



LA Public Health

Roxanne Hoge @Ro... 8/6/22

This is the most grotesque form of social coercion I've ever seen. @lapublichealth is preying on young people's desire (shared by most humans) to be connected.



Getting vaccinated should be a medical decision.

These girls were bullied. twitter.com/lapublichealth...

Show this thread

Hi. Please explain how encouraging peer pressure and using social reasoning to make personal medical decisions is helpful and safe. Seems like you're using taxpayer dollars to encourage bullying.

1:33 PM

Roxanne Hoge @Ro... 8/5/

I'd like to respond to this tweet



Start a message





LA Public Health

1:33 PM

Roxanne Hoge @Ro... 8/5/22

I'd like to respond to this tweet from @lapublichealth urging residents to be fully vaccinated to increase protection.



What would I say? I'd mention Barbara Ferrer's admission that "vaccines don't work so great."

I can't. Why? @kathrynbarerger @HildaSolis @JaniceHahn

@ALT_lacph twitter.com/lapublichealth...

Show this thread

1:46 PM

August 9, 2022

Roxanne Hoge @Ro... 8/9/22

This is back-door to forced indoor masking of our kids. Why are you allowing @lapublichealth



Start a message



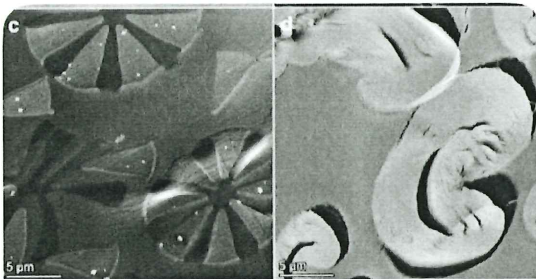


LA Public Health

Dr. Gina @RealDr... 8/30/22

SHOCKING: As we predicted...
All masks tested positive for
Titanium Dioxide (TiO₂), a group
2B carcinogenic. The best
(lowest contamination) has more
than 5x the acceptable limit.

Ohh and by the way, you are
forcing your kid to breathing
through it.



nature.com
Titanium dioxide particles
frequently present in face m...

Also what is the official
response to this? [twitter.com/
realdrgina/sta...](https://twitter.com/realdrgina/status/1571111111)



Start a message





LA Public Health

October 7, 2022



Why no twets? 10/6/22

So Babs @lapublichealth says she can't get the new booster yet She didn't say why but I see 3 reasons

1. She had Covid less than 2 months ago
 2. She had a booster less than 2 months ago
 3. She had a reaction to the shots previously
- As our PH director we have the right to know

Show this thread

Hello. I am concerned that Ms Ferrer says she's unable to get boosted. Could you please tell us why?

9:

October 10, 2022



Start a message



Los Angeles County Department of Public Health's Post X



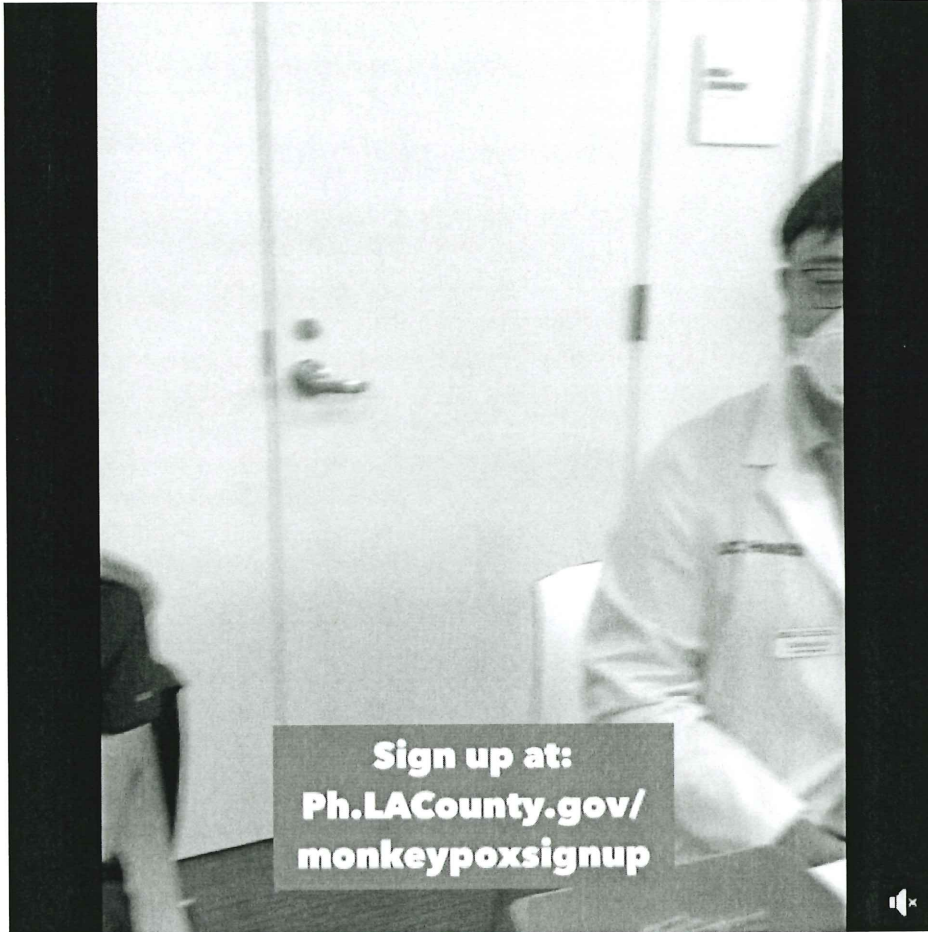
Los Angeles County Department of Public Health

August 23, 2022 ·

Monkeypox vaccine eligibility has been expanded in LA County.

If you meet the criteria, you can get vaccinated at any Public Health vaccination pod, or other monkeypox vaccination sites in LA County.

Limited spots are available! Sign up at ph.lacounty.gov/monkeypoxsignup



LACPUBLICHEALTH.SJC1.QUALTRICS.COM
MONKEYPOX VACCINE SIGN-UP FORM

Learn more

121

41 comments 50 shares

Like

Comment

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Most relevant



Renee A. Lemán



Like Reply 44w

2 Replies



Lisa Winckler



Like Reply 43w

7

COMP.EXH.110

EXHIBIT 21
Brett Morrow
7/7/2023
Heather J. Bautista
CSR 11600, RPR, CRR

Los Angeles County Department of Public Health's Post X

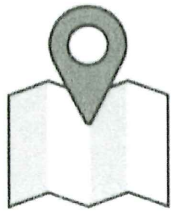


Los Angeles County Department of Public Health

August 30, 2022 · 🌐

Registration is no longer required to get vaccinated at public health monkeypox vaccination pods. If you are eligible, you may walk-up to any site to get vaccinated.

For more information, visit ph.lacounty.gov/monkeypox



No appointment needed at Public Health Monkeypox Vaccine PODs

Balboa Sports Complex

17015 Burbank Blvd Encino, CA 91316
11:00 AM - 6:00 PM
Wednesday - Sunday

Ted Watkins Memorial Park

1335 E 103rd St Los Angeles, CA 90002
11:00 AM - 6:00 PM
Wednesday - Sunday

Market Street Center

22900 Market St. Santa Clarita, CA 91321
12:00 PM - 7:00 PM
Wednesday - Sunday

Obregon Park

4021 E. 1st St. Los Angeles, CA 90063
11:00 AM - 6:00 PM
Wednesday - Sunday

If you are eligible, you may walk up to any Public Health pod to get vaccinated.



PUBLICHEALTH.LACOUNTY.GOV

Monkeypox | LA County Department of Public Health

[Learn more](#)

County of Los Angeles Department of Public Health Communications & Pub...

👍👎🗨️ 157

17 comments 72 shares

👍 Like

🗨️ Comment

➦ Share

Most relevant ▾



Christophe Touchard · Follow
too late ! Got my 2 shots in Studio city

Like Reply 42w



Mark Taraborelli
Derek

Like Reply 42w



Rebecca Nayery
5631

Like Reply 42w



Nette Slaby
What a load of c r a p! 9.4.22

COMP.EXH.111

EXHIBIT 22

Brett Morrow

7/7/2023

Heather J. Bautista
CSR 11600, RPR, CRR

Los Angeles County Department of Public Health's Post X



Los Angeles County Department of Public Health

September 1, 2022

Celebrate safely this Labor Day weekend. Get free services like vaccination, testing, and treatment at hundreds of sites in LA County. Visit [VaccinateLACounty.com](https://www.vaccinatelacounty.com) to find a location near you.

Celebra de forma segura este fin de semana del Día del Trabajo. Obtén servicios gratuitos como la vacunación, pruebas y tratamiento en cientos de lugares en el condado de LA. Visita [VacunateLosAngeles.com](https://www.vacunatelosangeles.com) para encontrar una ubicación cerca suyo.

See Translation

40

13 comments 7 shares

Like

Comment

Share

Most relevant



Monica R

No one needs to test anymore unless they are showing symptoms. No one needs to mask unless they are sick and if they have certain underlying conditions, one way masking does work. Now should no different than before that basketball player started the paranoia March 2020.

Like Reply 42w

Los Angeles County Department of Public Health's Post X



Los Angeles County Department of Public Health

October 10, 2022

Children who have already had COVID-19 should still get vaccinated to strengthen their immune systems. The COVID-19 vaccines have undergone - and will continue to undergo - the most intensive safety monitoring in U.S. history.

Children who are up to date on vaccines, including booster doses when eligible are likely to have stronger protection against COVID-19.

Source: LA County Department of Public Health #ShareTheFacts #VaccinateNow... See more

See Translation



421

129 comments 53 shares

Like

Comment

Share

Most relevant



Joshua Colón

At this point, they just don't care about losing credibility.

Like Reply 36w

19

1 Reply

Los Angeles County Department of Public Health's Post



Los Angeles County Department of Public Health

October 13, 2022

Did you hear? Updated "bivalent" boosters have been approved for children 5-11 years old!

Now everyone 5+ is eligible for a dose 2 months after any previous booster or primary vaccination.

Updated boosters for children 5-11 will be available in LA County next week.



Los Angeles County Department of Public Health

The mission of the Los Angeles County Department of Public Health is to prote...

Call now

175

93 comments 4 shares

Like

Comment

Share

Most relevant



Joann Hill

Yes I already had both of my booster and my 4th Pfizer and flu shot I'm good I haven't gotten COVID -19 I advise everyone to get their shots COVID is no gone



Like Reply 36w

4 Replies



Rebecca Bennett Duke

Wow! This is very exciting news.

Like Reply 36w 12

Los Angeles County Department of Public Health's Post X



Los Angeles County Department of Public Health

October 14, 2022

"We vaccinated our child to keep our community safe." -Alejandra and Joaquin.

In Joaquin's vaccination story, Alejandra made the decision to vaccinate him so that they can not only protect him but the elders, friends, and educators that he interacts with. Childhood Vaccines and Boosters Now Available. #ImVaccinatedBecause #VaccinateNow

Image Description: Alejandra, a Latinx woman with dark brown hair, is wearing an orange short sleeve shirt and necklace. She is hugging Jo... See more

See Translation

WE VACCINATED OUR CHILD...
**TO KEEP OUR
COMMUNITY
SAFE**

-Alejandra
& Joaquin



Մենք դասպատեցինք եւր
Մեր երեխանին...
**ՀԱՄԱՅՆՔԸ
ԱՊԱՀՈՎ
ԴԱՅԵԼՈՒ
ՀԱՄԱՐ**

-Ալեհանդրա
և Դոակին



26

3 comments 5 shares

Like

Comment

Share

Most relevant



Renee A. Lemán
Pandering. Wow.

Like Reply 34w



Wayne Thomas
This post contains false information

Like Reply 33w



Pearl Lo
<https://openvaers.com/covid-data>



OPENVAERS.COM
Home - OpenVAERS

Like Reply 35w

Los Angeles County Department of Public Health's Post X



Los Angeles County Department of Public Health

October 19, 2022 · 🌐

"We vaccinated our children to keep them safe." -Christy and Yuna.

Christy decided to vaccinate her children because she trusted the science and knew that vaccinations have been around for a long time. Childhood Vaccines and Boosters Now Available. #ImVaccinatedBecause #VaccinateNow

Image Description: Christy, a Latinx/AAPI woman with dark brown curly hair, is wearing a brown button-down shirt with gold hoop earrings. She is carrying Yuna, a young Latinx/AAPI/Black girl with dark brown curly hair, who is wearing a black dress.

"우리는 아이들을 안전하게 보호하기 위해 백신 접종시켰습니다." -Christy와 Yuna.

Christy는 과학을 믿고 있고 백신이 오랫동안 사용되어 왔음을 알고 있기 때문에 아이들을 백신 접종시키기로 결정했습니다. #ImVaccinatedBecause #VaccinateNow

이미지 설명: 짙은 갈색의 곱슬머리 라틴계/아시아-태평양계 여성인 Christy는 골드 후프 귀걸이와 브라운 버튼다운 셔츠를 착용하고 있습니다. Christy는 검은색 원피스를 착용한 갈색 곱슬머리 라틴계/아시아 태평양계/흑인 소녀인 Yuna를 들고 있습니다.

See Translation

WE VACCINATED OUR CHILDREN...
TO KEEP THEM SAFE

-Christy & Yuna



우리 아이들의 안전을 지키기 위해

아이들은 백신접종을 마쳤습니다

- 크리스티와 유나



👍❤️👍 43

2 comments 5 shares

👍 Like

💬 Comment

➦ Share

Most relevant ▾



Wayne Thomas

Who would use the term Latinx? People who aren't proud of their heritage I suppose. You know, the one that includes their use of the language Spanish, which has female and male gendered words. Oh yeah, there aren't any other genders, so you go an invent a term that everyone rejects. How cringy!

Like Reply 33w



Ramon SJ

<https://www.theepochtimes.com/fauci-couldnt-name-any...>



THE EPOCH TIMES.COM

Fauci Couldn't Name Any Studies Showing Masks Work Against COVID-19: Lawyers

Like Reply 29w



EXHIBIT 27

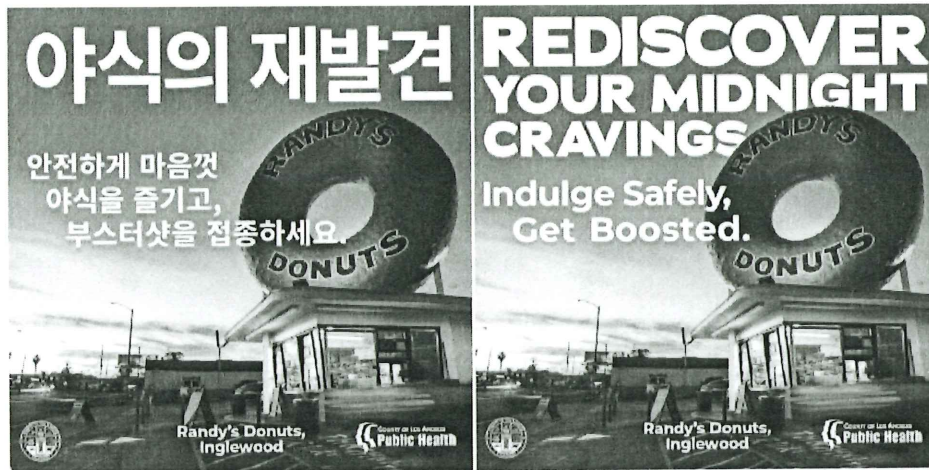
Brett Morrow

7/7/2023

Heather J. Bautista
CSR 11600, RPR, CRR

Los Angeles County Department of Public Health's Post X

See Translation



127

24 comments 10 shares

Like

Comment

Share

Most relevant



Thomas A. Fitzgerald

Get vaccinated. For yourself, your family, friends, community and loved ones. Together we can eradicate COVID19. ❤️

Like Reply 34w

3



David Duong

Thomas A. Fitzgerald If you want 10 booster shot to your family, by all mean. Dont mandate other people. This is when people actually not believing in it.

Like Reply 34w



Thomas A. Fitzgerald

Michael Richardactually, empirical reasoning is quite the opposite.

Like Reply 34w

Los Angeles County Department of Public Health's Post



Los Angeles County Department of Public Health

October 28, 2022

"He's vaccinated because his health is important." -Erik and Benny.

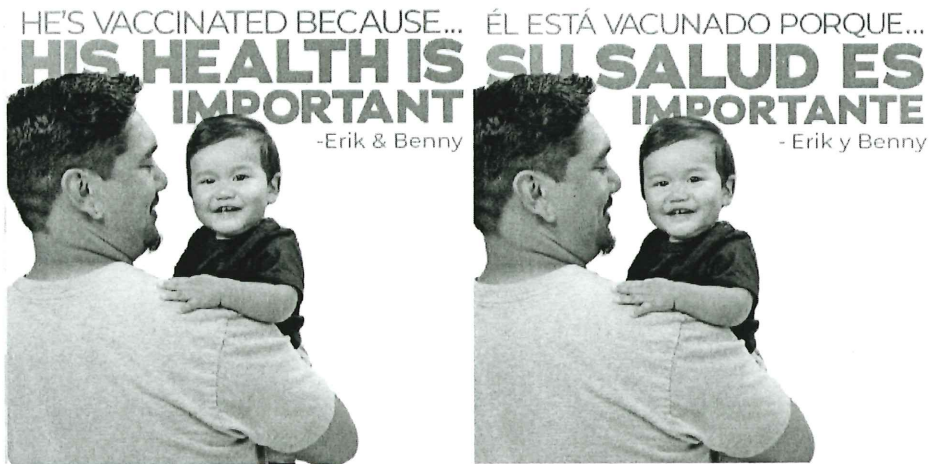
Erik felt like it was important for him to be vaccinated so he knew that Benny could play safely around his cousins and friends. Childhood Vaccines and Boosters Now Available.

#ImVaccinatedBecause #VaccinateNow

Image Description: Erik, a Latinx/AAPI man with short dark brown hair and facial hair, is wearing a gray short sleeve shirt. He is carrying Benny, a young Latinx/AAPI boy with short dark brown hair...

See more

See Translation



151

8 comments 2 shares

Like

Comment

Share

Most relevant



Sonny AT

How do you know they are LatinX? Only 2-3% identify with this word . Stop referring to the whole Latino community as Latinx.

Like Reply 34w

4



Hezekiah Duckworth

Enough with the Covid propaganda!!!

Like Reply 34w

9



Jimmy Hobbs

When you give your dog 3 rabies vaccines and he still gets rabies

Like Reply 33w



Ramon SJ

<https://www.theepochtimes.com/fauci-couldnt-name-any...>



THEEPOCHTIMES.COM

Fauci Couldn't Name Any Studies Showing Masks Work Against COVID-19: Lawyers

Like Reply 29w



Healthy People in Healthy Communities



Los Angeles County Department of Public Health

112K followers · 19 following

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Do you recommend Los Angeles County Department of Public Health?

Yes

No

Rating · 4.1 (172 Reviews)



Charles Byrd recommends Los Angeles County Department of Public Health.

June 20 at 3:56 PM

I can invest my last dollar with only one person and that's Mr DONALD BRYAN who prove to be the most honest and trustworthy Expert trader.

he has been helping me with my trading for long now and my experience has been so amazing earning \$14,000 every two weeks from my little start up capital of \$600

If you need my kind of result then Message Mr.Bryan now on his social business accounts below to get the full investment guidance you need to get started

TE... See more



COMP.EXH.119

EXHIBIT 30
Brett Morrow
7/7/2023
Heather J. Baunsta
CSR 11600, RPR, CRR



Tiffany Irving recommends Los Angeles County Department of Public Health.

May 4 · 🌐

Unbelievable HSV 1&2 is curable with natural herbs, its Very informative page for every person who want to get cured, Doctor Balogun has be found the real & legit herbal Doctor he cured my HSV. All given information are highly recommended to everyone who need cure WhatsApp or call 📞 +2349064881054

<https://www.facebook.com/Dr-Balogun-solution-center-100903865783754/>

👍 Like

💬 Comment

➦ Share



Lebogang Sizwe Gwaai recommends Los Angeles County Department of Public Health.

June 11 at 1:36 PM · 🌐

I have be dealing with herpes for the past 5 years until i got review online about Dr Oliha people testifies how they got cured with his herbal medicine. And i order the treatment, after taking it for 14days i totally got cured with Dr Oliha natural treatment. I'm recommending you diagnosis with herpes should get this treatment and be cured of it you can contact his email via; (oliha.miraclemedicine@gmail.com) you can also call or whatsapp +2349038382931 <https://www.face...> See more

👍 Like

💬 Comment

➦ Share



Salvador Fraias recommends Los Angeles County Department of Public Health.

April 8 · 🌐

It being 2 weeks my Wife got cured. From Herpes all to a Herbal Dr Agbomian, He send me a medication With the help of DHL delivery services. He is a reliable source you can contact He <https://m.facebook.com/DrAgbomianHerbalMedicine/>

👍 Like

💬 Comment

➦ Share



EXHIBIT 13

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 | 866.999.8310

COMP.EXH.122

1 provide any documents reflecting those threats
2 today?

3 MR. RAYGOR: I don't know. I gave you the
4 archive. We produced the entire archive.

5 MS. HAMILL: Do you know how many gigabytes
6 were produced?

7 MR. RAYGOR: I do not.

8 MS. HAMILL: Okay.

9 BY MS. HAMILL:

10 Q. Okay. We asked for the org chart. I assume
11 that it's in these documents that I will review on
12 our break.

13 Number 18 on Page 18, "Any and all documents
14 reflecting the Department of Public Health's
15 decision to disable public comments on its social
16 media posts on or about August 4th, 2022."

17 Were you involved in that decision?

18 A. The communications office made that decision
19 and then informed me of it to see if I had any
20 objections.

21 Q. Did you have any objections?

22 A. I did not.

23 Q. Did you have any concerns?

24 A. We discussed making sure that at the town
25 halls, people would be able to ask us questions.

1 Q. And how do those town halls work?

2 A. I can't talk about how the platform works. I
3 can talk about how we organize the town hall. We
4 have various presenters that talk for a couple of
5 minutes each on the topic for that town hall. They
6 range -- they're generally clinicians and public
7 health practitioners. I usually am moderating. And
8 then after those short presentations, we open for
9 questions from the general public, and try to get to
10 as many of the questions as possible related to the
11 topic that's being discussed.

12 Q. And how are those questions moderated?

13 A. I would not know the answer to that.

14 Q. Are you the person who gets to ask the
15 questions of the panelists?

16 A. I'm given a list of questions that come --
17 because I think there's a variety of ways that
18 people can ask us questions. And so I will be given
19 a list of those questions as they're coming in. And
20 then I will go ahead and ask as many of those
21 questions as I can.

22 Q. But you don't always ask all of the questions

23 --

24 A. We never have time to ask all of the questions.

25 Q. Are you aware of whether or not all members of

1 the public participating in the town hall can see
2 the questions being asked?

3 A. I have no idea how the technology works.

4 Q. And do you select the clinicians and the public
5 health practitioners who speak on these panels?

6 A. I will do that with my team, you know. We
7 really are really responding, often, to questions
8 that are being asked of us. So if there's a new
9 guidance on vaccinations, for example, we'll do town
10 hall on vaccinations. And then we'll have our
11 experts on vaccinations present the information.

12 Q. Would you ever invite a clinician or public
13 health practitioner who has views that are divergent
14 from yours on best practices with respect to COVID?

15 A. All of the -- as far as I recall, all of the
16 presenters at our town halls are people who work at
17 the Department of Public Health.

18 Q. Okay.

19 MS. HAMILL: Is this clear for your transcript?

20 THE COURT REPORTER: Yeah, only because I'm
21 hooked up to his audio. Otherwise, I wouldn't be
22 able to do it.

23 BY MS. HAMILL:

24 Q. No. 19, "Any and all documents reflecting an
25 archive of Department of Public Health's data from

1 information is misinformation or not?

2 A. We have a team of epidemiologists, clinicians,
3 public health practitioners who work hard to
4 determine what is accurate information. So I would
5 say when the information is not aligned with what
6 we've determined is accurate information, for us,
7 that would represent misinformation.

8 You asked a hard question, because there are
9 lots of different ways people can think about
10 misinformation.

11 Q. And so if I'm understanding correctly,
12 information that's not aligned with what the
13 Department of Public Health has put out would
14 constitute misinformation?

15 MR. RAYGOR: Objection, the witness provided
16 her testimony.

17 THE WITNESS: I don't think that's what I said.
18 It's not necessarily information that we've put out.
19 It's information that we have determined is
20 credible, and accurate, and based in science.

21 Sometimes there could be misinformation circulating
22 about a topic we have yet to present information on.

23 BY MS. HAMILL:

24 Q. And so how do you determine whether something
25 is credible, and accurate, and based in science?

1 this study in the conflict of interest in the
2 comments section of the Department of Public
3 Health's Twitter account?

4 MR. RAYGOR: Lacks foundation.

5 THE WITNESS: I mean, the answer is no.

6 BY MS. HAMILL:

7 Q. I'm going to have marked as Exhibit 8 a Twitter
8 thread from July 20th, 2020.

9 MR. RAYGOR: What was the date?

10 MS. HAMILL: July 20th, 2022. Sorry.

11 (Exhibit 8 marked.)

12 BY MS. HAMILL:

13 Q. Have you seen this before?

14 A. No, I have not.

15 Q. So this begins -- this is a Twitter thread that
16 starts with a tweet from the Department of Public
17 Health on July 20th, 2022 that provides the COVID-19
18 daily update. And there are a series of responses
19 in the comments below. The first is a quote tweet
20 of Bill Melugin from Fox LA, saying, "A study cited
21 by the CDC that found that COVID mitigation efforts
22 like masks mandates in schools were effective was
23 authored by LA County bureaucrats including the
24 daughter of Barbara Ferrer. The conflict of
25 interest was never disclosed. @jenvanlaar reports."

1 And then below that, there are a couple of more
2 photos and references to a purported conflict of
3 interest and nepotism.

4 But this had nothing to do with the
5 department's decision to turn off public comments?

6 A. Absolutely not. I mean -- first of all, I
7 never saw it.

8 Second of all, as you're well aware, there were
9 lots of other places where people were bringing up
10 the same issue, and complaining. And the conflict
11 of interest, there can be no conflict of interest
12 between two parties that are working on either a
13 study or an article together. A conflict of
14 interest, in our world, is a third party that's
15 interfering. So there's no third party here. A lot
16 of the information in this study is from people who
17 work for me at the Department of Public Health. So
18 it's just -- I mean, I think we answered this
19 question over and over again. We understand that
20 some people look at this and see it differently but
21 there -- there really is no conflict of interest
22 when two organizations are partnering together, in
23 terms of those disclosures. That's not what's
24 expected on the disclosures. And as you are well
25 aware, people, for three years, have posted

1 everywhere, on their own accounts, on other people's
2 accounts. You know, their disagreements or their
3 worries about me or some actions I've taken. And,
4 you know, that -- there will be no reason to close
5 this down for that. I mean -- and I've really --
6 I've never seen this until you're just showing it to
7 me. And it's never come up in any of the
8 discussions.

9 **Q. So you've never heard about the comments**
10 **regarding potential conflicts of interest --**

11 A. Not on -- not that were posted on social media.

12 **Q. Where did you hear about it?**

13 A. Well, I think -- I think television. I think
14 Fox, in particular, did a lot of TV and asked direct
15 questions about this. So I was well aware, and have
16 indicated that I'm well aware that there were issues
17 being raised. But I'm not aware, and have never
18 seen the posts that you just showed me, that showed
19 up on our social media. And I didn't really know
20 about this. And I think in some ways, it doesn't
21 change anything. I mean, there are lots of other
22 places where people were expressing their concerns.
23 And I was very aware of them. But not that it was
24 showing up on our sites.

25 **Q. Can you provide an example of the "other**

1 differences between incidental COVID
2 hospitalizations and hospitalizations for people
3 with COVID disease -- related disease. It's not on
4 this, but we have it, and we've shared it a lot.

5 **Q. So Doctors Spellberg and Holtom of LA County**
6 **USC are part of health services; is that correct?**

7 A. They are.

8 **Q. Okay. And I think you told me earlier that**
9 **with respect to an organization chart, you are**
10 **equals with the director of health services?**

11 A. That's right.

12 **Q. Okay. And so Dr. Spellberg and Dr. Holtom do**
13 **not report to you?**

14 A. They do not.

15 **Q. They report to --**

16 A. I don't know who they report to so I'm not
17 going to comment.

18 **Q. Okay.**

19 A. I mean, I know who the director is of the
20 Department of Health Services, but I don't know who
21 they directly report to.

22 **Q. Who's the director again?**

23 A. Dr. Christina Galli.

24 **Q. And I'm going to hand a two-page document to**
25 **mark as Exhibit 10.**

Barbara Ferrer, Ph.D.

1 admitted due to COVID. Virtually none of them go to
2 the ICU. And when they do go to the ICU, it is not
3 for pneumonia. They are not intubated... we have
4 not seen one of those since February."

5 Do you recall -- I know that you haven't seen
6 this, because you don't go on Twitter -- but do you
7 recall your office issuing the statement on Page 1,
8 on July 15th, that we are entering high community
9 level?

10 A. Yeah, I don't recall, but I think it happened.

11 Q. And do you remember hearing that the LA County
12 USC doctors were saying only 10 percent of COVID
13 positive admissions were admitted due to COVID?

14 A. No, I don't.

15 Q. Is it concerning to you to see that as a
16 comment on the department's social media?

17 A. I -- I don't know what -- what you're asking
18 me. This is a comment on our -- these are people
19 posting on our account?

20 Q. Yes.

21 A. I think this is part of what was happening with
22 the account. But, no, does this particularly
23 concern me? It concerns me only in that the message
24 we're trying to give out is this message. And now
25 people are paying a lot of attention to this

1 message. We're trying to tell people there's a lot
2 more transmission. The truth of the matter is,
3 there was a lot more transmission. I mean, the way
4 you measure transmission is an agreed-upon measure.
5 Again, similar to deaths. And so when the community
6 level went high, as defined by the CDC, it does mean
7 that it is real; that more people can get infected.

8 So this is the message I want people to get.
9 And what's upsetting is not the content of this
10 message, but that it's different from this. And on
11 our site, all I want people to see is this.

12 MR. RAYGOR: So the very first use of "this
13 message," the third use of "this message," the fifth
14 and the sixth use of "this message," were referring
15 to the first page of Exhibit 10. And then the
16 intervening uses of "this message," were referring
17 to the second page of Exhibit 10.

18 THE WITNESS: Thank you, sorry about that.

19 MR. RAYGOR: It's okay.

20 BY MS. HAMILL:

21 Q. The video can help with that, as well.

22 I'm handing over a two-page document that I'd
23 like to have marked as Exhibit 11.

24 (Exhibit 11 marked.)

25 ///

Message

From: Tellez, Marla [Marla.Tellez@FOX.COM]
Sent: 8/5/2022 3:07:34 AM
To: Brett Morrow [BMorrow@ph.lacounty.gov]; Ford, Elizabeth [Elizabeth.Ford@FOX.COM]; DPH-Media [media@ph.lacounty.gov]
Subject: Re: Request for statement

CAUTION: External Email. Proceed Responsibly.

Thank you!

Get [Outlook for iOS](#)

From: Brett Morrow <BMorrow@ph.lacounty.gov>
Sent: Thursday, August 4, 2022 5:48:44 PM
To: Ford, Elizabeth <Elizabeth.Ford@FOX.COM>; DPH-Media <media@ph.lacounty.gov>
Cc: Tellez, Marla <Marla.Tellez@FOX.COM>
Subject: Re: Request for statement

See below from Public Health.

-
Public Health has zero tolerance for threats, bullying, or harassment on any of our platforms and made the decision to disable social media comments after receiving concerns from numerous residents who were being targeted. Residents who wish to share their thoughts with Public Health on social media can still do so by sending direct messages to our accounts.

Brett Morrow

he/him/his

Chief Communications Officer
Los Angeles County Department of Public Health
213-288-8759 Office
323-715-7977 Mobile
bmorrow@ph.lacounty.gov

From: Ford, Elizabeth <Elizabeth.Ford@FOX.COM>
Sent: Thursday, August 4, 2022 4:36 PM
To: DPH-Media <media@ph.lacounty.gov>
Cc: Tellez, Marla <Marla.Tellez@FOX.COM>
Subject: Request for statement

CAUTION: External Email. Proceed Responsibly.

Hi LA County Public Health media team.

Fox 11 viewers wondering why the comments have been turned off on the LA County Public Health social media accounts.

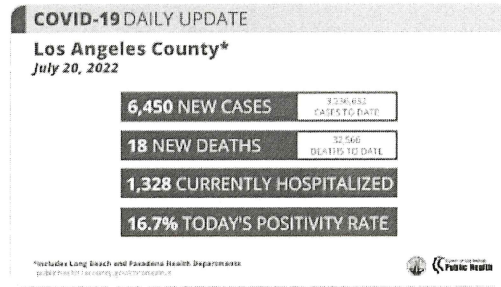
Can you please provide a statement on this?



COMP.EXH.133

LACDPH0000409

COVID-19 Daily Update: July 20, 2022
New Cases: 6,450 (3,236,632 to date)
New Deaths: 18 (32,566 to date)
Current Hospitalizations: 1,328
Today's Positivity Rate: 16.7%



6:00 PM · Jul 20, 2022

35 Retweets 6 Quotes 80 Likes 4 Bookmarks



Public Unhealthy Director™ @FedUpCitizenLA · Jul 20, 2022
Replying to @lapublichealth

Bill Melugin @BillFOXLA · Jul 20, 2022

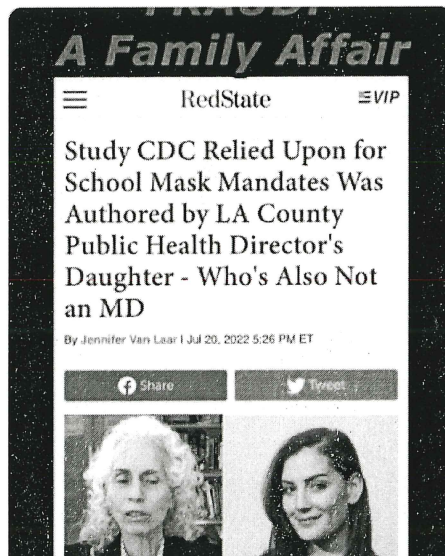
A study cited by the CDC that found COVID mitigation efforts like masks mandates in schools were effective was authored by L.A. County bureaucrats, including the daughter of Barbara Ferrer. The conflict of interest was never disclosed, @jenvanlaar reports. redstate.com/jenvanlaar/2022...



Public Unhealthy Director™ @FedUpCitizenLA · Jul 20, 2022
Replying to @lapublichealth
#FireFerrer



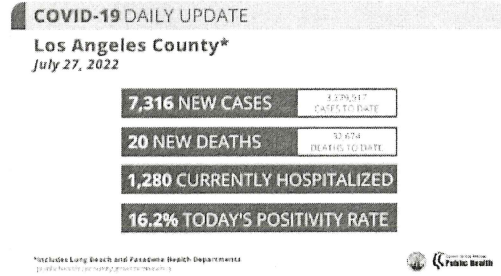
Public Unhealthy Director™ @FedUpCitizenLA · Jul 20, 2022
Replying to @lapublichealth
#FireFerrer



COMP.EXH.134



COVID-19 Daily Update:
July 27, 2022
New Cases: 7,316 (3,279,517 to date)
New Deaths: 20 (32,674 to date)
Current Hospitalizations: 1,280
Today's Positivity Rate: 16.2%



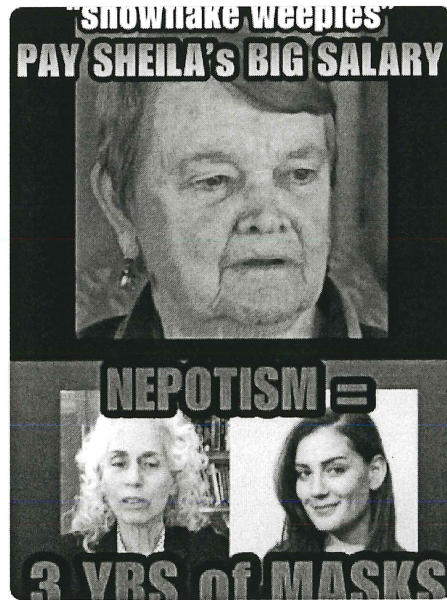
8:00 PM · Jul 27, 2022

36 Retweets 9 Quotes 85 Likes 4 Bookmarks



Public Unhealthy Director™ @FedUpCitizenLA · Jul 27, 2022
Replying to @lapublichealth

@LACountyBDS send @SheilaKuehl into early retirement and #FireFerrer @lapublichealth for countless scandals. We will not stop until they're GONE! No more masks! Ignore us and kiss your careers goodbye. We're angry, fed up & organized! We've had it! Enough!



Pavement @Pavement1999 · Jul 27, 2022
I encourage anyone who believes there is a Covid emergency in LA to watch today's LAC+USC press conference (read through this thread too).

Phil Kerpen @kerpen · Jul 27, 2022
Holtom: "Most people have a test positive only because we test every human being who is admitted to the hospital. There is no medical reason that one would have gotten a COVID test on the vast majority of these people..."
Show this thread





LA Public Health 
@lapublichealth

...

LA County enters High COVID-19 Community level & will require masking indoors if county remains high for two consecutive weeks (effective July 29). Wearing a high quality, well-fitted respirator helps limit the spread of the highly transmissible BA.5 variant.

LA County Enters High COVID-19 Community Level



If LA County remains in the High COVID-19 Community Level for two consecutive weeks, universal indoor masking will be implemented on **July 29** to help slow the rate of transmission & protect those most vulnerable.

ALT

For more information, visit ph.lacounty.gov/masks



COUNTY OF LOS ANGELES
Public Health

3:52 PM · Jul 15, 2022

COMP.EXH.136

EXHIBIT

10

Barbara Ferrer



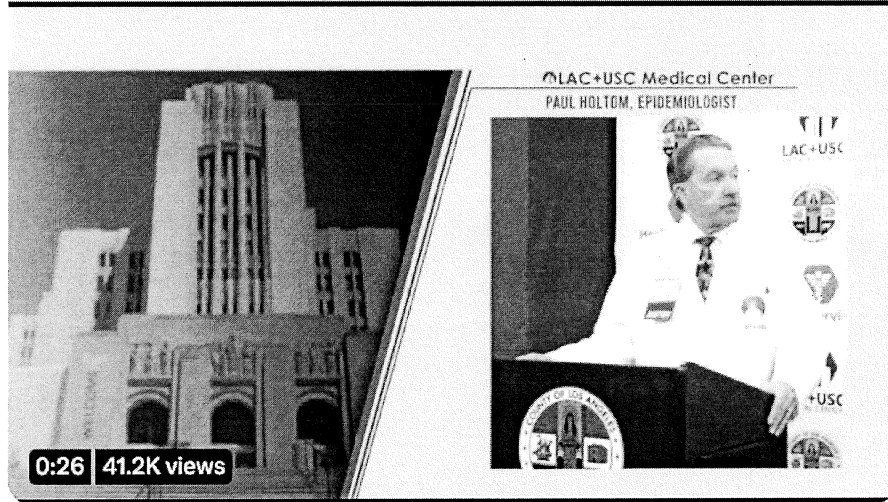
Nikki will not comply 🇺🇸 @goldenrose_79 · Jul 16, 2022

Why do real doctors have a very different perspective? Public Health Social Justice Warriors should be ignored. I prefer to listen to actual doctors.



Jen G @Jen_G123 · Jul 15, 2022

Show this thread



2



1



10



Storm @stormrobinson · Jul 16, 2022

Meanwhile, on Earth...



Phil Kerpen @kerpen · Jul 16, 2022

LAC+USC full July 14 vid:

"Only 10% of our COVID positive admissions are admitted due to COVID. Virtually none of them go to the ICU, and when they do go to the ICU it is not for pneumonia. They are not intubated... we have not seen one of those since February."

HT @Campbels12.

Show this thread



EXHIBIT 14



Get Ready for Summer Fun: These Safety Tips Will Help Reduce Disruptions to July 4th Celebrations, Other Activities. View: buff.ly/3Psa4C7

Disruptions to July 4th Celebrations, Other Activities

As this week marks the official start of summer, the Los Angeles County Department of Public Health (Public Health) wants to remind residents of several straightforward measures they can take to help prevent illness or injury from interrupting their July 4th celebrations and other activities.

Summertime offers opportunities to attend outdoor events and get-togethers with family and friends, that unfortunately can also result in sunburn, dehydration, food and mosquito-borne illness, firework injuries and increased COVID-19 transmission if precautions are not taken. To help safeguard this summer's fun in the sun, Public Health is offering safety tips to Los Angeles County residents.

While COVID-19 indicators remain low in Los Angeles County, risk remains, especially for people who are older or immunocompromised. To avoid inadvertently spreading COVID-19 to others, anyone with possible symptoms, such as a cough, runny nose, fever or headache, should stay home. For extra assurance, Public Health recommends testing for anyone who has symptoms, has been exposed to COVID-19 or if they are attending a gathering with someone at higher risk for severe illness from COVID. Free tests continue to be available across Los Angeles County. Err on the side of caution, especially with those who are more vulnerable, and take an opportunity to enjoy the many activities offered throughout the county during the summer months.⁴

The CDC has replaced COVID-19 Community Levels with Hospital Admission Levels, which can help individuals and communities decide which prevention actions they can take based on the most recent information. Los Angeles County is in the Low Hospital Admission Level with 2.7 weekly COVID-19 hospital admissions per 100,000 people, reported as of June 15, 2023.

Public Health reports COVID-19 data weekly. The following table shows case, wastewater, emergency department, hospitalization and death data in Los Angeles County over the past four weeks.

Metric	Date of Weekly Report			
	6/21/2023	6/14/2023	6/7/2023	5/31/2023
Weekly cases reported ^{1,2}	1,817	1,716	1,902	1,801
SARS-CoV-2 wastewater concentration as a percent of the Winter 2022-2023 peak concentration value ³	10%	17%	10%	11%

food thermometer can help make sure food is being stored at safe temperatures and ice and coolers should be available to store food at outdoor events.

Mosquitos are abundant in many parts of the county. Using effective insect repellent when outdoors and wearing protective clothing covering arms and legs can help prevent annoying bites and potential exposure to mosquito-borne illnesses including West Nile virus.

Many Fourth of July celebrations feature fireworks. Personal use of fireworks is illegal in Los Angeles County and children should not be allowed to handle or ignite fireworks. Never hold a lit firework and do not try to reignite a firework that does not go off or malfunctions. To safely enjoy a firework show, grab a blanket or chairs and enjoy one of the many public displays being held throughout Los Angeles County.

At any event or gathering, there is always the possibility of contracting COVID-19. If a person tests positive, it is important they inform others who have been exposed. Many people who test positive are eligible for COVID-19 treatment, which is widely available and must be started within five days of symptom onset. Health care providers can prescribe an oral therapeutic for COVID-19, which is shown to reduce the chance for severe illness and hospitalization, or free telehealth services are available through the Public Health Call Center, open seven days a week week ending each Sunday; hospitalizations = week ending each Saturday.
4) Data for past weeks is subject to change in future reports.

A wide range of data and dashboards on COVID-19 from the Los Angeles County Department of Public Health are available on the Public Health website at <http://www.publichealth.lacounty.gov/COVIDdata> including:

- [COVID-19 Locations & Demographics \(data by demographic characteristics and geography, active outbreaks, and citations\)](#)
- [COVID-19 Response Plan](#)
- [COVID-19 Vaccinations](#)
- [Skilled Nursing Facility Metrics](#)

Always check with trusted sources for the latest accurate information about novel coronavirus:

- Los Angeles County Department of Public Health: <http://publichealth.lacounty.gov/media/Coronavirus/>
- California Department of Public Health: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/immunization/nCoV2019.aspx>
- Centers for Disease Control and Prevention: <https://www.cdc.gov/coronavirus/2019-ncov/index.html>
- CDC Spanish: <https://espanol.cdc.gov/enes/coronavirus/2019-ncov/index.html>

4:26 PM · Jun 22, 2023 · 5,693 Views

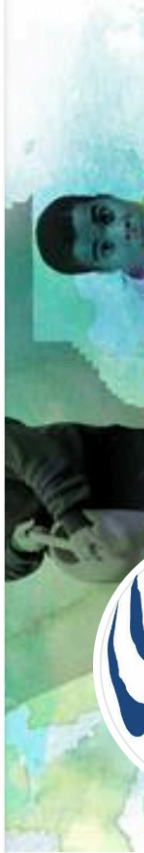
1 Repost 6 Likes



Who can reply?

People @lapublichealth mentioned can reply

EXHIBIT 15



Los Angeles County Department of Public Health

112K followers · 19 following

Contact us

Message

Follow

Posts

About

Mentions

Reviews

Reels

Photos

More



Do you recommend Los Angeles County Department of Public Health?

Yes

No

Rating · 4.2 (176 Reviews)



Maria Malema Health recommends Los Angeles County Department of Public Health

August 9 at 2:37 PM

For almost a year I had herpes and I was lonely and sad luckily I was directed to a very kind and Great Herbal Dr Oliha who helped me cure my herpes and now I'm very healthy thank you so much Dr Oliha . You can also be free of this virus too. Here's his contact details below WhatsApp; +2349038382931 and Email: oliha.miraclemedicine@gmail.com He has cure for other deadly diseases like Diabetes HIV/ Aids, Hepatitis of all types and cancer ... See more



Write a comment...



EXHIBIT 16

Re: Alliance of Los Angeles County Parents Subpoena to X Corp. - Meet and Confer

1 message

Julie Hamill <julie@juliehamill-law.com>

Tue, Aug 15, 2023 at 7:38 PM

To: "Hawk, J. Jonathan" <jhawk@whitecase.com>

Cc: "Kuethman, Kathryn" <kathryn.kuethman@whitecase.com>

Can you please be more specific? We're at the 11th hour now, and I have no choice at this point but to move to compel.

Julie Hamill
Hamill Law & Consulting
julie@juliehamill-law.com
(424) 265-0529
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 Tue, Aug 15, 2023 at 7:20 PM Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Hi, Julie. We're working on it. We're having an issue with the production platform we're using but are trying to work through it. I'll keep you posted.

Jon

From: Julie Hamill <julie@juliehamill-law.com>

Date: Tuesday, Aug 15, 2023 at 7:28 PM

To: Hawk, J. Jonathan <jhawk@whitecase.com>

Subject: Re: Alliance of Los Angeles County Parents Subpoena to X Corp. - Meet and Confer

Where and when should I expect to receive the documents?

Sent from my iPhone

On Aug 15, 2023, at 10:45 AM, Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Thanks, Julie.

J Jonathan Hawk | Partner

T +1 213 620 7741 **M** +1 626 755 1400 **E** jhawk@whitecase.com

White & Case LLP | 555 South Flower Street, Suite 2700 | Los Angeles, CA 90071-2433

From: Julie Hamill <julie@juliehamill-law.com>

Sent: Tuesday, August 15, 2023 7:44 AM

To: Hawk, J. Jonathan <jhawk@whitecase.com>

Subject: Re: Alliance of Los Angeles County Parents Subpoena to X Corp. - Meet and Confer

COMP.EXH.143

Yes, agreed. Thanks.

On Aug 15, 2023, at 10:39 AM, Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Julie, we should be ready to produce today. It's taken some time to finalize the production with our review / production tool. You have not been strung along. Our correspondence shows that, including that we even had to devise and propose search terms.

Regarding the lack of a protective order, we'll have documents marked "confidential." Those should not be publicly disseminated, including not on your website. The only potentially valid use for the documents would be in direct connection with the litigation, i.e., filing them with the court.

Can we agree that you would only potentially use those documents to file them with the court -- and that if you intend to file any of those documents, you first discuss with me as to whether X Corp. will agree to lift the "confidential" tag on those specified documents so they can be publicly filed or, if we will not agree to that, you will request to file them under seal?

Jon

J Jonathan Hawk | Partner

T +1 213 620 7741 **M** +1 626 755 1400 **E** jhawk@whitecase.com

White & Case LLP | 555 South Flower Street, Suite 2700 | Los Angeles, CA 90071-2433

From: Julie Hamill <julie@juliehamill-law.com>
Sent: Monday, August 14, 2023 2:55 PM
To: Hawk, J. Jonathan <jhawk@whitecase.com>
Subject: Re: Alliance of Los Angeles County Parents Subpoena to X Corp. - Meet and Confer

Jonathan,

As you know, my brief deadline is Friday. If I don't receive anything from you before then I will notify the court and request an extension of my deadline to respond to the County's motion for summary judgment. I hope to avoid having to move to compel response to my subpoena, but it looks like I've been strung along.

Julie Hamill

Hamill Law & Consulting

julie@juliehamill-law.com

(424) 265-0529

www.juliehamill-law.com

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COMP.EXH.144

On Sun, Aug 13, 2023 at 6:43AM Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Hi, Julie. We were finalizing the production as of Friday. I'll check w the team first thing tomorrow morning re status.

Also, is there a protective order in this case?

Jon

From: Julie Hamill <julie@juliehamill-law.com>

Date: Sunday, Aug 13, 2023 at 8:39 AM

To: Hawk, J. Jonathan <jhawk@whitecase.com>

Subject: Re: Alliance of Los Angeles County Parents Subpoena to X Corp. - Meet and Confer

Jonathan,

Can you please provide a status update?

Julie Hamill

Hamill Law & Consulting

julie@juliehamill-law.com

(424) 265-0529

www.juliehamill-law.com

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On Wed, Aug 9, 2023 at 12:56 PM Julie Hamill <julie@juliehamill-law.com> wrote:

Checking in on the status of this.

Julie Hamill

Hamill Law & Consulting

COMP.EXH.145

julie@juliehamill-law.com

(424) 265-0529

www.juliehamill-law.com

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On Wed, Jul 26, 2023 at 10:24 AM Julie Hamill <julie@juliehamill-law.com> wrote:

Appreciate that, thanks.

Sent from my iPhone

On Jul 26, 2023, at 10:20 AM, Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Julie, apologies for missing this. We're into our review process already. We're aiming to start delivering documents the week of August 7. We are treating this as a priority. I'm happy to discuss of course.

Jon

J Jonathan Hawk | Partner

T +1 213 620 7741 **M** +1 626 755 1400 **E** jhawk@whitecase.com

White & Case LLP | 555 South Flower Street, Suite 2700 | Los Angeles, CA 90071-2433

From: Julie Hamill <julie@juliehamill-law.com>

Sent: Sunday, July 23, 2023 7:28 PM

To: Hawk, J. Jonathan <jhawk@whitecase.com>

Cc: Kuethman, Kathryn <kathryn.kuethman@whitecase.com>

Subject: Re: Alliance of Los Angeles County Parents Subpoena to X Corp. - Meet and Confer

I am checking in to see whether you have any updates on this subpoena response.

Best regards,

Julie Hamill

Hamill Law & Consulting

julie@juliehamill-law.com

(424) 265-0529

COMP.EXH.146

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On Fri, Jul 14, 2023 at 11:02AM Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Thanks. We'll proceed and keep you posted re timing.

J Jonathan Hawk | Partner

T +1 213 620 7741 **M** +1 626 755 1400 **E** jhawk@whitecase.com

White & Case LLP | 555 South Flower Street, Suite 2700 | Los Angeles, CA 90071-2433

From: Julie Hamill <julie@juliehamill-law.com>

Sent: Friday, July 14, 2023 10:51 AM

To: Hawk, J. Jonathan <jhawk@whitecase.com>

Cc: Kuethman, Kathryn <kathryn.kuethman@whitecase.com>

Subject: Re: Alliance of Los Angeles County Parents Subpoena to X Corp. - Meet and Confer

Yes. Thank you.

Sent from my iPhone

On Jul 14, 2023, at 10:34 AM, Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Julie,

JIRA does not allow for complex searches (we just checked). As to JIRA in connection with Search 2, we'd propose running the following terms, for a date period March 1, 2020-present:

1. Brett Morrow
2. Morrow
3. Laurent Culbertson
4. Culbertson

Are you ok with that?

Jon

From: Julie Hamill <julie@juliehamill-law.com>
Sent: Friday, July 14, 2023 10:19 AM
To: Hawk, J. Jonathan <jhawk@whitecase.com>
Cc: Kuethman, Kathryn <kathryn.kuethman@whitecase.com>
Subject: Re: Alliance of Los Angeles County Parents Subpoena to X Corp. - Meet and Confer

OK - I agree. Thanks.

I do not want to bring a motion, but it is something I will have to do if forced. We've spent a substantial amount of time splitting hairs over details in a very limited subpoena served over two months ago.

Julie Hamill
Hamill Law & Consulting
julie@juliehamill-law.com
(424) 265-0529
www.juliehamill-law.com

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On Fri, Jul 14, 2023 at 10:14 AM Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Julie, Twitter can search email and Slack. JIRA is not a messaging system. We need to check this.

Twitter cannot search Blind. It's not a Twitter platform or official Twitter work product. If you want information from Blind, you need to subpoena Blind. Twitter DMs are also not a Twitter work product. It is an individual's account, and there are SCA concerns.

If you agree, we will check into JIRA re Search 2, as part of the scope re email and Slack.

As for your threatened motion, we've objected to the breadth of these terms. You just clarified in your email below despite our repeated requests. We're working towards resolution but, as I've also

COMPLEX 148

explained, we need time to run these searches. If you rush your motion, we'll have to oppose, including in that you failed to meet and confer in good faith, and will seek sanctions. Your timing restrictions are not of our creation, including that you did not set up a time to meet and confer for a week after we sent our responses.

We likely will not be in a position to start producing early next week. We need to agree to the searches (with only Search 2 still outstanding; and we / Twitter had to propose actual search terms), then begin to review for responsiveness and privilege. This takes time. We're working towards it, and are moving fast. You, however, are not trying to set out a proposed schedule. You're just continually threatening an expedited motion against a third party. The more appropriate approach – rather than unduly burdening a third party with urgency and motion practice of your creation – would be to try to move your deadlines, including on the basis that you're trying to work with a third party to produce documents. Ultimately it's your contemplated motion. I think under the circumstances it would be entirely inappropriate, and we'd oppose and seek sanctions for reasons discussed. The more productive approach would be for you to collaborate, give us time to check, and then try to discuss a reasonable schedule for document production that I can take to Twitter and continue working on resolution.

Jon

J Jonathan Hawk | Partner

T +1 213 620 7741 **M** +1 626 755 1400 **E** jhawk@whitecase.com

White & Case LLP | 555 South Flower Street, Suite 2700 | Los Angeles, CA 90071-2433

From: Julie Hamill <julie@juliehamill-law.com>
Sent: Friday, July 14, 2023 10:00 AM
To: Hawk, J. Jonathan <jhawk@whitecase.com>
Cc: Kuethman, Kathryn <kathryn.kuethman@whitecase.com>
Subject: Re: Alliance of Los Angeles County Parents Subpoena to X Corp. - Meet and Confer

Thanks, Jonathan. You've had the subpoena since mid-May, and it is quite simple, straightforward, and extremely limited. I've limited the original subpoena substantially over two months of back and forth communications. Unfortunately, I am now in a position where I will have to bring a motion early next week absent production of documents. Please let me know if you require any further meet and confer before I file.

Best regards,

Julie Hamill

Hamill Law & Consulting

julie@juliehamill-law.com

(424) 265-0529

COMP.EXH.149

www.juliehamill-law.com

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On Fri, Jul 14, 2023 at 9:19AM Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Julie, you're now specifying additional things you want. And we objected to the term "communications." I now need to go back to Twitter and see about those other channels, and check. It helps if you specify up front, and below you said emails and Slack. This takes time to now go check, which I'll do.

J Jonathan Hawk | Partner

T +1 213 620 7741 **M** +1 626 755 1400 **E** jhawk@whitecase.com

White & Case LLP | 555 South Flower Street, Suite 2700 | Los Angeles, CA 90071-2433

From: Julie Hamill <julie@juliehamill-law.com>
Sent: Friday, July 14, 2023 9:16 AM
To: Hawk, J. Jonathan <jhawk@whitecase.com>
Cc: Kuethman, Kathryn <kathryn.kuethman@whitecase.com>
Subject: Re: Alliance of Los Angeles County Parents Subpoena to X Corp. - Meet and Confer

Thanks, Jonathan. The subpoena defines "communications" in point 1, and we reserve the right to seek compliance with the subpoena in accordance with that definitions. In the interest of resolving this matter in a timely way, please search Slack, Jira, Blind, Twitter direct messages, and email. Thank you.

Julie Hamill

Hamill Law & Consulting

julie@juliehamill-law.com

(424) 265-0529

www.juliehamill-law.com

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COMP.EXH.150

On Fri, Jul 14, 2023 at 8:02AM Hawk, J. Jonathan
<jhawk@whitecase.com> wrote:

Julie, re Search 2 we've confirmed Slack is ok. But we still need to limit "communications." Since we're aligned on everything else per our thread below, are you also agreeable that search 2 be as follows? This would capture emails and Slacks.

1. Search 2: **emails and Slacks** between Lauren Culbertson and anyone else with search terms ("brett morrow" or "morrow"), with a date range of March 1, 2020-present.

Let me know. Thanks.

Jon

J Jonathan Hawk | Partner

T +1 213 620 7741 **M** +1 626 755 1400 **E** jhawk@whitecase.com

White & Case LLP | 555 South Flower Street, Suite 2700 | Los Angeles, CA 90071-2433

From: Hawk, J. Jonathan <jhawk@whitecase.com>
Sent: Wednesday, July 12, 2023 2:11 PM
To: Julie Hamill <julie@juliehamill-law.com>
Cc: Kuethman, Kathryn <kathryn.kuethman@whitecase.com>
Subject: RE: Alliance of Los Angeles County Parents Subpoena to X Corp. - Meet and Confer

Julie, we're generally fine with these proposed edits except that we're still working on the "communications" piece. I think that phrase itself is too broad. If you're interested in Slack in addition to email, we can potentially be more specific — but we're looking now into what we may be able to get from Slack. Wanted to let you know we're still working on this.

Jon

From: Julie Hamill <julie@juliehamill-law.com>
Date: Tuesday, Jul 11, 2023 at 4:24 PM
To: Hawk, J. Jonathan <jhawk@whitecase.com>
Cc: Kuethman, Kathryn <kathryn.kuethman@whitecase.com>
Subject: Re: Alliance of Los Angeles County Parents Subpoena to X Corp. - Meet and Confer

COMP.EXH.151

TY

On Jul 11, 2023, at 4:14 PM, Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

I'll run these by Twitter and see what they think.

From: Julie Hamill <julie@juliehamill-law.com>

Date: Tuesday, Jul 11, 2023 at 4:13 PM

To: Hawk, J. Jonathan <jhawk@whitecase.com>

Cc: Kuethman, Kathryn <kathryn.kuethman@whitecase.com>

Subject: Re: Alliance of Los Angeles County Parents Subpoena to X Corp. - Meet and Confer

Those are the only changes I made, plus the removal of "and ("suspend" or "suspension")" from search 2.

Julie Hamill

Hamill Law & Consulting

julie@juliehamill-law.com

(424) 265-0529

www.juliehamill-law.com

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On Tue, Jul 11, 2023 at 4:10 PM Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Thanks. Are the spelling and "communications" the only two proposed changes? If not can you highlight the others?

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From: Julie Hamill <julie@juliehamill-law.com>

Date: Tuesday, Jul 11, 2023 at 4:06 PM

To: Hawk, J. Jonathan
<jhawk@whitecase.com>

Cc: Kuethman, Kathryn
<kathryn.kuethman@whitecase.com>

Subject: Re: Alliance of Los Angeles
County Parents Subpoena to X Corp. -
Meet and Confer

Thank you. I made a few small changes, reflected below. I fixed the spelling of @frasercommunications.com and revised search #2 to "communications" instead of just emails. I want to make sure internal messaging services (e.g. Slack) are searched for comms with Lauren Culbertson regarding Mr. Morrow.

Best regards,

Julie Hamill

Hamill Law & Consulting

julie@juliehamill-law.com

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On Tue, Jul 11, 2023 at 3:30 PM Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Julie, thanks again for these. We've worked with the search terms and date range you proposed, and they proved unwieldy, particularly given the breadth of some of the terms (e.g. "Post"). That said, we gave some thought to how we could try to capture what I think you're after using your context /

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terms, and had better results getting to a manageable universe of documents to, as next steps, review for responsiveness and privilege, with the below six searches:

1. Search 1: emails between a Twitter employee and the below email domains (bulleted list) with search terms words "misinformation, or morrow, or threats, or harassment, or intimidating, or Los Angeles County Department of Public Health, or Ferrer, or Culbertson, or Twitter Case Number 0282691988," with a date range of March 1, 2020-present.

1. @ph.lacounty.gov
2. @bos.lacounty.gov
3. @sheppardmullin.com
4. Bmorrow@ph.lacounty.gov
5. @frasercommunications.com
6. boland@mail.house.gov

1. Search 2: communications between Lauren Culbertson and anyone else with search terms ("brett morrow" or "morrow"), with a date range of March 1, 2020-present.

1. Search 3: emails between Twitter employees with search terms search terms ("brett morrow" or "morrow") and ("suspend" or "suspension"), with a date range of March 1, 2020-present.

1. Search 4: emails discussing "@alt_lacph," with a date range of March 1, 2020-present.

1. Search 5: emails discussing "@lapublichealth" and "misinformation," with a date range of March 1, 2020-present.

1. Search 6: for emails between Twitter employees and ("babara ferrer" /3 "ferrer" and "suspend" or "suspension"), with a date range of is March 1, 2020-present.

I still believe request nos. 4, 8, 10, and 11, even in light of your letter, are overbroad and unclear. And request nos. 13 and 15 don't need addressing, since we don't have anything beyond what you already have based on our call re the reason for suspension and because your client is trying to request her information and appeal using the links I provided. That said, I believe the

scope of the searches above capture the scope envisioned in your letter / most requests, including what nos. 4, 8, 10, and 11 may be after (if anything non-privileged and responsive exists), particularly in light of what you've explained your case is about.

If you agree with the above search terms, we can run them and start to review for responsiveness and privilege (without agreeing to a privilege log). We'd certainly need more time than Friday to run the search and document review, but can move quickly once I have your agreement to this scoping.

Happy to discuss, and look forward to your response.

Jon

J Jonathan Hawk | Partner

T +1 213 620 7741 **M** +1 626 755 1400 **E**
jhawk@whitecase.com

White & Case LLP | 555 South Flower Street, Suite
2700 | Los Angeles, CA 90071-2433

From: Julie Hamill <julie@juliehamill-law.com>
Sent: Monday, July 10, 2023 12:17 PM
To: Hawk, J. Jonathan
<jhawk@whitecase.com>
Cc: Kuethman, Kathryn
<kathryn.kuethman@whitecase.com>
Subject: Re: Alliance of Los Angeles County
Parents Subpoena to X Corp. - Meet and
Confer

OK:

1. Misinformation
2. Post
3. Morrow
4. Threats
5. Harassment
6. Intimidating
7. Los Angeles County Department of
Public Health
8. Ferrer
9. Culbertson
10. Twitter Case Number 0282691988
11. @alt_lacph

Julie Hamill

Hamill Law & Consulting

julie@juliehamill-law.com

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(424) 265-0529

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On Mon, Jul 10, 2023 at 12:04 PM Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Julie, Twitter has asked that you propose search terms. I think that's an entirely reasonable request so we can start to see what we have. Can you please do that? We're not in a position to guess at what terms you'd want if we have to pull them from the letter.

J Jonathan Hawk | Partner

T +1 213 620 7741 **M** +1 626 755 1400 **E**
jhawk@whitecase.com

White & Case LLP | 555 South Flower Street,
Suite 2700 | Los Angeles, CA 90071-2433

From: Julie Hamill <julie@juliehamill-law.com>
Sent: Monday, July 10, 2023 12:03 PM
To: Hawk, J. Jonathan <jhawk@whitecase.com>
Cc: Kuethman, Kathryn <kathryn.kuethman@whitecase.com>
Subject: Re: Alliance of Los Angeles County Parents Subpoena to X Corp. - Meet and Confer

Thanks, Jonathan. My letter dated June 26 (attached here) contains limited date ranges and subject matter for each of the subpoena requests. I believe the requests are self-limiting on their own, but if for some reason the search turns up a significant number of results I can add more terms.

My client appealed the suspension multiple times and was denied. I will have her follow the process you provided to obtain personal information.

Will you be able to provide responsive documents (if any exist) by this Friday?

Best regards,

Julie Hamill

Hamill Law & Consulting

julie@juliehamill-law.com

(424) 265-0529

www.juliehamill-law.com

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On Fri, Jul 7, 2023 at 2:09 PM Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Julie,

I've discussed with Twitter. Without waiving any of our objections or rights, we are amenable to looking for potentially relevant documents following our discussions. To do that, however, we first need you to propose search terms based on your letter, and a relevant date range. Can you send over proposed search terms + date range, and we can see what that looks like?

Also re your client's account, a user with a suspended account can request a copy of her / his personal information. A link explaining how to do that is here (<https://help.twitter.com/en/managing-your-account/suspended-twitter-accounts#request-copy-personal-info>). Also, if a user wants to appeal a suspension, s / he can appeal using the link here (<https://help.twitter.com/en/forms/account-access/appeals/redirect>). Has your client tried these avenues, or understand Twitter doesn't have anything beyond what you told me your client already knows

re the reasons for the account suspension?

Jon

J Jonathan Hawk | Partner

T +1 213 620 7741 **M** +1 626 755 1400 **E**
jhawk@whitecase.com

White & Case LLP | 555 South Flower Street,
Suite 2700 | Los Angeles, CA 90071-2433

From: Hawk, J. Jonathan
Sent: Saturday, July 1, 2023 8:13 PM
To: 'Julie Hamill' <julie@juliehamill-law.com>
Cc: Kuethman, Kathryn
<kathryn.kuethman@whitecase.com>
Subject: RE: Alliance of Los Angeles County Parents Subpoena to X Corp. - Meet and Confer

Julie,

We have received your letter. While we object to several of your characterizations in the letter and your purported summary of our conversations, in particular, we'd like to make clear that Twitter has not "agreed to limit the scope to the extent possible for all requests" (page 2) as revised in your letter. On our call, we simply noted to you that your overbroad requests would need to be more specific for Twitter to consider them, and we asked that you propose more narrowly tailored requests with subject matter limitations. For the avoidance of any doubt, Twitter has not agreed to anything except to consider narrowed, more specific requests in the context of this third party subpoena. As we explained to you over the phone, all of your proposed requests are subject to client approval, and our client is out of office until after July 4. We cannot agree to produce any documents, even in response to your revised requests, without client approval.

We'll discuss your proposals with Twitter once our client is back in the office, and will revert. Have a good 4th holiday.

J Jonathan Hawk | Partner

T +1 213 620 7741 **M** +1 626 755 1400 **E**
jhawk@whitecase.com

White & Case LLP | 555 South Flower Street,
Suite 2700 | Los Angeles, CA 90071-2433

From: Julie Hamill <julie@juliehamill-law.com>

Sent: Tuesday, June 27, 2023 12:29 PM

To: Hawk, J. Jonathan
<jhawk@whitecase.com>

Subject: Alliance of Los Angeles
County Parents Subpoena to X Corp. -
Meet and Confer

Mr. Hawk,

Please find attached my letter of today.

Best regards,

Julie Hamill

Hamill Law & Consulting

julie@juliehamill-law.com

(424) 265-0529

www.juliehamill-law.com

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EXHIBIT 17

Re: Alliance of LA County Parents - Declaration

1 message

Salvador Rodriguez <salrodriguez@scng.com>

Sat, Jul 22, 2023 at 2:59 PM

To: Julie Hamill <julie@juliehamill-law.com>

Thanks Julie, just need checking with my higher up to get the OK on this since it involves an attempt by the government to get us to do something.

On Tue, Jul 18, 2023 at 2:38 PM Julie Hamill <julie@juliehamill-law.com> wrote:

Hi Sal,

I neglected to attach the declaration - my apologies. It is attached here.

Best regards,

Julie Hamill
Hamill Law & Consulting
julie@juliehamill-law.com
(424) 265-0529
www.juliehamill-law.com

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----- Forwarded message -----

From: **Julie Hamill** <julie@juliehamill-law.com>
Date: Fri, Jul 14, 2023 at 4:26 PM
Subject: Alliance of LA County Parents - Declaration
To: <salrodriguez@scng.com>

Mr. Rodriguez,

I represent the Alliance of LA County Parents in litigation against the LA County Department of Public Health. We are challenging the County's censorship of dissenting views during the covid-19 pandemic. More information about our case is available here: www.laparents.org.

During my deposition of Brett Morrow last Friday, he testified that he called you after publication of the attached article but couldn't recall what was discussed. My understanding is that he asked you to take the article down. I drafted the attached declaration regarding what actually transpired. Would you please review the attached, make any necessary changes to ensure it is accurate, and then I can send it to you via docusign for execution? I would greatly appreciate it. This information is a critical piece in our opposition to the County's motion for summary judgment.

Please feel free to call me if you'd like to discuss.

Best regards,

Julie Hamill
Hamill Law & Consulting
julie@juliehamill-law.com
(424) 265-0529
www.juliehamill-law.com

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