
LOS ANGELES, ET AL SPECIAL  
INTERROGATORIES, SET ONE**

1 **PROPOUNDING PARTY: COUNTY OF LOS ANGELES et al**

2 **RESPONDING PARTY: ALLIANCE OF LOS ANGELES COUNTY PARENTS**

3 **SET NUMBER: ONE**

4 Plaintiff and petitioner hereby provides the following responses to interrogatories without  
5 prejudice to further discovery, reserving the right to present evidence of any subsequently  
6 discovered facts at the time of trial of this action. Each of the following responses is rendered and  
7 based upon information and belief at the time of the preparation of these answers, after diligent  
8 inquiry. Discovery will continue as long as permitted by statute or stipulation of the parties and the  
9 investigation of this responding party's attorneys and agents will continue to and throughout the trial  
10 of this action. Petitioner, therefore, specifically reserves the right, at the time of trial, to introduce  
11 any evidence from any source which may hereinafter be discovered and testimony from any  
12 witnesses whose identities may hereafter be discovered.

13 If any information has unintentionally been omitted from these responses, the interrogated  
14 party reserves the right to apply for relief so as to permit the insertion of the omitted information  
15 from these responses.

16 These introductory paragraphs shall apply to each and every response given herein and shall  
17 be incorporated by this reference a though fully set forth in each and every following interrogatory  
18 response.

19  
20 **SPECIAL INTERROGATORY. 1:**

21 In Paragraph 18 of Plaintiff's *First Amended Petition*, Plaintiff states:

22 "Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
23 ('Petitioner' or 'Alliance') is an unincorporated association composed of and  
24 supported by parents of children in Los Angeles County who attend childcare  
25 programs, K-12 schools, and/or play youth sports in the County. Petitioner Alliance  
26 is a community group that was organized for the purpose of representing the interests  
27 of Los Angeles County children subjected to harsh and restrictive mandates by local  
28 education agencies, the County of Los Angeles ('County'), and the State of

1 California ('State'). One of its goals is to advocate for fair, humane, and equal  
2 treatment of all children within the County and to remove all unnecessary, harmful,  
3 and unjustified restrictions against children and provide children with a full return to  
4 normalcy. Members of Alliance reside within the County, own real property within  
5 the County, have children who attend childcare or K-12 schools in the County, and/or  
6 play youth sports in the County.”

7 Identify each parent who is a member of Alliance of Los Angeles County Parents, by  
8 stating, for each such member, his or her full name, residence address (a street address, not a  
9 P.O. box), e-mail address, and telephone number.

10  
11 **RESPONSE TO SPECIAL INTERROGATORY 1:**

12 Objection: Responding Party objects to this interrogatory on the following grounds:  
13 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
14 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
15 2023.010(c)); Unreasonably cumulative and undue burden (See Code Civ. Proc., §§  
16 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

17 The only remaining cause of action in this case is a challenge to Propounding Party’s  
18 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
19 association is unnecessary and overly burdensome. Many members submitted information  
20 about harm to their children using first and last initials in order to protect privacy and avoid  
21 retaliation by employers, government agencies, labor unions, and social networks, which is  
22 one of the reasons the association and not individual petitioners brought this action in the  
23 first place. Petitioners are not seeking any damages – they simply seek injunctive relief to  
24 rectify constitutional violations. Further, Responding Party identified sufficient witnesses  
25 for Propounding Party to ascertain standing in its Response to County’s Form  
26 Interrogatories, Set One . The identification of all members of Responding Party association  
27 is accordingly irrelevant, unwarranted, and unreasonably cumulative.

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**SPECIAL INTERROGATORY. 2:**

In Paragraph 18 of Plaintiff’s *First Amended Petition*, Plaintiff states:

“Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by parents of children in Los Angeles County who attend childcare programs, K-12 schools, and/or play youth sports in the County. Petitioner Alliance is a community group that was organized for the purpose of representing the interests of Los Angeles County children subjected to harsh and restrictive mandates by local education agencies, the County of Los Angeles (‘County’), and the State of California (‘State’). One of its goals is to advocate for fair, humane, and equal treatment of all children within the County and to remove all unnecessary, harmful, and unjustified restrictions against children and provide children with a full return to normalcy. Members of Alliance reside within the County, own real property within the County, have children who attend childcare or K-12 schools in the County, and/or play youth sports in the County.”

For each parent who is a member of Alliance of Los Angeles County Parents, state the date (day, month, and year) that he or she first became such a member and, if applicable, the date (day, month, and year) that he or she ceased being such a member.

**RESPONSE TO SPECIAL INTERROGATORY 2:**

Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment, oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

1 The only remaining cause of action in this case is a challenge to Propounding Party’s  
2 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
3 association is unnecessary and overly burdensome. Many members submitted information  
4 about harm to their children using first and last initials in order to protect privacy and avoid  
5 retaliation by employers, government agencies, labor unions, and social networks, which is  
6 one of the reasons the association and not individual petitioners brought this action in the  
7 first place. Petitioners are not seeking any damages – they simply seek injunctive relief to  
8 rectify constitutional violations. Further, Responding Party identified sufficient witnesses  
9 for Propounding Party to ascertain standing in its Response to County’s Form  
10 Interrogatories, Set One. The identification of all members of Responding Party association  
11 is accordingly irrelevant, unwarranted, and unreasonably cumulative.  
12 Without waiving the above-stated objections, the members identified in Response to  
13 County’s Form Interrogatories, Set One, became members on or about February 7, 2022,  
14 and remain members through the time of this writing.

15  
16 **SPECIAL INTERROGATORY. 3:**

17 In Paragraph 18 of Plaintiff’s *First Amended Petition*, Plaintiff states:

18 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
19 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
20 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
21 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
22 organized for the purpose of representing the interests of Los Angeles County children  
23 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
24 Angeles (‘County’), and the State of California (‘State’). One of its goals is to advocate for  
25 fair, humane, and equal treatment of all children within the County and to remove all  
26 unnecessary, harmful, and unjustified restrictions against children and provide children with  
27 a full return to normalcy. Members of Alliance reside within the County, own real property  
28

1 within the County, have children who attend childcare or K-12 schools in the County, and/or  
2 play youth sports in the County.”

3 Identify each child of each parent who is a member of Alliance of Los Angeles County  
4 Parents and who attends or has attended “childcare programs . . . in the County” or “K-12  
5 schools . . . in the County” or plays or has played “youth sports in the County”, by stating,  
6 for each such child, his or her full name, residence address (a street address, not a P.O. box),  
7 e-mail address, telephone number, and date of birth.

8  
9 **RESPONSE TO SPECIAL INTERROGATORY 3:**

10 Objection: Responding Party objects to this interrogatory on the following grounds:  
11 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
12 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
13 2023.010(c)); Unreasonably cumulative and undue burden (See Code Civ. Proc., §§  
14 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

15 The only remaining cause of action in this case is a challenge to Propounding Party’s  
16 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
17 association is unnecessary and overly burdensome. Many members submitted information  
18 about harm to their children using first and last initials in order to protect privacy and avoid  
19 retaliation by employers, government agencies, labor unions, and social networks, which is  
20 one of the reasons the association and not individual petitioners brought this action in the  
21 first place. Petitioners are not seeking any damages – they simply seek injunctive relief to  
22 rectify constitutional violations. Further, Responding Party identified sufficient witnesses  
23 for Propounding Party to ascertain standing in its Response to County’s Form  
24 Interrogatories, Set One. The identification of all members of Responding Party association  
25 is accordingly irrelevant, unwarranted, and unreasonably cumulative.

1 Without waiving the above-stated objections, the members identified in Response to  
2 County’s Form Interrogatories, Set One are available through counsel. Counsel will not  
3 provide their personal identifying information absent a protective order.  
4

5 **SPECIAL INTERROGATORY. 4:**

6 In Paragraph 18 of Plaintiff’s *First Amended Petition*, Plaintiff states:

7 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
8 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and  
9 supported by parents of children in Los Angeles County who attend childcare  
10 programs, K-12 schools, and/or play youth sports in the County. Petitioner Alliance  
11 is a community group that was organized for the purpose of representing the interests  
12 of Los Angeles County children subjected to harsh and restrictive mandates by local  
13 education agencies, the County of Los Angeles (‘County’), and the State of  
14 California (‘State’). One of its goals is to advocate for fair, humane, and equal  
15 treatment of all children within the County and to remove all unnecessary, harmful,  
16 and unjustified restrictions against children and provide children with a full return to  
17 normalcy. Members of Alliance reside within the County, own real property within  
18 the County, have children who attend childcare or K-12 schools in the County, and/or  
19 play youth sports in the County.”

20 For each child of a parent who is a member of Alliance of Los Angeles County Parents,  
21 identify, after the name of each such child, all “childcare programs . . . in the County”, “K-  
22 12 schools . . . in the County”, and “youth sports in the County” he or she has attended or  
23 played, by stating, for each such childcare program and K-12 school, its full name, location,  
24 address (a street address, not a P.O. box), e-mail address, and telephone number and for  
25 each such sport the name of the sport and where the child played it.

26 **RESPONSE TO SPECIAL INTERROGATORY 4:**  
27  
28

1 Objection: Responding Party objects to this interrogatory on the following grounds:  
2 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
3 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
4 2023.010(c)); Unreasonably cumulative and undue burden (See Code Civ. Proc., §§  
5 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

6 The only remaining cause of action in this case is a challenge to Propounding Party’s  
7 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
8 association is unnecessary and overly burdensome. Many members submitted information  
9 about harm to their children using first and last initials in order to protect privacy and avoid  
10 retaliation by employers, government agencies, labor unions, and social networks, which is  
11 one of the reasons the association and not individual petitioners brought this action in the  
12 first place. Petitioners are not seeking any damages – they simply seek injunctive relief to  
13 rectify constitutional violations. Further, Responding Party identified sufficient witnesses  
14 for Propounding Party to ascertain standing in its Response to County’s Form  
15 Interrogatories, Set One. The identification of all members of Responding Party association  
16 is accordingly irrelevant, unwarranted, and unreasonably cumulative.

17 Without waiving the above-stated objections, the members identified in Response to  
18 County’s Form Interrogatories, Set One are available through counsel. Counsel will not  
19 provide their personal identifying information absent a protective order.  
20

21 **SPECIAL INTERROGATORY. 5:**

22 In Paragraph 18 of Plaintiff’s *First Amended Petition*, Plaintiff states:

23 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
24 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and  
25 supported by parents of children in Los Angeles County who attend childcare  
26 programs, K-12 schools, and/or play youth sports in the County. Petitioner Alliance  
27 is a community group that was organized for the purpose of representing the interests  
28



1 of Los Angeles County children subjected to harsh and restrictive mandates by local  
2 education agencies, the County of Los Angeles ('County'), and the State of  
3 California ('State'). One of its goals is to advocate for fair, humane, and equal  
4 treatment of all children within the County and to remove all unnecessary, harmful,  
5 and unjustified restrictions against children and provide children with a full return to  
6 normalcy. Members of Alliance reside within the County, own real property within  
7 the County, have children who attend childcare or K-12 schools in the County, and/or  
8 play youth sports in the County.”

9 For each parent who is a member of Alliance of Los Angeles County Parents, state, after the  
10 name of each such parent, all handles he or she has used to post any commentary, question,  
11 or content on any social media platform (including, but not limited to, Facebook, Twitter,  
12 Instagram, YouTube, Twitter, Pinterest, Snapchat, and LinkedIn).

13 **RESPONSE TO SPECIAL INTERROGATORY 5:**

14 Objection: Responding Party objects to this interrogatory on the following grounds:  
15 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
16 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
17 2023.010(c)); Unreasonably cumulative and undue burden (See Code Civ. Proc., §§  
18 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

19 The only remaining cause of action in this case is a challenge to Propounding Party’s  
20 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
21 association is unnecessary and overly burdensome. Many members submitted information  
22 about harm to their children using first and last initials in order to protect privacy and avoid  
23 retaliation by employers, government agencies, labor unions, and social networks, which is  
24 one of the reasons the association and not individual petitioners brought this action in the  
25 first place. Many members use alias handles on social media to avoid retaliation by  
26 employers, government agencies, friends and family. Petitioners are not seeking any  
27 damages – they simply seek injunctive relief to rectify constitutional violations. Further,  
28

1 Responding Party identified sufficient witnesses for Propounding Party to ascertain standing  
2 in its Response to County’s Form Interrogatories, Set One. The identification of all  
3 members of Responding Party association is accordingly irrelevant, unwarranted, and  
4 unreasonably cumulative. The identification of members’ social media handles is similarly  
5 irrelevant, unwarranted, and unreasonably cumulative, as Propounding Party’s constitutional  
6 violation would exist regardless of whether a member commented.

7  
8 **SPECIAL INTERROGATORY. 6:**

9 In Paragraph 18 of Plaintiff’s *First Amended Petition*, Plaintiff states:

10 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
11 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and  
12 supported by parents of children in Los Angeles County who attend childcare  
13 programs, K-12 schools, and/or play youth sports in the County. Petitioner Alliance  
14 is a community group that was organized for the purpose of representing the interests  
15 of Los Angeles County children subjected to harsh and restrictive mandates by local  
16 education agencies, the County of Los Angeles (‘County’), and the State of  
17 California (‘State’). One of its goals is to advocate for fair, humane, and equal  
18 treatment of all children within the County and to remove all unnecessary, harmful,  
19 and unjustified restrictions against children and provide children with a full return to  
20 normalcy. Members of Alliance reside within the County, own real property within  
21 the County, have children who attend childcare or K-12 schools in the County, and/or  
22 play youth sports in the County.”

23 For each parent who is a member of Alliance of Los Angeles County Parents, identify, after  
24 the name of each such parent, all commentary, questions, and content that he or she intended  
25 to post on any social media platform (including, but not limited to, Facebook, Twitter,  
26 Instagram, YouTube, Twitter, Pinterest, Snapchat, and LinkedIn) but was precluded from  
27 doing so by the actions of defendant County of Los Angeles Department of Public Health,  
28

1 by stating, for each such commentary, question and content, the entirety of what was  
2 intended to be posted, the name of the platform on which it was intended to be posted, and  
3 the date it was intended to be posted.

4 **RESPONSE TO SPECIAL INTERROGATORY 6:**

5 Objection: Responding Party objects to this interrogatory on the following grounds:

6 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
7 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
8 2023.010(c)); Unreasonably cumulative and undue burden (See Code Civ. Proc., §§  
9 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

10 The only remaining cause of action in this case is a challenge to Propounding Party’s  
11 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
12 association is unnecessary and overly burdensome. Many members submitted information  
13 about harm to their children using first and last initials in order to protect privacy and avoid  
14 retaliation by employers, government agencies, labor unions, and social networks, which is  
15 one of the reasons the association and not individual petitioners brought this action in the  
16 first place. Many members use alias handles on social media to avoid retaliation by  
17 employers, government agencies, friends and family. Petitioners are not seeking any  
18 damages – they simply seek injunctive relief to rectify constitutional violations. Further,  
19 Responding Party identified sufficient witnesses for Propounding Party to ascertain standing  
20 in its Response to County’s Form Interrogatories, Set One. The identification of all  
21 members of Responding Party association is accordingly irrelevant, unwarranted, and  
22 unreasonably cumulative. The identification of members’ social media handles is similarly  
23 irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
24 members would have posted is irrelevant, as Propounding Party’s constitutional violation  
25 would exist regardless of whether a member commented.

26  
27 **SPECIAL INTERROGATORY. 7:**

28

1 In Paragraph 18 of Plaintiff’s *First Amended Petition*, Plaintiff states:

2 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
3 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and  
4 supported by parents of children in Los Angeles County who attend childcare  
5 programs, K-12 schools, and/or play youth sports in the County. Petitioner Alliance  
6 is a community group that was organized for the purpose of representing the interests  
7 of Los Angeles County children subjected to harsh and restrictive mandates by local  
8 education agencies, the County of Los Angeles (‘County’), and the State of  
9 California (‘State’). One of its goals is to advocate for fair, humane, and equal  
10 treatment of all children within the County and to remove all unnecessary, harmful,  
11 and unjustified restrictions against children and provide children with a full return to  
12 normalcy. Members of Alliance reside within the County, own real property within  
13 the County, have children who attend childcare or K-12 schools in the County, and/or  
14 play youth sports in the County.”

15 For each parent who is a member of Alliance of Los Angeles County Parents, identify, after  
16 the name of each such parent, all commentary, questions, and content that he or she intended  
17 to post on any social media platform (including, but not limited to, Facebook, Twitter,  
18 Instagram, YouTube, Twitter, Pinterest, Snapchat, and LinkedIn) but was precluded from  
19 doing so by the actions of defendant Muntu Davis, M.D., by stating, for each such  
20 commentary, question and content, the entirety of what was intended to be posted, the name  
21 of the platform on which it was intended to be posted, and the date it was intended to be  
22 posted.

23 **RESPONSE TO SPECIAL INTERROGATORY 7:**

24 Objection: Responding Party objects to this interrogatory on the following grounds:  
25 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
26 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
27  
28

1 2023.010(c)); Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§  
2 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

3 The only remaining cause of action in this case is a challenge to Propounding Party’s  
4 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
5 association is unnecessary and overly burdensome. Many members submitted information  
6 about harm to their children using first and last initials in order to protect privacy and avoid  
7 retaliation by employers, government agencies, labor unions, and social networks, which is  
8 one of the reasons the association and not individual petitioners brought this action in the  
9 first place. Many members use alias handles on social media to avoid retaliation by  
10 employers, government agencies, friends and family. Petitioners are not seeking any  
11 damages – they simply seek injunctive relief to rectify constitutional violations. Further,  
12 Responding Party identified sufficient witnesses for Propounding Party to ascertain standing  
13 in its Response to County’s Form Interrogatories, Set One. The identification of all  
14 members of Responding Party association is accordingly irrelevant, unwarranted, and  
15 unreasonably cumulative. The identification of members’ social media handles is similarly  
16 irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
17 members would have posted is irrelevant, as Propounding Party’s constitutional violation  
18 would exist regardless of whether a member commented.

19  
20 **SPECIAL INTERROGATORY. 8:**

21 In Paragraph 18 of Plaintiff’s *First Amended Petition*, Plaintiff states:

22 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
23 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and  
24 supported by parents of children in Los Angeles County who attend childcare  
25 programs, K-12 schools, and/or play youth sports in the County. Petitioner Alliance  
26 is a community group that was organized for the purpose of representing the interests  
27 of Los Angeles County children subjected to harsh and restrictive mandates by local  
28

1 education agencies, the County of Los Angeles ('County'), and the State of  
2 California ('State'). One of its goals is to advocate for fair, humane, and equal  
3 treatment of all children within the County and to remove all unnecessary, harmful,  
4 and unjustified restrictions against children and provide children with a full return to  
5 normalcy. Members of Alliance reside within the County, own real property within  
6 the County, have children who attend childcare or K-12 schools in the County, and/or  
7 play youth sports in the County.”

8 For each parent who is a member of Alliance of Los Angeles County Parents, identify, after  
9 the name of each such parent, all commentary, questions, and content that he or she intended  
10 to post on any social media platform (including, but not limited to, Facebook, Twitter,  
11 Instagram, YouTube, Twitter, Pinterest, Snapchat, and LinkedIn) but was precluded from  
12 doing so by the actions of defendant Barbara Ferrer, PhD, by stating, for each such  
13 commentary, question and content, the entirety of what was intended to be posted, the name  
14 of the platform on which it was intended to be posted, and the date it was intended to be  
15 posted.

16 **RESPONSE TO SPECIAL INTERROGATORY 8:**

17 Objection: Responding Party objects to this interrogatory on the following grounds:  
18 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
19 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
20 2023.010(c)); Unreasonably cumulative and undue burden (See Code Civ. Proc., §§  
21 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

22 The only remaining cause of action in this case is a challenge to Propounding Party’s  
23 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
24 association is unnecessary and overly burdensome. Many members submitted information  
25 about harm to their children using first and last initials in order to protect privacy and avoid  
26 retaliation by employers, government agencies, labor unions, and social networks, which is  
27 one of the reasons the association and not individual petitioners brought this action in the  
28

1 first place. Many members use alias handles on social media to avoid retaliation by  
2 employers, government agencies, friends and family. Petitioners are not seeking any  
3 damages – they simply seek injunctive relief to rectify constitutional violations. Further,  
4 Responding Party identified sufficient witnesses for Propounding Party to ascertain standing  
5 in its Response to County’s Form Interrogatories, Set One. The identification of all  
6 members of Responding Party association is accordingly irrelevant, unwarranted, and  
7 unreasonably cumulative. The identification of members’ social media handles is similarly  
8 irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
9 members would have posted is irrelevant, as Propounding Party’s constitutional violation  
10 would exist regardless of whether a member commented.

11  
12 **SPECIAL INTERROGATORY. 9:**

13 In Paragraph 18 of Plaintiff’s *First Amended Petition*, Plaintiff states:

14 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
15 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and  
16 supported by parents of children in Los Angeles County who attend childcare  
17 programs, K-12 schools, and/or play youth sports in the County. Petitioner Alliance  
18 is a community group that was organized for the purpose of representing the interests  
19 of Los Angeles County children subjected to harsh and restrictive mandates by local  
20 education agencies, the County of Los Angeles (‘County’), and the State of  
21 California (‘State’). One of its goals is to advocate for fair, humane, and equal  
22 treatment of all children within the County and to remove all unnecessary, harmful,  
23 and unjustified restrictions against children and provide children with a full return to  
24 normalcy. Members of Alliance reside within the County, own real property within  
25 the County, have children who attend childcare or K-12 schools in the County, and/or  
26 play youth sports in the County.”

1 State the full name of each parent who is a member of Alliance of Los Angeles County  
2 Parents who is claiming in this action that his or her free speech rights were violated by the  
3 actions of defendant County of Los Angeles Department of Public Health.

4 **RESPONSE TO SPECIAL INTERROGATORY 9:**

5 Objection: Responding Party objects to this interrogatory on the following grounds:

6 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
7 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
8 2023.010(c)); Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§  
9 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

10 The only remaining cause of action in this case is a challenge to Propounding Party’s  
11 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
12 association is unnecessary and overly burdensome. Many members submitted information  
13 about harm to their children using first and last initials in order to protect privacy and avoid  
14 retaliation by employers, government agencies, labor unions, and social networks, which is  
15 one of the reasons the association and not individual petitioners brought this action in the  
16 first place. Many members use alias handles on social media to avoid retaliation by  
17 employers, government agencies, friends and family. Petitioners are not seeking any  
18 damages – they simply seek injunctive relief to rectify constitutional violations. Further,  
19 Responding Party identified sufficient witnesses for Propounding Party to ascertain standing  
20 in its Response to County’s Form Interrogatories, Set One. The identification of all  
21 members of Responding Party association is accordingly irrelevant, unwarranted, and  
22 unreasonably cumulative. The identification of members’ social media handles is similarly  
23 irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
24 members would have posted is irrelevant, as Propounding Party’s constitutional violation  
25 would exist regardless of whether a member commented. Without waiving the above-stated  
26 objections, the members identified in Responding Party’s Response to County’s Form  
27 Interrogatories.

28



1  
2 **SPECIAL INTERROGATORY. 10:**

3 In Paragraph 18 of Plaintiff’s *First Amended Petition*, Plaintiff states:

4 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
5 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and  
6 supported by parents of children in Los Angeles County who attend childcare  
7 programs, K-12 schools, and/or play youth sports in the County. Petitioner Alliance  
8 is a community group that was organized for the purpose of representing the interests  
9 of Los Angeles County children subjected to harsh and restrictive mandates by local  
10 education agencies, the County of Los Angeles (‘County’), and the State of  
11 California (‘State’). One of its goals is to advocate for fair, humane, and equal  
12 treatment of all children within the County and to remove all unnecessary, harmful,  
13 and unjustified restrictions against children and provide children with a full return to  
14 normalcy. Members of Alliance reside within the County, own real property within  
15 the County, have children who attend childcare or K-12 schools in the County, and/or  
16 play youth sports in the County.”

17 State the full name of each parent who is a member of Alliance of Los Angeles County  
18 Parents who is claiming in this action that his or her free speech rights were violated by the  
19 actions of defendant Muntu Davis, M.D.

20 **RESPONSE TO SPECIAL INTERROGATORY 10:**

21 Objection: Responding Party objects to this interrogatory on the following grounds:  
22 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
23 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
24 2023.010(c)); Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§  
25 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b).)

26 The only remaining cause of action in this case is a challenge to Propounding Party’s  
27 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
28

1 association is unnecessary and overly burdensome. Many members submitted information  
2 about harm to their children using first and last initials in order to protect privacy and avoid  
3 retaliation by employers, government agencies, labor unions, and social networks, which is  
4 one of the reasons the association and not individual petitioners brought this action in the  
5 first place. Many members use alias handles on social media to avoid retaliation by  
6 employers, government agencies, friends and family. Petitioners are not seeking any  
7 damages – they simply seek injunctive relief to rectify constitutional violations. Further,  
8 Responding Party identified sufficient witnesses for Propounding Party to ascertain standing  
9 in its Response to County’s Form Interrogatories, Set One. The identification of all  
10 members of Responding Party association is accordingly irrelevant, unwarranted, and  
11 unreasonably cumulative. The identification of members’ social media handles is similarly  
12 irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
13 members would have posted is irrelevant, as Propounding Party’s constitutional violation  
14 would exist regardless of whether a member commented. Without waiving the above-stated  
15 objections, the members identified in Responding Party’s Response to County’s Form  
16 Interrogatories.

17  
18 **SPECIAL INTERROGATORY. 11:**

19 In Paragraph 18 of Plaintiff’s *First Amended Petition*, Plaintiff states:

20 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
21 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and  
22 supported by parents of children in Los Angeles County who attend childcare  
23 programs, K-12 schools, and/or play youth sports in the County. Petitioner Alliance  
24 is a community group that was organized for the purpose of representing the interests  
25 of Los Angeles County children subjected to harsh and restrictive mandates by local  
26 education agencies, the County of Los Angeles (‘County’), and the State of  
27 California (‘State’). One of its goals is to advocate for fair, humane, and equal  
28

1 treatment of all children within the County and to remove all unnecessary, harmful,  
2 and unjustified restrictions against children and provide children with a full return to  
3 normalcy. Members of Alliance reside within the County, own real property within  
4 the County, have children who attend childcare or K-12 schools in the County, and/or  
5 play youth sports in the County.”

6 State the full name of each parent who is a member of Alliance of Los Angeles County  
7 Parents who is claiming in this action that his or her free speech rights were violated by the  
8 actions of defendant Barbara Ferrer, PhD.

9 **RESPONSE TO SPECIAL INTERROGATORY 11:**

10 Objection: Responding Party objects to this interrogatory on the following grounds:

11 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
12 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
13 2023.010(c)); Unreasonably cumulative and undue burden (See Code Civ. Proc., §§  
14 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

15 The only remaining cause of action in this case is a challenge to Propounding Party’s  
16 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
17 association is unnecessary and overly burdensome. Many members submitted information  
18 about harm to their children using first and last initials in order to protect privacy and avoid  
19 retaliation by employers, government agencies, labor unions, and social networks, which is  
20 one of the reasons the association and not individual petitioners brought this action in the  
21 first place. Many members use alias handles on social media to avoid retaliation by  
22 employers, government agencies, friends and family. Petitioners are not seeking any  
23 damages – they simply seek injunctive relief to rectify constitutional violations. Further,  
24 Responding Party identified sufficient witnesses for Propounding Party to ascertain standing  
25 in its Response to County’s Form Interrogatories, Set One. The identification of all  
26 members of Responding Party association is accordingly irrelevant, unwarranted, and  
27 unreasonably cumulative. The identification of members’ social media handles is similarly  
28

1 irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
2 members would have posted is irrelevant, as Propounding Party’s constitutional violation  
3 would exist regardless of whether a member commented. Without waiving the above-stated  
4 objections, the members identified in Responding Party’s Response to County’s Form  
5 Interrogatories.

6  
7 **SPECIAL INTERROGATORY. 12:**

8 In Paragraph 18 of Plaintiff’s *First Amended Petition*, Plaintiff states:

9 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
10 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and  
11 supported by parents of children in Los Angeles County who attend childcare  
12 programs, K-12 schools, and/or play youth sports in the County. Petitioner Alliance  
13 is a community group that was organized for the purpose of representing the interests  
14 of Los Angeles County children subjected to harsh and restrictive mandates by local  
15 education agencies, the County of Los Angeles (‘County’), and the State of  
16 California (‘State’). One of its goals is to advocate for fair, humane, and equal  
17 treatment of all children within the County and to remove all unnecessary, harmful,  
18 and unjustified restrictions against children and provide children with a full return to  
19 normalcy. Members of Alliance reside within the County, own real property within  
20 the County, have children who attend childcare or K-12 schools in the County, and/or  
21 play youth sports in the County.”

22 Describe in full detail each and every injury suffered by each parent who is a member of  
23 Alliance of Los Angeles County Parents and who is claiming in this action that his or her  
24 free speech rights were violated by the actions of defendant County of Los Angeles  
25 Department of Public Health, by stating, following the name of each such parent, the full  
26 nature, scope and extent of each such injury, including, but not limited to, the date or dates  
27 such injury was first suffered and, if appropriate, when such injury ceased being suffered,  
28

1 the amount of any monetary damages or injuries suffered, whether any emotional distress  
2 was suffered and, if so, the nature and severity of such distress, and how such injury has  
3 physically or emotionally manifested.

4 **RESPONSE TO SPECIAL INTERROGATORY 12:**

5 Objection: Responding Party objects to this interrogatory on the following grounds:

6 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
7 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
8 2023.010(c)); Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§  
9 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

10 The only remaining cause of action in this case is a challenge to Propounding Party’s  
11 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
12 association is unnecessary and overly burdensome. Many members submitted information  
13 about harm to their children using first and last initials in order to protect privacy and avoid  
14 retaliation by employers, government agencies, labor unions, and social networks, which is  
15 one of the reasons the association and not individual petitioners brought this action in the  
16 first place. Many members use alias handles on social media to avoid retaliation by  
17 employers, government agencies, friends and family. Petitioners are not seeking any  
18 damages – they simply seek injunctive relief to rectify constitutional violations. Further,  
19 Responding Party identified sufficient witnesses for Propounding Party to ascertain standing  
20 in its Response to County’s Form Interrogatories, Set One. The identification of all  
21 members of Responding Party association is accordingly irrelevant, unwarranted, and  
22 unreasonably cumulative. The identification of members’ social media handles is similarly  
23 irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
24 members would have posted is irrelevant, as Propounding Party’s constitutional violation  
25 would exist regardless of whether a member commented. The full nature, scope and extent  
26 of the harm caused to members by the Propounding Party’s actions are not relevant due to  
27 the absence of a claim for damages.

28

1  
2 **SPECIAL INTERROGATORY. 13:**

3 In Paragraph 18 of Plaintiff's *First Amended Petition*, Plaintiff states:

4 "Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
5 ('Petitioner' or 'Alliance') is an unincorporated association composed of and  
6 supported by parents of children in Los Angeles County who attend childcare  
7 programs, K-12 schools, and/or play youth sports in the County. Petitioner Alliance  
8 is a community group that was organized for the purpose of representing the interests  
9 of Los Angeles County children subjected to harsh and restrictive mandates by local  
10 education agencies, the County of Los Angeles ('County'), and the State of  
11 California ('State'). One of its goals is to advocate for fair, humane, and equal  
12 treatment of all children within the County and to remove all unnecessary, harmful,  
13 and unjustified restrictions against children and provide children with a full return to  
14 normalcy. Members of Alliance reside within the County, own real property within  
15 the County, have children who attend childcare or K-12 schools in the County, and/or  
16 play youth sports in the County."

17 Describe in full detail each and every injury suffered by each parent who is a member of  
18 Alliance of Los Angeles County Parents and who is claiming in this action that his or her  
19 free speech rights were violated by the actions of defendant Muntu Davis, M.D., by stating,  
20 following the name of each such parent, the full nature, scope and extent of each such  
21 injury, including, but not limited to, the date or dates such injury was first suffered and, if  
22 appropriate, when such injury ceased being suffered, the amount of any monetary damages  
23 or injuries suffered, whether any emotional distress was suffered and, if so, the nature and  
24 severity of such distress, and how such injury has physically or emotionally manifested.

25 **RESPONSE TO SPECIAL INTERROGATORY 13:**

26 Objection: Responding Party objects to this interrogatory on the following grounds:

27 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
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1 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
2 2023.010(c)); Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§  
3 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

4 The only remaining cause of action in this case is a challenge to Propounding Party’s  
5 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
6 association is unnecessary and overly burdensome. Many members submitted information  
7 about harm to their children using first and last initials in order to protect privacy and avoid  
8 retaliation by employers, government agencies, labor unions, and social networks, which is  
9 one of the reasons the association and not individual petitioners brought this action in the  
10 first place. Many members use alias handles on social media to avoid retaliation by  
11 employers, government agencies, friends and family. Petitioners are not seeking any  
12 damages – they simply seek injunctive relief to rectify constitutional violations. Further,  
13 Responding Party identified sufficient witnesses for Propounding Party to ascertain standing  
14 in its Response to County’s Form Interrogatories, Set One. The identification of all  
15 members of Responding Party association is accordingly irrelevant, unwarranted, and  
16 unreasonably cumulative. The identification of members’ social media handles is similarly  
17 irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
18 members would have posted is irrelevant, as Propounding Party’s constitutional violation  
19 would exist regardless of whether a member commented. The full nature, scope and extent  
20 of the harm caused to members by the Propounding Party’s actions are not relevant due to  
21 the absence of a claim for damages.

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23 **SPECIAL INTERROGATORY. 14:**

24 In Paragraph 18 of Plaintiff’s *First Amended Petition*, Plaintiff states:

25 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
26 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and  
27 supported by parents of children in Los Angeles County who attend childcare  
28

1 programs, K-12 schools, and/or play youth sports in the County. Petitioner Alliance  
2 is a community group that was organized for the purpose of representing the interests  
3 of Los Angeles County children subjected to harsh and restrictive mandates by local  
4 education agencies, the County of Los Angeles ('County'), and the State of  
5 California ('State'). One of its goals is to advocate for fair, humane, and equal  
6 treatment of all children within the County and to remove all unnecessary, harmful,  
7 and unjustified restrictions against children and provide children with a full return to  
8 normalcy. Members of Alliance reside within the County, own real property within  
9 the County, have children who attend childcare or K-12 schools in the County, and/or  
10 play youth sports in the County.”

11 Describe in full detail each and every injury suffered by each parent who is a member of  
12 Alliance of Los Angeles County Parents and who is claiming in this action that his or her  
13 free speech rights were violated by the actions of defendant Barbara Ferrer, PhD, by stating,  
14 following the name of each such parent, the full nature, scope and extent of each such  
15 injury, including, but not limited to, the date or dates such injury was first suffered and, if  
16 appropriate, when such injury ceased being suffered, the amount of any monetary damages  
17 or injuries suffered, whether any emotional distress was suffered and, if so, the nature and  
18 severity of such distress, and how such injury has physically or emotionally manifested.

19 **RESPONSE TO SPECIAL INTERROGATORY 14:**

20 Objection: Responding Party objects to this interrogatory on the following grounds:  
21 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
22 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
23 2023.010(c)); Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§  
24 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

25 The only remaining cause of action in this case is a challenge to Propounding Party’s  
26 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
27 association is unnecessary and overly burdensome. Many members submitted information  
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1 about harm to their children using first and last initials in order to protect privacy and avoid  
2 retaliation by employers, government agencies, labor unions, and social networks, which is  
3 one of the reasons the association and not individual petitioners brought this action in the  
4 first place. Many members use alias handles on social media to avoid retaliation by  
5 employers, government agencies, friends and family. Petitioners are not seeking any  
6 damages – they simply seek injunctive relief to rectify constitutional violations. Further,  
7 Responding Party identified sufficient witnesses for Propounding Party to ascertain standing  
8 in its Response to County’s Form Interrogatories, Set One. The identification of all  
9 members of Responding Party association is accordingly irrelevant, unwarranted, and  
10 unreasonably cumulative. The identification of members’ social media handles is similarly  
11 irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
12 members would have posted is irrelevant, as Propounding Party’s constitutional violation  
13 would exist regardless of whether a member commented. The full nature, scope and extent  
14 of the harm caused to members by the Propounding Party’s actions are not relevant due to  
15 the absence of a claim for damages.

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17 **SPECIAL INTERROGATORY. 15:**

18 In Paragraph 18 of Plaintiff’s *First Amended Petition*, Plaintiff states:

19 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
20 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and  
21 supported by parents of children in Los Angeles County who attend childcare  
22 programs, K-12 schools, and/or play youth sports in the County. Petitioner Alliance  
23 is a community group that was organized for the purpose of representing the interests  
24 of Los Angeles County children subjected to harsh and restrictive mandates by local  
25 education agencies, the County of Los Angeles (‘County’), and the State of  
26 California (‘State’). One of its goals is to advocate for fair, humane, and equal  
27 treatment of all children within the County and to remove all unnecessary, harmful,  
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1 and unjustified restrictions against children and provide children with a full return to  
2 normalcy. Members of Alliance reside within the County, own real property within  
3 the County, have children who attend childcare or K-12 schools in the County, and/or  
4 play youth sports in the County.”

5 Describe in full detail each and every injury suffered by each child of a parent who is a  
6 member of Alliance of Los Angeles County Parents and who is claiming in this action that  
7 his or her free speech rights were violated by the actions of defendant County of Los  
8 Angeles Department of Public Health, by stating, following the name of each such child, the  
9 full nature, scope and extent of each such injury, including, but not limited to, the date or  
10 dates such injury was first suffered and, if appropriate, when such injury ceased being  
11 suffered, the amount of any monetary damages or injuries suffered, whether any emotional  
12 distress was suffered and, if so, the nature and severity of such distress, and how such injury  
13 has physically or emotionally manifested.

14 **RESPONSE TO SPECIAL INTERROGATORY 15:**

15 Objection: Responding Party objects to this interrogatory on the following grounds:  
16 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
17 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
18 2023.010(c)); Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§  
19 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

20 The only remaining cause of action in this case is a challenge to Propounding Party’s  
21 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
22 association is unnecessary and overly burdensome. Many members submitted information  
23 about harm to their children using first and last initials in order to protect privacy and avoid  
24 retaliation by employers, government agencies, labor unions, and social networks, which is  
25 one of the reasons the association and not individual petitioners brought this action in the  
26 first place. Many members use alias handles on social media to avoid retaliation by  
27 employers, government agencies, friends and family. Petitioners are not seeking any  
28

1 damages – they simply seek injunctive relief to rectify constitutional violations. Further,  
2 Responding Party identified sufficient witnesses for Propounding Party to ascertain standing  
3 in its Response to County’s Form Interrogatories, Set One. The identification of all  
4 members of Responding Party association is accordingly irrelevant, unwarranted, and  
5 unreasonably cumulative. The identification of members’ social media handles is similarly  
6 irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
7 members would have posted is irrelevant, as Propounding Party’s constitutional violation  
8 would exist regardless of whether a member commented. The full nature, scope and extent  
9 of the harm caused to members by the Propounding Party’s actions are not relevant due to  
10 the absence of a claim for damages.

11  
12 **SPECIAL INTERROGATORY. 16:**

13 In Paragraph 18 of Plaintiff’s *First Amended Petition*, Plaintiff states:

14 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
15 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and  
16 supported by parents of children in Los Angeles County who attend childcare  
17 programs, K-12 schools, and/or play youth sports in the County. Petitioner Alliance  
18 is a community group that was organized for the purpose of representing the interests  
19 of Los Angeles County children subjected to harsh and restrictive mandates by local  
20 education agencies, the County of Los Angeles (‘County’), and the State of  
21 California (‘State’). One of its goals is to advocate for fair, humane, and equal  
22 treatment of all children within the County and to remove all unnecessary, harmful,  
23 and unjustified restrictions against children and provide children with a full return to  
24 normalcy. Members of Alliance reside within the County, own real property within  
25 the County, have children who attend childcare or K-12 schools in the County, and/or  
26 play youth sports in the County.”

1 Describe in full detail each and every injury suffered by each child of a parent who is a  
2 member of Alliance of Los Angeles County Parents and who is claiming in this action that  
3 his or her free speech rights were violated by the actions of defendant Muntu Davis, M.D.,  
4 by stating, following the name of each such child, the full nature, scope and extent of each  
5 such injury, including, but not limited to, the date or dates such injury was first suffered and,  
6 if appropriate, when such injury ceased being suffered, the amount of any monetary  
7 damages or injuries suffered, whether any emotional distress was suffered and, if so, the  
8 nature and severity of such distress, and how such injury has physically or emotionally  
9 manifested.

10 **RESPONSE TO SPECIAL INTERROGATORY 16:**

11 Objection: Responding Party objects to this interrogatory on the following grounds:

12 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
13 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
14 2023.010(c)); Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§  
15 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

16 The only remaining cause of action in this case is a challenge to Propounding Party’s  
17 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
18 association is unnecessary and overly burdensome. Many members submitted information  
19 about harm to their children using first and last initials in order to protect privacy and avoid  
20 retaliation by employers, government agencies, labor unions, and social networks, which is  
21 one of the reasons the association and not individual petitioners brought this action in the  
22 first place. Many members use alias handles on social media to avoid retaliation by  
23 employers, government agencies, friends and family. Petitioners are not seeking any  
24 damages – they simply seek injunctive relief to rectify constitutional violations. Further,  
25 Responding Party identified sufficient witnesses for Propounding Party to ascertain standing  
26 in its Response to County’s Form Interrogatories, Set One. The identification of all  
27 members of Responding Party association is accordingly irrelevant, unwarranted, and  
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1 unreasonably cumulative. The identification of members’ social media handles is similarly  
2 irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
3 members would have posted is irrelevant, as Propounding Party’s constitutional violation  
4 would exist regardless of whether a member commented. The full nature, scope and extent  
5 of the harm caused to members by the Propounding Party’s actions are not relevant due to  
6 the absence of a claim for damages.

7  
8 **SPECIAL INTERROGATORY. 17:**

9 In Paragraph 18 of Plaintiff’s *First Amended Petition*, Plaintiff states:

10 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
11 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
12 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
13 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
14 organized for the purpose of representing the interests of Los Angeles County children  
15 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
16 Angeles (‘County’), and the State of California (‘State’). One of its goals is to advocate for  
17 fair, humane, and equal treatment of all children within the County and to remove all  
18 unnecessary, harmful, and unjustified restrictions against children and provide children with  
19 a full return to normalcy. Members of Alliance reside within the County, own real property  
20 within the County, have children who attend childcare or K-12 schools in the County, and/or  
21 play youth sports in the County.”

22 Describe in full detail each and every injury suffered by each child of a parent who is a  
23 member of Alliance of Los Angeles County Parents and who is claiming in this action that  
24 his or her free speech rights were violated by the actions of defendant Barbara Ferrer, PhD,  
25 by stating, following the name of each such child, the full nature, scope and extent of each  
26 such injury, including, but not limited to, the date or dates such injury was first suffered and,  
27 if appropriate, when such injury ceased being suffered, the amount of any monetary

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1 damages or injuries suffered, whether any emotional distress was suffered and, if so, the  
2 nature and severity of such distress, and how such injury has physically or emotionally  
3 manifested.

4 **RESPONSE TO SPECIAL INTERROGATORY 17:**

5 Objection: Responding Party objects to this interrogatory on the following grounds:

6 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
7 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
8 2023.010(c)); Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§  
9 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

10 The only remaining cause of action in this case is a challenge to Propounding Party’s  
11 violation of Petitioner’s free speech rights. Identification of all members of Petitioner  
12 association is unnecessary and overly burdensome. Many members submitted information  
13 about harm to their children using first and last initials in order to protect privacy and avoid  
14 retaliation by employers, government agencies, labor unions, and social networks, which is  
15 one of the reasons the association and not individual petitioners brought this action in the  
16 first place. Many members use alias handles on social media to avoid retaliation by  
17 employers, government agencies, friends and family. Petitioners are not seeking any  
18 damages – they simply seek injunctive relief to rectify constitutional violations. Further,  
19 Responding Party identified sufficient witnesses for Propounding Party to ascertain standing  
20 in its Response to County’s Form Interrogatories, Set One. The identification of all  
21 members of Responding Party association is accordingly irrelevant, unwarranted, and  
22 unreasonably cumulative. The identification of members’ social media handles is similarly  
23 irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
24 members would have posted is irrelevant, as Propounding Party’s constitutional violation  
25 would exist regardless of whether a member commented. The full nature, scope and extent  
26 of the harm caused to members by the Propounding Party’s actions are not relevant due to  
27 the absence of a claim for damages.

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**SPECIAL INTERROGATORY. 18:**

State the full name of each member of Alliance of Los Angeles County Parents who has the authority to legally bind all members of Alliance of Los Angeles County Parents by contract or agreement, verified answers to written discovery requests, and testimony in this lawsuit by deposition, by declaration or at trial.

**RESPONSE TO SPECIAL INTERROGATORY 18:**

Objection: Responding Party objects to this interrogatory on the following grounds: Calls for a legal conclusion; Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment, oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

The only remaining cause of action in this case is a challenge to Propounding Party’s violation of Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary and overly burdensome. Many members submitted information about harm to their children using first and last initials in order to protect privacy and avoid retaliation by employers, government agencies, labor unions, and social networks, which is one of the reasons the association and not individual petitioners brought this action in the first place. Many members use alias handles on social media to avoid retaliation by employers, government agencies, friends and family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The identification of all members of Responding Party association is accordingly irrelevant, unwarranted, and unreasonably cumulative. The identification of members’ social media handles is similarly irrelevant, unwarranted, and unreasonably cumulative. Without waiving the above stated objections, Margaret Orenstein.

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**SPECIAL INTERROGATORY. 19:**

If Julie A. Hamill has ever been a member of Alliance of Los Angeles County Parents, state the date she first became a member and the date, if applicable, she ceased being a member.

**RESPONSE TO SPECIAL INTERROGATORY 19:**

Objection: Responding Party objects to this interrogatory on the following grounds:  
Unwarranted annoyance, embarrassment, oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Compound.  
Julie A. Hamill is counsel to the Alliance.

**SPECIAL INTERROGATORY. 20:**

In Paragraph 147 of Plaintiff’s *First Amended Petition*, Plaintiff states:

“ . . . a Petitioner member created an informational Twitter account to allow the public to communicate with each other regarding COVID health orders following the comment ban . . . .”

Identify that member Alliance of Los Angeles County Parents, by stating his or her full name, residence address (a street address, not a P.O. box), business address, e-mail address, and telephone number.

**RESPONSE TO SPECIAL INTERROGATORY 20:**

Cynthia Rojas. Ms. Rojas can be reached through counsel for Petitioner.

Dated: April 28, 2023

Hamill Law & Consulting  
  
By:          /s/ Julie A. Hamill  
Julie A. Hamill  
Attorney for Petitioner  
Alliance of Los Angeles County Parents



1 **VERIFICATION**

2 **ALLIANCE OF LOS ANGELES COUNTY PARENTS v. COUNTY OF LOS ANGELES**  
3 **DEPARTMENT OF PUBLIC HEALTH, *et al.*, Case No.: 21GDCV00784**

4 I have read the foregoing AMENDED ALLIANCE OF LOS ANGELES COUNTY  
5 PARENTS RESPONSE TO COUNTY OF LOS ANGELES, ET AL SPECIAL  
6 INTERROGATORIES, SET ONE and know its contents.

7 I am a founding member of the Alliance of Los Angeles County Parents, an unincorporated  
8 association, a party to this action, and am authorized to make this verification for and on its behalf,  
9 and I make this verification for that reason.

10 I am informed and believe and on that ground allege that the matters stated in the foregoing  
11 document are true.

12 Executed on April 28, 2023, at Los Angeles, California.

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

15 \_\_\_\_\_  
16 Margaret Orenstein, on behalf of  
17 Alliance of Los Angeles County Parents  
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**PROOF OF SERVICE**

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 28, 2023 I served the foregoing document: AMENDED ALLIANCE OF LOS ANGELES COUNTY PARENTS RESPONSE TO COUNTY OF LOS ANGELES, ET AL SPECIAL INTERROGATORIES, SET ONE 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).
- (STATE) I declare under penalty of perjury under the laws of the State of California that the

1 above is true and correct.

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

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Executed on April 28, 2023 at Rancho Palos Verdes, California.

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

# EXHIBIT E

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

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,

18  
19 Respondents and Defendants.  
20

Case No.: 22STCP02772

**ALLIANCE OF LOS ANGELES COUNTY  
PARENTS RESPONSE TO COUNTY OF  
LOS ANGELES, ET AL DEMANDS FOR  
PRODUCTION, SET ONE**

1 **PROPOUNDING PARTY: COUNTY OF LOS ANGELES et al**

2 **RESPONDING PARTY: ALLIANCE OF LOS ANGELES COUNTY PARENTS**

3 **SET NUMBER: ONE**

4 Plaintiff and petitioner hereby provides the following responses to demands for production  
5 without prejudice to further discovery, reserving the right to present evidence of any subsequently  
6 discovered facts and documents at the time of trial of this action. Each of the following responses is  
7 rendered and based upon information and belief at the time of the preparation of these answers, after  
8 diligent inquiry. Discovery will continue as long as permitted by statute or stipulation of the parties  
9 and the investigation of this responding party's attorneys and agents will continue to and throughout  
10 the trial of this action. Petitioner, therefore, specifically reserves the right, at the time of trial, to  
11 introduce any evidence from any source which may hereinafter be discovered and testimony from  
12 any witnesses whose identities may hereafter be discovered.

13 If any information has unintentionally been omitted from these responses, the responding  
14 party reserves the right to apply for relief so as to permit the insertion of the omitted information  
15 from these responses.

16 These introductory paragraphs shall apply to each and every response given herein and shall  
17 be incorporated by this reference a though fully set forth in each and every following interrogatory  
18 response.

19  
20 **DEMAND FOR PRODUCTION NO. 1:**

21 In Paragraph 18 of Plaintiff's First Amended Petition, Plaintiff states:

22 "Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
23 ('Petitioner' or 'Alliance') is an unincorporated association composed of and supported by  
24 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
25 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
26 organized for the purpose of representing the interests of Los Angeles County children  
27 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
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1 Angeles ('County'), and the State of California ('State'). One of its goals is to advocate for  
2 fair, humane, and equal treatment of all children within the County and to remove all  
3 unnecessary, harmful, and unjustified restrictions against children and provide children with  
4 a full return to normalcy. Members of Alliance reside within the County, own real property  
5 within the County, have children who attend childcare or K-12 schools in the County, and/or  
6 play youth sports in the County.”

7 Produce all DOCUMENTS and tangible things sufficient to show the identity and contact  
8 information of each parent who is or has been a member of Alliance of Los Angeles County Parents  
9 since June 1, 2022.

10  
11 **RESPONSE TO DEMAND FOR PRODUCTION NO. 1**

12 Objection. Responding Party objects to this demand for production on the following grounds:  
13 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
14 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c));  
15 Unreasonably cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–  
16 (2), 2023.010(c), 2030.090(b)); Compound; Attorney-Client privilege and work product.

17 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
18 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
19 and overly burdensome. Many members submitted information about harm to their children using  
20 first and last initials in order to protect privacy and avoid retaliation by employers and government  
21 agencies, which is one of the reasons the association and not individual petitioners brought this  
22 action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief  
23 to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for  
24 Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One .  
25 The identification of all members of Responding Party association is accordingly irrelevant,  
26 unwarranted, and unreasonably cumulative. You may contact witnesses via counsel for Petitioner.

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1 **DEMAND FOR PRODUCTION NO. 2:**

2 In Paragraph 18 of Plaintiff’s First Amended Petition, Plaintiff states:

3 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
4 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
5 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
6 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
7 organized for the purpose of representing the interests of Los Angeles County children  
8 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
9 Angeles (‘County’), and the State of California (‘State’). One of its goals is to advocate for  
10 fair, humane, and equal treatment of all children within the County and to remove all  
11 unnecessary, harmful, and unjustified restrictions against children and provide children with  
12 a full return to normalcy. Members of Alliance reside within the County, own real property  
13 within the County, have children who attend childcare or K-12 schools in the County, and/or  
14 play youth sports in the County.”

15 Produce all DOCUMENTS and tangible things sufficient to show the date (day, month, and  
16 year) that each parent who is or has been a member of Alliance of Los Angeles County  
17 Parents since June 1, 2022 first became such a member and, if applicable, the date (day,  
18 month, and year) he or she ceased being such a member.

19 **RESPONSE TO DEMAND FOR PRODUCTION NO. 2.**

20 Objection. Responding Party objects to this demand for production on the following grounds:  
21 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
22 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c));  
23 Unreasonably cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–  
24 (2), 2023.010(c), 2030.090(b)); Compound; Attorney-Client privilege and work product.

25 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
26 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
27 and overly burdensome. Many members submitted information about harm to their children using  
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1 first and last initials in order to protect privacy and avoid retaliation by employers, government  
2 agencies, labor unions, and social networks, which is one of the reasons the association and not  
3 individual petitioners brought this action in the first place. Petitioners are not seeking any damages  
4 – they simply seek injunctive relief to rectify constitutional violations. Further, Responding Party  
5 identified sufficient witnesses for Propounding Party to ascertain standing in its Response to  
6 County’s Form Interrogatories, Set One. The identification of all members of Responding Party  
7 association is accordingly irrelevant, unwarranted, and unreasonably cumulative. You may contact  
8 witnesses via counsel for Petitioner. To the extent any information demanded here is necessary for  
9 the purpose of showing standing, Petitioner is willing to provide such necessary information under  
10 protective order.

11  
12 **DEMAND FOR PRODUCTION NO. 3:**

13 In Paragraph 18 of Plaintiff’s First Amended Petition, Plaintiff states:

14 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
15 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
16 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
17 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
18 organized for the purpose of representing the interests of Los Angeles County children  
19 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
20 Angeles (‘County’), and the State of California (‘State’). One of its goals is to advocate for  
21 fair, humane, and equal treatment of all children within the County and to remove all  
22 unnecessary, harmful, and unjustified restrictions against children and provide children with  
23 a full return to normalcy. Members of Alliance reside within the County, own real property  
24 within the County, have children who attend childcare or K-12 schools in the County, and/or  
25 play youth sports in the County.”

26 Produce all DOCUMENTS and tangible things sufficient to show the identity and contact  
27 information of each child whose parent is a member of Alliance of Los Angeles County Parents and  
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1 who attends or has attended “childcare programs . . . in the County” or “K-12 schools . . . in the  
2 County” or plays or has played “youth sports in the County” at any time since June 1, 2022.

3 **RESPONSE TO DEMAND FOR PRODUCTION NO. 3**

4 Objection. Responding Party objects to this demand for production on the following grounds:  
5 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
6 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c));  
7 Unreasonably cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–  
8 (2), 2023.010(c), 2030.090(b)); Compound; Attorney-Client privilege and work product.

9 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
10 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
11 and overly burdensome. Many members submitted information about harm to their children using  
12 first and last initials in order to protect privacy and avoid retaliation by employers, government  
13 agencies, labor unions, and social networks, which is one of the reasons the association and not  
14 individual petitioners brought this action in the first place. Petitioners are not seeking any damages  
15 – they simply seek injunctive relief to rectify constitutional violations. Further, Responding Party  
16 identified sufficient witnesses for Propounding Party to ascertain standing in its Response to  
17 County’s Form Interrogatories, Set One. The identification of all members of Responding Party  
18 association is accordingly irrelevant, unwarranted, and unreasonably cumulative. You may contact  
19 witnesses via counsel for Petitioner. To the extent any information demanded here is necessary for  
20 the purpose of showing standing, Petitioner is willing provide such necessary information under  
21 protective order.

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23 **DEMAND FOR PRODUCTION NO. 4:**

24 In Paragraph 18 of Plaintiff’s First Amended Petition, Plaintiff states:

25 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
26 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
27 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
28

1 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
2 organized for the purpose of representing the interests of Los Angeles County children  
3 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
4 Angeles ('County'), and the State of California ('State'). One of its goals is to advocate for  
5 fair, humane, and equal treatment of all children within the County and to remove all  
6 unnecessary, harmful, and unjustified restrictions against children and provide children with  
7 a full return to normalcy. Members of Alliance reside within the County, own real property  
8 within the County, have children who attend childcare or K-12 schools in the County, and/or  
9 play youth sports in the County.”

10 Produce all DOCUMENTS and tangible things sufficient to describe and show the identity  
11 and contact information of all “childcare programs . . . in the County”, “K-12 schools . . . in  
12 the County”, and “youth sports in the County” that each child whose parent who is a  
13 member of Alliance of Los Angeles County Parents has attended or played at any time since  
14 June 1, 2022.

15 **RESPONSE TO DEMAND FOR PRODUCTION NO. 4:**

16 Objection. Responding Party objects to this demand for production on the following grounds:  
17 Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance,  
18 embarrassment, oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c));  
19 Unreasonably cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–  
20 (2), 2023.010(c), 2030.090(b)); Compound; Attorney-Client privilege and work product.

21 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
22 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
23 and overly burdensome. Many members submitted information about harm to their children using  
24 first and last initials in order to protect privacy and avoid retaliation by employers, government  
25 agencies, labor unions, and social networks, which is one of the reasons the association and not  
26 individual petitioners brought this action in the first place. Petitioners are not seeking any damages  
27 – they simply seek injunctive relief to rectify constitutional violations. Further, Responding Party  
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1 identified sufficient witnesses for Propounding Party to ascertain standing in its Response to  
2 County’s Form Interrogatories, Set One. The identification of all members of Responding Party  
3 association is accordingly irrelevant, unwarranted, and unreasonably cumulative. You may contact  
4 witnesses via counsel for Petitioner. To the extent any information demanded here is necessary for  
5 the purpose of showing standing, Petitioner is willing provide such necessary information under  
6 protective order.

7  
8 **DEMAND FOR PRODUCTION NO. 5:**

9 In Paragraph 18 of Plaintiff’s First Amended Petition, Plaintiff states:

10 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
11 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
12 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
13 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
14 organized for the purpose of representing the interests of Los Angeles County children  
15 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
16 Angeles (‘County’), and the State of California (‘State’). One of its goals is to advocate for  
17 fair, humane, and equal treatment of all children within the County and to remove all  
18 unnecessary, harmful, and unjustified restrictions against children and provide children with  
19 a full return to normalcy. Members of Alliance reside within the County, own real property  
20 within the County, have children who attend childcare or K-12 schools in the County, and/or  
21 play youth sports in the County.”

22 Produce all DOCUMENTS and tangible things sufficient to show all social media handles that each  
23 parent who is a member of Alliance of Los Angeles County Parents has used to post any  
24 commentary, question, or content on any social media platform (including, but not limited to,  
25 Facebook, Twitter, Instagram, YouTube, Twitter, Pinterest, Snapchat, and LinkedIn) at any time  
26 since June 1, 2022.

27 **RESPONSE TO DEMAND FOR PRODUCTION NO. 5:**

28

1 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
2 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
3 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
4 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
5 2023.010(c), 2030.090(b)); Compound.

6 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
7 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
8 and overly burdensome. Many members submitted information about harm to their children using  
9 first and last initials in order to protect privacy and avoid retaliation by employers, government  
10 agencies, labor unions, and social networks, which is one of the reasons the association and not  
11 individual petitioners brought this action in the first place. Many members use alias handles on  
12 social media to avoid retaliation by employers, government agencies, friends and family. Petitioners  
13 are not seeking any damages – they simply seek injunctive relief to rectify constitutional violations.  
14 Further, Responding Party identified sufficient witnesses for Propounding Party to ascertain  
15 standing in its Response to County’s Form Interrogatories, Set One. The identification of all  
16 members of Responding Party association is accordingly irrelevant, unwarranted, and unreasonably  
17 cumulative. The identification of members’ social media handles is similarly irrelevant,  
18 unwarranted, and unreasonably cumulative, as Propounding Party’s constitutional violation would  
19 exist regardless of whether a member commented.

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

22 In Paragraph 18 of Plaintiff’s First Amended Petition, Plaintiff states:

23 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
24 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
25 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
26 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
27 organized for the purpose of representing the interests of Los Angeles County children  
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1           subjected to harsh and restrictive mandates by local education agencies, the County of Los  
2 Angeles (‘County’), and the State of California (‘State’). One of its goals is to advocate for  
3 fair, humane, and equal treatment of all children within the County and to remove all  
4 unnecessary, harmful, and unjustified restrictions against children and provide children with  
5 a full return to normalcy. Members of Alliance reside within the County, own real property  
6 within the County, have children who attend childcare or K-12 schools in the County, and/or  
7 play youth sports in the County.”

8 Produce all DOCUMENTS and tangible things that constitute, concern, reflect, or show all  
9 commentary, questions, and content that each parent who is a member of Alliance of Los Angeles  
10 County Parents intended to post on any social media platform (including, but not limited to,  
11 Facebook, Twitter, Instagram, YouTube, Twitter, Pinterest, Snapchat, and LinkedIn) but was  
12 precluded from doing so by the actions of defendant County of Los Angeles Department of Public  
13 Health.

14 **RESPONSE TO DEMAND FOR PRODUCTION NO. 6:**

15 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
16 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
17 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
18 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
19 2023.010(c), 2030.090(b)); Compound.

20 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
21 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
22 and overly burdensome. Many members submitted information about harm to their children using  
23 first and last initials in order to protect privacy and avoid retaliation by employers, government  
24 agencies, labor unions, and social networks, which is one of the reasons the association and not  
25 individual petitioners brought this action in the first place. Many members use alias handles on  
26 social media to avoid retaliation by employers, government agencies, labor unions, friends and  
27 family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify  
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1 constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding  
2 Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The  
3 identification of all members of Responding Party association is accordingly irrelevant,  
4 unwarranted, and unreasonably cumulative. The identification of members’ social media handles is  
5 similarly irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
6 members would have posted is irrelevant, as Propounding Party’s constitutional violation would  
7 exist regardless of whether a member commented.

8  
9 **DEMAND FOR PRODUCTION NO. 7:**

10 In Paragraph 18 of Plaintiff’s First Amended Petition, Plaintiff states:

11 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
12 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
13 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
14 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
15 organized for the purpose of representing the interests of Los Angeles County children  
16 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
17 Angeles (‘County’), and the State of California (‘State’). One of its goals is to advocate for  
18 fair, humane, and equal treatment of all children within the County and to remove all  
19 unnecessary, harmful, and unjustified restrictions against children and provide children with  
20 a full return to normalcy. Members of Alliance reside within the County, own real property  
21 within the County, have children who attend childcare or K-12 schools in the County, and/or  
22 play youth sports in the County.”

23 Produce all DOCUMENTS and tangible things that constitute, concern, reflect, or show all  
24 commentary, questions, and content that each parent who is a member of Alliance of Los  
25 Angeles County Parents intended to post on any social media platform (including, but not  
26 limited to, Facebook, Twitter, Instagram, YouTube, Twitter, Pinterest, Snapchat, and  
27 LinkedIn) but was precluded from doing so by the actions of defendant Muntu Davis, M.D.

1 **RESPONSE TO DEMAND FOR PRODUCTION NO 7:**

2 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
3 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
4 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
5 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
6 2023.010(c), 2030.090(b)); Compound.

7 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
8 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
9 and overly burdensome. Many members submitted information about harm to their children using  
10 first and last initials in order to protect privacy and avoid retaliation by employers, government  
11 agencies, labor unions, and social networks, which is one of the reasons the association and not  
12 individual petitioners brought this action in the first place. Many members use alias handles on  
13 social media to avoid retaliation by employers, government agencies, labor unions, friends and  
14 family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify  
15 constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding  
16 Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The  
17 identification of all members of Responding Party association is accordingly irrelevant,  
18 unwarranted, and unreasonably cumulative. The identification of members’ social media handles is  
19 similarly irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
20 members would have posted is irrelevant, as Propounding Party’s constitutional violation would  
21 exist regardless of whether a member commented.

22  
23 **DEMAND FOR PRODUCTION NO. 8:**

24 In Paragraph 18 of Plaintiff’s First Amended Petition, Plaintiff states:

25 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
26 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
27 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
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1 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
2 organized for the purpose of representing the interests of Los Angeles County children  
3 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
4 Angeles ('County'), and the State of California ('State'). One of its goals is to advocate for  
5 fair, humane, and equal treatment of all children within the County and to remove all  
6 unnecessary, harmful, and unjustified restrictions against children and provide children with  
7 a full return to normalcy. Members of Alliance reside within the County, own real property  
8 within the County, have children who attend childcare or K-12 schools in the County, and/or  
9 play youth sports in the County.”

10 Produce all DOCUMENTS and tangible things that constitute, concern, reflect, or show all  
11 commentary, questions, and content that each parent who is a member of Alliance of Los Angeles  
12 County Parents intended to post on any social media platform (including, but not limited to,  
13 Facebook, Twitter, Instagram, YouTube, Twitter, Pinterest, Snapchat, and LinkedIn) but was  
14 precluded from doing so by the actions of defendant Barbara Ferrer, PhD.

15 **RESPONSE TO DEMAND FOR PRODUCTION NO. 8:**

16 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
17 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
18 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
19 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
20 2023.010(c), 2030.090(b)); Compound.

21 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
22 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
23 and overly burdensome. Many members submitted information about harm to their children using  
24 first and last initials in order to protect privacy and avoid retaliation by employers, government  
25 agencies, labor unions, and social networks, which is one of the reasons the association and not  
26 individual petitioners brought this action in the first place. Many members use alias handles on  
27 social media to avoid retaliation by employers, government agencies, labor unions, friends and  
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1 family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify  
2 constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding  
3 Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The  
4 identification of all members of Responding Party association is accordingly irrelevant,  
5 unwarranted, and unreasonably cumulative. The identification of members’ social media handles is  
6 similarly irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
7 members would have posted is irrelevant, as Propounding Party’s constitutional violation would  
8 exist regardless of whether a member commented.

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

11 In Paragraph 18 of Plaintiff’s First Amended Petition, Plaintiff states:

12 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
13 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
14 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
15 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
16 organized for the purpose of representing the interests of Los Angeles County children  
17 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
18 Angeles (‘County’), and the State of California (‘State’). One of its goals is to advocate for  
19 fair, humane, and equal treatment of all children within the County and to remove all  
20 unnecessary, harmful, and unjustified restrictions against children and provide children with  
21 a full return to normalcy. Members of Alliance reside within the County, own real property  
22 within the County, have children who attend childcare or K-12 schools in the County, and/or  
23 play youth sports in the County.”

24 Produce all DOCUMENTS and tangible things sufficient to show the identity and contact  
25 information of each parent who is a member of Alliance of Los Angeles County Parents and  
26 is claiming in this action that his or her free speech rights were violated by the actions of  
27 defendant County of Los Angeles Department of Public Health.

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**RESPONSE TO DEMAND FOR PRODUCTION NO. 9:**

Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment, oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

The only remaining cause of action in this case is a challenge to Propounding Party’s violation of Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary and overly burdensome. Many members submitted information about harm to their children using first and last initials in order to protect privacy and avoid retaliation by employers, government agencies, labor unions, and social networks, which is one of the reasons the association and not individual petitioners brought this action in the first place. Many members use alias handles on social media to avoid retaliation by employers, government agencies, labor unions, friends and family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The identification of all members of Responding Party association is accordingly irrelevant, unwarranted, and unreasonably cumulative. The identification of members’ social media handles is similarly irrelevant, unwarranted, and unreasonably cumulative. Without waiving the above-stated objections, the members identified in Responding Party’s Response to County’s Form Interrogatories.

**DEMAND FOR PRODUCTION NO. 10:**

In Paragraph 18 of Plaintiff’s First Amended Petition, Plaintiff states:

“Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
('Petitioner' or 'Alliance') is an unincorporated association composed of and supported by

1 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
2 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
3 organized for the purpose of representing the interests of Los Angeles County children  
4 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
5 Angeles ('County'), and the State of California ('State'). One of its goals is to advocate for  
6 fair, humane, and equal treatment of all children within the County and to remove all  
7 unnecessary, harmful, and unjustified restrictions against children and provide children with  
8 a full return to normalcy. Members of Alliance reside within the County, own real property  
9 within the County, have children who attend childcare or K-12 schools in the County, and/or  
10 play youth sports in the County.”

11 Produce all DOCUMENTS and tangible things sufficient to show the identity and contact  
12 information of each parent who is a member of Alliance of Los Angeles County Parents and  
13 is claiming in this action that his or her free speech rights were violated by the actions of  
14 defendant Muntu Davis, M.D.

15

16 **RESPONSE TO DEMAND FOR PRODUCTION NO. 10:**

17 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
18 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
19 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
20 cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
21 2023.010(c), 2030.090(b).)

22 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
23 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
24 and overly burdensome. Many members submitted information about harm to their children using  
25 first and last initials in order to protect privacy and avoid retaliation by employers, government  
26 agencies, labor unions, and social networks, which is one of the reasons the association and not  
27 individual petitioners brought this action in the first place. Many members use alias handles on  
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1 social media to avoid retaliation by employers, government agencies, friends and family. Petitioners  
2 are not seeking any damages – they simply seek injunctive relief to rectify constitutional violations.  
3 Further, Responding Party identified sufficient witnesses for Propounding Party to ascertain  
4 standing in its Response to County’s Form Interrogatories, Set One. The identification of all  
5 members of Responding Party association is accordingly irrelevant, unwarranted, and unreasonably  
6 cumulative. The identification of members’ social media handles is similarly irrelevant,  
7 unwarranted, and unreasonably cumulative. The specific commentary that members would have  
8 posted is irrelevant, as Propounding Party’s constitutional violation would exist regardless of  
9 whether a member commented. Without waiving the above-stated objections, the members  
10 identified in Responding Party’s Response to County’s Form Interrogatories. Witnesses can be  
11 reached through counsel for Petitioner.

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

14 In Paragraph 18 of Plaintiff’s First Amended Petition, Plaintiff states:

15 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
16 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
17 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
18 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
19 organized for the purpose of representing the interests of Los Angeles County children  
20 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
21 Angeles (‘County’), and the State of California (‘State’). One of its goals is to advocate for  
22 fair, humane, and equal treatment of all children within the County and to remove all  
23 unnecessary, harmful, and unjustified restrictions against children and provide children with  
24 a full return to normalcy. Members of Alliance reside within the County, own real property  
25 within the County, have children who attend childcare or K-12 schools in the County, and/or  
26 play youth sports in the County.”

1 Produce all DOCUMENTS and tangible things sufficient to show the identity and contact  
2 information of each parent who is a member of Alliance of Los Angeles County Parents and is  
3 claiming in this action that his or her free speech rights were violated by the actions of defendant  
4 Barbara Ferrer, PhD.

5  
6 **DEMAND FOR PRODUCTION NO. 12:**

7 In Paragraph 18 of Plaintiff’s First Amended Petition, Plaintiff states:

8 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
9 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
10 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
11 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
12 organized for the purpose of representing the interests of Los Angeles County children  
13 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
14 Angeles (‘County’), and the State of California (‘State’). One of its goals is to advocate for  
15 fair, humane, and equal treatment of all children within the County and to remove all  
16 unnecessary, harmful, and unjustified restrictions against children and provide children with  
17 a full return to normalcy. Members of Alliance reside within the County, own real property  
18 within the County, have children who attend childcare or K-12 schools in the County, and/or  
19 play youth sports in the County.”

20 Produce all DOCUMENTS and tangible things that concern, reflect, show, or relate to each  
21 and every injury suffered by each parent who is a member of Alliance of Los Angeles  
22 County Parents and is claiming in this action that his or her free speech rights were violated  
23 by the actions of defendant County of Los Angeles Department of Public Health.

24 **RESPONSE TO DEMAND FOR PRODUCTION NO. 12:**

25 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
26 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
27 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
28

1 cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
2 2023.010(c), 2030.090(b)); Compound.

3 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
4 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
5 and overly burdensome. Many members submitted information about harm to their children using  
6 first and last initials in order to protect privacy and avoid retaliation by employers, government  
7 agencies, labor unions, and social networks, which is one of the reasons the association and not  
8 individual petitioners brought this action in the first place. Many members use alias handles on  
9 social media to avoid retaliation by employers, government agencies, labor unions, friends and  
10 family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify  
11 constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding  
12 Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The  
13 identification of all members of Responding Party association is accordingly irrelevant,  
14 unwarranted, and unreasonably cumulative. The identification of members’ social media handles is  
15 similarly irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
16 members would have posted is irrelevant, as Propounding Party’s constitutional violation would  
17 exist regardless of whether a member commented. The full nature, scope and extent of the harm  
18 caused to members by the Propounding Party’s actions are not relevant due to the absence of a  
19 claim for damages.

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

22 In Paragraph 18 of Plaintiff’s First Amended Petition, Plaintiff states:

23 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
24 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
25 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
26 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
27 organized for the purpose of representing the interests of Los Angeles County children  
28

1           subjected to harsh and restrictive mandates by local education agencies, the County of Los  
2 Angeles (‘County’), and the State of California (‘State’). One of its goals is to advocate for  
3 fair, humane, and equal treatment of all children within the County and to remove all  
4 unnecessary, harmful, and unjustified restrictions against children and provide children with  
5 a full return to normalcy. Members of Alliance reside within the County, own real property  
6 within the County, have children who attend childcare or K-12 schools in the County, and/or  
7 play youth sports in the County.”

8 Produce all DOCUMENTS and tangible things that concern, reflect, show, or relate to each and  
9 every injury suffered by each parent who is a member of Alliance of Los Angeles County Parents  
10 and is claiming in this action that his or her free speech rights were violated by the actions of  
11 defendant Muntu Davis, M.D.

12 **RESPONSE TO DEMAND FOR PRODUCTION NO. 13:**

13 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
14 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
15 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
16 cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
17 2023.010(c), 2030.090(b)); Compound.

18 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
19 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
20 and overly burdensome. Many members submitted information about harm to their children using  
21 first and last initials in order to protect privacy and avoid retaliation by employers, government  
22 agencies, labor unions, and social networks, which is one of the reasons the association and not  
23 individual petitioners brought this action in the first place. Many members use alias handles on  
24 social media to avoid retaliation by employers, government agencies, labor unions, friends and  
25 family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify  
26 constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding  
27 Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The

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1 identification of all members of Responding Party association is accordingly irrelevant,  
2 unwarranted, and unreasonably cumulative. The identification of members' social media handles is  
3 similarly irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
4 members would have posted is irrelevant, as Propounding Party's constitutional violation would  
5 exist regardless of whether a member commented. The full nature, scope and extent of the harm  
6 caused to members by the Propounding Party's actions are not relevant due to the absence of a  
7 claim for damages.

8  
9 **DEMAND FOR PRODUCTION NO. 14:**

10 In Paragraph 18 of Plaintiff's First Amended Petition, Plaintiff states:

11 "Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
12 ('Petitioner' or 'Alliance') is an unincorporated association composed of and supported by  
13 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
14 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
15 organized for the purpose of representing the interests of Los Angeles County children  
16 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
17 Angeles ('County'), and the State of California ('State'). One of its goals is to advocate for  
18 fair, humane, and equal treatment of all children within the County and to remove all  
19 unnecessary, harmful, and unjustified restrictions against children and provide children with  
20 a full return to normalcy. Members of Alliance reside within the County, own real property  
21 within the County, have children who attend childcare or K-12 schools in the County, and/or  
22 play youth sports in the County."

23 Produce all DOCUMENTS and tangible things that concern, reflect, show, or relate to each and  
24 every injury suffered by each parent who is a member of Alliance of Los Angeles County Parents  
25 and is claiming in this action that his or her free speech rights were violated by the actions of  
26 defendant Barbara Ferrer.

27 **RESPONSE TO DEMAND FOR PRODUCTION NO. 14:**

1 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
2 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
3 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
4 cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
5 2023.010(c), 2030.090(b)); Compound.

6 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
7 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
8 and overly burdensome. Many members submitted information about harm to their children using  
9 first and last initials in order to protect privacy and avoid retaliation by employers, government  
10 agencies, labor unions, and social networks, which is one of the reasons the association and not  
11 individual petitioners brought this action in the first place. Many members use alias handles on  
12 social media to avoid retaliation by employers, government agencies, labor unions, friends and  
13 family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify  
14 constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding  
15 Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The  
16 identification of all members of Responding Party association is accordingly irrelevant,  
17 unwarranted, and unreasonably cumulative. The identification of members’ social media handles is  
18 similarly irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
19 members would have posted is irrelevant, as Propounding Party’s constitutional violation would  
20 exist regardless of whether a member commented. The full nature, scope and extent of the harm  
21 caused to members by the Propounding Party’s actions are not relevant due to the absence of a  
22 claim for damages.

23  
24 **DEMAND FOR PRODUCTION NO. 15:**

25 In Paragraph 18 of Plaintiff’s First Amended Petition, Plaintiff states:

26 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
27 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
28

1 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
2 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
3 organized for the purpose of representing the interests of Los Angeles County children  
4 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
5 Angeles ('County'), and the State of California ('State'). One of its goals is to advocate for  
6 fair, humane, and equal treatment of all children within the County and to remove all  
7 unnecessary, harmful, and unjustified restrictions against children and provide children with  
8 a full return to normalcy. Members of Alliance reside within the County, own real property  
9 within the County, have children who attend childcare or K-12 schools in the County, and/or  
10 play youth sports in the County.”

11 Produce all DOCUMENTS and tangible things that concern, reflect, show, or relate to each  
12 and every injury suffered by each child whose parent is a member of Alliance of Los  
13 Angeles County Parents and who is claiming in this action that his or her free speech rights  
14 were violated by the actions of defendant County of Los Angeles Department of Public  
15 Health.

16 **RESPONSE TO DEMAND FOR PRODUCTION NO. 15:**

17 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
18 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
19 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
20 cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
21 2023.010(c), 2030.090(b)); Compound.

22 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
23 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
24 and overly burdensome. Many members submitted information about harm to their children using  
25 first and last initials in order to protect privacy and avoid retaliation by employers, government  
26 agencies, labor unions, and social networks, which is one of the reasons the association and not  
27 individual petitioners brought this action in the first place. Many members use alias handles on  
28

1 social media to avoid retaliation by employers, government agencies, labor unions, friends and  
2 family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify  
3 constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding  
4 Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The  
5 identification of all members of Responding Party association is accordingly irrelevant,  
6 unwarranted, and unreasonably cumulative. The identification of members’ social media handles is  
7 similarly irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
8 members would have posted is irrelevant, as Propounding Party’s constitutional violation would  
9 exist regardless of whether a member commented. The full nature, scope and extent of the harm  
10 caused to members by the Propounding Party’s actions are not relevant due to the absence of a  
11 claim for damages.

12  
13 **DEMAND FOR PRODUCTION NO. 16:**

14 In Paragraph 18 of Plaintiff’s First Amended Petition, Plaintiff states:

15 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
16 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
17 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
18 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
19 organized for the purpose of representing the interests of Los Angeles County children  
20 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
21 Angeles (‘County’), and the State of California (‘State’). One of its goals is to advocate for  
22 fair, humane, and equal treatment of all children within the County and to remove all  
23 unnecessary, harmful, and unjustified restrictions against children and provide children with  
24 a full return to normalcy. Members of Alliance reside within the County, own real property  
25 within the County, have children who attend childcare or K-12 schools in the County, and/or  
26 play youth sports in the County.”

1 Produce all DOCUMENTS and tangible things that concern, reflect, show, or relate to each and  
2 every injury suffered by each child whose parent is a member of Alliance of Los Angeles County  
3 Parents and who is claiming in this action that his or her free speech rights were violated by the  
4 actions of defendant Muntu Davis, M.D.

5  
6 **RESPONSE TO DEMAND FOR PRODUCTION NO. 16:**

7 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
8 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
9 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
10 cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
11 2023.010(c), 2030.090(b)); Compound.

12 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
13 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
14 and overly burdensome. Many members submitted information about harm to their children using  
15 first and last initials in order to protect privacy and avoid retaliation by employers, government  
16 agencies, labor unions, and social networks, which is one of the reasons the association and not  
17 individual petitioners brought this action in the first place. Many members use alias handles on  
18 social media to avoid retaliation by employers, government agencies, labor unions, friends and  
19 family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify  
20 constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding  
21 Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The  
22 identification of all members of Responding Party association is accordingly irrelevant,  
23 unwarranted, and unreasonably cumulative. The identification of members’ social media handles is  
24 similarly irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
25 members would have posted is irrelevant, as Propounding Party’s constitutional violation would  
26 exist regardless of whether a member commented. The full nature, scope and extent of the harm

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1 caused to members by the Propounding Party’s actions are not relevant due to the absence of a  
2 claim for damages.

3  
4 **DEMAND FOR PRODUCTION NO. 17:**

5 In Paragraph 18 of Plaintiff’s First Amended Petition, Plaintiff states:

6 “Petitioner and Plaintiff ALLIANCE OF LOS ANGELES COUNTY PARENTS  
7 (‘Petitioner’ or ‘Alliance’) is an unincorporated association composed of and supported by  
8 parents of children in Los Angeles County who attend childcare programs, K-12 schools,  
9 and/or play youth sports in the County. Petitioner Alliance is a community group that was  
10 organized for the purpose of representing the interests of Los Angeles County children  
11 subjected to harsh and restrictive mandates by local education agencies, the County of Los  
12 Angeles (‘County’), and the State of California (‘State’). One of its goals is to advocate for  
13 fair, humane, and equal treatment of all children within the County and to remove all  
14 unnecessary, harmful, and unjustified restrictions against children and provide children with  
15 a full return to normalcy. Members of Alliance reside within the County, own real property  
16 within the County, have children who attend childcare or K-12 schools in the County, and/or  
17 play youth sports in the County.”

18 Produce all DOCUMENTS and tangible things that concern, reflect, show, or relate to each and  
19 every injury suffered by each child whose parent is a member of Alliance of Los Angeles County  
20 Parents and who is claiming in this action that his or her free speech rights were violated by the  
21 actions of defendant Barbara Ferrer, PhD.

22 **RESPONSE TO DEMAND FOR PRODUCTION NO. 17:**

23 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
24 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
25 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
26 cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
27 2023.010(c), 2030.090(b)); Compound.

1 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
2 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
3 and overly burdensome. Many members submitted information about harm to their children using  
4 first and last initials in order to protect privacy and avoid retaliation by employers, government  
5 agencies, labor unions, and social networks, which is one of the reasons the association and not  
6 individual petitioners brought this action in the first place. Many members use alias handles on  
7 social media to avoid retaliation by employers, government agencies, labor unions, friends and  
8 family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify  
9 constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding  
10 Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The  
11 identification of all members of Responding Party association is accordingly irrelevant,  
12 unwarranted, and unreasonably cumulative. The identification of members’ social media handles is  
13 similarly irrelevant, unwarranted, and unreasonably cumulative. The specific commentary that  
14 members would have posted is irrelevant, as Propounding Party’s constitutional violation would  
15 exist regardless of whether a member commented. The full nature, scope and extent of the harm  
16 caused to members by the Propounding Party’s actions are not relevant due to the absence of a  
17 claim for damages.

18  
19 **DEMAND FOR PRODUCTION NO. 18:**

20 In Paragraph 140 of Plaintiff’s First Amended Petition, Plaintiff states:

21 “In a media briefing, Ferrer stated that DPH’s reason for blocking public comment was that some of  
22 the comments were ‘harassment’ and ‘bullying.’”

23 Produce all DOCUMENTS and tangible things that constitute, reflect, or show everything stated  
24 and presented at that media briefing.

25 **RESPONSE TO DEMAND FOR PRODUCTION NO. 18:**

26  
27  
28

1 Objection: Unduly burdensome as this information equally available to both parties. The discovery  
2 sought is obtainable from some other source that is more convenient, less burdensome, or less  
3 expensive. (Code Civ. Proc., § 2019.030(a)(1).)

4 Without waiving the above stated objections:

5 <https://twitter.com/MarlaTellez/status/1555400582961147905?s=20>

6 **DEMAND FOR PRODUCTION NO. 19:**

7 In Paragraph 141 of Plaintiff’s First Amended Petition, Plaintiff states:

8 “Attorneys for Petitioner demanded that DPH reopen public comment, and threatened to add a  
9 cause of action for violation of Petitioners’ free speech rights.”

10 Produce all DOCUMENTS and tangible things that constitute, concern, reflect, show, or  
11 relate to that demand and threat.

12 **RESPONSE TO DEMAND FOR PRODUCTION NO. 19:**

13 Objection: Unduly burdensome as this information equally available to both parties. The discovery  
14 sought is obtainable from Propounding Party, that is more convenient, less burdensome, and less  
15 expensive. (Code Civ. Proc., § 2019.030(a)(1).)

16 Without waiving the above stated objections: See counsel for Petitioner’s email to counsel for  
17 Propounding Party dated Fri, Aug 5, 2022 at 1:55 PM.

19 **DEMAND FOR PRODUCTION NO. 20:**

20 In Paragraph 142 of Plaintiff’s First Amended Petition, Plaintiff states:

21 “In response, on August 21, 2022, DPH posted a message stating: ‘This account is now for  
22 informational purposes only and, for that reason, public comments are limited to live “town hall”-  
23 type events it conducts wherein it solicits comments from the public during the live event. Once  
24 such events are concluded, the Department will then close the live event. Once such events are  
25 concluded, the Department will then close the live event post to public comments. Other posts will  
26 remain closed to public comments. Residents who have questions or are looking for guidance can  
27 send a direct message and Public Health will respond as soon as possible.’”



1 Produce all DOCUMENTS and tangible things that constitute, reflect, or show that response.

2 **RESPONSE TO DEMAND FOR PRODUCTION NO. 20:**

3 Objection: Unduly burdensome as this information equally available to both parties. The discovery  
4 sought is obtainable from Propounding Party, which is more convenient, less burdensome, and less  
5 expensive. (Code Civ. Proc., § 2019.030(a)(1).)

6 Without waiving the above stated objections: *See*

7 <https://twitter.com/lapublichealth/status/1561419235238195201?s=20>

8  
9 **DEMAND FOR PRODUCTION NO. 21:**

10 In Paragraph 143 of Plaintiff’s First Amended Petition, Plaintiff states:

11 “On occasion, since August 21, 2022, DPH has forgotten to shut off public comments, and  
12 comments have sporadically been allowed on various posts. Users may also still retweet,  
13 quote tweet, ‘like,’ and register non-verbal reactions to DPH posts. Anyone tagged in a post  
14 by DPH may comment.”

15 Produce all DOCUMENTS and tangible things that reflect or show that the County of Los Angeles  
16 Department of Public Health “has forgotten to shut off public comments” since August 21, 2022.

17 **RESPONSE TO DEMAND FOR PRODUCTION NO. 21:**

18 Objection: Unduly burdensome as this information equally available to both parties. The discovery  
19 sought is obtainable from Propounding Party, which is more convenient, less burdensome, and less  
20 expensive. (Code Civ. Proc., § 2019.030(a)(1).)

21  
22 **DEMAND FOR PRODUCTION NO. 22:**

23 In Paragraph 143 of Plaintiff’s First Amended Petition, Plaintiff states:

24 “On occasion, since August 21, 2022, DPH has forgotten to shut off public comments, and  
25 comments have sporadically been allowed on various posts. Users may also still retweet,  
26 quote tweet, ‘like,’ and register non-verbal reactions to DPH posts. Anyone tagged in a post  
27 by DPH may comment.”

28

1 Produce all DOCUMENTS and tangible things that reflect or show that such “comments  
2 have sporadically been allowed on various posts” since August 21, 2022.

3 **RESPONSE TO DEMAND FOR PRODUCTION NO. 22:**

4 Objection: Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a),  
5 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Unduly burdensome as this information equally  
6 available to both parties. The discovery sought is obtainable from Propounding Party, which is more  
7 convenient, less burdensome, and less expensive. (Code Civ. Proc., § 2019.030(a)(1).) This demand  
8 seeks the same information as No. 21.

9  
10 **DEMAND FOR PRODUCTION NO. 23:**

11 In Paragraph 143 of Plaintiff’s First Amended Petition, Plaintiff states:

12 “On occasion, since August 21, 2022, DPH has forgotten to shut off public comments, and  
13 comments have sporadically been allowed on various posts. Users may also still retweet,  
14 quote tweet, ‘like,’ and register non-verbal reactions to DPH posts. Anyone tagged in a post  
15 by DPH may comment.”

16 Produce all DOCUMENTS and tangible things that reflect or show that “Users may also still  
17 retweet, quote tweet, ‘like,’ and register non-verbal reactions to DPH posts.”

18 **RESPONSE DEMAND FOR PRODUCTION NO. 23:**

19 Objection: Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a),  
20 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Unduly burdensome as this information equally  
21 available to both parties. The discovery sought is obtainable from Propounding Party, which is more  
22 convenient, less burdensome, and less expensive. (Code Civ. Proc., § 2019.030(a)(1).)

23  
24 **DEMAND FOR PRODUCTION NO. 24:**

25 In Paragraph 143 of Plaintiff’s First Amended Petition, Plaintiff states:

26 “On occasion, since August 21, 2022, DPH has forgotten to shut off public comments, and  
27 comments have sporadically been allowed on various posts. Users may also still retweet, quote  
28

1 tweet, ‘like,’ and register non-verbal reactions to DPH posts. Anyone tagged in a post by DPH may  
2 comment.”

3 Produce all DOCUMENTS and tangible things that reflect or show that “Anyone tagged in a  
4 post by DPH may comment.”

5  
6 **RESPONSE TO DEMAND FOR PRODUCTION NO. 24:**

7 Objection: Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a),  
8 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Unduly burdensome as this information equally  
9 available to both parties. The discovery sought is obtainable from Propounding Party, which is more  
10 convenient, less burdensome, and less expensive. (Code Civ. Proc., § 2019.030(a)(1).)

11  
12 **DEMAND FOR PRODUCTION NO. 25:**

13 In Paragraph 145 of Plaintiff’s First Amended Petition, Plaintiff states:

14 “By allowing people to send private messages directly to them, DPH is not leaving open ample  
15 alternative channels for communication of information.”

16 Produce all DOCUMENTS and tangible things that constitute, reflect, or show all such private  
17 messages sent to the County of Los Angeles Department of Public Health by members of Alliance  
18 of Los Angeles County Parents.

19  
20 **RESPONSE TO DEMAND FOR PRODUCTION NO. 25:**

21 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
22 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
23 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
24 cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
25 2023.010(c), 2030.090(b)); Compound.

26 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
27 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary

28

1 and overly burdensome. Many members submitted information about harm to their children using  
2 first and last initials in order to protect privacy and avoid retaliation by employers, government  
3 agencies, labor unions, and social networks, which is one of the reasons the association and not  
4 individual petitioners brought this action in the first place. Many members use alias handles on  
5 social media to avoid retaliation by employers, government agencies, labor unions, friends and  
6 family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify  
7 constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding  
8 Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The  
9 identification of all members of Responding Party association is accordingly irrelevant,  
10 unwarranted, and unreasonably cumulative. The identification of members’ social media handles is  
11 similarly irrelevant, unwarranted, and unreasonably cumulative. Identifying and producing all  
12 messages from all members of Responding Party is accordingly irrelevant, unwarranted, and unduly  
13 burdensome.

14  
15 **DEMAND FOR PRODUCTION NO. 26:**

16 In Paragraph 147 of Plaintiff’s First Amended Petition, Plaintiff states:

17 “ . . . a Petitioner member created an informational Twitter account to allow the public to  
18 communicate with each other regarding COVID health orders following the comment ban”

19 Produce all DOCUMENTS and tangible things sufficient to show the identity and contact  
20 information of that “Petitioner member” of Alliance of Los Angeles County Parents.

21 **RESPONSE TO DEMAND FOR PRODUCTION NO. 26:**

22 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
23 (Romero v. Hern (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
24 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
25 cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
26 2023.010(c), 2030.090(b)); Compound.

1 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
2 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
3 and overly burdensome. Many members submitted information about harm to their children using  
4 first and last initials in order to protect privacy and avoid retaliation by employers, government  
5 agencies, labor unions, and social networks, which is one of the reasons the association and not  
6 individual petitioners brought this action in the first place. Many members use alias handles on  
7 social media to avoid retaliation by employers, government agencies, labor unions, friends and  
8 family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify  
9 constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding  
10 Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The  
11 identification of all members of Responding Party association is accordingly irrelevant,  
12 unwarranted, and unreasonably cumulative. The identification of members’ social media handles is  
13 similarly irrelevant, unwarranted, and unreasonably cumulative.

14 Without waiving the above stated objections, Ms. Rojas can be reached through counsel for  
15 Petitioner.

16  
17 **DEMAND FOR PRODUCTION NO. 27:**

18 In Paragraph 147 of Plaintiff’s First Amended Petition, Plaintiff states:

19 “a Petitioner member created an informational Twitter account to allow the public to  
20 communicate with each other regarding COVID health orders following the comment ban”

21 Produce all DOCUMENTS and tangible things that concern, reflect, show, or relate to the  
22 creation of that informational Twitter account.

23 **RESPONSE TO DEMAND FOR PRODUCTION NO. 27:**

24 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
25 (Romero v. Hern (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
26 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
27  
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1 cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
2 2023.010(c), 2030.090(b)); Compound; Attorney-Client privilege and work product.

3 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
4 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
5 and overly burdensome. Many members submitted information about harm to their children using  
6 first and last initials in order to protect privacy and avoid retaliation by employers, government  
7 agencies, labor unions, and social networks, which is one of the reasons the association and not  
8 individual petitioners brought this action in the first place. Many members use alias handles on  
9 social media to avoid retaliation by employers, government agencies, labor unions, friends and  
10 family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify  
11 constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding  
12 Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The  
13 identification of all members of Responding Party association is accordingly irrelevant,  
14 unwarranted, and unreasonably cumulative. The identification of members’ social media handles is  
15 similarly irrelevant, unwarranted, and unreasonably cumulative.

16 Without waiving the above-stated objections, Petitioner will provide any non-privileged responsive  
17 documents.

18  
19 **DEMAND FOR PRODUCTION NO. 28:**

20 In Paragraph 147 of Plaintiff’s First Amended Petition, Plaintiff states:

21 “Further, when a Petitioner member created an informational Twitter account to allow the public to  
22 communicate with each other regarding COVID health orders following the comment ban, the  
23 account was repeatedly reported and ultimately suspended by Twitter.”

24 Produce all DOCUMENTS and tangible things that reflect, show, or concern that “the  
25 account was repeatedly reported”.

26 **RESPONSE TO DEMAND FOR PRODUCTION NO. 28:**

1 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
2 (Romero v. Hern (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
3 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
4 cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
5 2023.010(c), 2030.090(b)); Compound; Attorney-Client privilege and work product.

6 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
7 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
8 and overly burdensome. Many members submitted information about harm to their children using  
9 first and last initials in order to protect privacy and avoid retaliation by employers, government  
10 agencies, labor unions, and social networks, which is one of the reasons the association and not  
11 individual petitioners brought this action in the first place. Many members use alias handles on  
12 social media to avoid retaliation by employers, government agencies, labor unions, friends and  
13 family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify  
14 constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding  
15 Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The  
16 identification of all members of Responding Party association is accordingly irrelevant,  
17 unwarranted, and unreasonably cumulative. The identification of members’ social media handles is  
18 similarly irrelevant, unwarranted, and unreasonably cumulative. Unduly burdensome as this  
19 information equally available to both parties. The discovery sought is obtainable from Propounding  
20 Party, which is more convenient, less burdensome, and less expensive. (Code Civ. Proc., §  
21 2019.030(a)(1).)

22  
23 Without waiving the above-stated objections, Petitioner will provide any responsive documents.  
24

25 **DEMAND FOR PRODUCTION NO. 29:**

26 In Paragraph 147 of Plaintiff’s First Amended Petition, Plaintiff states:  
27  
28

1 “On information and belief, the reporting and suspension of the account was at the behest of  
2 DPH and its communications team.”  
3

4 Produce all DOCUMENTS and tangible things that support Alliance of Los Angeles County  
5 Parents’ allegation that it is so “informed” and so “believes”.  
6

7 **RESPONSE TO DEMAND FOR PRODUCTION NO. 29**

8 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
9 (Romero v. Hern (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
10 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
11 cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
12 2023.010(c), 2030.090(b)); Compound; Attorney-Client privilege and work product.

13 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
14 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
15 and overly burdensome. Many members submitted information about harm to their children using  
16 first and last initials in order to protect privacy and avoid retaliation by employers, government  
17 agencies, labor unions, and social networks, which is one of the reasons the association and not  
18 individual petitioners brought this action in the first place. Many members use alias handles on  
19 social media to avoid retaliation by employers, government agencies, labor unions, friends and  
20 family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify  
21 constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding  
22 Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The  
23 identification of all members of Responding Party association is accordingly irrelevant,  
24 unwarranted, and unreasonably cumulative. The identification of members’ social media handles is  
25 similarly irrelevant, unwarranted, and unreasonably cumulative. Unduly burdensome as this  
26 information equally available to both parties. The discovery sought is obtainable from Propounding  
27  
28



1 Party, which is more convenient, less burdensome, and less expensive. (Code Civ. Proc., §  
2 2019.030(a)(1)).

3  
4 Without waiving the above-stated objections, Petitioner will provide any responsive documents.

5  
6 **DEMAND FOR PRODUCTION NO. 30:**

7 In Paragraph 147 of Plaintiff’s First Amended Petition, Plaintiff states:

8 “The account, known as @ALT\_lacph, merely retweeted every post by DPH and allowed public  
9 comment.”

10 Produce all DOCUMENTS and tangible things that constitute, reflect, show, or concern the  
11 content of and commentary on that account, @ALT\_lacph.

12 **RESPONSE TO DEMAND FOR PRODUCTION NO. 30:**

13 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
14 (Romero v. Hern (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
15 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
16 cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
17 2023.010(c), 2030.090(b)); Compound; Attorney-Client privilege and work product.

18 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
19 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
20 and overly burdensome. Many members submitted information about harm to their children using  
21 first and last initials in order to protect privacy and avoid retaliation by employers, government  
22 agencies, labor unions, and social networks, which is one of the reasons the association and not  
23 individual petitioners brought this action in the first place. Many members use alias handles on  
24 social media to avoid retaliation by employers, government agencies, labor unions, friends and  
25 family. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify  
26 constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding  
27 Party to ascertain standing in its Response to County’s Form Interrogatories, Set One. The

28

1 identification of all members of Responding Party association is accordingly irrelevant,  
2 unwarranted, and unreasonably cumulative. The identification of members' social media handles is  
3 similarly irrelevant, unwarranted, and unreasonably cumulative. Unduly burdensome as this  
4 information equally available to both parties. The discovery sought is obtainable from Propounding  
5 Party, which is more convenient, less burdensome, and less expensive. (Code Civ. Proc., §  
6 2019.030(a)(1).).

7 Since the account was suspended in August 2022, a record of the tweet history is unavailable to  
8 Petitioner.

9 **DEMAND FOR PRODUCTION NO. 31:**

10 In Paragraph 148 of Plaintiff's First Amended Petition, Plaintiff states:

11 "DPH allows only people and entities with which [sic] it is ideologically aligned and tags in  
12 its posts to comment."

13 Produce all DOCUMENTS and tangible things that support Alliance of Los Angeles County  
14 Parents' allegation that the County of Los Angeles Department of Public Health allows only people  
15 and entities with whom or which it is ideologically aligned and tags in its posts to comment.

16  
17 **RESPONSE TO DEMAND FOR PRODUCTION NO. 31:**

18 Objection: Unduly burdensome as this information equally available to both parties. The discovery  
19 sought is obtainable from Propounding Party, which is more convenient, less burdensome, and less  
20 expensive. (Code Civ. Proc., § 2019.030(a)(1).) This seeks the same information sought in No. 21,  
21 which Propounding Party is better positioned to provide.

22  
23 **DEMAND FOR PRODUCTION NO. 32:**

24 In Paragraph 9 of the Prayer for Relief in Plaintiff's First Amended Petition, Plaintiff  
25 prays:

26 "For damages according to proof;" Produce all DOCUMENTS and tangible things that show, for  
27 each individual member of Alliance of Los Angeles County Parents, the damages suffered by that  
28

1 member as a result of the actions of defendant County of Los Angeles Department of Public Health  
2 in “blocking all public comment on its Twitter, Facebook, and Instagram posts” (as that phrase is  
3 used in Paragraph 140 of Plaintiffs’ First Amended Petition).

4  
5 **RESPONSE TO DEMAND FOR PRODUCTION NO. 32:**

6 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
7 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
8 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
9 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
10 2023.010(c), 2030.090(b)); Compound.

11 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
12 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
13 and overly burdensome. Many members submitted information about harm to their children using  
14 first and last initials in order to protect privacy and avoid retaliation by employers and government  
15 agencies, which is one of the reasons the association and not individual petitioners brought this  
16 action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief  
17 to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for  
18 Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One .  
19 The identification of all members of Responding Party association is accordingly irrelevant,  
20 unwarranted, and unreasonably cumulative.

21  
22 **DEMAND FOR PRODUCTION NO. 33:**

23 In Paragraph 9 of the Prayer for Relief in Plaintiff’s First Amended Petition, Plaintiff  
24 prays:

25 “For damages according to proof;”

26 Produce all DOCUMENTS and tangible things that show, for each individual member of  
27 Alliance of Los Angeles County Parents, the damages suffered by that member as a result of  
28

1 the actions of defendant Muntu Davis, M.D. in “blocking all public comment on its Twitter,  
2 Facebook, and Instagram posts” (as that phrase is used in Paragraph 140 of Plaintiffs’ First  
3 Amended Petition).

4 **RESPONSE TO DEMAND FOR PRODUCTION NO. 33:**

5 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
6 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
7 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
8 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
9 2023.010(c), 2030.090(b)); Compound.

10 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
11 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
12 and overly burdensome. Many members submitted information about harm to their children using  
13 first and last initials in order to protect privacy and avoid retaliation by employers and government  
14 agencies, which is one of the reasons the association and not individual petitioners brought this  
15 action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief  
16 to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for  
17 Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One .  
18 The identification of all members of Responding Party association is accordingly irrelevant,  
19 unwarranted, and unreasonably cumulative.

20  
21 **DEMAND FOR PRODUCTION NO. 34:**

22 In Paragraph 9 of the Prayer for Relief in Plaintiff’s First Amended Petition, Plaintiff  
23 prays:

24 “For damages according to proof;”

25 Produce all DOCUMENTS and tangible things that show, for each individual member of  
26 Alliance of Los Angeles County Parents, the damages suffered by that member as a result of  
27 the actions of defendant Barbara Ferrer, PhD in “blocking all public comment on its Twitter,  
28

1 Facebook, and Instagram posts” (as that phrase is used in Paragraph 140 of Plaintiffs’ First  
2 Amended Petition).

3 **RESPONSE TO DEMAND FOR PRODUCTION NO. 34:**

4 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
5 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
6 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
7 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
8 2023.010(c), 2030.090(b)); Compound.

9 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
10 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
11 and overly burdensome. Many members submitted information about harm to their children using  
12 first and last initials in order to protect privacy and avoid retaliation by employers and government  
13 agencies, which is one of the reasons the association and not individual petitioners brought this  
14 action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief  
15 to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for  
16 Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One .  
17 The identification of all members of Responding Party association is accordingly irrelevant,  
18 unwarranted, and unreasonably cumulative.

19  
20 **DEMAND FOR PRODUCTION NO. 35:**

21 In Paragraph 9 of the Prayer for Relief in Plaintiff’s First Amended Petition, Plaintiff  
22 prays:

23 “For damages according to proof;”

24 For each member of Alliance of Los Angeles County Parents, produce all DOCUMENTS  
25 and tangible things from which defendant County of Los Angeles Department of Public  
26 Health can calculate the amount of damages suffered by that member as a result of the  
27 actions of defendant County of Los Angeles Department of Public Health in “blocking all  
28

1 public comment on its Twitter, Facebook, and Instagram posts” (as that phrase is used in  
2 Paragraph 140 of Plaintiffs’ First Amended Petition).

3 **RESPONSE TO DEMAND FOR PRODUCTION NO. 35:**

4 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
5 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
6 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
7 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
8 2023.010(c), 2030.090(b)); Compound.

9 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
10 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
11 and overly burdensome. Many members submitted information about harm to their children using  
12 first and last initials in order to protect privacy and avoid retaliation by employers and government  
13 agencies, which is one of the reasons the association and not individual petitioners brought this  
14 action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief  
15 to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for  
16 Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One .  
17 The identification of all members of Responding Party association is accordingly irrelevant,  
18 unwarranted, and unreasonably cumulative.

19  
20 **DEMAND FOR PRODUCTION NO. 36:**

21 In Paragraph 9 of the Prayer for Relief in Plaintiff’s First Amended Petition, Plaintiff  
22 prays:

23 “For damages according to proof;”

24 For each member of Alliance of Los Angeles County Parents, produce all DOCUMENTS  
25 and tangible things from which defendant Muntu Davis, M.D. can calculate the amount of  
26 damages suffered by that member as a result of the actions of defendant County of Los  
27 Angeles Department of Public Health in “blocking all public comment on its Twitter,  
28

1 Facebook, and Instagram posts” (as that phrase is used in Paragraph 140 of Plaintiffs’ First  
2 Amended Petition).

3  
4 **RESPONSE TO DEMAND FOR PRODUCTION NO. 36:**

5 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
6 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
7 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
8 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
9 2023.010(c), 2030.090(b)); Compound.

10 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
11 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
12 and overly burdensome. Many members submitted information about harm to their children using  
13 first and last initials in order to protect privacy and avoid retaliation by employers and government  
14 agencies, which is one of the reasons the association and not individual petitioners brought this  
15 action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief  
16 to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for  
17 Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One .  
18 The identification of all members of Responding Party association is accordingly irrelevant,  
19 unwarranted, and unreasonably cumulative.

20  
21  
22 **DEMAND FOR PRODUCTION NO. 37:**

23 In Paragraph 9 of the Prayer for Relief in Plaintiff’s First Amended Petition, Plaintiff  
24 prays:

25 “For damages according to proof;”

26 For each member of Alliance of Los Angeles County Parents, produce all DOCUMENTS  
27 and tangible things from which defendant Barbara Ferrer, PhD can calculate the amount of

1 damages suffered by that member as a result of the actions of defendant County of Los  
2 Angeles Department of Public Health in “blocking all public comment on its Twitter,  
3 Facebook, and Instagram posts” (as that phrase is used in Paragraph 140 of Plaintiffs’ First  
4 Amended Petition).

5  
6 **RESPONSE TO DEMAND FOR PRODUCTION NO. 37:**

7 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
8 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
9 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
10 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
11 2023.010(c), 2030.090(b)); Compound.

12 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
13 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
14 and overly burdensome. Many members submitted information about harm to their children using  
15 first and last initials in order to protect privacy and avoid retaliation by employers and government  
16 agencies, which is one of the reasons the association and not individual petitioners brought this  
17 action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief  
18 to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for  
19 Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One .  
20 The identification of all members of Responding Party association is accordingly irrelevant,  
21 unwarranted, and unreasonably cumulative.

22  
23 **DEMAND FOR PRODUCTION NO. 38:**

24 In Paragraph 10 of the Prayer for Relief in Plaintiff’s First Amended Petition,  
25 Plaintiff prays:

26 “For reasonable attorneys’ fees . . .;”

27 Produce all DOCUMENTS and tangible things that show, for each individual member of  
28



1 Alliance of Los Angeles County Parents, the attorneys’ fees incurred by that member as a result of  
2 the actions of defendant County of Los Angeles Department of Public Health in  
3 “blocking all public comment on its Twitter, Facebook, and Instagram posts” (as that phrase  
4 is used in Paragraph 140 of Plaintiffs’ First Amended Petition).

5  
6 **RESPONSE TO DEMAND FOR PRODUCTION NO. 38:**

7 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
8 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
9 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
10 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
11 2023.010(c), 2030.090(b)); Compound; Attorney-Client Privilege and work product.

12 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
13 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
14 and overly burdensome. Many members submitted information about harm to their children using  
15 first and last initials in order to protect privacy and avoid retaliation by employers and government  
16 agencies, which is one of the reasons the association and not individual petitioners brought this  
17 action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief  
18 to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for  
19 Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One .  
20 The identification of all members of Responding Party association is accordingly irrelevant,  
21 unwarranted, and unreasonably cumulative.

22 To the extent Propounding Party seeks fee bills and engagement agreements, those documents are  
23 protected from disclosure under the attorney-client privilege. If Propounding Party is willing to  
24 provide its engagement agreement with Sheppard Mullin, Petitioner will provide its engagement  
25 agreement with Hamill Law & Consulting.

26  
27 **DEMAND FOR PRODUCTION NO. 39:**

1 In Paragraph 10 of the Prayer for Relief in Plaintiff’s First Amended Petition,  
2 Plaintiff prays:  
3 “For reasonable attorneys’ fees . . .;”  
4 Produce all DOCUMENTS and tangible things that show, for each individual member of  
5 Alliance of Los Angeles County Parents, the attorneys’ fees incurred by that member as a  
6 result of the actions of defendant Muntu Davis, M.D. in “blocking all public comment on its  
7 Twitter, Facebook, and Instagram posts” (as that phrase is used in Paragraph 140 of  
8 Plaintiffs’ First Amended Petition).

9

10 **RESPONSE TO DEMAND FOR PRODUCTION NO. 39:**

11 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
12 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
13 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
14 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
15 2023.010(c), 2030.090(b)); Compound; Attorney-Client Privilege and work product.

16 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
17 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
18 and overly burdensome. Many members submitted information about harm to their children using  
19 first and last initials in order to protect privacy and avoid retaliation by employers and government  
20 agencies, which is one of the reasons the association and not individual petitioners brought this  
21 action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief  
22 to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for  
23 Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One .  
24 The identification of all members of Responding Party association is accordingly irrelevant,  
25 unwarranted, and unreasonably cumulative.

26 To the extent Propounding Party seeks fee bills and engagement agreements, those documents are  
27 protected from disclosure under the attorney-client privilege. If Propounding Party is willing to  
28

1 provide its engagement agreement with Sheppard Mullin, Petitioner will provide its engagement  
2 agreement with Hamill Law & Consulting.

3  
4 **DEMAND FOR PRODUCTION NO. 40:**

5 In Paragraph 10 of the Prayer for Relief in Plaintiff’s First Amended Petition,  
6 Plaintiff prays:

7 “For reasonable attorneys’ fees . . .;”

8 Produce all DOCUMENTS and tangible things that show, for each individual member of  
9 Alliance of Los Angeles County Parents, the attorneys’ fees incurred by that member as a  
10 result of the actions of defendant Barbara Ferrer, PhD in “blocking all public comment on its  
11 Twitter, Facebook, and Instagram posts” (as that phrase is used in Paragraph 140 of  
12 Plaintiffs’ First Amended Petition).

13  
14 **RESPONSE TO DEMAND FOR PRODUCTION NO. 40:**

15 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
16 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
17 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
18 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
19 2023.010(c), 2030.090(b)); Compound; Attorney-Client Privilege and work product.

20 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
21 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
22 and overly burdensome. Many members submitted information about harm to their children using  
23 first and last initials in order to protect privacy and avoid retaliation by employers and government  
24 agencies, which is one of the reasons the association and not individual petitioners brought this  
25 action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief  
26 to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for  
27 Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One .

28

1 The identification of all members of Responding Party association is accordingly irrelevant,  
2 unwarranted, and unreasonably cumulative.

3 To the extent Propounding Party seeks fee bills and engagement agreements, those documents are  
4 protected from disclosure under the attorney-client privilege. If Propounding Party is willing to  
5 provide its engagement agreement with Sheppard Mullin, Petitioner will provide its engagement  
6 agreement with Hamill Law & Consulting.

7  
8 **DEMAND FOR PRODUCTION NO. 41:**

9 In Paragraph 10 of the Prayer for Relief in Plaintiff’s First Amended Petition,  
10 Plaintiff prays:

11 “For reasonable attorneys’ fees . . .;”

12 For each member of Alliance of Los Angeles County Parents, produce all DOCUMENTS  
13 and tangible things from which defendant County of Los Angeles Department of Public  
14 Health can calculate the attorneys’ fees incurred by that member as a result of the actions of  
15 defendant County of Los Angeles Department of Public Health in “blocking all public  
16 comment on its Twitter, Facebook, and Instagram posts” (as that phrase is used in Paragraph  
17 140 of Plaintiffs’ First Amended Petition).

18  
19 **RESPONSE TO DEMAND FOR PRODUCTION NO. 41:**

20 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
21 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
22 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
23 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
24 2023.010(c), 2030.090(b)); Compound; Attorney-Client Privilege and work product.

25 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
26 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
27 and overly burdensome. Many members submitted information about harm to their children using  
28

1 first and last initials in order to protect privacy and avoid retaliation by employers and government  
2 agencies, which is one of the reasons the association and not individual petitioners brought this  
3 action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief  
4 to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for  
5 Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One .  
6 The identification of all members of Responding Party association is accordingly irrelevant,  
7 unwarranted, and unreasonably cumulative.

8 To the extent Propounding Party seeks fee bills and engagement agreements, those documents are  
9 protected from disclosure under the attorney-client privilege. If Propounding Party is willing to  
10 provide its engagement agreement with Sheppard Mullin, Petitioner will provide its engagement  
11 agreement with Hamill Law & Consulting.

12  
13 **DEMAND FOR PRODUCTION NO. 42:**

14 In Paragraph 10 of the Prayer for Relief in Plaintiff’s First Amended Petition,  
15 Plaintiff prays:

16 “For reasonable attorneys’ fees . . .;”

17 For each member of Alliance of Los Angeles County Parents, produce all DOCUMENTS  
18 and tangible things from which defendant Muntu Davis, M.D. can calculate the attorneys’  
19 fees incurred by that member as a result of the actions of defendant County of Los Angeles  
20 Department of Public Health in “blocking all public comment on its Twitter, Facebook, and  
21 Instagram posts” (as that phrase is used in Paragraph 140 of Plaintiffs’ First Amended  
22 Petition).

23 **RESPONSE TO DEMAND FOR PRODUCTION NO. 42:**

24 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
25 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
26 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably

1 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
2 2023.010(c), 2030.090(b)); Compound; Attorney-Client Privilege and work product.

3 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
4 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
5 and overly burdensome. Many members submitted information about harm to their children using  
6 first and last initials in order to protect privacy and avoid retaliation by employers and government  
7 agencies, which is one of the reasons the association and not individual petitioners brought this  
8 action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief  
9 to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for  
10 Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One .  
11 The identification of all members of Responding Party association is accordingly irrelevant,  
12 unwarranted, and unreasonably cumulative.

13 To the extent Propounding Party seeks fee bills and engagement agreements, those documents are  
14 protected from disclosure under the attorney-client privilege. If Propounding Party is willing to  
15 provide its engagement agreement with Sheppard Mullin, Petitioner will provide its engagement  
16 agreement with Hamill Law & Consulting.

17  
18 **DEMAND FOR PRODUCTION NO. 43:**

19 In Paragraph 10 of the Prayer for Relief in Plaintiff’s First Amended Petition,  
20 Plaintiff prays:

21 “For reasonable attorneys’ fees . . .;”

22 For each member of Alliance of Los Angeles County Parents, produce all DOCUMENTS  
23 and tangible things from which defendant Barbara Ferrer, PhD can calculate the attorneys’  
24 fees incurred by that member as a result of the actions of defendant County of Los Angeles  
25 Department of Public Health in “blocking all public comment on its Twitter, Facebook, and  
26 Instagram posts” (as that phrase is used in Paragraph 140 of Plaintiffs’ First Amended  
27 Petition).

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**RESPONSE TO DEMAND FOR PRODUCTION NO. 43:**

Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment, oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound; Attorney-Client Privilege and work product.

The only remaining cause of action in this case is a challenge to Propounding Party’s violation of Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary and overly burdensome. Many members submitted information about harm to their children using first and last initials in order to protect privacy and avoid retaliation by employers and government agencies, which is one of the reasons the association and not individual petitioners brought this action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One . The identification of all members of Responding Party association is accordingly irrelevant, unwarranted, and unreasonably cumulative.

To the extent Propounding Party seeks fee bills and engagement agreements, those documents are protected from disclosure under the attorney-client privilege. If Propounding Party is willing to provide its engagement agreement with Sheppard Mullin, Petitioner will provide its engagement agreement with Hamill Law & Consulting.

**DEMAND FOR PRODUCTION NO. 44:**

State the full name of each member of Alliance of Los Angeles County Parents who has the authority to legally bind all members of Alliance of Los Angeles County Parents by contract or agreement, verified answers to written discovery requests, and testimony in this lawsuit by deposition, by declaration or at trial.

1 **RESPONSE TO DEMAND FOR PRODUCTION NO. 44:**

2 Objection: Responding Party objects to this interrogatory on the following grounds: This Demand is  
3 identical to Special Interrogatory No.18. Calls for a legal conclusion; Overbroad, (*Romero v. Hern*  
4 (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment, oppression, and undue  
5 burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably cumulative and undue burden.  
6 (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.  
7 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
8 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
9 and overly burdensome. Many members submitted information about harm to their children using  
10 first and last initials in order to protect privacy and avoid retaliation by employers, government  
11 agencies, labor unions, and social networks, which is one of the reasons the association and not  
12 individual petitioners brought this action in the first place. Many members use alias handles on  
13 social media to avoid retaliation by employers, government agencies, friends and family. Petitioners  
14 are not seeking any damages – they simply seek injunctive relief to rectify constitutional violations.  
15 Further, Responding Party identified sufficient witnesses for Propounding Party to ascertain  
16 standing in its Response to County’s Form Interrogatories, Set One. The identification of all  
17 members of Responding Party association is accordingly irrelevant, unwarranted, and unreasonably  
18 cumulative. Without waiving the above stated objections, Margaret Orenstein.

19  
20 **DEMAND FOR PRODUCTION NO. 45:**

21 All DOCUMENTS and tangible things that concern, reflect, show, or relate to Julie A. Hamill being  
22 a member of Alliance of Los Angeles County Parents at any time.

23 **RESPONSE TO DEMAND FOR PRODUCTION NO. 45:**

24 Objection: Responding Party objects to this interrogatory on the following grounds: Unwarranted  
25 annoyance, embarrassment, and oppression (Code Civ. Proc., § 2023.010(c)); Attorney-Client  
26 Privilege and work product. The request is not reasonably calculated to lead to the discovery of  
27 relevant, admissible evidence.



1 Julie A. Hamill is counsel for Petitioner. Responding Party is unable to conceive of any legitimate  
2 purpose for this demand beyond harassment, annoyance, and intimidation by Propounding Party.

3  
4 **DEMAND FOR PRODUCTION NO. 46:**

5 All DOCUMENTS and tangible things that concern, reflect, show, or relate to the formation or  
6 creation of Alliance of Los Angeles County Parents.

7 **RESPONSE TO DEMAND FOR PRODUCTION NO. 46:**

8 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
9 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.) vague and ambiguous; Attorney-client privilege  
10 and work product.

11 To the extent this demand seeks registration or formation documents filed with the Secretary of  
12 State, none exist.

13  
14 **DEMAND FOR PRODUCTION NO. 47:**

15 All DOCUMENTS and tangible things that concern, reflect, show, or relate to the  
16 filing of any documents by Alliance of Los Angeles County Parents with the California  
17 Secretary of State or any other governmental entity or agency.

18 **RESPONSE TO DEMAND FOR PRODUCTION NO. 47**

19 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
20 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.) vague and ambiguous; Compound.

21 To the extent this demand seeks registration or formation documents filed with the Secretary of  
22 State, none exist.

23  
24 **DEMAND FOR PRODUCTION NO. 48:**

25 All DOCUMENTS and tangible things that concern, reflect, show, or relate to the  
26 structure and organization of Alliance of Los Angeles County Parents.

27 **RESPONSE TO DEMAND FOR PRODUCTION NO. 48:**

1 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
2 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.) vague and ambiguous; Attorney-client privilege  
3 and work product. To the extent this demand seeks an organization chart or formal filing, no such  
4 documents exist.

5  
6 **DEMAND FOR PRODUCTION NO. 49:**

7 All DOCUMENTS and tangible things sufficient to show the identity and contact  
8 information of all officers and directors of Alliance of Los Angeles County Parents.

9 **RESPONSE TO DEMAND FOR PRODUCTION NO. 49:**

10 Objection: Responding Party objects to this interrogatory on the following grounds: Calls for a legal  
11 conclusion; vague and ambiguous, attorney-client privilege and work product.

12 Without waiving the foregoing objections, Petitioner responds as follows: Petitioner does not have  
13 “officers” or “directors.”

14  
15 **DEMAND FOR PRODUCTION NO. 50:**

16 All DOCUMENTS and tangible things that constitute, concern, reflect, show, or  
17 relate to authorization by Alliance of Los Angeles County Parents to file this lawsuit.

18 **RESPONSE TO DEMAND FOR PRODUCTION NO. 50:**

19 Objection: Responding Party objects to this interrogatory on the following grounds: Calls for a legal  
20 conclusion; Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted  
21 annoyance, embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
22 2023.010(c)); Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a),  
23 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound; Attorney-client privilege and work  
24 product.

25 To the extent this demand seeks a copy of the engagement letter between Petitioner and counsel,  
26 that document is protected by attorney-client privilege. If Propounding Party is willing to provide its  
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1 engagement agreement with Sheppard Mullin, Petitioner will provide its engagement agreement  
2 with Hamill Law & Consulting.

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4 **DEMAND FOR PRODUCTION NO. 51:**

5 All DOCUMENTS and tangible things that constitute, concern, reflect, show, or  
6 relate to the authorization to file this lawsuit by each member of Alliance of Los Angeles  
7 County Parents who so authorized.

8 **RESPONSE TO DEMAND FOR PRODUCTION NO. 51:**

9 Objection: Responding Party objects to this interrogatory on the following grounds: Calls for a legal  
10 conclusion; Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted  
11 annoyance, embarrassment, oppression, and undue burden and expense (Code Civ. Proc., §  
12 2023.010(c)); Unreasonably cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a),  
13 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound; Attorney-client privilege and work  
14 product.

15 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
16 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
17 and overly burdensome. Many members submitted information about harm to their children using  
18 first and last initials in order to protect privacy and avoid retaliation by employers, government  
19 agencies, labor unions, and social networks, which is one of the reasons the association and not  
20 individual petitioners brought this action in the first place. Many members use alias handles on  
21 social media to avoid retaliation by employers, government agencies, friends and family. Petitioners  
22 are not seeking any damages – they simply seek injunctive relief to rectify constitutional violations.  
23 Further, Responding Party identified sufficient witnesses for Propounding Party to ascertain  
24 standing in its Response to County’s Form Interrogatories, Set One. The identification of all  
25 members of Responding Party association is accordingly irrelevant, unwarranted, and unreasonably  
26 cumulative. To the extent this demand seeks fee bills or the engagement agreement, such documents  
27 are protected by the attorney-client privilege. If Propounding Party is willing to provide its  
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1 engagement agreement with Sheppard Mullin, Petitioner will provide its engagement agreement  
2 with Hamill Law & Consulting.

3  
4 **DEMAND FOR PRODUCTION NO. 52:**

5 All DOCUMENTS and tangible things that constitute or reflect any and all  
6 communications (whether written, oral or electronic) between Julie A. Hamill, on the one  
7 hand, and any journalist or member of the press, on the other hand, concerning the free  
8 speech claim in this lawsuit.

9 **RESPONSE TO DEMAND FOR PRODUCTION NO. 52:**

10 Objection: Responding Party objects to this interrogatory on the following grounds: Unwarranted  
11 annoyance, embarrassment, and oppression (Code Civ. Proc., § 2023.010(c)); Attorney-Client  
12 Privilege and work product. The request is not reasonably calculated to lead to the discovery of  
13 relevant, admissible evidence.

14 Julie A. Hamill is counsel for Petitioner. Responding Party is unable to conceive of any legitimate  
15 purpose for this demand beyond harassment, annoyance, and intimidation by Propounding Party.

16  
17 **DEMAND FOR PRODUCTION NO. 53:**

18 All DOCUMENTS and tangible things that constitute or reflect any and all  
19 communications (whether written, oral or electronic) between any member of Alliance of  
20 Los Angeles County Parents, on the one hand, and any journalist or member of the press, on  
21 the other hand, concerning the free speech claim in this lawsuit.

22 **RESPONSE TO DEMAND FOR PRODUCTION NO. 53**

23 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
24 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
25 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
26 cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
27 2023.010(c), 2030.090(b)); Compound; Responding Party objects to this interrogatory on the  
28

1 following grounds: Unwarranted annoyance, embarrassment, and oppression (Code Civ. Proc., §  
2 2023.010(c)); Attorney-Client Privilege and work product. The request is not reasonably calculated  
3 to lead to the discovery of relevant, admissible evidence.

4  
5 **DEMAND FOR PRODUCTION NO. 54:**

6 All DOCUMENTS and tangible things that constitute or reflect any and all posts by  
7 Julie A. Hamill on any social media platform (including, but not limited to, Facebook,  
8 Twitter, Instagram, YouTube, Twitter, Pinterest, Snapchat, and LinkedIn) concerning the  
9 free speech claim in this lawsuit.

10 **RESPONSE TO DEMAND FOR PRODUCTION NO. 54:**

11 Objection: Responding Party objects to this interrogatory on the following grounds: Unwarranted  
12 annoyance, embarrassment, and oppression (Code Civ. Proc., § 2023.010(c)); Attorney-Client  
13 Privilege and work product. The request is not reasonably calculated to lead to the discovery of  
14 relevant, admissible evidence.

15 Julie A. Hamill is counsel for Petitioner. Responding Party is unable to conceive of any legitimate  
16 purpose for this demand beyond harassment, annoyance, and intimidation by Propounding Party.

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19 **DEMAND FOR PRODUCTION NO. 55:**

20 All DOCUMENTS and tangible things that constitute or reflect any and all posts by any member of  
21 Alliance of Los Angeles County Parents concerning the free speech claim in this lawsuit.

22 **RESPONSE TO DEMAND FOR PRODUCTION NO. 55:**

23 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
24 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
25 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
26 cumulative and undue burden. (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
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1 2023.010(c), 2030.090(b)); Compound. The request is not reasonably calculated to lead to the  
2 discovery of relevant, admissible evidence.

3  
4 **DEMAND FOR PRODUCTION NO. 56:**

5 All DOCUMENTS and tangible things from which defendant County of Los Angeles Department  
6 of Public Health can calculate or assess the amount, nature, scope, and extent of the injury or  
7 damage (including, but not limited to, the amount of any monetary damages or injuries suffered,  
8 and, if emotional distress was suffered, the nature and severity of such distress) suffered by each  
9 parent who is a member of Alliance of Los Angeles County Parents and who is claiming in this  
10 action that his or her free speech rights were violated by the actions of defendant County of Los  
11 Angeles Department of Public Health.

12 **RESPONSE TO DEMAND FOR PRODUCTION NO. 56**

13 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
14 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
15 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
16 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
17 2023.010(c), 2030.090(b)); Compound.

18 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
19 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
20 and overly burdensome. Many members submitted information about harm to their children using  
21 first and last initials in order to protect privacy and avoid retaliation by employers and government  
22 agencies, which is one of the reasons the association and not individual petitioners brought this  
23 action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief  
24 to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for  
25 Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One .  
26 The identification of all members of Responding Party association is accordingly irrelevant,  
27 unwarranted, and unreasonably cumulative.

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**DEMAND FOR PRODUCTION NO. 57:**

All DOCUMENTS and tangible things from which defendant Muntu Davis, M.D. can calculate or assess the amount, nature, scope, and extent of the injury or damage (including, but not limited to, the amount of any monetary damages or injuries suffered, and, if emotional distress was suffered, the nature and severity of such distress) suffered by each parent who is a member of Alliance of Los Angeles County Parents and who is claiming in this action that his or her free speech rights were violated by the actions of defendant Muntu Davis, M.D.

**RESPONSE TO DEMAND FOR PRODUCTION NO. 57:**

Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad, (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment, oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2), 2023.010(c), 2030.090(b)); Compound.

The only remaining cause of action in this case is a challenge to Propounding Party’s violation of Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary and overly burdensome. Many members submitted information about harm to their children using first and last initials in order to protect privacy and avoid retaliation by employers and government agencies, which is one of the reasons the association and not individual petitioners brought this action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One . The identification of all members of Responding Party association is accordingly irrelevant, unwarranted, and unreasonably cumulative.

1 **DEMAND FOR PRODUCTION NO. 58:**

2 All DOCUMENTS and tangible things from which defendant Barbara Ferrer, PhD can calculate or  
3 assess the amount, nature, scope, and extent of the injury or damage (including, but not limited to,  
4 the amount of any monetary damages or injuries suffered, and, if emotional distress was suffered,  
5 the nature and severity of such distress) suffered by each parent who is a member of Alliance of Los  
6 Angeles County Parents and who is claiming in this action that his or her free speech rights were  
7 violated by the actions of defendant Barbara Ferrer, PhD.

8 **RESPONSE TO DEMAND FOR PRODUCTION NO. 58:**

9 Objection: Responding Party objects to this interrogatory on the following grounds: Overbroad,  
10 (*Romero v. Hern* (1969) 276 Cal.App.2d 787, 794.); Unwarranted annoyance, embarrassment,  
11 oppression, and undue burden and expense (Code Civ. Proc., § 2023.010(c)); Unreasonably  
12 cumulative and undue burden (See Code Civ. Proc., §§ 2017.020(a), 2019.030(a)(1)–(2),  
13 2023.010(c), 2030.090(b)); Compound.

14 The only remaining cause of action in this case is a challenge to Propounding Party’s violation of  
15 Petitioner’s free speech rights. Identification of all members of Petitioner association is unnecessary  
16 and overly burdensome. Many members submitted information about harm to their children using  
17 first and last initials in order to protect privacy and avoid retaliation by employers and government  
18 agencies, which is one of the reasons the association and not individual petitioners brought this  
19 action in the first place. Petitioners are not seeking any damages – they simply seek injunctive relief  
20 to rectify constitutional violations. Further, Responding Party identified sufficient witnesses for  
21 Propounding Party to ascertain standing in its Response to County’s Form Interrogatories, Set One .  
22 The identification of all members of Responding Party association is accordingly irrelevant,  
23 unwarranted, and unreasonably cumulative.

24  
25 Dated: April 28, 2023

Hamill Law & Consulting

26  
27 By: /s/ Julie A. Hamill  
Julie A. Hamill  
Attorney for Petitioner



Alliance of Los Angeles County Parents

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1 **VERIFICATION**

2 **ALLIANCE OF LOS ANGELES COUNTY PARENTS v. COUNTY OF LOS ANGELES**  
3 **DEPARTMENT OF PUBLIC HEALTH, et al., Case No.: 21GDCV00784**

4 I have read the foregoing AMENDED ALLIANCE OF LOS ANGELES COUNTY  
5 PARENTS RESPONSE TO COUNTY OF LOS ANGELES, ET AL DEMANDS FOR  
6 PRODUCTION, SET ONE and know its contents.

7 I am a founding member of the Alliance of Los Angeles County Parents, an unincorporated  
8 association, a party to this action, and am authorized to make this verification for and on its behalf,  
9 and I make this verification for that reason.

10 I am informed and believe and on that ground allege that the matters stated in the foregoing  
11 document are true.

12 Executed on April 28, 2023, at Los Angeles, California.

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

15 \_\_\_\_\_  
16 Margaret Orenstein, on behalf of  
17 Alliance of Los Angeles County Parents  
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**PROOF OF SERVICE**

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 28, 2023 I served the foregoing document: AMENDED ALLIANCE OF LOS ANGELES COUNTY PARENTS RESPONSE TO COUNTY OF LOS ANGELES, ET AL DEMANDS FOR PRODUCTION, SET ONE 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).
- (STATE) I declare under penalty of perjury under the laws of the State of California that the

1 above is true and correct.

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

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Executed on April 28, 2023 at Rancho Palos Verdes, California.

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

# EXHIBIT F

Videotaped Deposition of  
**Barbara Ferrer, Ph.D.**  
May 03, 2023

Alliance of LA County Parents  
vs.  
County of LA Dept. of Public Health



[www.aptusCR.com](http://www.aptusCR.com) | 866.999.8310

1 Q. So just once. Okay. So I'm going to go over  
2 some ground rules with you.

3 MS. HAMILL: But before we do that, I do want  
4 to note for the record that my client, Sarah Beth  
5 Burwick, who is a member of the Alliance of  
6 Los Angeles County Parents is in the lobby. And  
7 Mr. Raygor is refusing to allow her to enter the  
8 room for the deposition. I'm going to give you an  
9 opportunity to allow her into the room. Or if you  
10 would like to provide legal justification for  
11 excluding my client from this deposition, I'd love  
12 to hear that.

13 MR. RAYGOR: It's -- you're in a deposition  
14 with Dr. Ferrer. I'm happy to talk with you off the  
15 record rather than take your time during the  
16 deposition.

17 MS. HAMILL: And will you allow my client,  
18 Sarah Beth Burwick, to enter the room and  
19 participate in this deposition by sitting here and  
20 observing?

21 MR. RAYGOR: Same response. I'm happy to talk  
22 with you off the record. You're here for a  
23 deposition of Dr. Ferrer. Please proceed or we can  
24 take a break.

25 MS. HAMILL: So I'm -- I'm just getting

1 clarification from you that you are refusing to  
2 allow my client into the room. Is that correct?

3 MR. RAYGOR: That is not correct. I have said  
4 that you're in the middle of a deposition,  
5 Dr. Ferrer is here. I'm happy to talk with you off  
6 the record.

7 MS. HAMILL: Let's go off the record.

8 THE VIDEOGRAPHER: We're going off the record  
9 at 11:44 a.m.

10 (Off the record.)

11 THE VIDEOGRAPHER: We're back on the record at  
12 11:52 a.m. Please continue.

13 MS. HAMILL: Thank you. So now we've wasted  
14 about 22 minutes in this deposition. Counsel for  
15 the county is trying to force me to sign some sort  
16 of document in order to allow my client to attend  
17 the deposition. She is sitting in the lobby,  
18 waiting to be let in the building, and Mr. Raygor  
19 continues to refuse. So we are going to proceed  
20 with the deposition.

21 BY MS. HAMILL:

22 **Q. You're under oath. So even though this**  
23 **deposition is taking place in a law office, the**  
24 **testimony that you give today requires you to**  
25 **testify truthfully under penalty of perjury as if**



1 who came back in here, told me you had reneged. So  
2 it was you who did not allow her to come up here.

3 MS. HAMILL: Number one, I am under no  
4 obligation to do anything in order to have my  
5 client, a party to this case, attend this  
6 deposition, under no obligation whatsoever. There's  
7 no legal authority for that.

8 Number two, I never agreed to put anything into  
9 writing, or to sign anything that you draft up for  
10 me to sign while I'm taking a deposition. I would  
11 never do that. So I'm going to give you -- excuse  
12 me, I'm speaking. I'm going to give you one last  
13 opportunity and then we are going to seek sanctions  
14 against you. Okay?

15 Under CCP 2025.420 (b)(12), "Any party,  
16 deponent, or other effective person or organization  
17 may move for a protective order to exclude  
18 designated persons other than the parties to the  
19 action, and their officers, and counsel from the  
20 deposition."

21 You have no authority to keep her out. So one  
22 last time: Are you going to allow Ms. Burwick to  
23 come upstairs?

24 MR. RAYGOR: Are you going to -- your word for  
25 her being a member is not sufficient. It's not

1 evidence.

2 Are you going to -- we should be able to state  
3 on the record that she is a member.

4 MS. HAMILL: Yes.

5 MR. RAYGOR: And at some point when we have our  
6 meet and confer, will you --

7 MS. HAMILL: I'm not agreeing to anything.  
8 She's coming up or not.

9 MR. RAYGOR: I just -- okay, well, now you're  
10 renegeing on that agreement.

11 Proceed. We just had an agreement, I thought  
12 --

13 MS. HAMILL: She will come up and say on the  
14 record that she is a member. I'm not agreeing to  
15 anything else. I'm not obligated to do that. We  
16 are going to seek sanctions against you unless you  
17 let her up right now. It's your call.

18 Do you need time to confer?

19 MR. RAYGOR: I don't need it, but I'd like it.

20 MS. HAMILL: Okay. Go ahead.

21 MR. RAYGOR: Go off the record.

22 MS. HAMILL: Not with me, with -- I'm done  
23 talking to you about this.

24 MR. RAYGOR: No, it's your deposition, Julie.  
25 If you -- I can't tell you to go off the record so I

1 If you're not going to give me common courtesy of  
2 professionalism, okay? I don't have to take this.

3 Are we off the record now?

4 THE VIDEOGRAPHER: No, we're still on the  
5 record.

6 MR. RAYGOR: You said we could go off the  
7 record. Will you please let us go off the record?

8 MS. HAMILL: Sure. We'll go off the record.

9 THE VIDEOGRAPHER: We're going off the record  
10 at 1:23 p.m.

11 (Off the record.)

12 THE VIDEOGRAPHER: We're back on record at  
13 1:34 p.m. Please continue.

14 MS. HAMILL: Thank you very much.

15 Will you allow my client to come upstairs now?

16 MR. RAYGOR: I will. But I've got to have a  
17 security officer approve it. I was waiting for him  
18 to come up. I don't know where he is. But, yes.

19 MS. HAMILL: Okay, thank you.

20 MR. RAYGOR: As long as she states on the  
21 record that she's a member.

22 MS. HAMILL: That's fine.

23 How do we expedite the security process so  
24 Ms. Burwick can enter the building?

25 MR. RAYGOR: I'm trying to find somebody else.

1 They're supposed to interrupt if they can find  
2 somebody else because the guy -- Quincy is in a  
3 meeting somewhere.

4 MS. HAMILL: I assume that the receptionist is  
5 able to call down to security and allow someone to  
6 enter.

7 MR. RAYGOR: Yeah. But based on her tweeting  
8 stream this morning, while she's been in the lobby,  
9 the security officer got concerned.

10 MS. HAMILL: I have not seen it.

11 MR. RAYGOR: So I've gotta get him to sort of  
12 intercede.

13 Anyway, let's go off. Can we go off so I can  
14 go talk to the receptionist?

15 MS. HAMILL: Sure.

16 THE VIDEOGRAPHER: Off the record at 1:35 p.m.

17 (Off the record.)

18 THE VIDEOGRAPHER: We are back on record at  
19 1:38 p.m. Please continue.

20 BY MS. HAMILL:

21 **Q. Thank you. I am marking as Exhibit 3 the**  
22 **County of Los Angeles Department of Public Health**  
23 **Organization Chart that was produced by respondents**  
24 **and defendants this morning.**

25 MS. HAMILL: Thank you.

1 Q. Does Brett?

2 A. You'd have to ask Brett.

3 MS. HAMILL: Do we know if --

4 MR. RAYGOR: Is this Exhibit 3, by the way?

5 MS. HAMILL: Do we know if Ms. Burwick is  
6 authorized yet?

7 MR. RAYGOR: I have been overruled,  
8 unfortunately. So I -- it's out of my hands.

9 MS. HAMILL: You've been overruled?

10 MR. RAYGOR: Yes, based on her conduct in the  
11 lobby, as reported by security, and on her Twitter  
12 -- stuff that's going on now, security has  
13 determined not a good liability risk.

14 MS. HAMILL: Can you explain exactly what  
15 you're talking about so that I have that for the  
16 record.

17 MR. RAYGOR: No, I can't.

18 MS. HAMILL: So you're excluding my client, but  
19 you're not explaining to me why?

20 MR. RAYGOR: I just explained, it's out of my  
21 hands.

22 MS. HAMILL: Well, I need to understand what  
23 the reasons are, because we are seeking sanctions  
24 against you.

25 MR. RAYGOR: Okay, got it. I understand.

1 MS. HAMILL: Can you provide me with whatever  
2 it is you're talking about?

3 MR. RAYGOR: Not during the deposition. Let's  
4 finish with Dr. Ferrer.

5 MS. HAMILL: Okay. I am texting her to tell  
6 her to leave now. And me doing that means I'm  
7 bringing a sanctions motion against you. Okay?

8 BY MS. HAMILL:

9 **Q. Outside of public meetings, how do you**  
10 **communicate with the Board of Supervisors?**

11 A. There's e-mails, there's phone calls that you  
12 might have. We attend a lot of events, and there  
13 may be Board of Supervisors that are at the events  
14 or sponsoring the events.

15 In terms of formal communications, we go  
16 through the Board and the Board office. There's an  
17 executive office of the Board.

18 **Q. So you communicate through the executive office**  
19 **to get to the Board --**

20 A. Or we send an e-mail to all of the members of  
21 the Board. Or we communicate with their staff.

22 MS. HAMILL: And, for the record, Ms. Burwick  
23 is disputing what you just told me. And so I'm  
24 assuming you're going to provide me with evidence  
25 that you are justifying your exclusion of my client

# EXHIBIT G

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**Print Exhibits - Ferrer Deposition**

1 message

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**Julie Hamill** <julie@juliehamill-law.com>  
To: Kent Raygor <KRaygor@sheppardmullin.com>

Wed, May 3, 2023 at 1:09 PM

Kent,

I would like to review some of the documents produced with Ms. Ferrer. Can you please print the contents of the thumb drive you provided? If not, I will still question her on these documents but it would be better for her to have a copy in front of her.

My client is still in the lobby. I intend to seek sanctions against you for wrongfully excluding my client from the deposition. You may exclude members of the public, but not a party, per CCP 2025.420(b)(12). If you allow her up now, I will not seek sanctions.

Best regards,

Julie Hamill  
Hamill Law & Consulting  
[julie@juliehamill-law.com](mailto:julie@juliehamill-law.com)  
(424) 265-0529  
[www.juliehamill-law.com](http://www.juliehamill-law.com)

The information contained in this e-mail and any attachments to it may be legally privileged and include confidential information. If you have received this e-mail in error, please notify the sender immediately of that fact by return e-mail and permanently delete the e-mail and any attachments. Thank you.



# EXHIBIT H

**Re: Ms. Burwick**

1 message

**Julie Hamill** <julie@juliehamill-law.com>

Wed, May 3, 2023 at 1:17 PM

To: Kent Raygor &lt;KRaygor@sheppardmullin.com&gt;

Cc: Valerie Alter &lt;VAlter@sheppardmullin.com&gt;, Zachary Golda &lt;zgolda@sheppardmullin.com&gt;

No - I will not sign any documents or be coerced to providing you into something to which you are not entitled. We will seek sanctions for your conduct today. Thanks.

Sent from my iPhone

On May 3, 2023, at 1:13 PM, Kent Raygor <KRaygor@sheppardmullin.com> wrote:

During a break just after the commencement of today's deposition, you and I discussed a basis for having Ms. Burwick attend the deposition as a representative of Plaintiff Alliance. I stated I would agree to that on the following terms:

1. You will identify all members of Plaintiff Alliance, including Ms. Burwick if she is a member. (I stated you and I could discuss a stipulated protective order if you had concerns about the disclosure of personal information like home addresses, phone numbers, and e-mails.)
2. You will provide a verification that confirms the identification of Plaintiff Alliance's members and that fixes the defects in the present verifications provided by Margaret Orenstein.
3. With that, Ms. Burwick could attend.

You then orally accepted those terms.

I then asked Mr. Birnie to step outside to discuss the offer and acceptance, and I went to write this e-mail that would simply ask you to confirm our agreement. I started writing this e-mail and Mr. Birnie told me you had reneged on our agreement.

I now reiterate the foregoing terms. If you want to reconsider and accept those terms, Ms. Burwick can join us in the deposition.

**Kent Raygor**

+1 310-228-3730 | direct

[KRaygor@sheppardmullin.com](mailto:KRaygor@sheppardmullin.com) | [Bio](#)**SheppardMullin**

1901 Avenue of the Stars, Suite 1600

Los Angeles, CA 90067-6017

+1 310-228-3700 | main

[www.sheppardmullin.com](http://www.sheppardmullin.com) | [LinkedIn](#) | [Twitter](#)

**Attention:** This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any

attachments.

# EXHIBIT I

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**Morrow off calendar**

1 message

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**Julie Hamill** <julie@juliehamill-law.com>

Wed, May 3, 2023 at 5:05 PM

To: Kent Raygor &lt;KRaygor@sheppardmullin.com&gt;, Valerie Alter &lt;VAlter@sheppardmullin.com&gt;, Zachary Golda &lt;zgolda@sheppardmullin.com&gt;

Kent,

Due to your conduct today, we're taking the deposition of Brett Morrow off calendar until we get a ruling from Judge Fahey. Any future depositions will be held in a space where you cannot use building security to wrongfully exclude my client from attending.

I've never seen anyone behave the way you did today. I am shocked.

Best regards,  
Julie Hamill

Sent from my iPhone



## Make a Reservation

ALLIANCE OF LOS ANGELES COUNTY PARENTS, AN UNINCORPORATED ASSOCIATION vs COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH, et al.

Case Number: 22STCP02772 Case Type: Civil Unlimited Category: Writ - Administrative Mandamus  
Date Filed: 2022-07-26 Location: Stanley Mosk Courthouse - Department 69

### Reservation

Case Name: ALLIANCE OF LOS ANGELES COUNTY PARENTS, AN UNINCORPORATED ASSOCIATION vs COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH, et al.	Case Number: 22STCP02772
Type: Motion for Sanctions	Status: RESERVED
Filing Party: Alliance of Los Angeles County Parents, an unincorporated association (Petitioner)	Location: Stanley Mosk Courthouse - Department 69
Date/Time: 06/26/2023 9:30 AM	Number of Motions: 1
Reservation ID: 663120536233	Confirmation Code: CR-TFAMJKZ4R5AWAMUZF

### Fees

Description	Fee	Qty	Amount
Motion for Sanctions	60.00	1	60.00
Credit Card Percentage Fee (2.75%)	1.65	1	1.65
<b>TOTAL</b>			<b>\$61.65</b>

### Payment

Amount: \$61.65	Type: Visa
Account Number: XXXX3180	Authorization: 02792C
Payment Date: 1969-12-31	

[Print Receipt](#)

[Reserve Another Hearing](#)

[Chat](#)



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**PROOF OF SERVICE**

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 May 26, 2023 I served the foregoing document: **ALLIANCE OF LOS ANGELES COUNTY PARENTS’ NOTICE OF MOTION AND MOTION FOR MONETARY SANCTIONS AND CONTEMPT AGAINST KENT RAYGOR; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF; DECLARATIONS OF SARAH BETH BURWICK AND JULIE A. HAMILL** 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 May 26, 2023 at Rancho Palos Verdes, California.

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