

EXHIBIT 18

OPINION • Opinion

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Bringing back a mask mandate in Los Angeles County is unjustified



Dr. Barbara Ferrer, Director of Public Health speaks during an event kicking off Coronavirus Vaccinations for Children at Eugene A. Obregon Park in Los Angeles on Wednesday, November 3, 2021. (Photo by Keith Birmingham, Pasadena Star-News/ SCNG)

By **SCOTT BALSITIS, JEFFREY KLAUSNER, HOUMAN HEMMATI** and **NEERAJ SOOD**

PUBLISHED: July 22, 2022 at 6:24 p.m. | UPDATED: July 25, 2022 at 11:53 a.m.



COMP.EXH.168

EXHIBIT 2

Brett Morrow

7/7/2023

Heather J. Bautista
CSR 11600, RPR, CRR

Last week, Los Angeles County Public Health Director Barbara Ferrer announced that the county had entered the CDC's "High" tier of community COVID risk, and that a mask mandate is therefore in the works. There's a problem, though: L.A. County isn't actually in the "High" tier.

The CDC now classifies the COVID risk in each county with a metric called "Community Levels" that incorporates both case counts and hospitalization rates. The Community Levels system was implemented to ensure that public health recommendations or mandates are not triggered by widespread mild illness, replacing an earlier system that only looked at positive test counts. To enter the "High" risk Community Level, a county must have more than 10 new COVID hospitalizations per 100,000 people over a seven day period. CDC data show L.A. County at 11 per 100,000, so by that measure L.A. County is designated "High."

Beneath those numbers though is a critical error: most of those "COVID hospitalizations" aren't actually caused by COVID. They represent people coming to the hospital for unrelated reasons who just happen to test positive at the time. We know this from Public Health's own data, which reports that since March only 40% of COVID-positive hospitalizations in the county have actually been caused by COVID. If only true COVID hospitalizations are counted to accurately reflect the virus's impact, the county easily drops out of the "High" tier.

According to Los Angeles County Department of Health Services hospital officials, even the 40% number is a large overestimate. In a remarkable video from the day of Dr. Ferrer's mandate announcement, Chief Medical Officer Dr. Brad Spellberg said of COVID admissions at Los Angeles County+USC Medical Center: "90% of the time it is not due to COVID. Only 10% of our COVID-positive admissions are 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 haven't seen one of those since February." Health Services confirmed these facts in a statement: "We currently have 30 COVID positive patients in the hospital of whom three were admitted for COVID, none of whom are in the ICU."

Hospital epidemiologist Dr. Paul Holtom summarized the situation this way: "As of this morning, we have no one in the hospital who had pulmonary disease due to COVID ... Certainly, there's no reason from a hospitalization-due-to-COVID perspective to be worried at this point."

The problem is not limited to just L.A. County: San Diego Unified School District is re-instituting restrictions based on the same flawed Community Levels metric. In contrast, other counties that are also technically in the "High" tier understand the data and are not even considering mandates. Marin County, for example, separates COVID-positive hospitalizations by cause to avoid confusion.

The case for new mandates is further undermined by the growing scientific literature showing mask mandates to be ineffective. In the pandemic turmoil of 2020, most studies didn't have the ability to compare COVID rates with and without masks in groups that were otherwise carefully matched. Claims of mask efficacy were thus based on studies with no or improper control groups. Other studies have relied on phone surveys or mathematical models rather than direct measurements of infection or transmission, or used contact tracing protocols that excluded counting masked transmission.

Now in mid 2022 we have much better data Exhaustive tracking of in school COVID spread was indistinguishable with and without student mask use in studies in Spain, a conclusion repeated in two separate COVID waves. Studies of student masking with control groups in Georgia, North Dakota, Finland and the UK have all found the same lack of any clear benefit. One randomized controlled trial showed no significant benefit to the mask wearer and a second randomized trial found a slight benefit (and only in older adults) that was not reproduced with a different analysis of the same data.

When researchers repeated a CDC study showing a mask benefit using identical methods but a larger and better dataset, the benefit of masking disappeared.

Influenza transmits by the same aerosol route as COVID, so we must add the results of 10 randomized controlled trials on masking and influenza, which the CDC reviewed and "found no significant effect of face masks on transmission."

All of this explains why White House COVID-19 Response Coordinator Ashish Jha found no difference in Omicron infection rates between mask mandated California and mask mandate-free Florida, or why Alameda County's recent mask mandate produced no difference in COVID rates versus neighboring counties.

Using data that doctors and scientists agree are not accurate to justify an ineffective mandate is terrible policymaking. Public health mandates aren't harmless, especially for children, students, parents, and families, who should not have to enter a fourth school year with restrictions based on fear not science

Scott Balsitis Ph D trained in pandemic preparedness in the CDC's Emerging Infectious Diseases program, and is currently a viral immunologist and vaccine developer in San Mateo County.

Jeffrey Klausner, MD, MPH is clinical professor of Medicine, Infectious Diseases, Population and Public Health, Keck School of Medicine of the University of Southern California. Dr. Klausner is a former CDC medical officer and former San Francisco city and county deputy health officer

Houman Hemmati, MD, Ph.D is a Los Angeles-based board-certified physician, pediatric

Editor's note: This piece has been updated to clarify Dr. Brad Spellberg's remarks.

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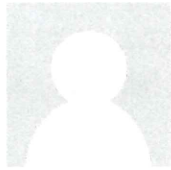
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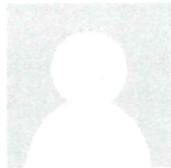
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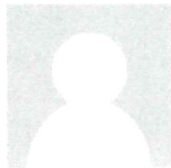
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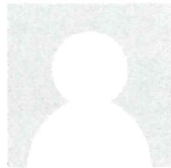
Scott Balsitis



Jeffrey Klausner



Houman Hemmati



Neeraj Sood

EXHIBIT 19

Aug 5, 2022

created @ALT_lacph account to QT every @lapublichealth tweet. The only text in the QT was a tag to @lapublichealth. The account only followed @lapublichealth and never commented on or liked any tweets.

Aug 10, 2022

account locked.

"Violating our rules against impersonation."

"Modify the content that violates our Rules - 1 profile name".

Changed name from "ALT LA Public Health Account" to "ALT LA Public Health Account - Commentary"

Account unlocked.

Your account has been locked.



ALT LA Public Health Account
@ALT_lacph

What happened?

We have determined that this account violated the [Twitter Rules](#). Specifically, for:

1. Violating our rules against [impersonation](#).

The account name (note: this is separate from the username, or @handle) should clearly indicate that the user is not affiliated with the subject of the account. Non-affiliation can be indicated by incorporating, for example, words such as (but not limited to) "parody," "fake," "fan," or "commentary." Non-affiliation should be stated in a way that can be understood by the intended audience.

As a result, we have locked your account.

What you can do:

To unlock your account, you must do the following:

- Modify the content that violates our Rules
 - 1 profile name

[Start](#)

Aug 22, 2022

wayback shows

name: ALT LA Public Health Account - Commentary

bio: Unofficial ALT account created for @lapublichealth that allows public debate. We will RT all LA Public Health dept content with comments turned on.

1 Following

214 Followers



ALT LA Public Health Account - Commentary

@ALT_Jacph

Unofficial ALT account created for @lapublichealth that allows public debate. We will RT all LA Public Health dept content with comments turned on.

Los Angeles Joined August 2022

1 Following 214 Followers

Tweets

Tweets & replies



ALT LA Public Health Account - Commentary @ALT_Jacph · 2h
@lapublichealth

Aug 23, 2022

account locked.

"Violating our rules against impersonation."

"Modify the content that violates our Rules - 1 profile bio"

3:15pm Changed bio from "Unofficial ALT account created for @lapublichealth that allows public debate. We will RT all LA Public Health dept content with comments turned on." to Commentary ALT account created for @lapublichealth that allows public debate. We will RT all LA Public Health dept content with comments turned on.



Account unlocked

3:17pm Account suspended

3:22 email received "Your account has been suspended for violation(s) of Twitter's rules, specifically our policy regarding parody, newsfeed, commentary, and fan accounts."

Aug 24, 2022

Appeal denied

Case# 0284464413: Your account is suspended or locked [ref:_00DA0K0A8._5004w2U3RaC:ref] Inbox x  

 **Twitter Support** <support@twitter.com>
to me 

Wed, Aug 24, 5:07 AM  



Hello,

We've reviewed your appeal, and determined that your account will remain suspended for violation(s) of our parody, newsfeed, commentary, and fan account [policy](#).

Thanks,

Twitter

Additional appeals were denied on Oct 27, Dec 10, and Dec 12

Summary

@alt_LACPH account was locked for violating rules against impersonation when it was not in violation. Both name and bio clearly explained the account was not an official account.

name: ALT LA Public Health Account - Commentary

bio: Unofficial ALT account created for @lapublichealth that allows public debate. We will RT all LA Public Health dept content with comments turned on.

In contrast @alt_CDC has been on Twitter since 2017 and is not been suspended.

Name: Alternative CDC

Bio: Unofficial unaffiliated resistance account by concerned scientists for humanity.



EXHIBIT 20

RE: X Corp Documents - Custodian of Records Declaration, Confidential Auth to File, Privilege Log

1 message

Hawk, J. Jonathan <jhawk@whitecase.com>
To: Julie Hamill <julie@juliehamill-law.com>
Cc: "Kuethman, Kathryn" <kathryn.kuethman@whitecase.com>

Thu, Aug 17, 2023 at 10:00 AM

Again, that's not our agreement. It's in writing in our emails and copied / pasted below. The documents are internal X Corp. documents. You agreed to ask to file them under seal if we didn't agree to lift the designation. You knew what your filing deadline was when you made that agreement. I'm offering to provide you language for a rationale, and I see no reason why you cannot file your request to seal simultaneous with your motion (and with the documents proposed to be under seal as not publicly available). It is common practice. If the court disagrees, it then orders you to file them not under seal.

What you are trying to do is breach a clear and unequivocal agreement you made. Neither X Corp. nor I take that lightly, and we absolutely oppose your wrongful and improper efforts. You can abide by your agreement, let me get you proposed language for a rationale, and see what the court does with it.

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: Thursday, August 17, 2023 9:24 AM
To: Hawk, J. Jonathan <jhawk@whitecase.com>
Cc: Kuethman, Kathryn <kathryn.kuethman@whitecase.com>
Subject: Re: X Corp Documents - Custodian of Records Declaration, Confidential Auth to File, Privilege Log

Jon,

Please take a breath. You marked the entire production of 11,000 documents as confidential. The vast majority of these documents are public newsletters and communications I already have in my possession. If you have legitimate reasons to keep the documents I identified in my email below as confidential and need them sealed, then please provide justification. I can make the request but I am telling you I cannot file them under seal without a court order. I did not make that rule. It says documents cannot be sealed pursuant to an agreement of the parties. Our agreement cannot supersede the court rule.

I suggest removing the confidential seal so I can proceed with filing. If you have legitimate legal reasons for seeking the sealing of the records, provide those to me.

Thanks

COMP.EXH.178

Sent from my iPhone

On Aug 17, 2023, at 12:17 PM, Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Julie, that is not what you agreed to and we have it in writing. What you agreed to is as follows from our email thread:

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?**

You responded:

Yes, agreed. Thanks.

You can file a simultaneous request to submit under seal with your motion and you are required to do just that under our agreement. I can get you language explaining why these internal documents should be sealed, so you can submit it with your declaration. But if you proceed to breach the agreement that you made, X Corp. will reserve all rights as against you and your client. I frankly have never had an attorney go back on their word in this way, and it's appalling. I don't think a court will appreciate it either if we need to bring your conduct to its attention.

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: Thursday, August 17, 2023 9:12 AM
To: Hawk, J. Jonathan <jhawk@whitecase.com>
Cc: Kuethman, Kathryn <kathryn.kuethman@whitecase.com>
Subject: Re: X Corp Documents - Custodian of Records Declaration, Confidential Auth to File, Privilege Log

What I am telling you is that I physically cannot file under seal absent a court order. And looking at the documents, I do not believe a court will order them sealed, and I am not going to file a motion to seal them because I do not have the legal justification to do so. I said that I would discuss with you before filing, and that I would not post them on the website.

If you have legal justification for filing under seal, then please provide that to me and I can provide it to the court, but it is not up to me whether the documents are under seal - it is up to the court. Please review the Court rules I provided in my last email.

Julie Hamill

Hamill Law & Consulting

julie@juliehamill-law.com

(424) 265-0529

COMP.EXH.179

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 Thu, Aug 17, 2023 at 9:08AM Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Julie, that is not our agreement. You agreed to file under seal, not to have us file a motion. I expect you not to breach your agreement. If you need a justification, I can provide you an explanation that you can include in a declaration in support of your motion.

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: Thursday, August 17, 2023 9:00 AM
To: Hawk, J. Jonathan <jhawk@whitecase.com>
Cc: Kuethman, Kathryn <kathryn.kuethman@whitecase.com>
Subject: Re: X Corp Documents - Custodian of Records Declaration, Confidential Auth to File, Privilege Log

Thank you. I also found the following documents marked as withheld for privilege - can you please identify the names of the parties involved, the dates, and the subject matter for these as well:

X_CORP_010201 - X_CORP_010240

Re: filing under seal, California Rules of Court, Rule 2.551(a) says: "[a] record must not be filed under seal without a court order. The court must not permit a record to be filed under seal based solely on the agreement or stipulation of the parties."

The court may order that a record be filed under seal only if it expressly finds facts that establish:

- (1) There exists an overriding interest that overcomes the right of public access to the record;
- (2) The overriding interest supports sealing the record;
- (3) A substantial probability exists that the overriding interest will be prejudiced if the record is not sealed;
- (4) The proposed sealing is narrowly tailored; and
- (5) No less restrictive means exist to achieve the overriding interest. See Cal. R. Ct. 2.550(d).

I am not seeing any legal justification for sealing the documents identified in items 1-12 in my email below, but I want to give you an opportunity to file a motion if you feel it is necessary.

Best regards,

Julie Hamill

COMP.EXH.180

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, Aug 16, 2023 at 5:45 PM Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

Julie, please seek to file any documents marked "confidential" under seal so they are not publicly viewable. As for the custodian of records decl I will ask X Corp. - they are offline now but will pass it along first thing in the morning.

Re the priv log, I'll discuss the request with X Corp. and revert.

Jon

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

Date: Wednesday, Aug 16, 2023 at 7:36 PM

To: Hawk, J. Jonathan <jhawk@whitecase.com>, Kuethman, Kathryn <kathryn.kuethman@whitecase.com>

Subject: X Corp Documents - Custodian of Records Declaration, Confidential Auth to File, Privilege Log

Jonathan,

Thank you for producing the responsive documents. I've done an initial review and intend to include the following documents in my filing tomorrow:

1. X_CORP_010993 – 010998
2. X_CORP_010985
3. X_CORP_010970
4. X_CORP_010956
5. X_CORP_010955- X_CORP_010969
6. X_CORP_002556
7. X_CORP_002559
8. X_CORP_002999
9. X_CORP_003037 - X_CORP_003038
10. X_CORP_005807- X_CORP_005809
11. X_CORP_009394- X_CORP_009395
12. X_CORP_004627- X_CORP_004628

As these are marked confidential, I want to know if there is anything you need me to do before filing them with the court.

COMPLEX 181

Also, X_CORP_11159-X_CORP_11194 are marked as withheld for privilege. Can you please identify the names of the parties involved, the dates, and the subject matter?

Finally, can you please provide a custodian of records declaration for these documents?

Best regards,

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.

=====
This communication may be privileged and confidential and is intended only for the individual or entity named above and others who have been specifically authorized to receive it. If you are not the intended recipient, please do not read, copy, use or disclose this communication to others; also, please notify the sender by replying to this e-mail or by telephone at (213) 620-7700, and then delete the e-mail and any copies of it.

Our external privacy policy is available on <https://www.whitecase.com/privacy-policy>.

=====
This communication may be privileged and confidential and is intended only for the individual or entity named above and others who have been specifically authorized to receive it. If you are not the intended recipient, please do not read, copy, use or disclose this communication to others; also, please notify the sender by replying to this e-mail or by telephone at (213) 620-7700, and then delete the e-mail and any copies of it.

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This communication may be privileged and confidential and is intended only for the individual or entity named above and others who have been specifically authorized to receive it. If you are not the intended recipient, please do not read, copy, use or disclose this communication to others; also, please notify the sender by replying to this e-mail or by telephone at (213) 620-7700, and then delete the e-mail and any copies of it.

Our external privacy policy is available on <https://www.whitecase.com/privacy-policy>.

=====

EXHIBIT 21

CERTIFICATE OF AUTHENTICITY OF DOMESTIC RECORDS OF REGULATORY
CONDUCTED ACTIVITY

I, Kathryn Green, certify and declare as follows:

1. I work for X Corp., and am located in Minneapolis, Minnesota. I am a duly authorized custodian of records for X Corp., and am qualified to certify X Corp.'s domestic records of regularly conducted activity.

2. I have reviewed the records produced by X Corp. in response to the subpoena to X Corp., dated May 11, 2023, in the case of Alliance of Los Angeles County Parents v. County of Los Angeles Department of Public Health, et al., Case No. 22 STCP02772, pending in the Superior Court of California, County of Los Angeles. The records were those located after a reasonable search and are true copies.

3. The records provided were made and kept by the automated systems of X Corp. in the course of regularly conducted activity as a regular practice of X Corp.

I declare under penalty of perjury under the laws of the State of California that the foregoing certification is true and correct to the best of my knowledge.

Executed on August 17, 2023, at Minneapolis, Minnesota.

DocuSigned by:

Kathryn Green

9D6C7A373F3A4AF...

Kathryn Green

REDACTED PER CRC 2.551(b)(3)(A)(ii)

REDACTED PER CRC 2.551(b)(3)(A)(ii)

REDACTED PER CRC 2.551(b)(3)(A)(ii)



REDACTED PER CRC 2.551(b)(3)(A)(ii)

REDACTED PER CRC 2.551(b)(3)(A)(ii)

REDACTED PER CRC 2.551(b)(3)(A)(ii)

REDACTED PER CRC 2.551(b)(3)(A)(ii)

REDACTED PER CRC 2.551(b)(3)(A)(ii)

REDACTED PER CRC 2.551(b)(3)(A)(ii)

REDACTED PER CRC 2.551(b)(3)(A)(ii)



REDACTED PER CRC 2.551(b)(3)(A)(ii)

REDACTED PER CRC 2.551(b)(3)(A)(ii)

REDACTED PER CRC 2.551(b)(3)(A)(ii)

COMP.EXH.197

REDACTED PER CRC 2.551(b)(3)(A)(ii)

| | | | |

COMP.EXH.198



REDACTED PER CRC 2.551(b)(3)(A)(ii)

REDACTED PER CRC 2.551(b)(3)(A)(ii)

REDACTED PER CRC 2.551(b)(3)(A)(ii)

| | 201

COMP.EXH.201

REDACTED PER CRC 2.551(b)(3)(A)(ii)

REDACTED PER CRC 2.551(b)(3)(A)(ii)

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COMP.EXH.203

REDACTED PER CRC 2.551(b)(3)(A)(ii)

REDACTED PER CRC 2.551(b)(3)(A)(ii)

REDACTED PER CRC 2.551(b)(3)(A)(ii)

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COMP.EXH.206

REDACTED PER CRC 2.551(b)(3)(A)(ii)

COMP.EXH.207

REDACTED PER CRC 2.551(b)(3)(A)(ii)

COMP.EXH.208

REDACTED PER CRC 2.551(b)(3)(A)(ii)

COMP.EXH.209

EXHIBIT 22

RE: X Corp Documents - Custodian of Records Declaration, Confidential Auth to File, Privilege Log

1 message

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

Thu, Aug 17, 2023 at 3:16 PM

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

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

Julie, this is the day of. You've provided no advance notice. And again you're trying to breach the clear agreement you made just days ago. You can say in your declaration in support of your request to file under seal that you understand from X Corp.'s counsel, and as shown from the face of the documents themselves, that... [from my email below] , and to that effect X Corp. has marked those documents as "CONFIDENTIAL."

Given the unacceptably short notice (ie you asking today), it will be exceedingly difficult, if at all possible, to get a declaration together. Moreover and I reiterate that you agreed to file the request to file under seal. You're latest last minute attempt to breach your agreement is yet again inappropriate.

There is a clear path forward that is consistent with your agreement, and I've explained that several times today.

Jon

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

Date: Thursday, Aug 17, 2023 at 5:11 PM

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

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

Subject: Re: X Corp Documents - Custodian of Records Declaration, Confidential Auth to File, Privilege Log

Are you planning to provide a declaration re: facts as to why these documents should be sealed in compliance w/ Cal Rules of Court? I am finalizing the documents right now.

Again, that rule says:

The court may order that a record be filed under seal only if it expressly finds facts that establish:

- (1) There exists an overriding interest that overcomes the right of public access to the record;
- (2) The overriding interest supports sealing the record;
- (3) A substantial probability exists that the overriding interest will be prejudiced if the record is not sealed;
- (4) The proposed sealing is narrowly tailored; and

- (5) No less restrictive means exist to achieve the overriding interest. See Cal. R. Ct. 2.550(d).

I've left a place for your declaration in my filing. Again, I do not see how the documents comply with the rule and I will not be making a declaration of those facts.

Alternatively, this problem can be solved by removing the confidential stamp.

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 Thu, Aug 17, 2023 at 11:01 AM Hawk, J. Jonathan <jhawk@whitecase.com> wrote:

COMP.EXH.211

Julie,

The documents we've provided and marked "CONFIDENTIAL" are all non-public, internal, business documents at X Corp., reflecting a variety of confidential and proprietary information. They include, for example, custom news alerts that then-Twitter personnel set up for specified accounts so they could have internal discussions about the types of content being disseminated by users on the platform. They also show emails between then-Twitter personnel and third parties that are (again) non-public, and discuss the Company's rationale for decisions made with regard to certain reported accounts and content. These types of materials reflect the Company's internal business workings and we believe should be kept confidential. Further, you told me that you already had some of the documents from defendants' own productions, and that you were seeking documents from X Corp. to corroborate that defendants had produced what they had; I haven't seen those you claim to have from defendants but imagine if you do have such documents you could file those rather than the documents we've marked "CONFIDENTIAL."

Also as a recall, X Corp. is a third party to your litigation and has gone to great lengths to comply with your demands. We have, for example, proposed ways to narrow your document requests when you refused to. We then proposed search terms when you refused to. And we've pushed to finalize and get you the production in time for your filing deadline, all while you've made repeated threats of motions to compel and other inappropriate accusations on various email threads. We are again now -- on a mere few hours' notice, and to accommodate your filing deadline -- providing the above explanation as to why the documents should be filed under seal.

I see no need to file this email with the Court. There is good reason for the documents to be filed under seal that can be explained in your papers making that request, and filing only this email thread would be an glaringly incomplete story. It does not, for example, show our emails where you agreed just earlier this week to file "CONFIDENTIAL" documents under seal. It does not show all of X Corp.'s search term proposals after you refused to make any. It does not show your repeated threats and other inappropriate accusations in still other email threads.

We are trying yet again, as we have been, to work with you on this. We are providing the explanation to facilitate your obligation under our agreement to request that "CONFIDENTIAL" documents be filed under seal. We are happy to discuss if you think you need something further, but we expect our agreement will be followed, particularly because there is good reason for the "CONFIDENTIAL" documents to remain non-public.

I'm working on the custodian declaration. Happy to discuss.

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: Thursday, August 17, 2023 10:07 AM
To: Hawk, J. Jonathan <jhawk@whitecase.com>
Cc: Kuethman, Kathryn <kathryn.kuethman@whitecase.com>
Subject: Re: X Corp Documents - Custodian of Records Declaration, Confidential Auth to File, Privilege Log

Jonathan,

I am making the request, and filing this exchange with the Court. I have to file today, so pls provide whatever rationale you have within the next three hours. Again, as stated in my emails below, I wanted to provide you an opportunity to make a formal motion. I never agreed to do that on your behalf.

Thanks,

Julie Hamill

Hamill Law & Consulting

julie@juliehamill-law.com

(424) 265-0529

COMP.EXH.212

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.

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California, I am over the age of
3 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..

4 On August 18, 2023 I served the foregoing document: **ALLIANCE OF LOS ANGELES**
5 **COUNTY PARENTS’ COMPENDIUM OF EXHIBITS IN SUPPORT OF OPPOSITION TO**
6 **DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT** on the interested parties in this
action.

7 By placing a true copy thereof enclosed in a sealed envelope addressed as follows:

8 By attaching a true copy via electronic transmission addressed as follows:

9 Valerie Alter, VAlter@sheppardmullin.com
10 Kent Raygor, KRaygor@sheppardmullin.com
11 Zachary Golda, zgolda@sheppardmullin.com
12 Sheppard Mullin
13 1901 Avenue of the Stars, Suite 1600
14 Los Angeles, California 90067-6055
Attorneys for Respondents and Defendants
County of Los Angeles Department of Public Health
Barbara Ferrer
Muntu Davis

15 **ONLY BY ELECTRONIC TRANSMISSION.** Only by emailing the document(s) to the
16 persons at the e-mail address(es). This is necessitated during the declared National Emergency due
17 to the Coronavirus (COVID-19) pandemic because this office will be working remotely, not able to
18 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.

19 **BY ELECTRONIC MAIL:** I caused said document to be delivered by electronic mail to the
20 e-mail address(es) as listed on the attached service list.

21 **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.

22 **(BY MAIL)** As follows: I am “readily familiar” with the firm’s practice of collection and
23 processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal
24 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
25 if postal cancellation date or postage meter date is more than one day after the date of deposit for
mailing in affidavit.

26 **(BY OVERNIGHT DELIVERY)** By: Federal Express, to be delivered on next business day.

27 **(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 August 18, 2023 at Beulah, Michigan.

/s/

Julie A. Hamill