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1 2 3 4 5 6 7	SHEPPARD MULLIN RICHTER & HAMPTON KENT R. RAYGOR, Cal. Bar No. 117224 kraygor@sheppardmullin.com VALERIE E. ALTER, Cal. Bar No. 239905 valter@sheppardmullin.com ZACHARY J. GOLDA, Cal. Bar No. 327532 zgolda@sheppardmullin.com 1901 Avenue of the Stars, Suite 1600 Los Angeles, California 90067-6055 Telephone: (310) 228-3700 Facsimile: (310) 228-3701 Attorneys for Defendants	N LLP						
8	COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH, MUNTU DAVIS, M.D., and BARBARA FERRER, Ph.D., MPH, M.Ed							
9	SUPERIOR COURT OF THE STATE OF CALIFORNIA							
10	IN AND FOR THE COUNTY OF L	OS ANGELES, CENTRAL DISTRICT						
11		, 						
12	ALLIANCE OF LOS ANGELES COUNTY PARENTS, an unincorporated association,	Case No. 22STCP02772						
13	, ,	Assigned for All Purposes to:						
14	Petitioner and Plaintiff,	Hon. William F. Fahey, Dep't 69	on n					
15	V.	DECLARATION OF KENT R. RAYG SUPPORT OF EX PARTE APPLICAT						
16	COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH;	FOR A PROTECTIVE ORDER						
17	MUNTU DAVIS, in his official capacity as Health Officer for the County of Los Angeles;	[Defendants' Ex Parte Application filed concurrently herewith]						
18	BARBARA FERRER, in her official capacity as Director of the County of	<u>Hearing</u>						
19	Los Angeles Department of Public Health; and DOES 1 through 25, inclusive,	Date: September 21, 2023 Time: 8:30 a.m. Dep't: 69						
20	Respondents and Defendants.	Petition Filed: July 26, 2022						
21 22		Verified FAP filed: January 13, 2022 FSC: October 4, 2023 Trial Date: October 16, 202						
		That Date. October 10, 202	3					
23								
24								
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- 1	I .							

DECLARATION OF KENT R. RAYGOR

I, Kent R. Raygor, declare as follows:

- 1. I am a partner with Sheppard Mullin Richter & Hampton LLP, attorneys of record for defendants County of Los Angeles Department of Public Health, Muntu Davis, M.D., and Barbara Ferrer Ph.D., MPH, M.Ed (collectively "LACDPH") in this action. If called as a witness, I could and would competently testify to all facts stated herein.
- 2. Attached hereto as **EXHIBIT A** is a true and correct copy of the *ex parte* notice email I sent on September 18, 2023 to Julie Hamill, counsel for Alliance. Ms. Hamill responded in writing on September 18, stating: "Yes, I will appear and oppose."
- 3. After the hearing before the Court on September 14, 2023, counsel for Twitter/X (Jonathan Hawk), Ms. Hamill, and I met in the hallway outside Department 69. Mr. Hawk and Ms. Hamill discussed the protective order that had been discussed with the Court during the hearing. Mr. Hawk repeated that Twitter/X still needed a protective order and would agree to certain redactions by Ms. Hamill. Ms. Hamill expressly agreed to a protective order and stated that she had no desire to disseminate Twitter/X materials. On September 15, 2023, I sent an e-mail to Ms. Hamill along with supplemental responses by LACDPH to Alliance's discovery requests. In it, I stated:

"Please let us know when you have a draft of the stipulated protective order you are discussing with X Corp ready for our review. We will produce documents once it is entered."

She responded on September 15, denying she ever agreed to a protective order. I then spoke with Mr. Hawk. He confirmed what I, too, had heard in the hallway, namely that Ms. Hamill had agreed to a protective order.

4. Almost from the beginning of this case, Ms. Hamill has been unprofessional in dealing with Defendants' counsel. She has been posting documents produced in this case for purposes having nothing to do with the litigation of this matter. She has done so on her personal Twitter feed and Plaintiff's website, and has been interviewed on talk shows, podcasts, and news programs about activities and documents produced in this case. None of that has any legitimate

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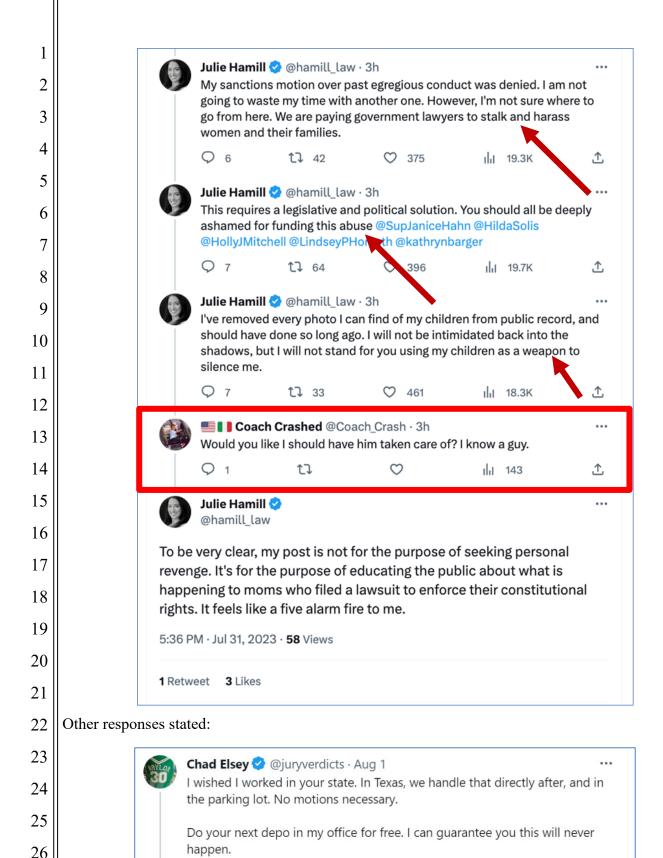
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purpose in connection with the litigation of this matter. It is only done to raise Ms. Hamill's political profile, generate business for her law practice, and generate donations from the public to fund her lawsuit through her crowdfunding solicitations made on her Twitter feed and the Alliance website.

5. Unfortunately, her extra-judicial actions have generated repeated harassment of Defendants' witnesses, Defendants' counsel, and even a potential death or injury threat directed at me. In response to tweets from Ms. Hamill immediately following the deposition of Dr. Ferrer, Mr. Morrow, LACDPH's Chief of Communications, received the following e-mail:



Within hours of my July 31, 2023 deposition of Roxanne Hoge as the PMQ witness for Alliance and in response to tweets from Ms. Hamill, someone responded to Ms. Hamill and made the boxed statement below:



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Show replies



Nickola_Temple @NickolaTemple · Aug 1

Make it as public as possible. The county & Sheppard Mullin are saying "nice kid you have there" it would be a shame if anything happened to him. sheppardmullin.com It is a nice law firm you have there it would be a shame if something happened to some of your partners.

Q

111 38



Glen Waldrop @0ldmanGlen · Aug 2

There is a fix for this but we can't discuss it in s public forum.

Q

LI

111 9

6. Other examples of her posts are:



As I stated repeatedly in discovery responses, privacy of Alliance members is critically important because the County has displayed a willingness to engage in abuse, harassment, intimidation and retaliation. I rest my case.

10:24 AM · Jul 15, 2023 · 751 Views



Despite the irrelevance, despite my objections, and despite me wiping my website clean of photos of my kids, lawyers for Los Angeles County actually entered a photo of my son into evidence in support of a procedurally improper motion to dismiss. Does the @LACountyBOS support mafia tactics on lawyers working to enforce a constitutional right?

WHERE IS THE ADULT IN THE ROOM?

2:44 PM · Sep 5, 2023 · 70.3K Views



Lawyers for the County have taken their unethical behavior to another level following the denial of my motion for sanctions. As I predicted, their strategy is to harass and intimidate any Alliance member they can find. It's appalling. I'm embarrassed to share a profession with people like this.

9:55 AM · Jul 15, 2023 · 18.9K Views

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Julie H	amill 🤣 @hamill	_law · 1	า		•••
Abuse, harassment, intimidation. A message to anyone else who dares to					
challen	ge the constituti	onality o	of t	he county's actions. Ironic, eh?	
\Diamond	t ⊋	\bigcirc	1	ال 34 ـــــــــــــــــــــــــــــــــــ	

She now also adds Twitter's counsel at White & Case to the mix:



Other examples are marked in **EXHIBIT B** hereto, which is a collection of some of Ms. Hamill's posts about this case and replies thereto, gathered and copied by our paralegal, Lily Chu. As can be seen therein, such posts often inflame her followers. Ms. Hamill appears to have either deleted or she or Twitter/X has archived any posts older than June 19, 2023 so we are no longer able to see them.

7. Ms. Hamill's extra-judicial commentary and posts are not professional or decorous and make it difficult to simply litigate the merits of this dispute. We are repeatedly attacked. In four communications on April 13, 14 (twice) and 17, 2023, Ms. Hamill falsely accused my law firm of spoliating evidence (*i.e.*, LACDPH's Twitter feed) and refused to simply talk with us to try to work through her questions and those raised by our discovery meet-and-confer letter. Ms. Hamill and I spoke on April 24, 2023 to try to work out all outstanding issues. During the call, she called me "rude", "dismal" and "condescending". She falsely stated I have "repeatedly threatened" her, a statement she has repeated to me on other occasions. I have never threatened her. Nevertheless, I continued to try to work out our differences and move things forward. I explained to her how there was no spoliation and that she was misinformed about how Twitter archives older posts. She asked us to produce LACDPH's Twitter archive at Dr. Ferrer's May 3, 2023 deposition and we did, but she never apologized for falsely accusing us of spoliation. Instead, she has continually accused us of lying and, based on that false accusation, has refused to talk with us unless we speak only in writing, and, if we speak orally, will only do so if we record the conversations.

- 8. Accusing us of "abusing", "harassing", "intimidating", and "threatening" her and Alliance's members has become one of Ms. Hamill's themes. We have never done any such thing. The following are just a handful of examples of such attacks (all emphasis added):
 - "I don't imagine the legislature intended to create a system wherein a Big Law firm with limitless resources *abuses* discovery processes to *harass* and *harm* citizens trying to enforce an important right affecting the public interest." [April 14, 2023 e-mail from Ms. Hamill to me.]
 - "I am not going to allow you to *abuse* and *harass* the parents in this organization."
 [May 3, 2023 e-mail from Ms. Hamill to me.]
 - "Unfortunately, because of your *abusive* and *dishonest* conduct throughout this litigation, I am unable to meet and confer with you off the record going forward. I am happy to speak with Valerie, but I am not open to any off-record conversations with you." [May 3, 2023 e-mail from Ms. Hamill to me.]
 - "[Alliance] is unable to conceive of any legitimate purpose for this demand beyond harassment, annoyance, and intimidation by [LACDPH]." [Stated once in Alliance's April 17, 2023 amended responses to LACDPH's form interrogatories and three times in its April 28, 2023 responses to LACDPH's document demands.]
 - "Counsel for [LACDPH] is on notice that any further abuse and harassment of Ms.
 Hamill or any members of the Alliance will be met with additional requests for sanctions." [Alliance's May 19, 2023 supplemental responses to LACDPH's special interrogatories.]
- 9. Ms. Hamill repeated those attacks in her May 26, 2023 motion for sanctions and contempt against me:
 - "This motion for sanctions arises out of counsel for LADPH's abusive attempts to harass and intimidate Alliance members into further silence."
 - "This motion for sanctions is brought to curb abuse of the discovery process by defense counsel Kent Raygor...."

- "MS. HAMILL: And I am fearful that going forward we will continue to be subject to the same *abuse* and *harassment* that we experienced, and that is on the record on this day of May 3rd. That is why I filed the motion. I filed the motion to curb further discovery abuses in the future." [*Id.* at 10:21-26.]
- "MS. HAMILL: ... [M]y personal practice is that I will not have any off-record discussions with Mr. Raygor based on a pattern of *dishonesty*. And so that I will continue that going forward. I can have discussions " [Id. at 11:16-12:4.]
- 12. On July 13, 2023 six days after the July 7, 2023 deposition of LACDPH's Chief Communications Officer, Brett Morrow Ms. Hamill appeared on the John Phillips talk show on KABC 790 AM. A recording of the interview can be found at: https://www.kabc.com/the-john-phillips-show/. She publicly mischaracterized happened at the Morrow deposition. For example:
- [at 04:30]¹ MS. HAMILL: "And, uh, counsel for the County *attempted to kick her [Roxanne Hoge] out*, but we held the deposition on my turf this time, and he wasn't allowed to physically remove her and so he stopped trying to fight me on it."

 I did not attempt to kick Ms. Hoge out of the deposition. In fact, I expressly stated on the transcript, "I'm not going to kick her out". [July 7, 2023 Morrow Deposition Transcript, at 13:2-14:5.]
- 13. In another example from that interview, she mischaracterized the testimony about threats received by LACDPH:
 - [at 15:06] MS. HAMILL: "His [Mr. Morrow's] explanation is that there were threats, which have never been identified he couldn't identify a single threat um, harassment and misinformation, and misinformation includes anything that is contrary to whatever was coming out of Barbara Ferrer's mouth."
 - [at 16:16] MS. HAMILL: "He was unable to remember any specific threats and he was unable to remember recall ever contacting law enforcement."

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¹ Some of the indicated time stamps might be a bit off due to the length of different ads that are inserted at the beginning of the recording.

1	On the contrary, Mr. Morrow identified at least one such threat and that it was reported to law					
2	enforcement:					
3	"Q. Can you think of any specific examples of threats that you described in your e-					
4	mails to Twitter?					
5	A. I can't remember if I was thinking of specific threats at that time, but <i>I do</i>					
6	remember social media threats saying that Dr. Ferrer should be shot.					
7	Q. That was on Twitter?					
8	A. I believe that was Facebook.					
9	Q. Facebook?					
10	A. Correct.					
11	Q. Was that reported to law enforcement?					
12	A. I believe so."					
13	[July 7, 2023 Morrow Deposition Transcript, at 161:19-162:4 (emphasis added).]					
14	14. She publicly engaged in inappropriate name-calling directed at Mr. Morrow:					
15	• [at 06:31] MS. HAMILL: "[Brett Morrow] came across as nice, somewhat aloof,					
16	incredibly incompetent"					
17	• [at 06:49] MS. HAMILL: "He was kind, he was polite, but it was clear to me that he					
18	is, um – I feel bad saying this, because he's so nice – but he's incredibly incompetent					
19	and stupid."					
20	• [at 17:38] MS. HAMILL: "I feel so bad saying this, because he really seems like a					
21	nice person, but <i>I don't think he has the intellectual capacity</i> to run that office."					
22	at 19:13] MS. HAMILL: "My impression of the two of them Brett Morrow and Dr.					
23	Barbara Ferrer] is that they're really <i>not very bright</i> . And <i>they're not, like, strategic</i>					
24	geniuses or anything along those lines. And it could be that they're just two dim					
25	bulbs who fell into a lot of power and abused it, or it could be something more					
26	sinister."					
27						

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1	15. The same kind of attacks occurred in other interviews. In a May 5, 2023 KABC				
2	790AM (https://www.kabc.com/the-john-phillips-show/) two days after the deposition of Dr.				
3	Barbara Ferrer, Ms. Hamill stated:				
4	• [at 04:43] HAMILL: "[T]he harassing and abusive actions of opposing counsel are				
5	probably going to delay those final results."				
6	• [at 05:30] PHILLIPS: "She [Dr. Barbara Ferrer] runs that office like it's a part of a				
7	political machine, like it's Tammany Hall." HAMILL: "Yeah, I don't disagree."				
8	• [at 11:46] HAMILL: "She [Dr. Barbara Ferrer] came across as a Luddite who				
9	doesn't understand and doesn't pay attention to social media and doesn't use it."				
10	16. A redline of the Court's protective order template found at				
11	https://www.lacourt.org/division/civil/pdf/formprotectiveorder1confidential_1.pdf is attached				
12	hereto as EXHIBIT C.				
13	I declare under penalty of perjury under the laws of the State of California that the foregoin				
14	is true and correct.				
15	Executed on September 20, 2023 at Los Angeles, California.				
16	V. 100				
17	KENT R. RAYGOR				
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From: Kent Raygor

Sent: Monday, September 18, 2023 2:29 PM **To:** 'Julie Hamill' <julie@juliehamill-law.com>

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

J. Jonathan' <jhawk@whitecase.com> **Subject:** Alliance Case -- Ex Parte Notice

Julie,

We hereby give you notice that we will be making an *ex parte* application before Judge Fahey in **Department 69** at **8:30 a.m.** on **Thursday, September 21, 2023**. We will be asking the Court to enter a protective order based on the Court's template located at https://www.lacourt.org/division/civil/pdf/formprotectiveorder1confidential_1.pdf, and that provides that all documents produced in this action by the parties and non-parties (*e.g.*, Twitter/X), and the contents of such documents, can only be used for the purposes of this litigation. Our application will also be based on CALIFORNIA RULE OF PROFESSIONAL CONDUCT 3.6.

Pursuant to California Rule of Court 3.1204(a)(2), please let us know if Alliance will appear to oppose the application.

Kent Raygor

+1 310-228-3730 | direct KRaygor@sheppardmullin.com | Bio

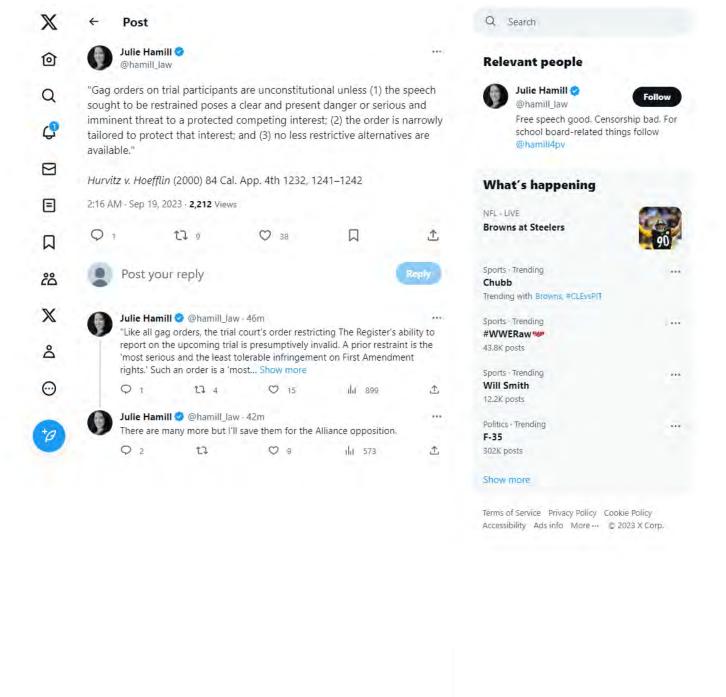
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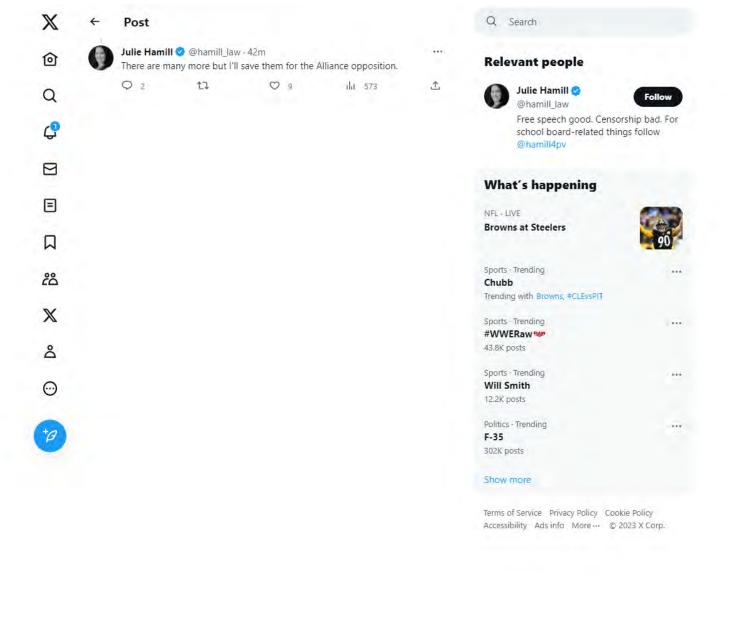
1901 Avenue of the Stars, Suite 1600 Los Angeles, CA 90067-6017 +1 310-228-3700 | main www.sheppardmullin.com | LinkedIn | Twitter

cc: J. Jonathan Hawk, Esq. (counsel for non-party Twitter/X Corp.)



Document title: (1) Julie Hamill on X: ""Gag orders on trial participants are unconstitutional unless (1) the speech sought to be restrained poses a clear and present danger or serious and imminent threat to a protected competing interest; (2) the order is narrowly tailored to protect that interest; and (3) no less..." / X Capture URL: https://twitter.com/hamill_law/status/1703956279767818690 Page loaded at (UTC): Tue, 19 Sep 2023 03:06:15 GMT Capture timestamp (UTC): Tue, 19 Sep 2023 03:06:46 GMT Capture tool: 10.29.3 54.157.181.49 Collection server IP: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 3 Capture ID: 8gzr9umDpkEJCiVNXKZBuw User: sm-lchu PDF REFERENCE #: 87DmzSxUkwWgyGwGJCjRr4



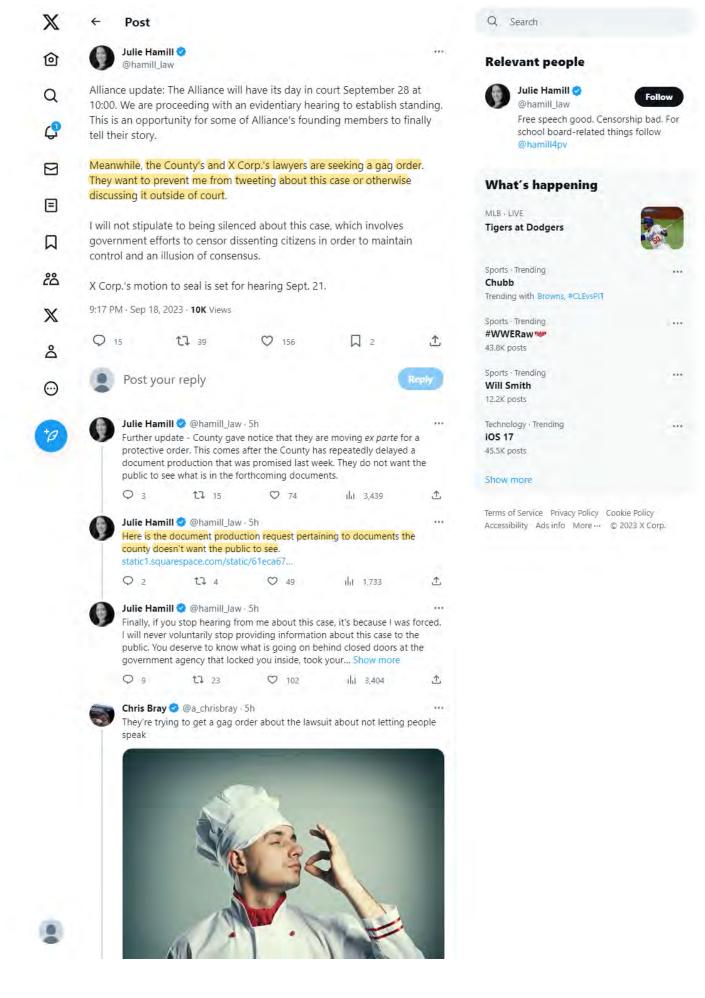


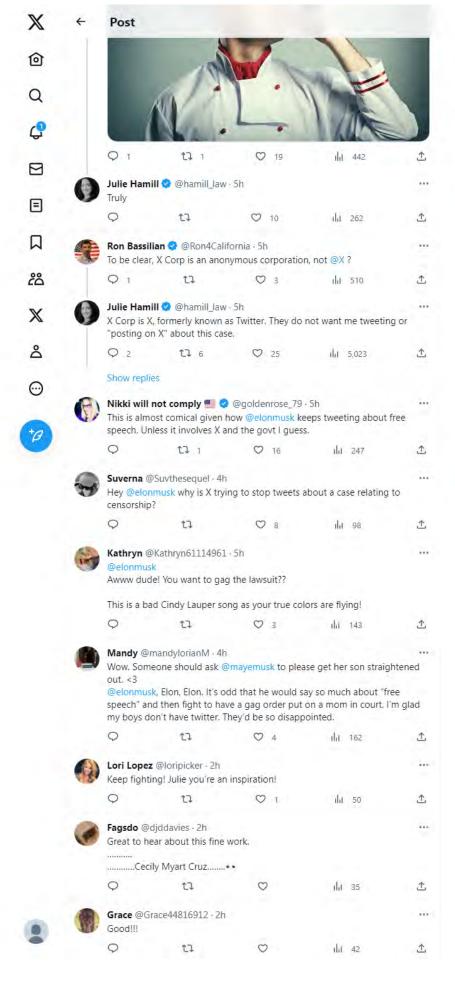


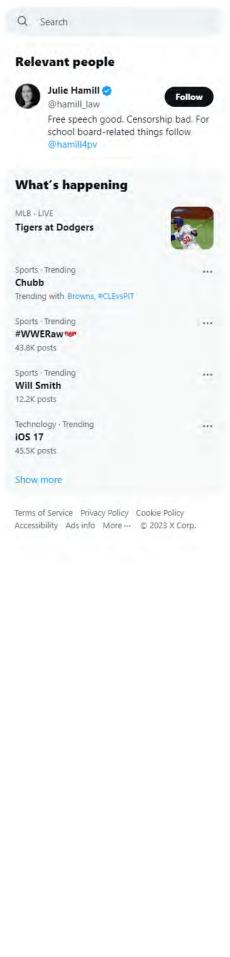
Document title: (1) Julie Hamill on X: "Alliance update: The Alliance will have its day in court September 28 at 10:00. We are proceeding with an evidentiary hearing to establish standing. This is an opportunity for some of Alliance's founding members to finally tell their story. Meanwhile, the County's and X Corp.'s..." / X Capture URL: https://twitter.com/hamill_law/status/1703880992686215344 Page loaded at (UTC): Tue, 19 Sep 2023 03:07:03 GMT Capture timestamp (UTC): Tue, 19 Sep 2023 03:08:31 GMT Capture tool: 10.29.3 54.157.181.49 Collection server IP: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 6 Capture ID: tTHemnvtB1FhfkAqkoYpQs User: sm-lchu

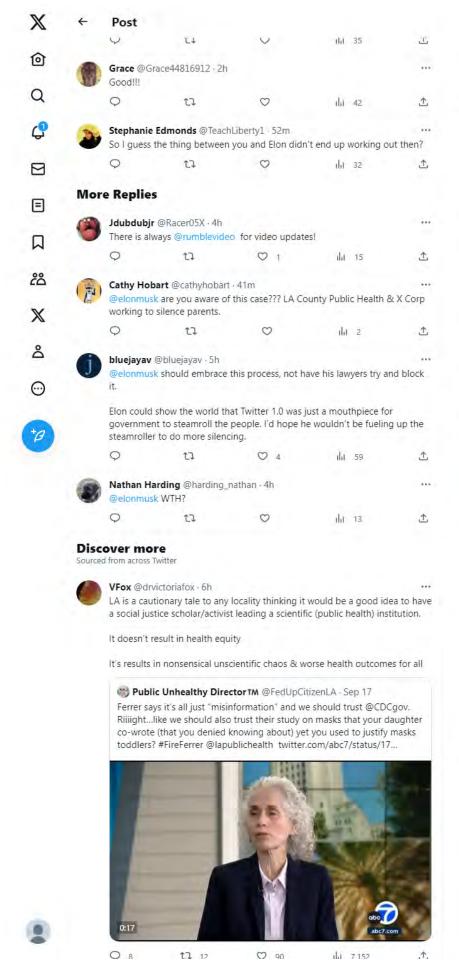
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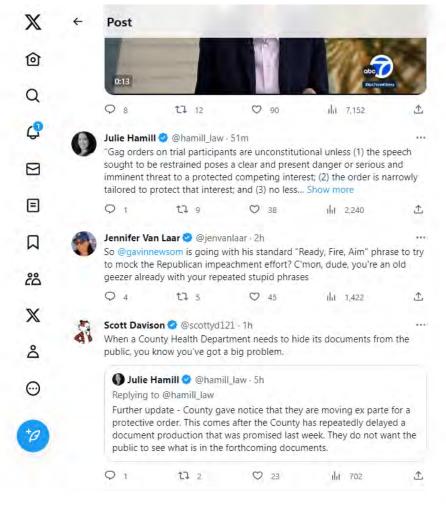






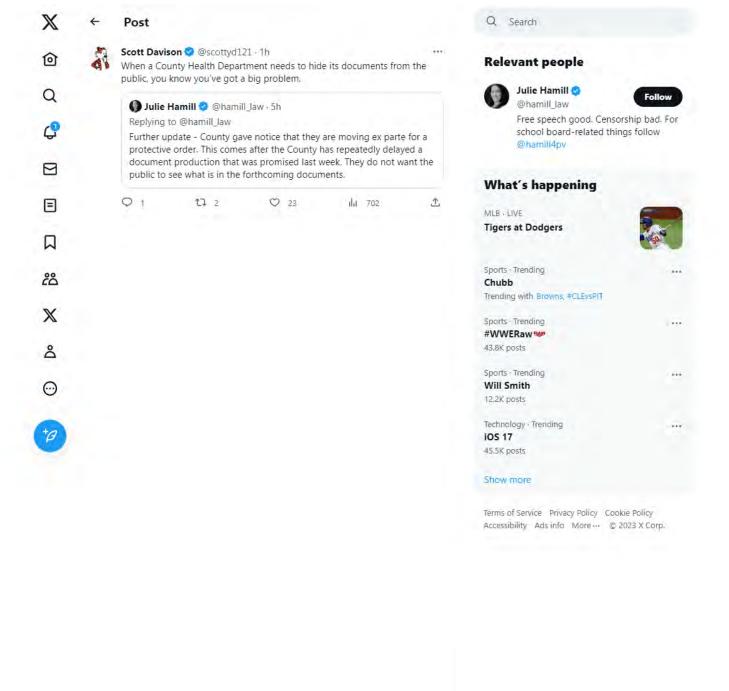






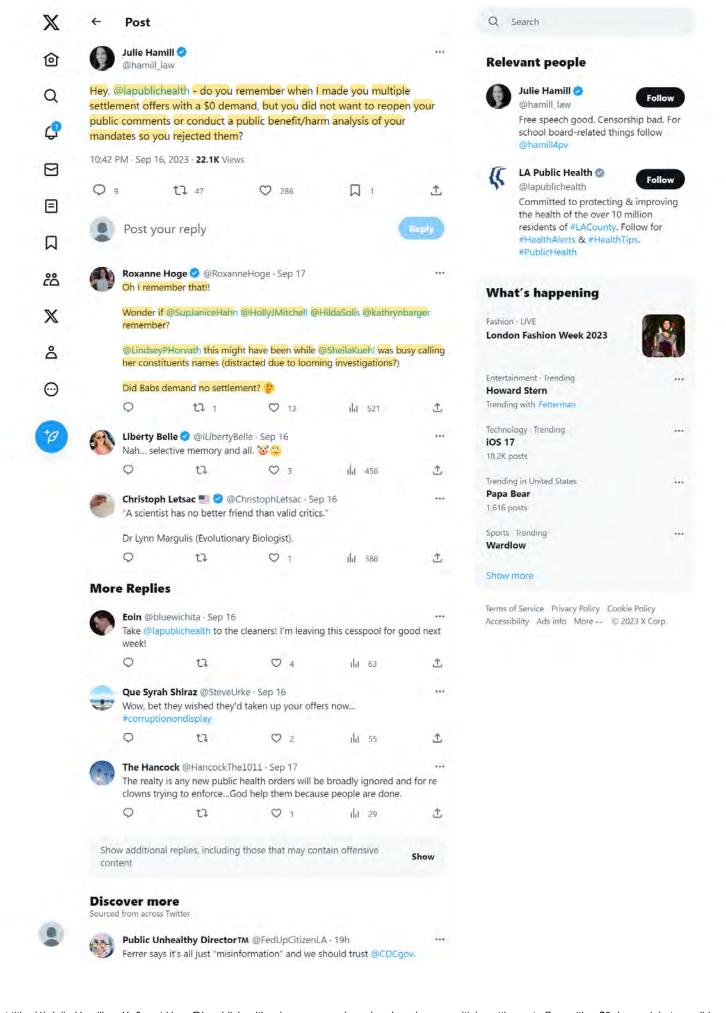


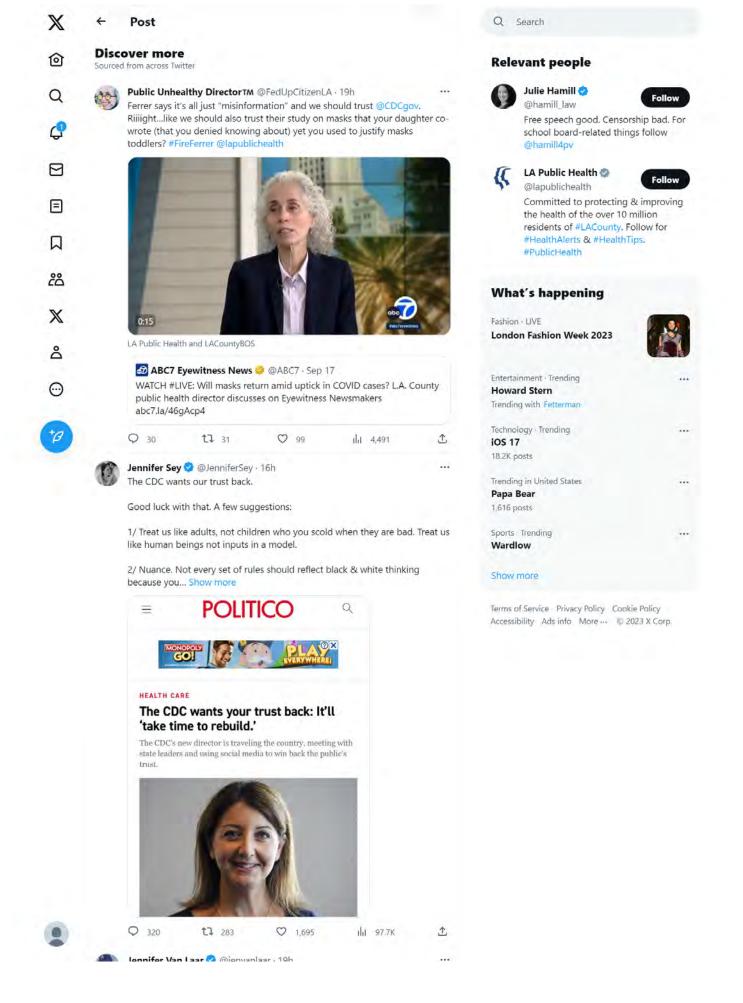
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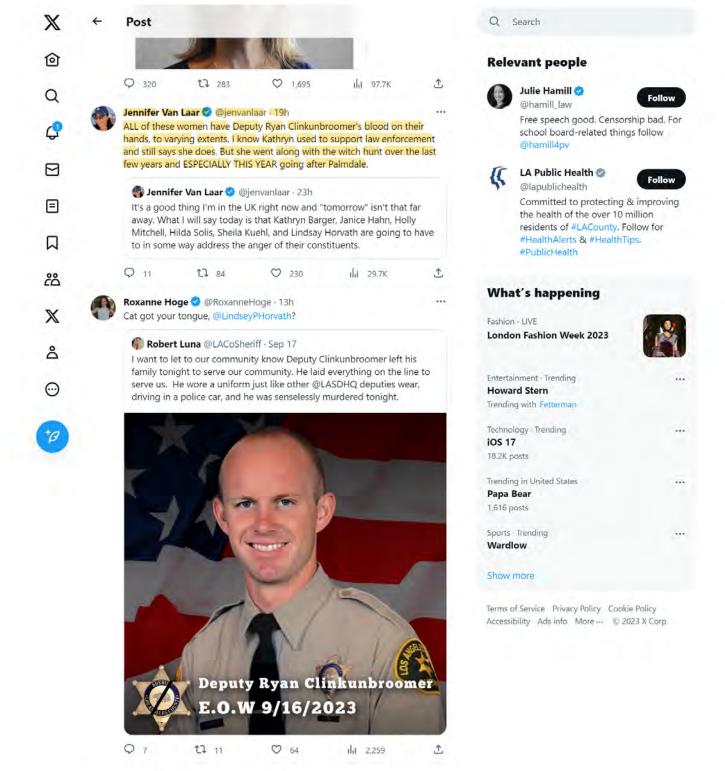


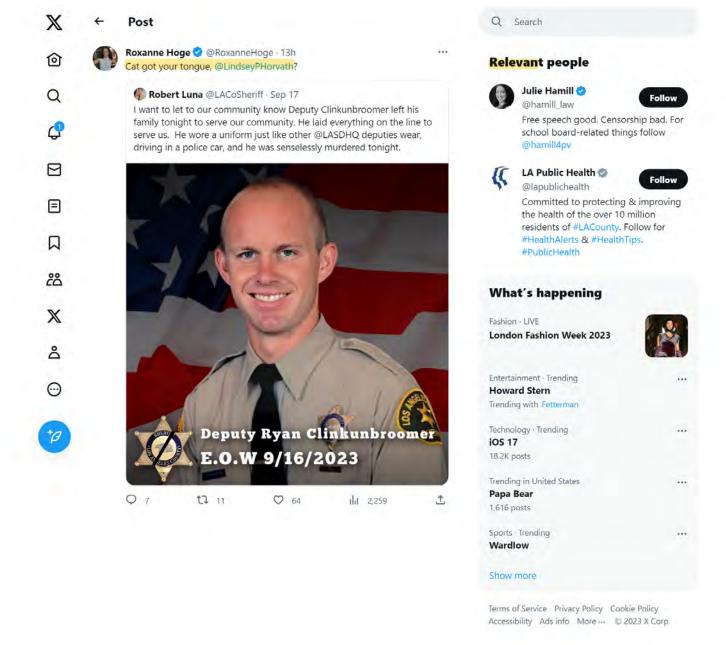


Document title: (1) Julie Hamill on X: "Hey, @lapublichealth - do you remember when I made you multiple settlement offers with a \$0 demand, but you did not want to reopen your public comments or conduct a public benefit/harm analysis of your mandates so you rejected them?" / X Capture URL: https://twitter.com/hamill_law/status/1703177588993364012 Page loaded at (UTC): Mon, 18 Sep 2023 18:17:40 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 18:19:41 GMT Capture tool: 10.29.2 Collection server IP: 54.157.181.49 Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 5 Capture ID: iLgvkZMKUsVtJJvuAXJ2kK User: sm-lchu PDF REFERENCE #: 4dKckGchfBneEofq4L5wZS



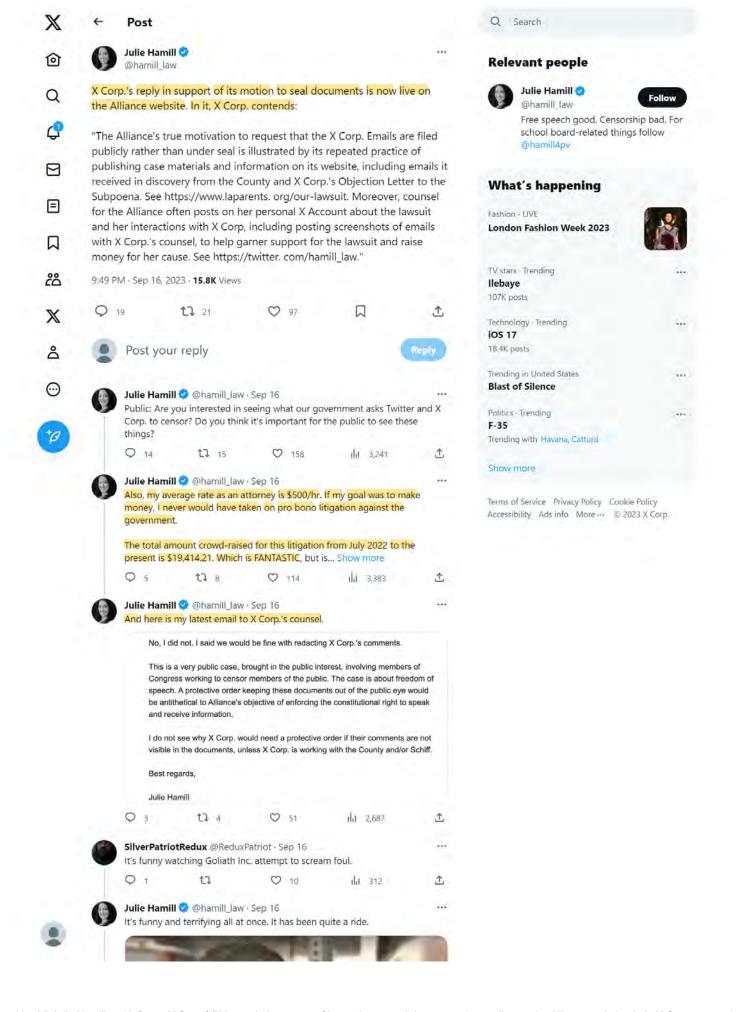


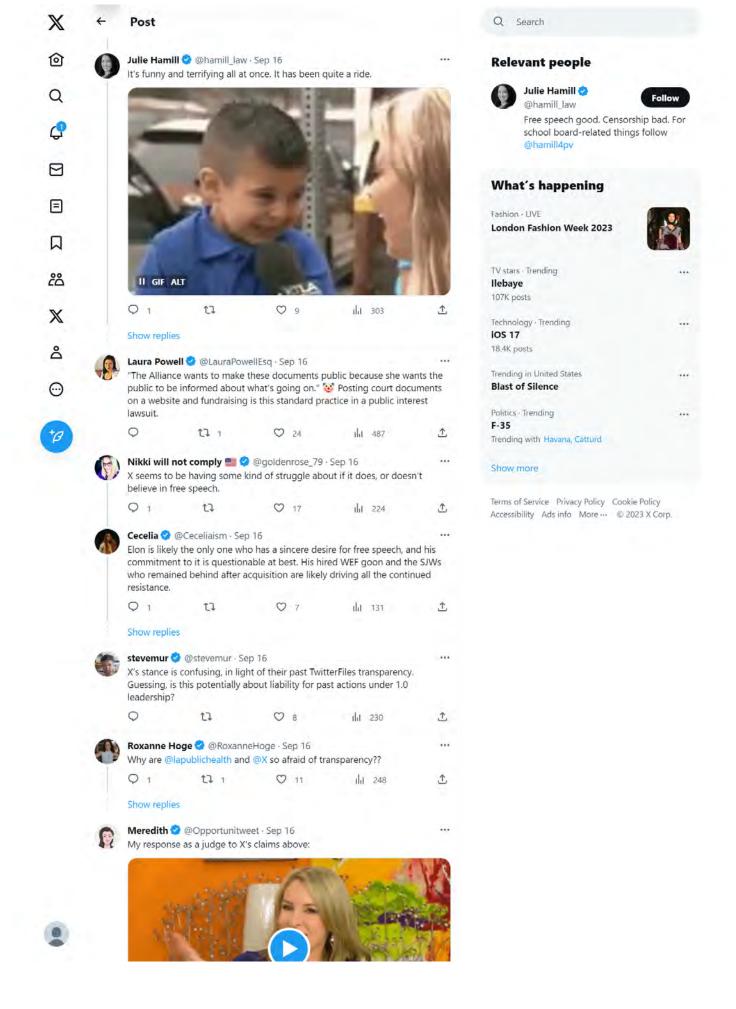


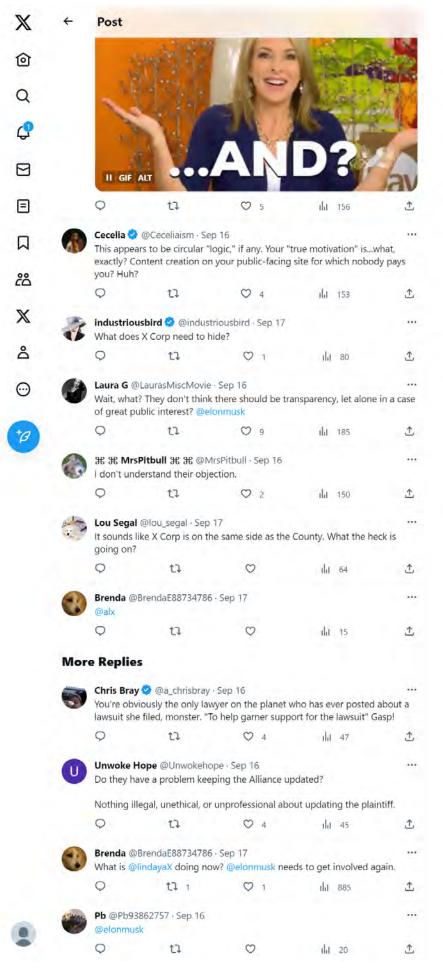




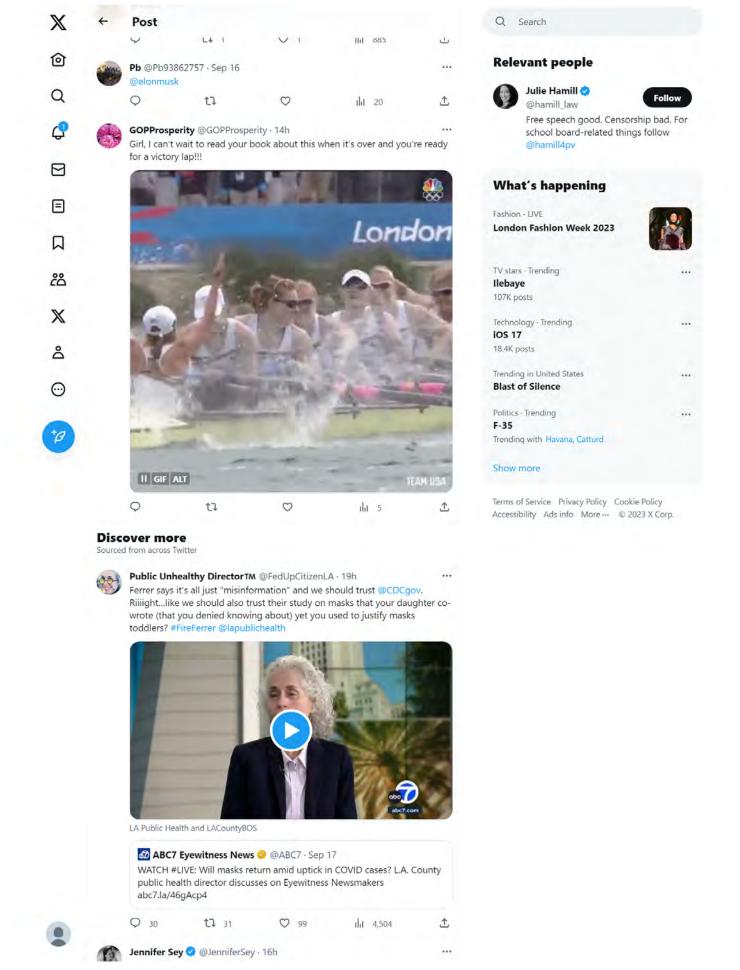
Document title: (1) Julie Hamill on X: "X Corp.'s reply in support of its motion to seal documents is now live on the Alliance website. In it, X Corp. contends: "The Alliance's true motivation to request that the X Corp. Emails are filed publicly rather than under seal is illustrated by its repeated practice of..." / X Capture URL: https://twitter.com/hamill_law/status/1703164262599004670 Page loaded at (UTC): Mon, 18 Sep 2023 18:20:09 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 18:21:49 GMT Capture tool: 10.29.2 54.157.181.49 Collection server IP: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 8 Capture ID: 4DwiRwTrbQSQ68Xass4buL User: sm-lchu PDF REFERENCE #: rGZoJToaRqLq6ZQxdMaYcs

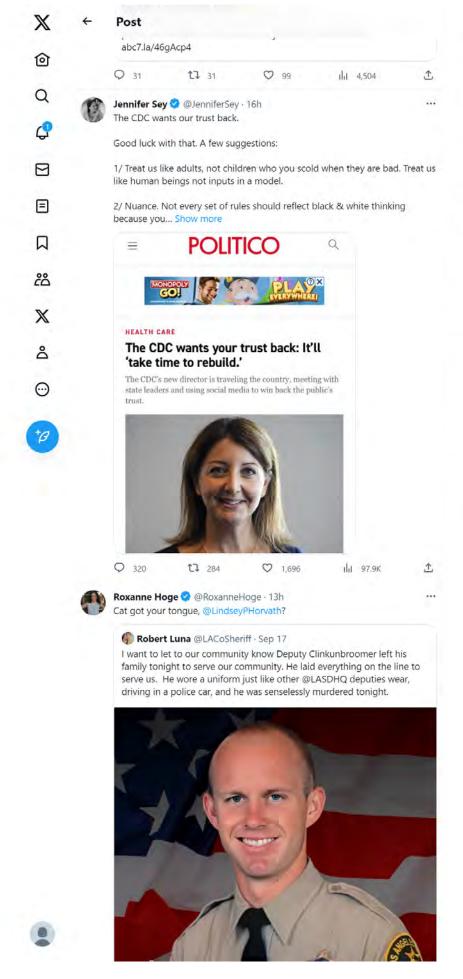




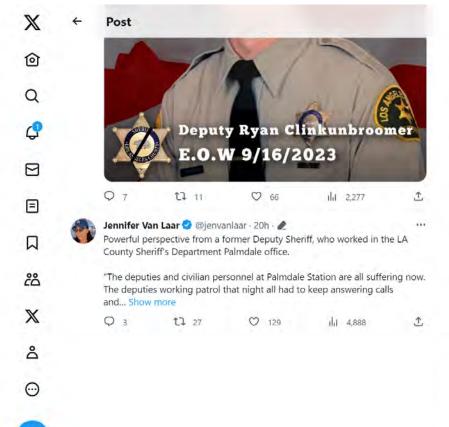




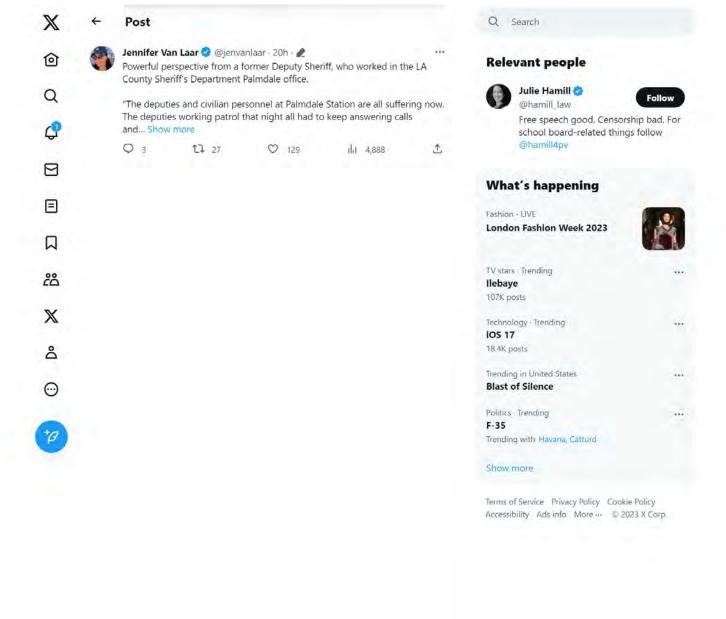






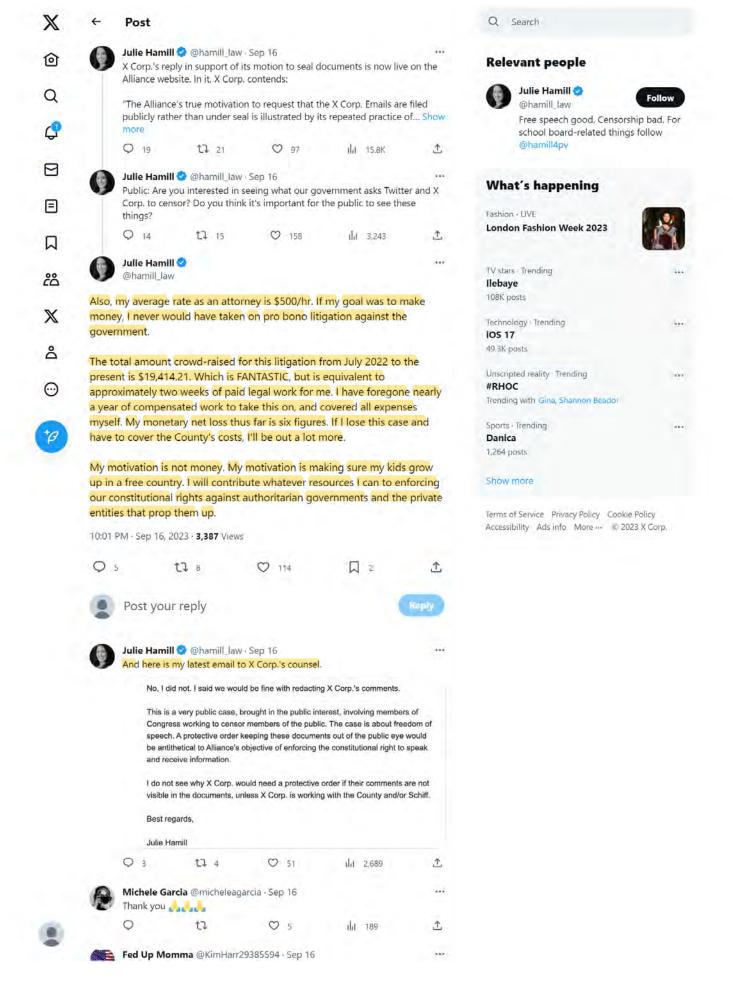


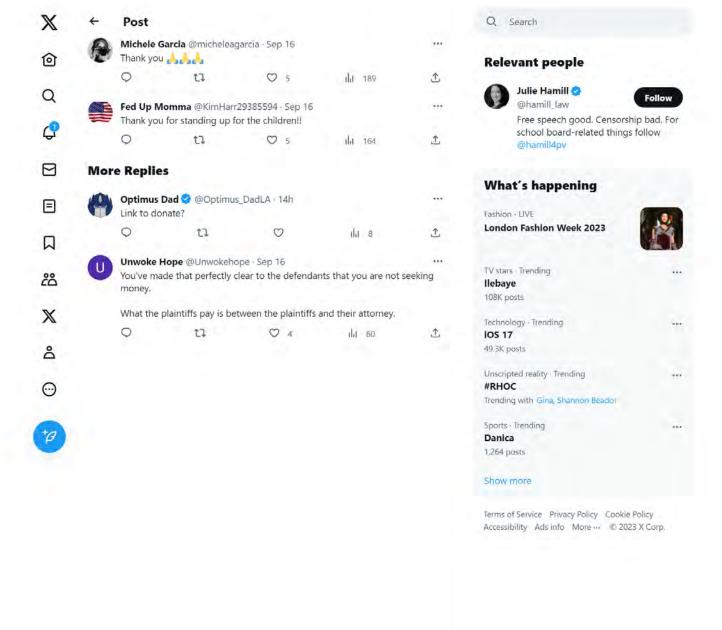


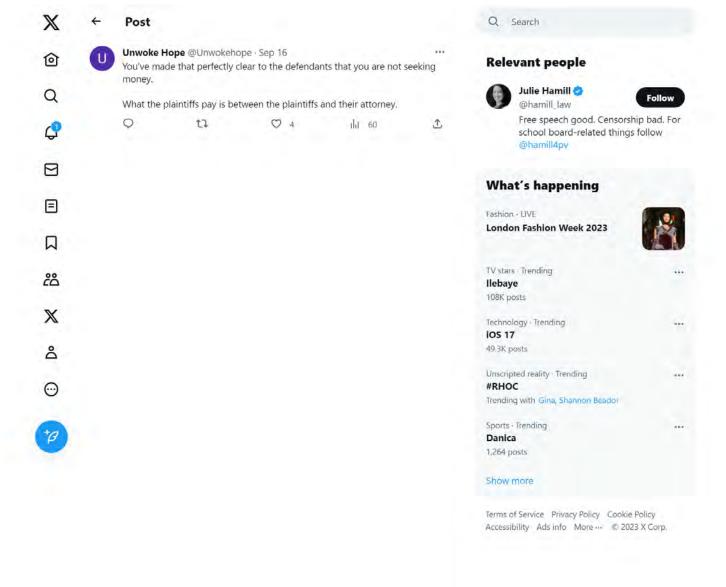




Document title: (1) Julie Hamill on X: "Also, my average rate as an attorney is \$500/hr. If my goal was to make money, I never would have taken on pro bono litigation against the government. The total amount crowd-raised for this litigation from July 2022 to the present is \$19,414.21. Which is FANTASTIC, but is..." / X Capture URL: https://twitter.com/hamill_law/status/1703167147294515589 Page loaded at (UTC): Mon, 18 Sep 2023 18:21:56 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 18:22:42 GMT Capture tool: 10.29.2 Collection server IP: 54.157.181.49 Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 4 Capture ID: pUvkTKoP5HPvdmAGKr9jyj User: sm-lchu PDF REFERENCE #: jB2wiR5LFkPajVvyCLm5Sd ___





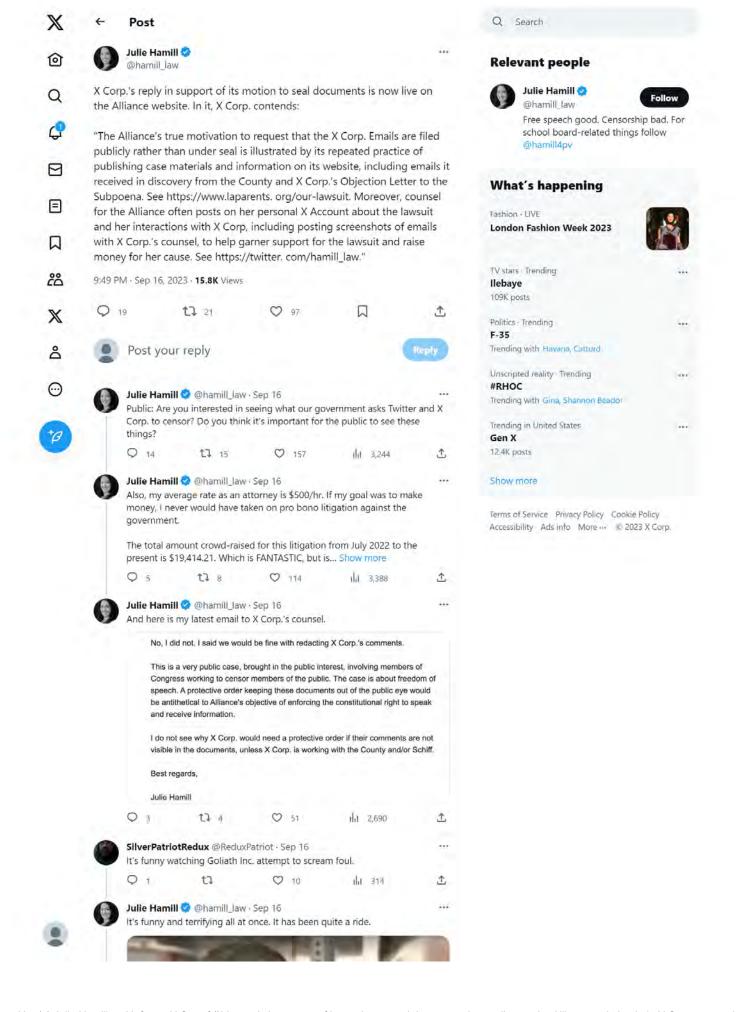


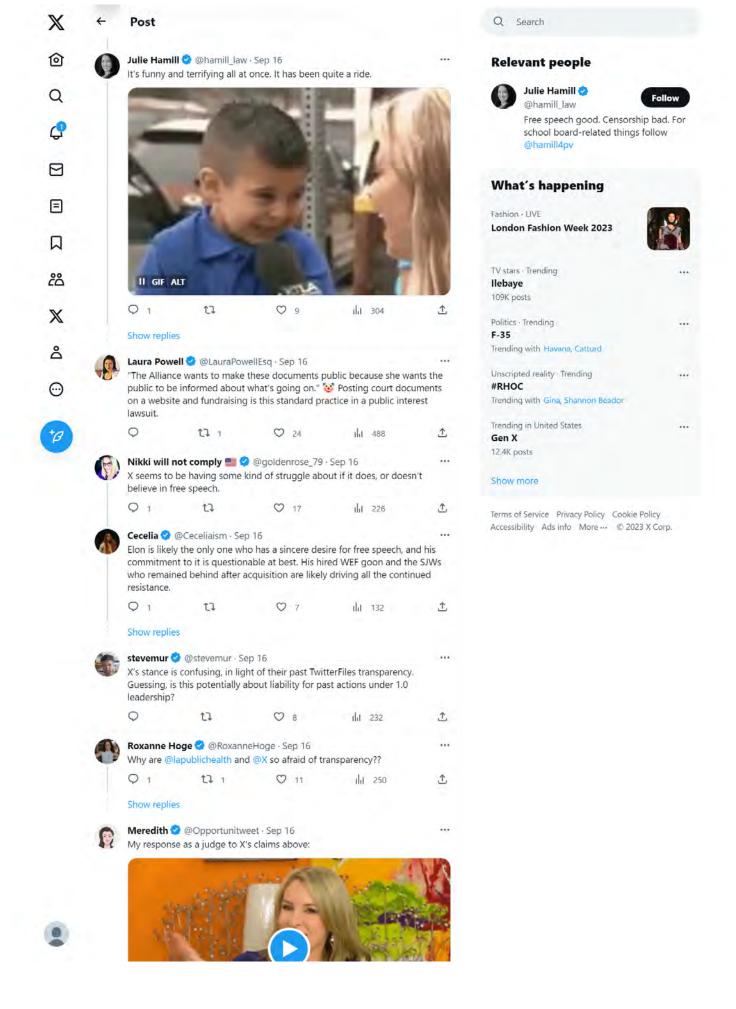


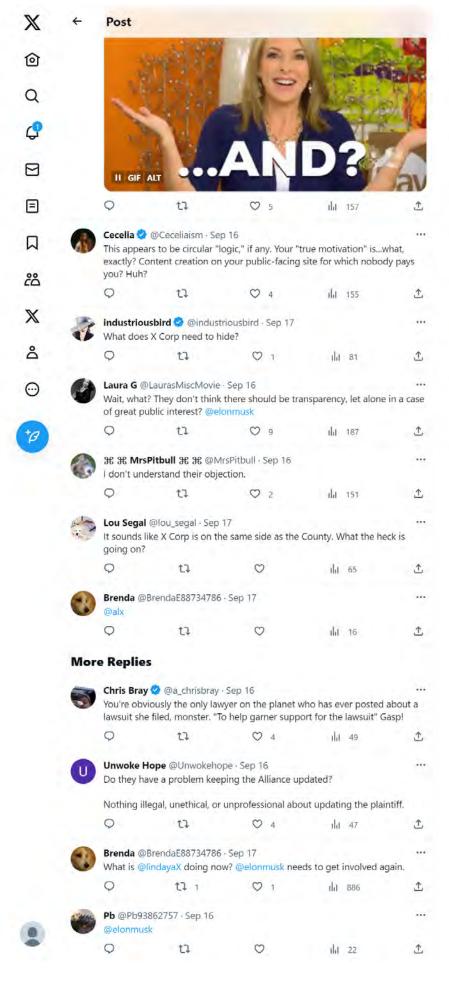
Document title: (1) Julie Hamill on X: "X Corp.'s reply in support of its motion to seal documents is now live on the Alliance website. In it, X Corp. contends: "The Alliance's true motivation to request that the X Corp. Emails are filed publicly rather than under seal is illustrated by its repeated practice of..." / X Capture URL: https://twitter.com/hamill_law/status/1703164262599004670 Page loaded at (UTC): Mon, 18 Sep 2023 18:24:10 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 18:25:19 GMT Capture tool: 10.29.2 Collection server IP: 54.157.181.49 Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) 7 PDF length: Capture ID: rVqP7NgXXPgHvftxgU5z3P User: sm-lchu

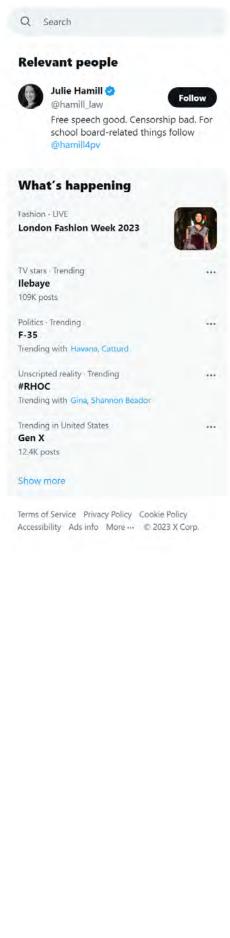
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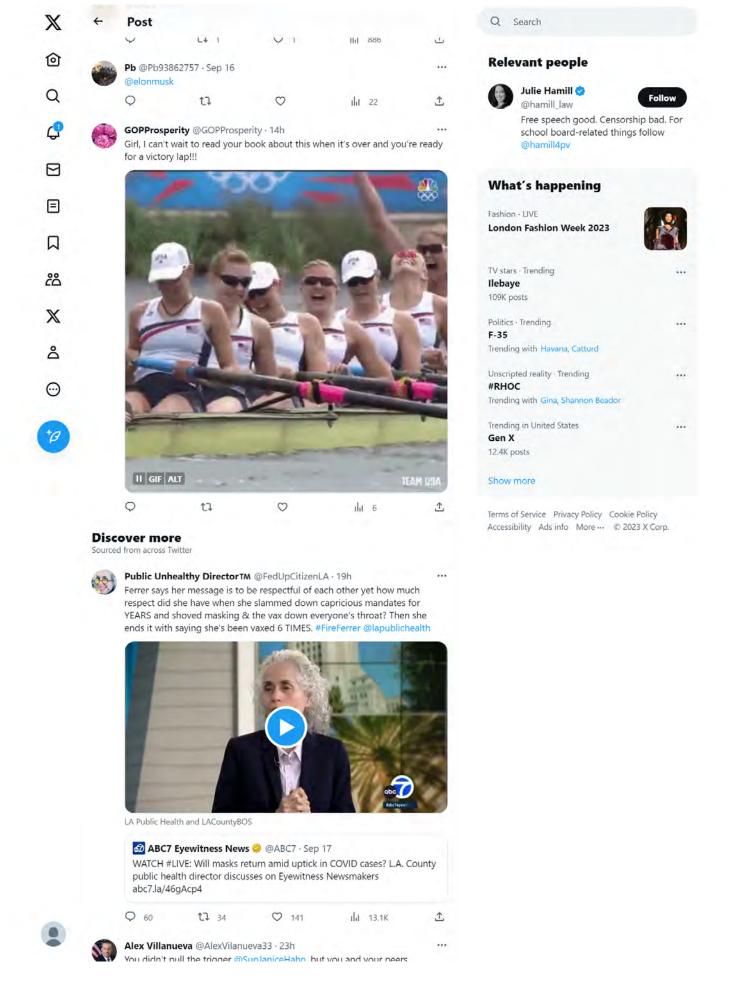
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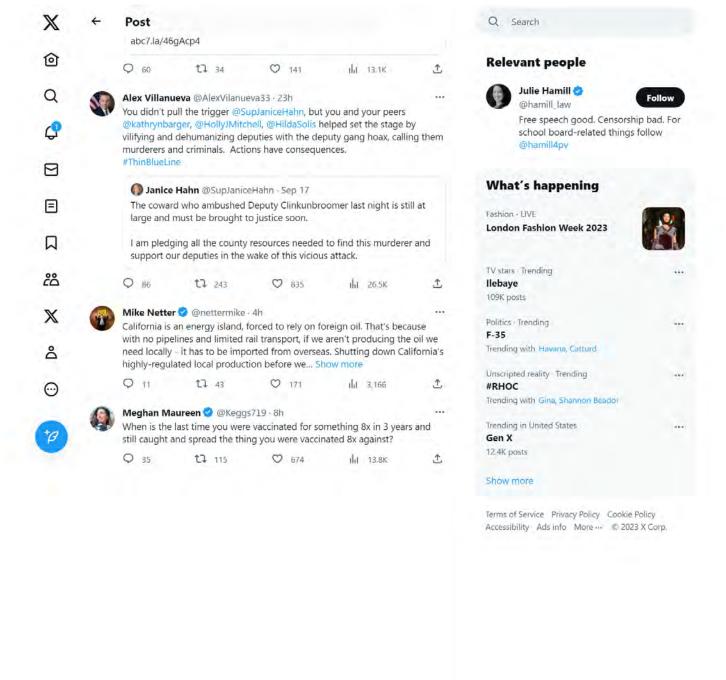


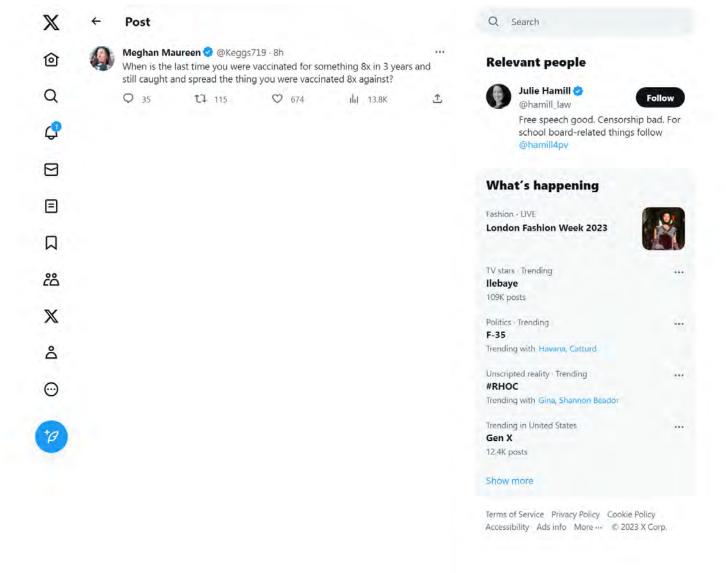






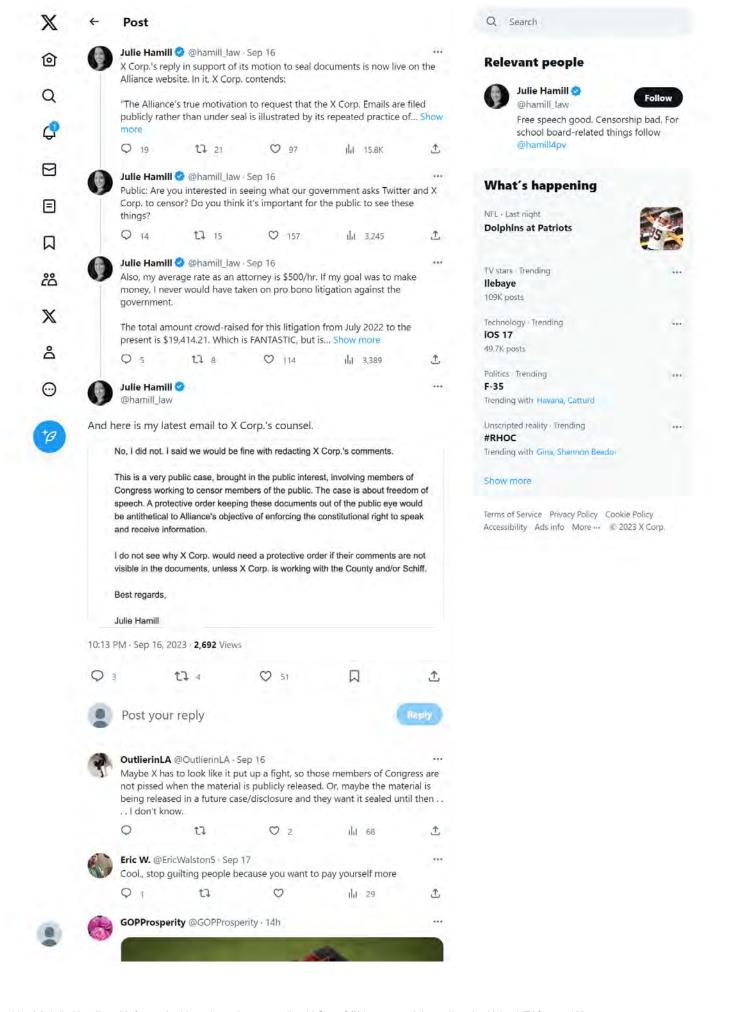


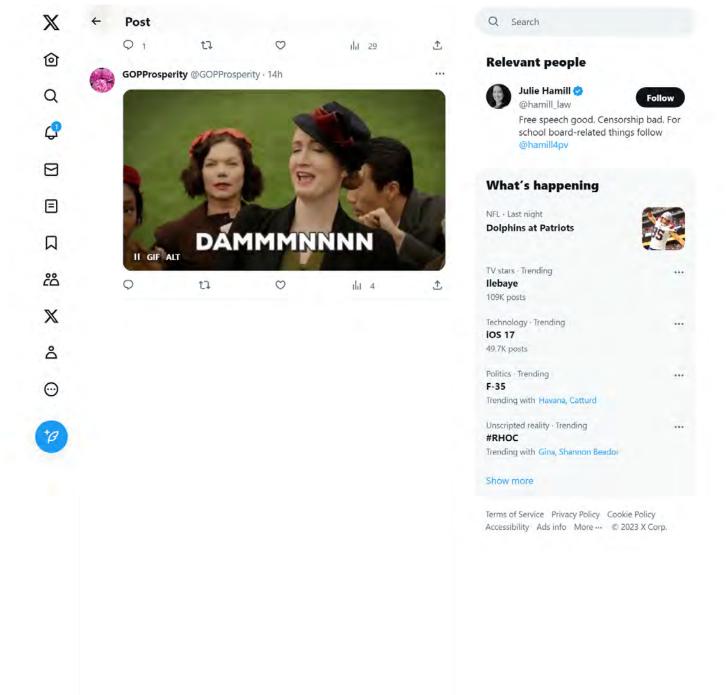


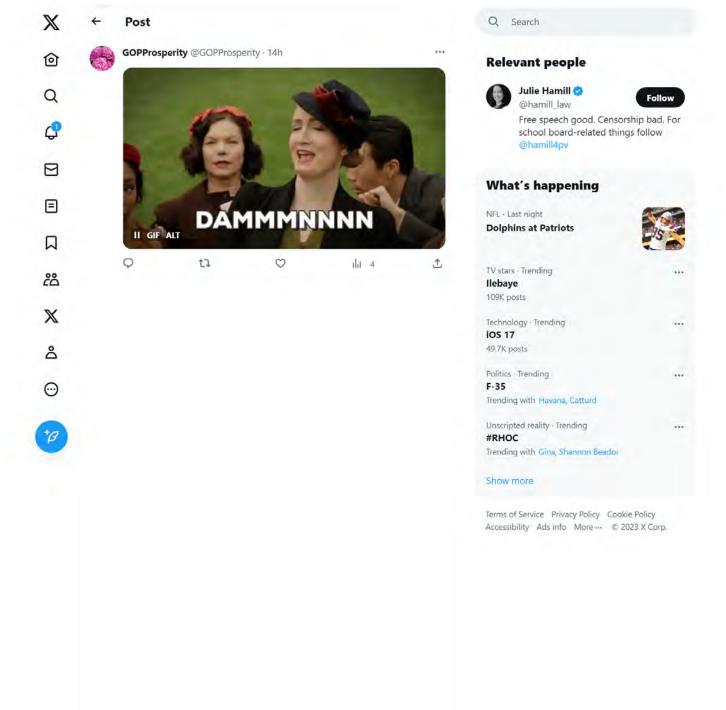




Document title: (1) Julie Hamill on X: "And here is my latest email to X Corp.'s counsel. https://t.co/ weUtA4qVZ3" / X Capture URL: https://twitter.com/hamill_law/status/1703170352124481589 Page loaded at (UTC): Mon, 18 Sep 2023 18:25:30 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 18:26:08 GMT Capture tool: 10.29.2 Collection server IP: 54.157.181.49 Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Windows_NT (Node 16.17.1) Operating system: PDF length: 4 Capture ID: 7Zm2pu8ULomL3Xxcc8W7aw User: sm-lchu PDF REFERENCE #: r8kGYDyK7qjYggBc3BwfXh

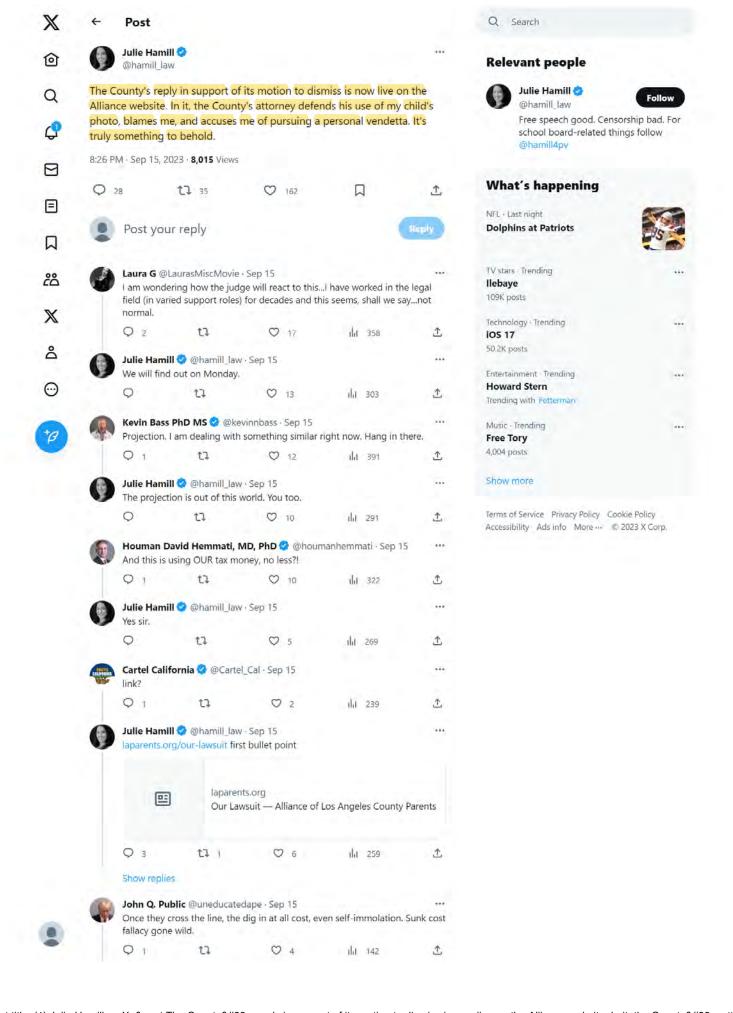


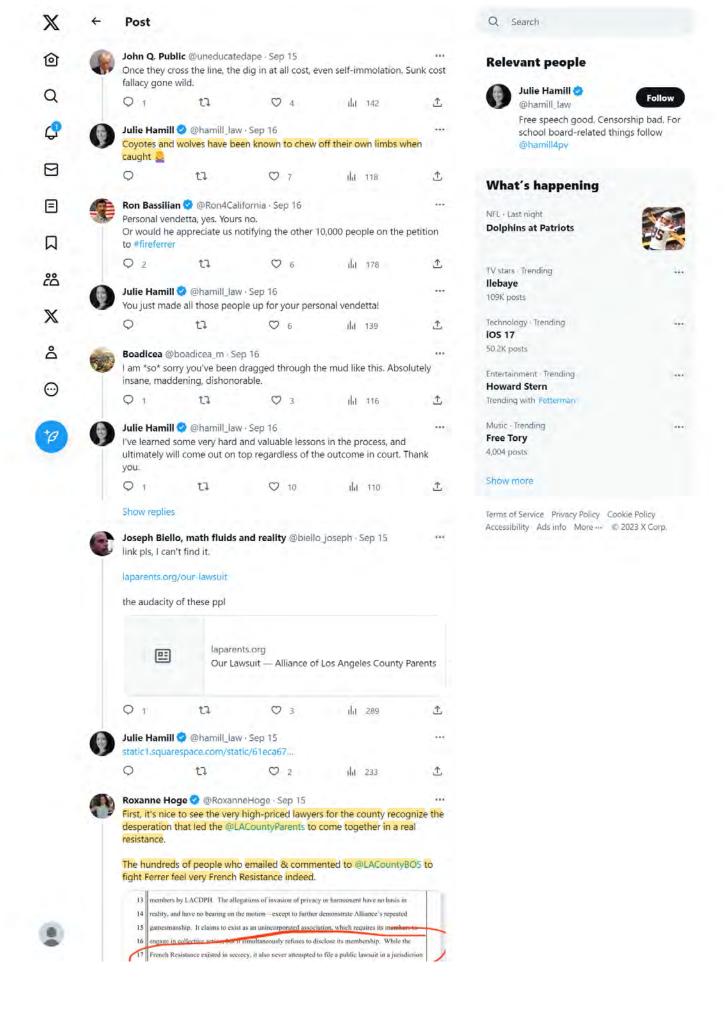


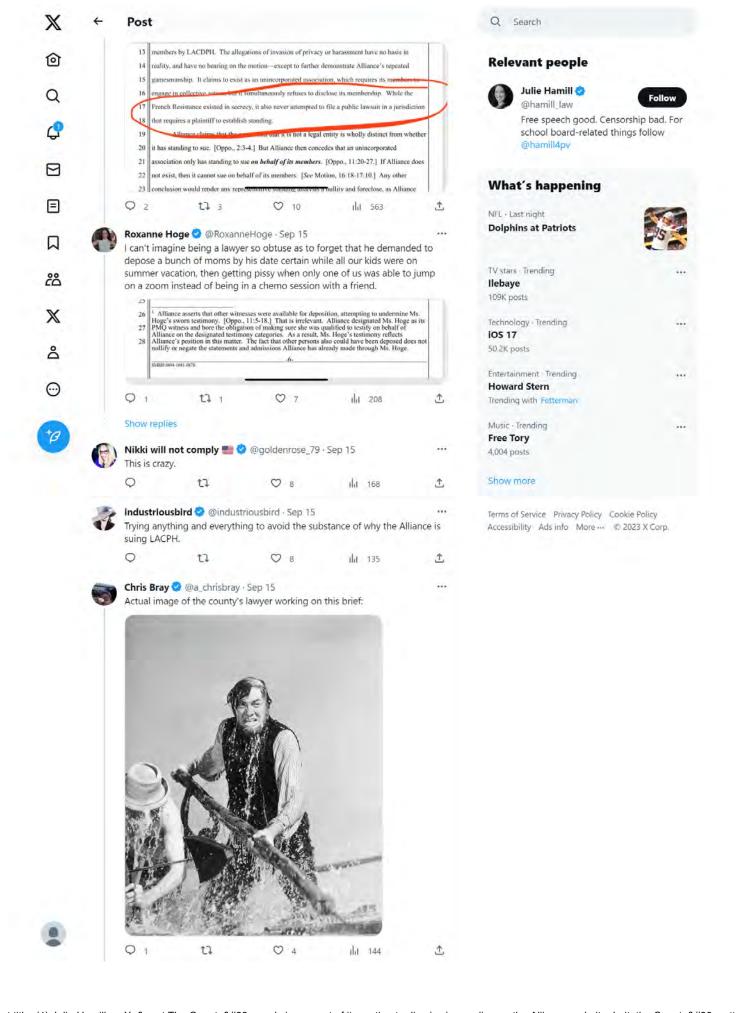


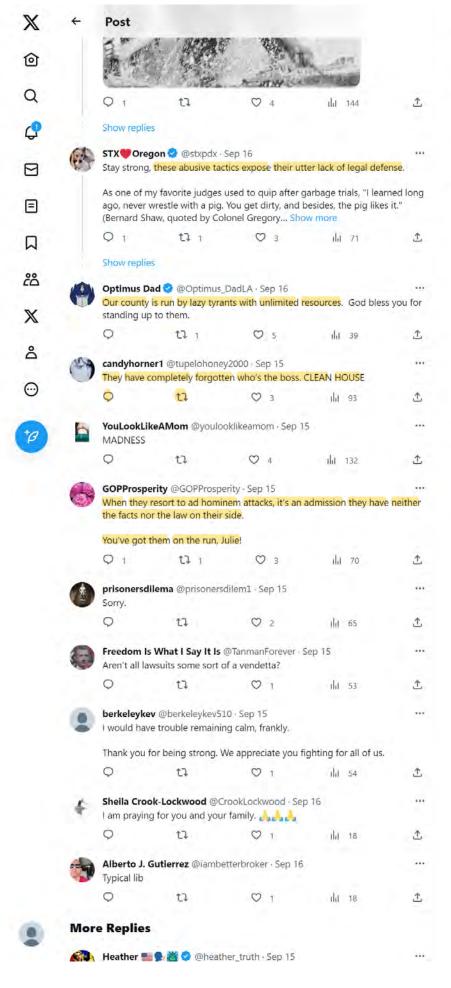


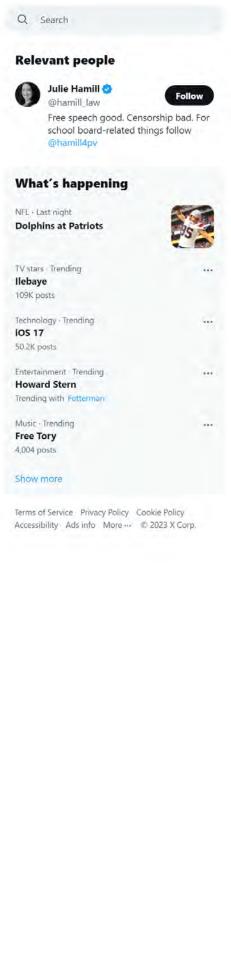
Document title:	(1) Julie Hamill on X: "The County's reply in support of its motion to dismiss is now live on the Alliance website. In it, the County's attorney defends his use of my child's photo, blames me, and accuses me of pursuing a personal vendetta. It's truly something to behold." / X
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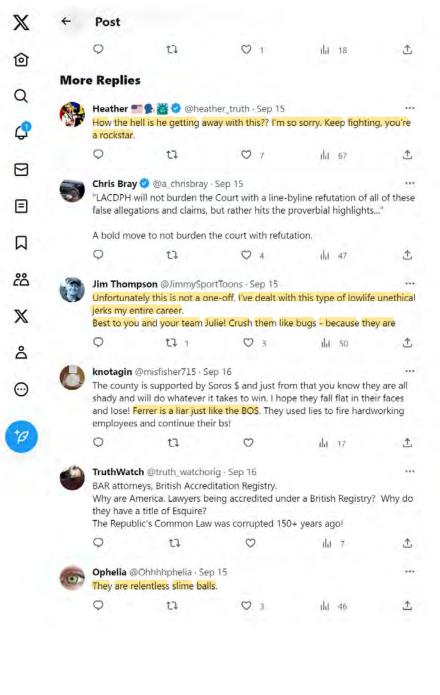


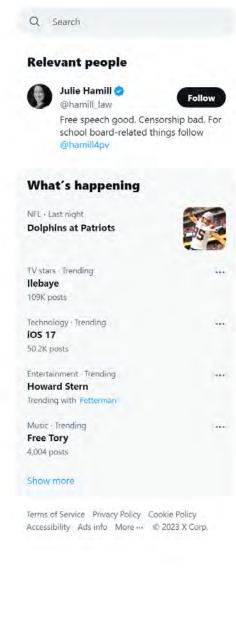


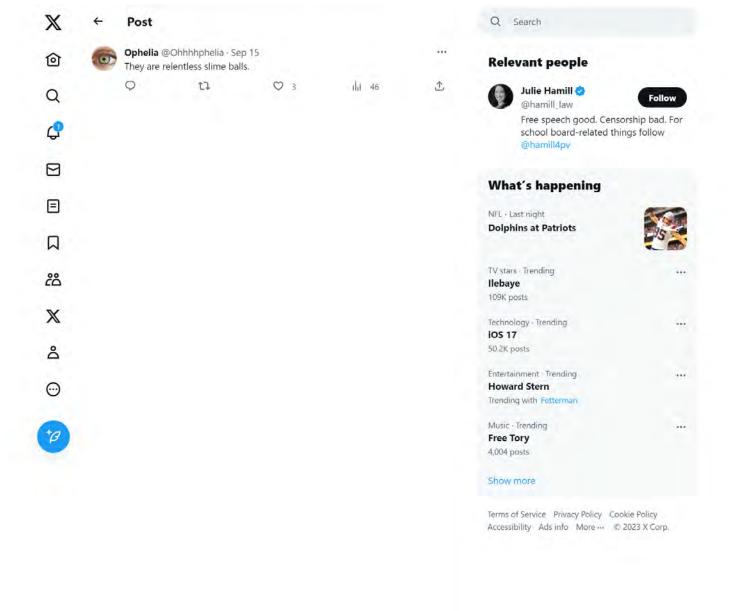






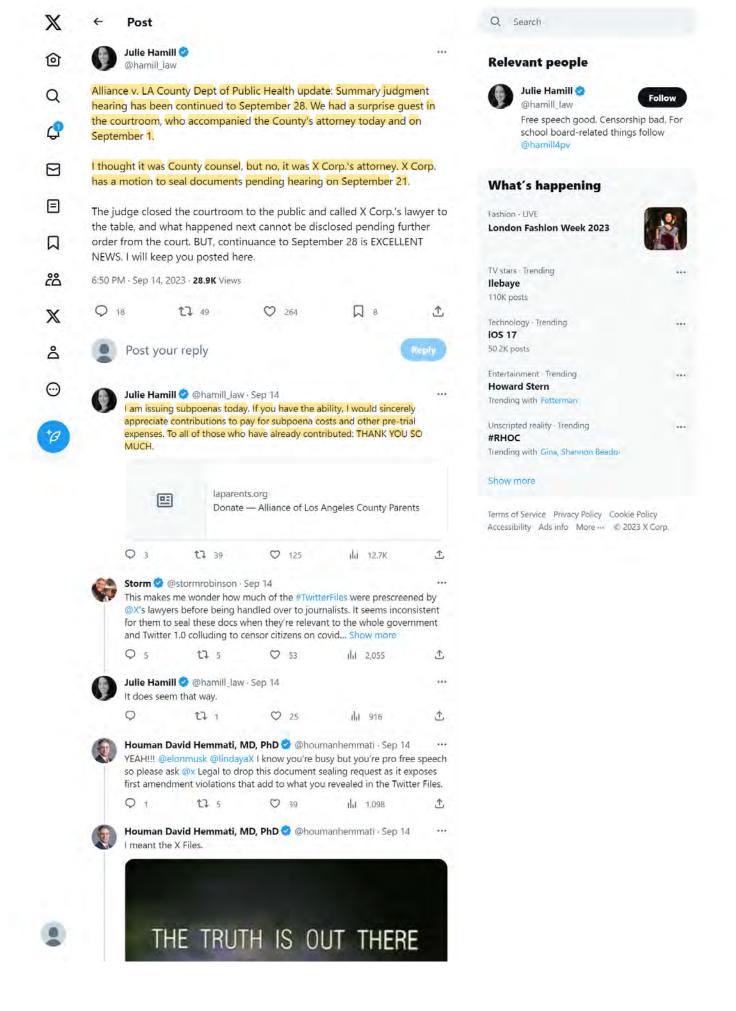


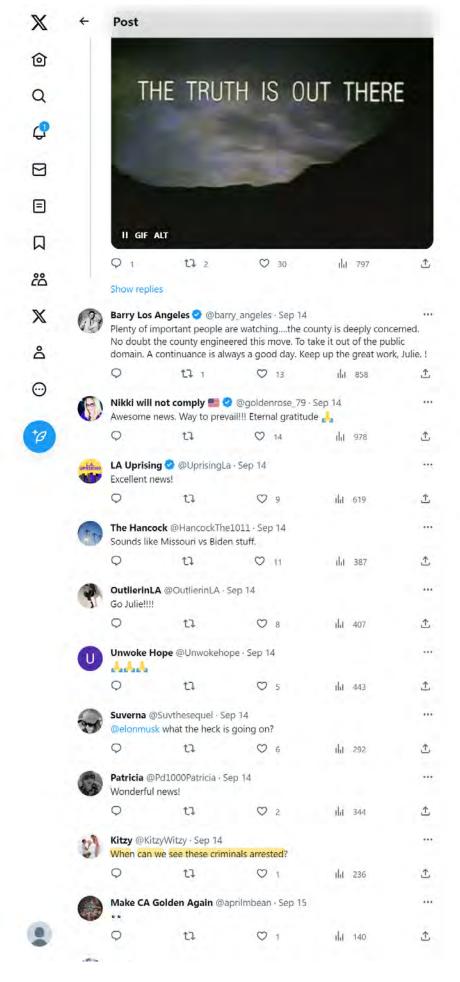


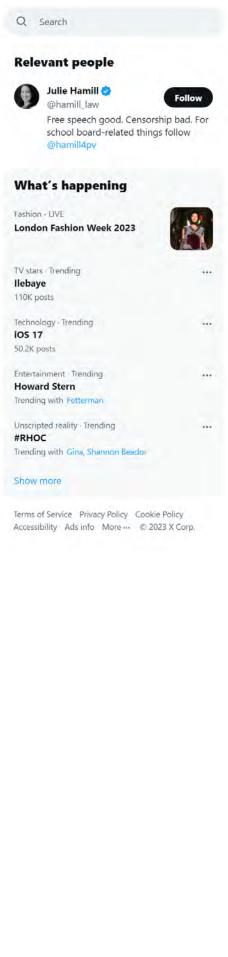


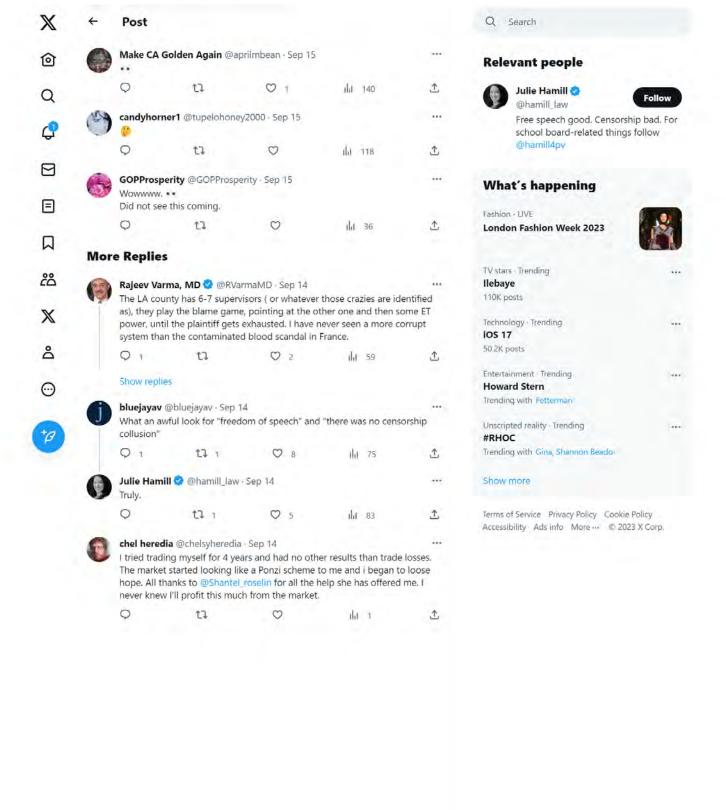


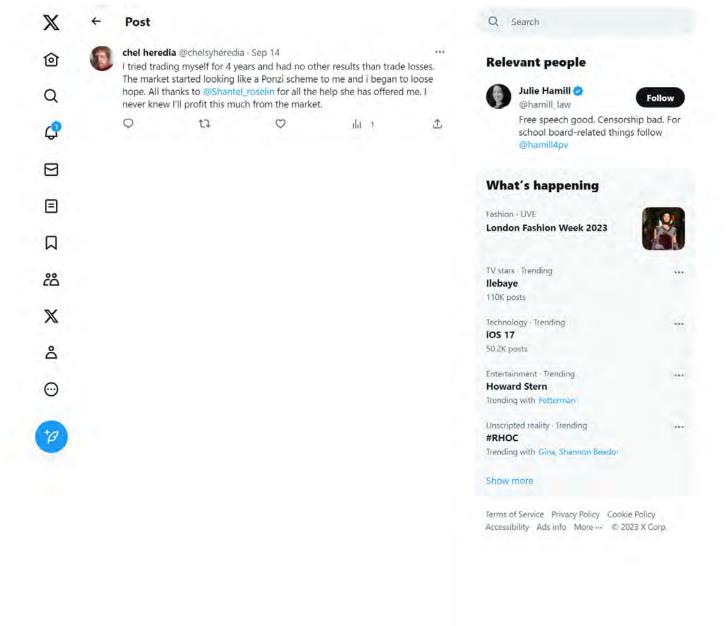
Document title: (1) Julie Hamill on X: "Alliance v. LA County Dept of Public Health update: Summary judgment hearing has been continued to September 28. We had a surprise guest in the courtroom, who accompanied the County's attorney today and on September 1. I thought it was County counsel, but no, it was X Corp.'s..." / X Capture URL: https://twitter.com/hamill_law/status/1702394314222084510 Page loaded at (UTC): Mon, 18 Sep 2023 18:28:23 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 18:29:13 GMT Capture tool: 10.29.2 54.157.181.49 Collection server IP: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 5 Capture ID: vXn13cnrb3w5NnopJAwmmm User: sm-lchu PDF REFERENCE #: hVcNrDtsvjrZiKheeRgead





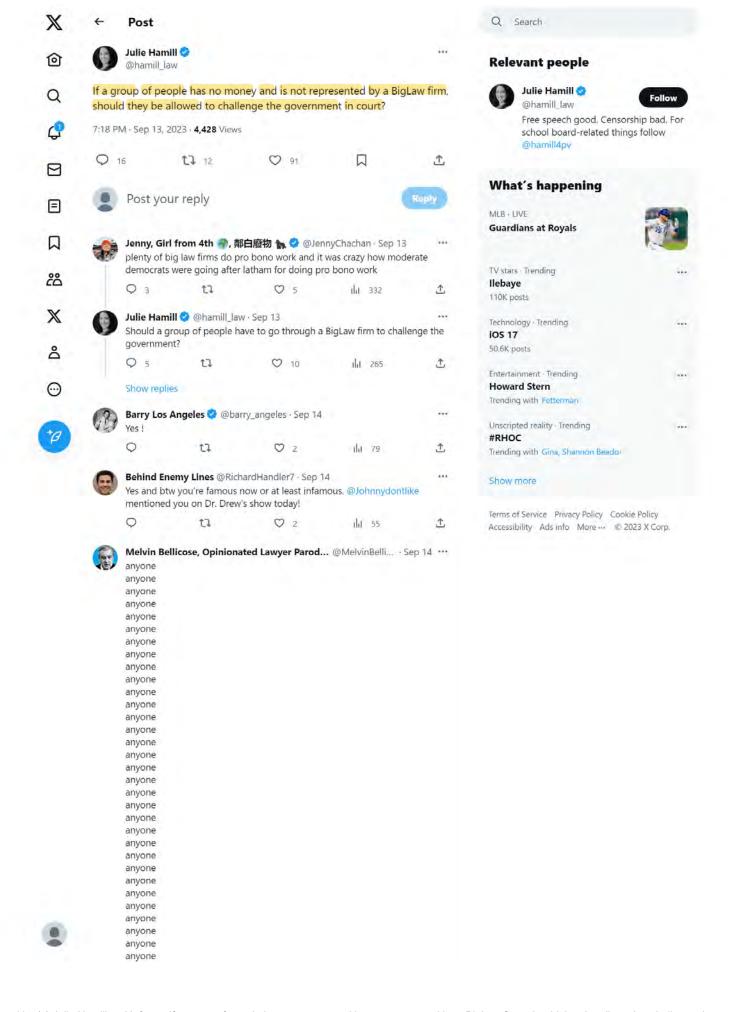


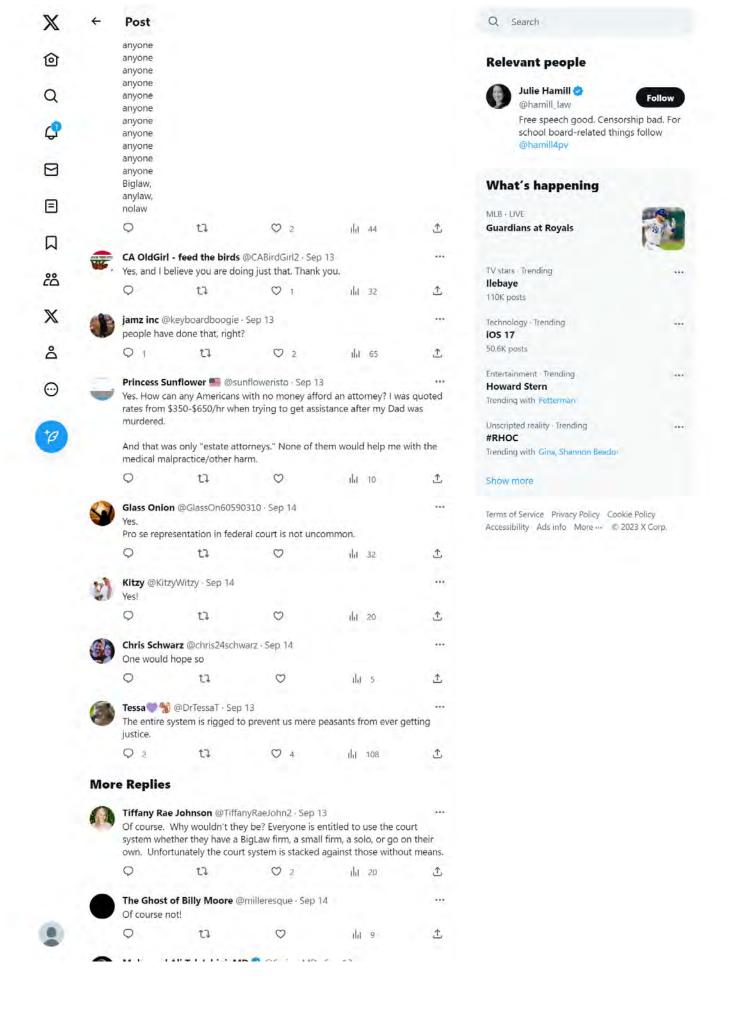


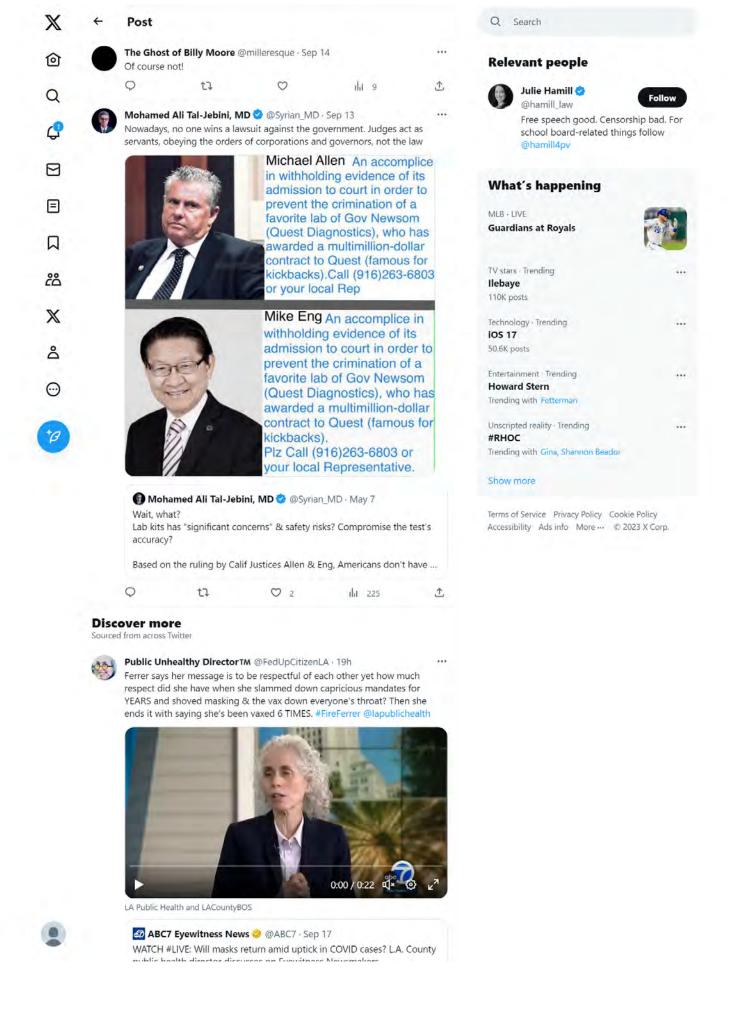


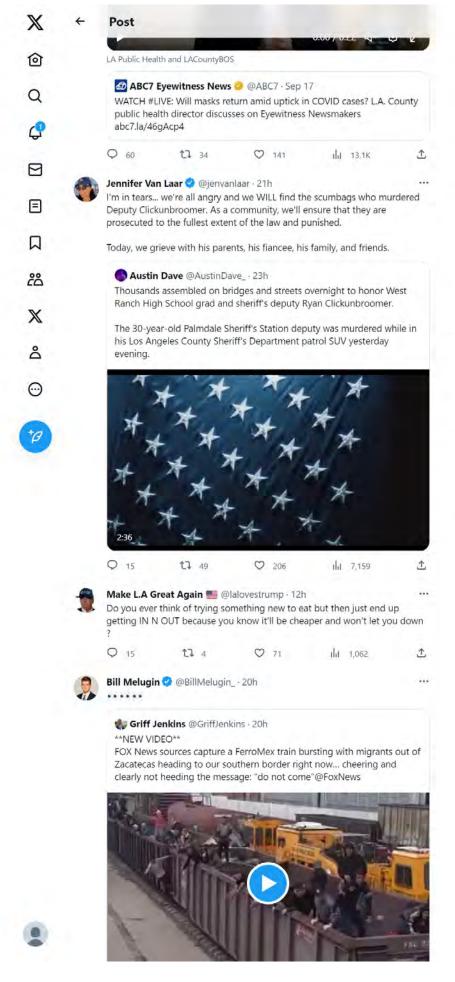


Document title: (1) Julie Hamill on X: "If a group of people has no money and is not represented by a BigLaw firm, should they be allowed to challenge the government in court?" / X Capture URL: https://twitter.com/hamill_law/status/1702039021684408673 Page loaded at (UTC): Mon, 18 Sep 2023 18:29:28 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 18:31:13 GMT Capture tool: 10.29.2 Collection server IP: 54.157.181.49 Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Windows_NT (Node 16.17.1) Operating system: PDF length: 6 Capture ID: dKTqPKM4bGMJTTmdzL7pExUser: sm-lchu PDF REFERENCE #: 7JfnJeYVDTTx6kAfcuH8W6 _

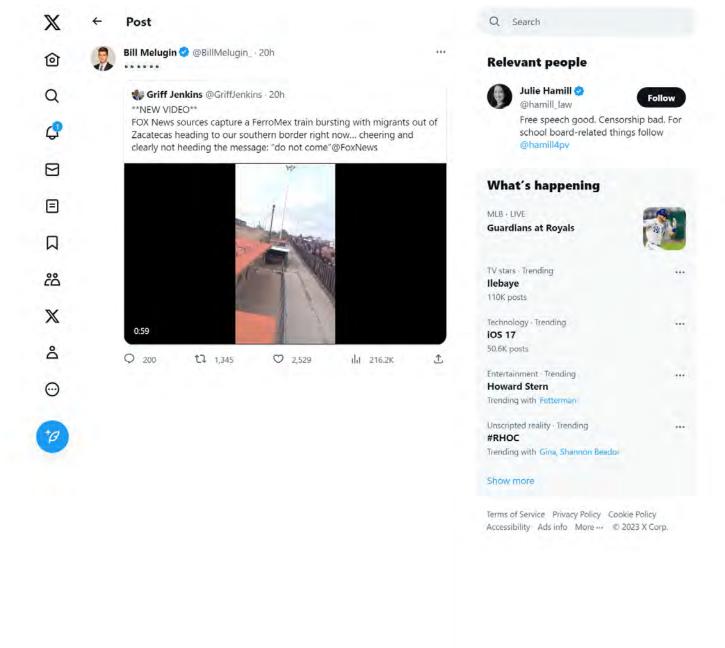










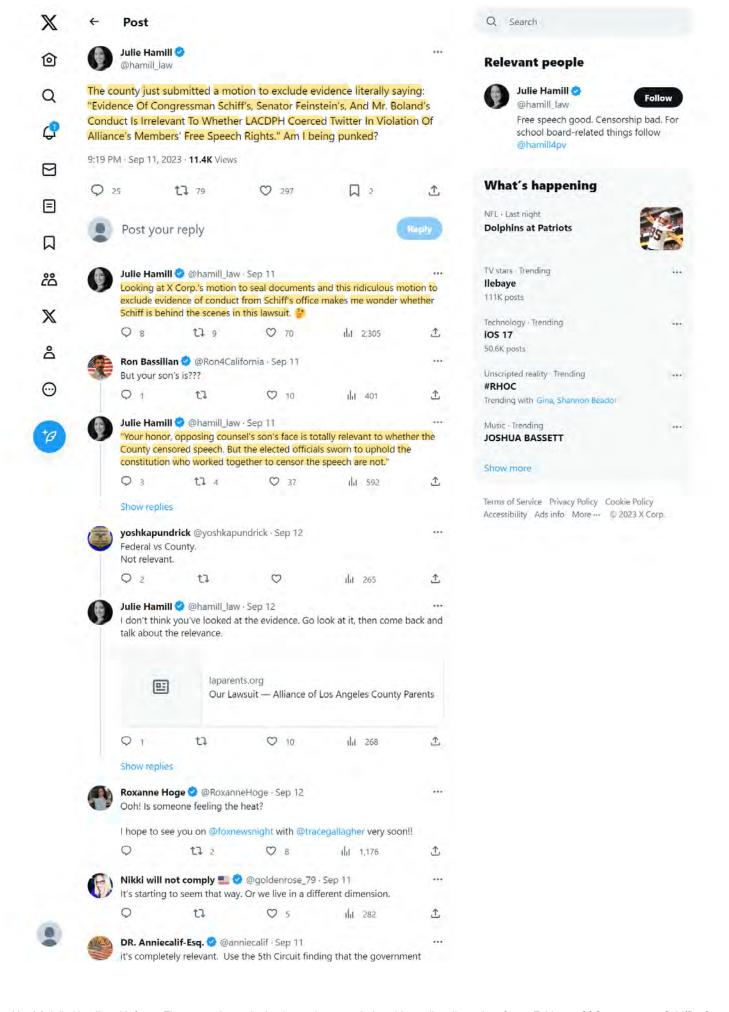


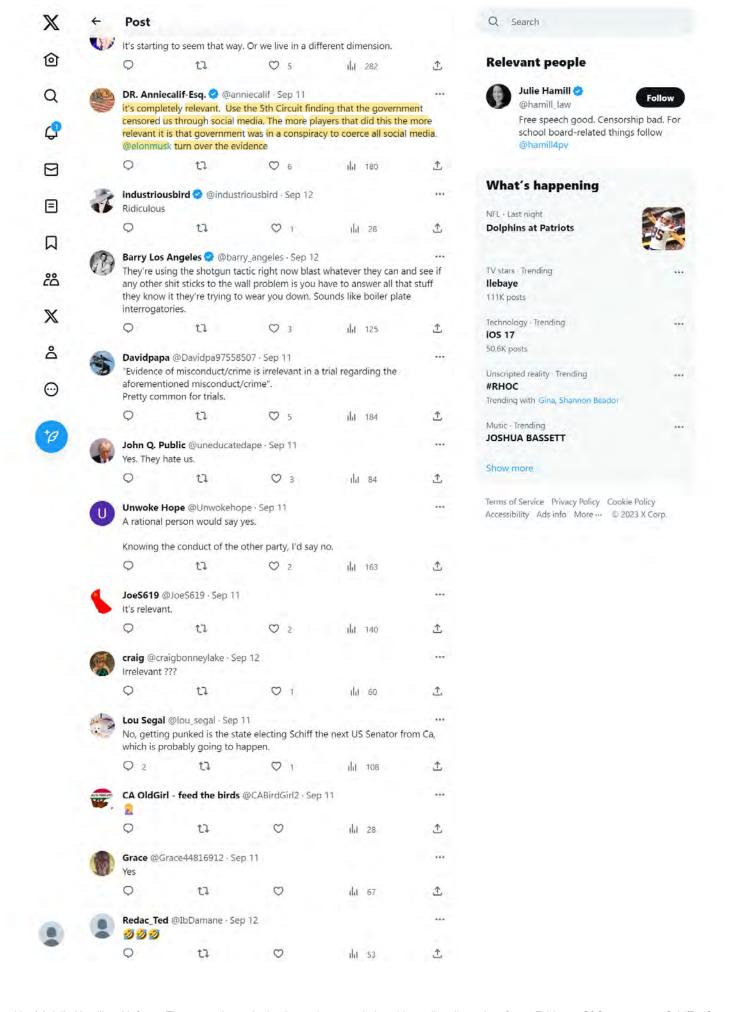


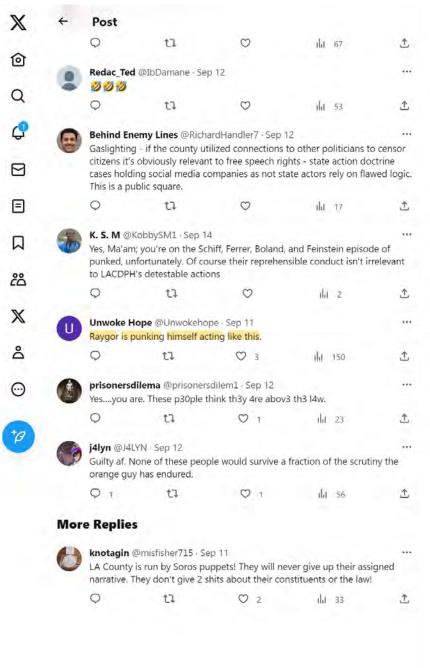
Document title: (1) Julie Hamill on X: "The county just submitted a motion to exclude evidence literally saying: "Evidence Of Congressman Schiff's, Senator Feinstein's, And Mr. Boland's Conduct Is Irrelevant To Whether LACDPH Coerced Twitter In Violation Of Alliance's Members' Free Speech Rights." Am I being punked?" / X Capture URL: https://twitter.com/hamill_law/status/1701344645396181133 Page loaded at (UTC): Mon, 18 Sep 2023 18:31:27 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 18:32:17 GMT Capture tool: 10.29.2 54.157.181.49 Collection server IP: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 5 Capture ID: odyA3YkzsuU4i2FQC6b5tK User: sm-lchu

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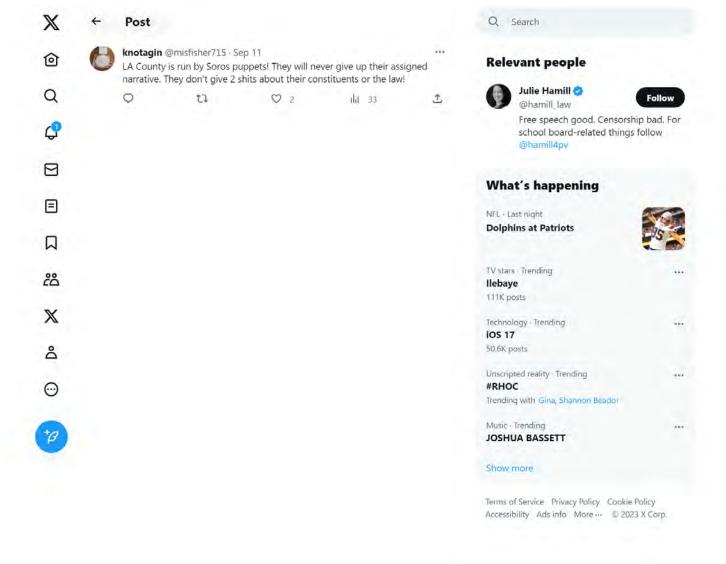
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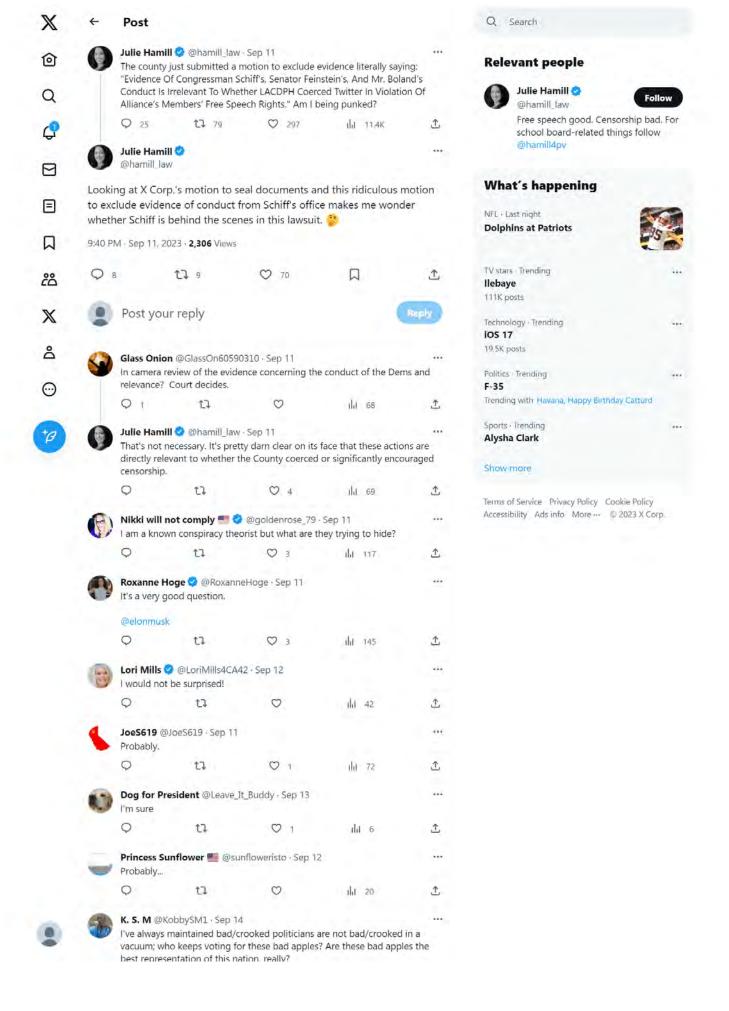


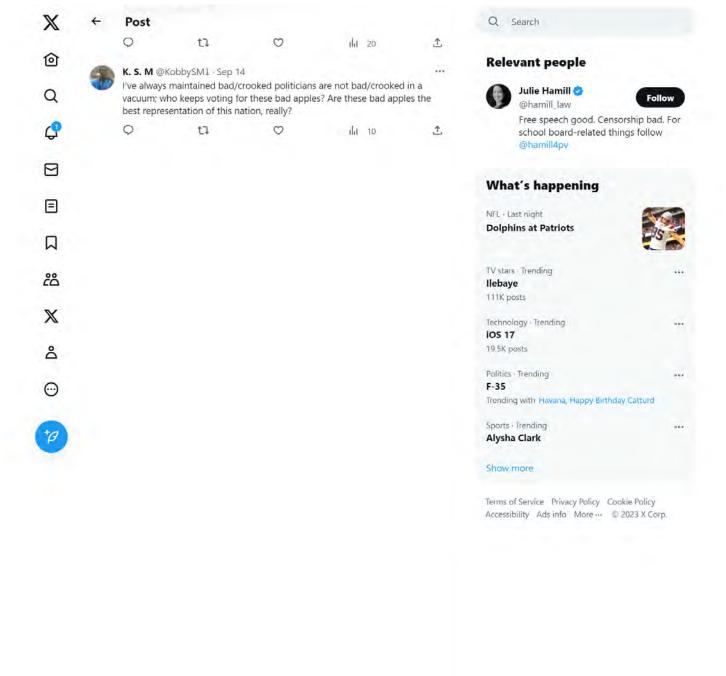




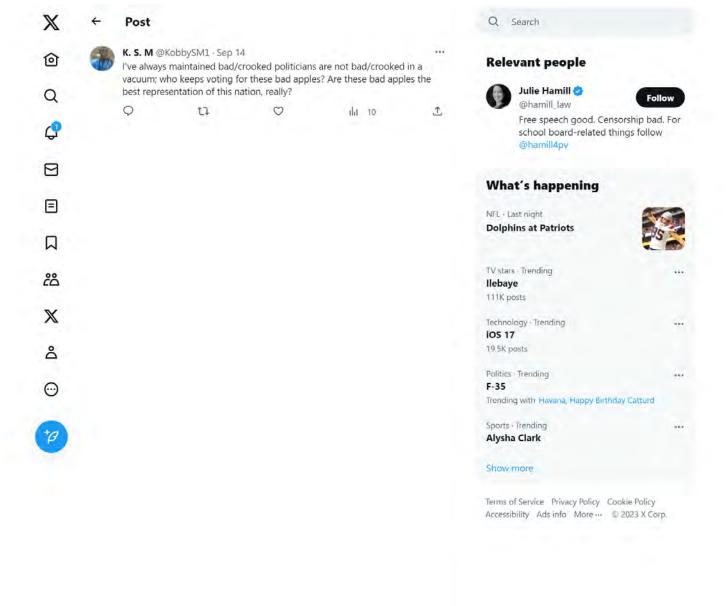


Document title:	(1) Julie Hamill on X: "Looking at X Corp.'s motion to seal documents and this ridiculous motion to exclude evidence of conduct from Schiff's office makes me wonder whether Schiff is behind the scenes in this lawsuit. " / X
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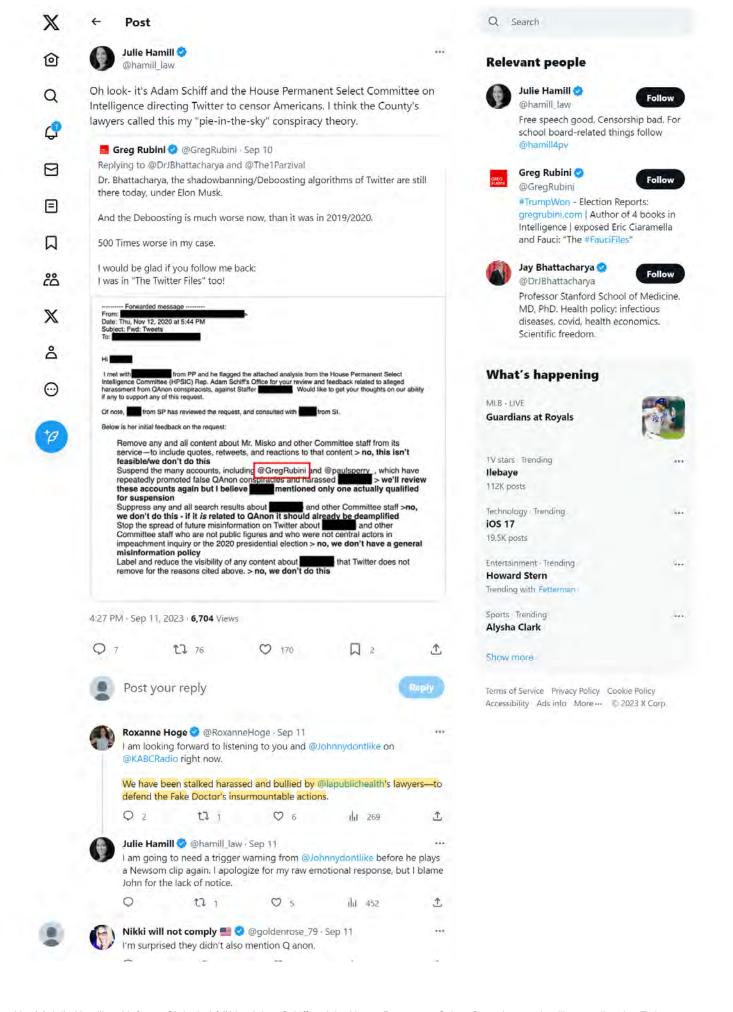


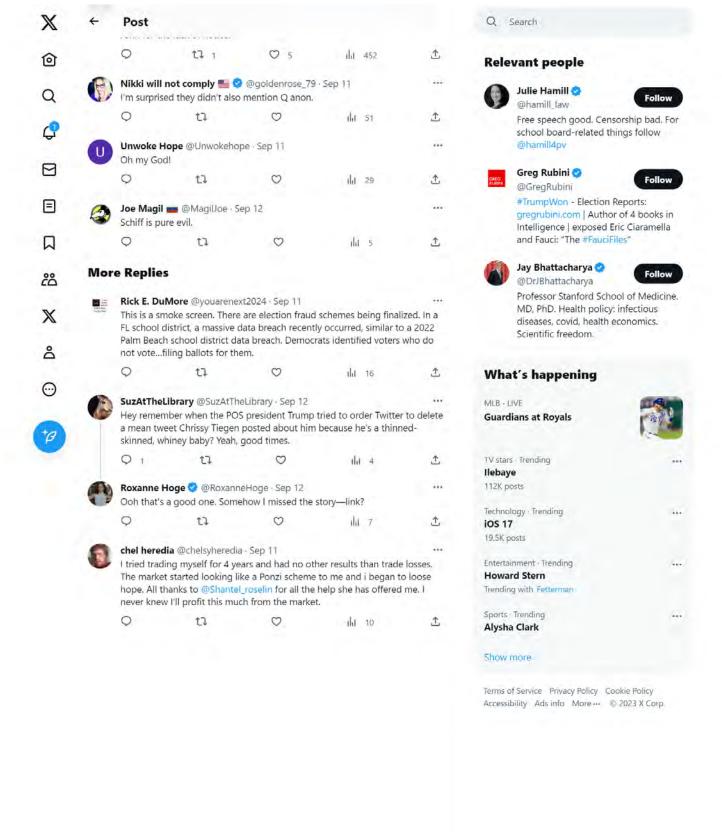
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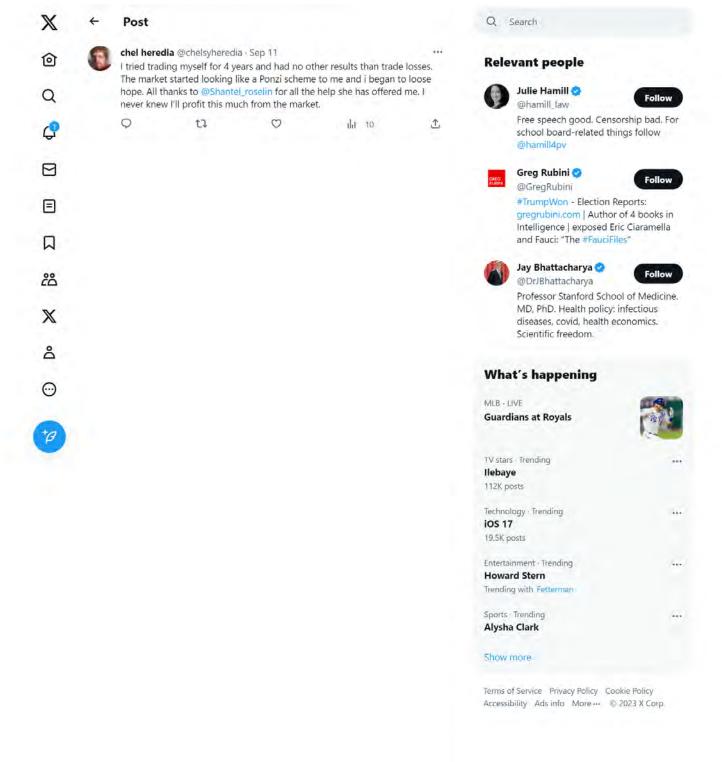




Document title:	(1) Julie Hamill on X: "Oh look- it's Adam Schiff and the House Permanent Select Committee on Intelligence directing Twitter to censor Americans. I think the County's lawyers called this my "pie-in-the-sky" conspiracy theory." / X
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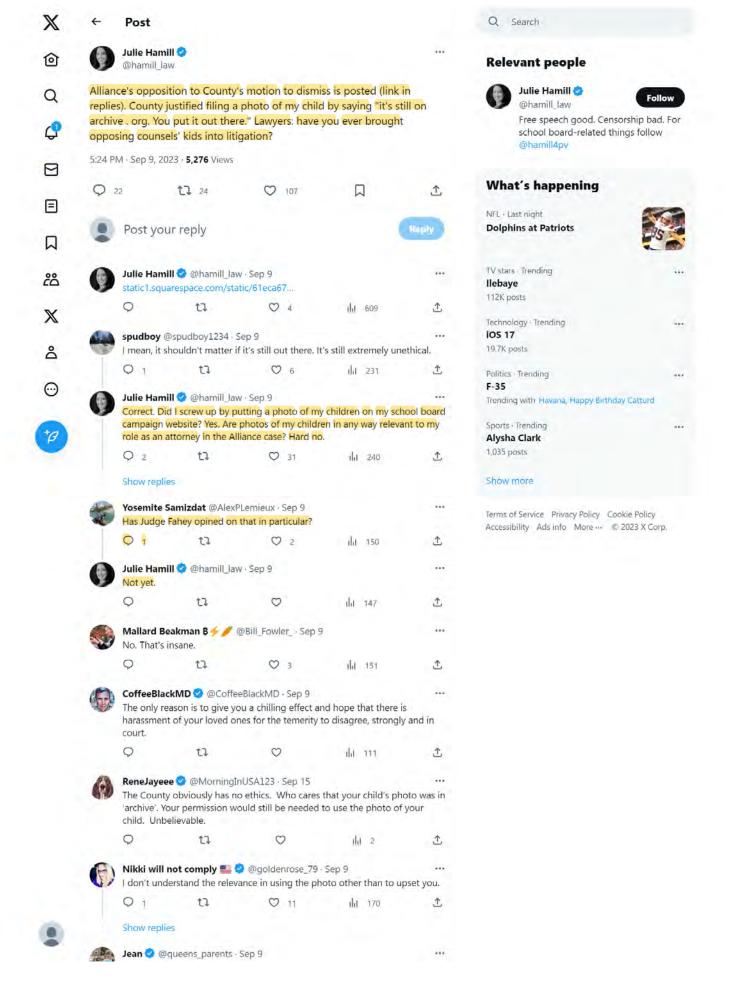


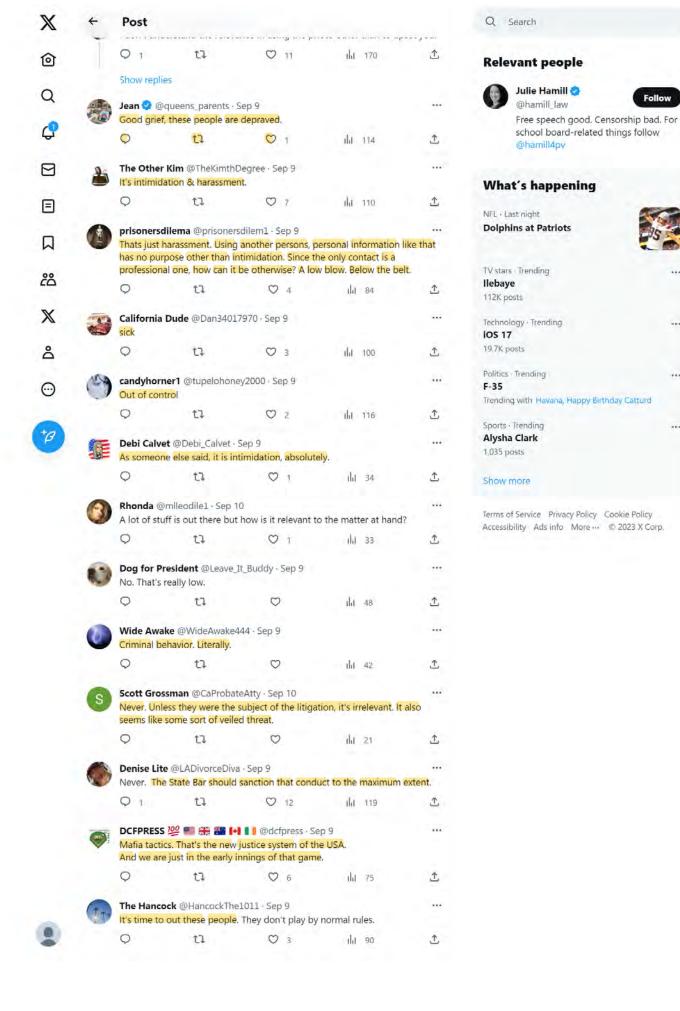




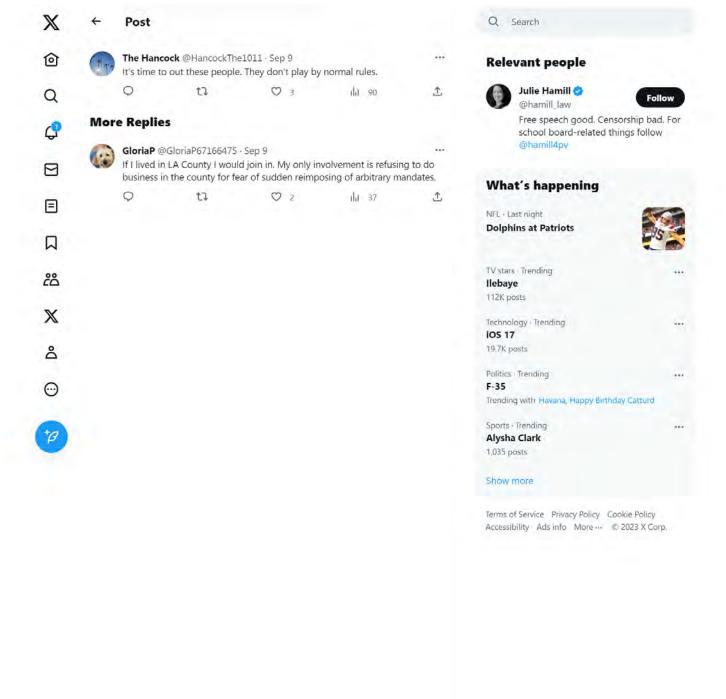


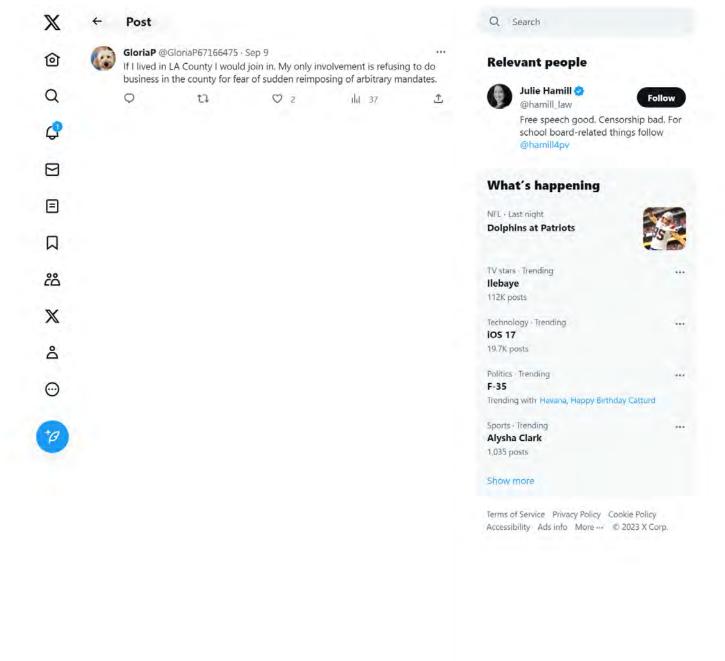
Document title: (1) Julie Hamill on X: "Alliance's opposition to County's motion to dismiss is posted (link in replies). County justified filing a photo of my child by saying "it's still on archive . org. You put it out there." Lawyers: have you ever brought opposing counsels' kids into litigation?" / X Capture URL: https://twitter.com/hamill_law/status/1700560771120255473 Page loaded at (UTC): Mon, 18 Sep 2023 18:35:24 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 18:36:12 GMT Capture tool: 10.29.2 Collection server IP: 54.157.181.49 Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 5 Capture ID: 81QGpLmLc3o8zWfcRyzqjM User: sm-lchu 3N7txYj8X84Euk5aspLKvH _ PDF REFERENCE #:





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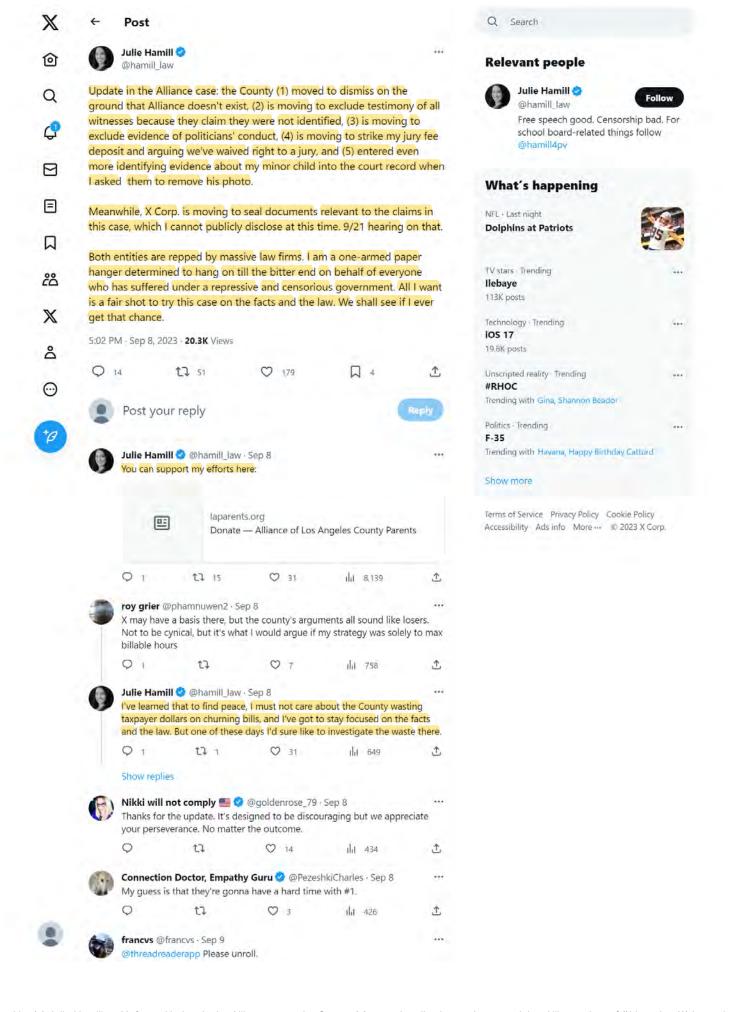


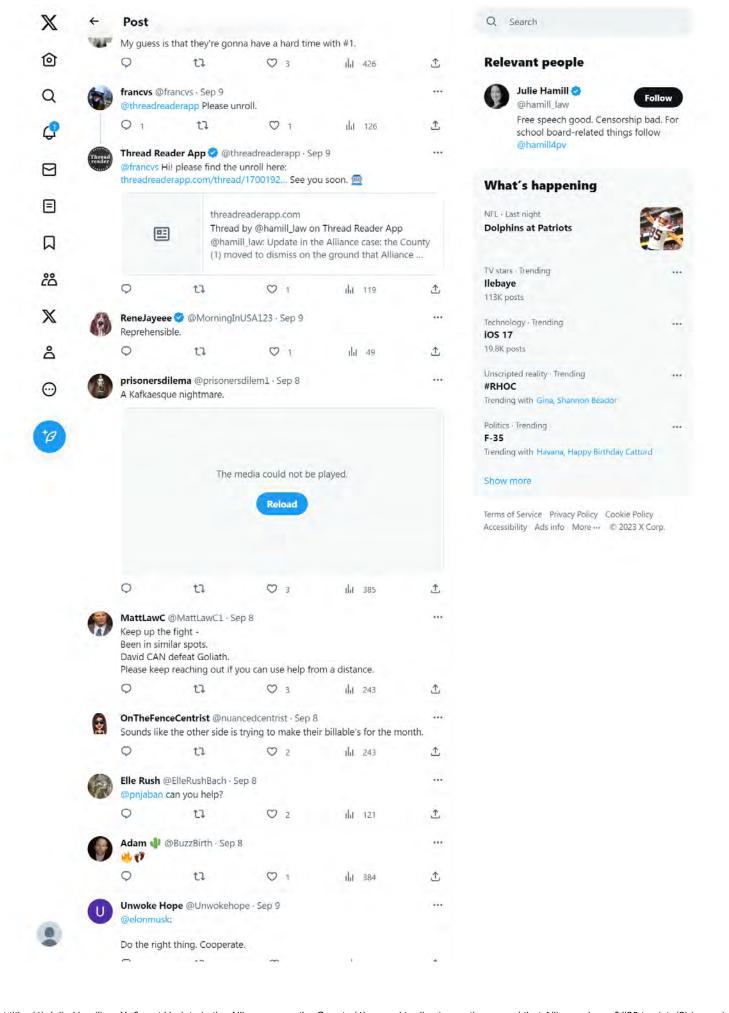


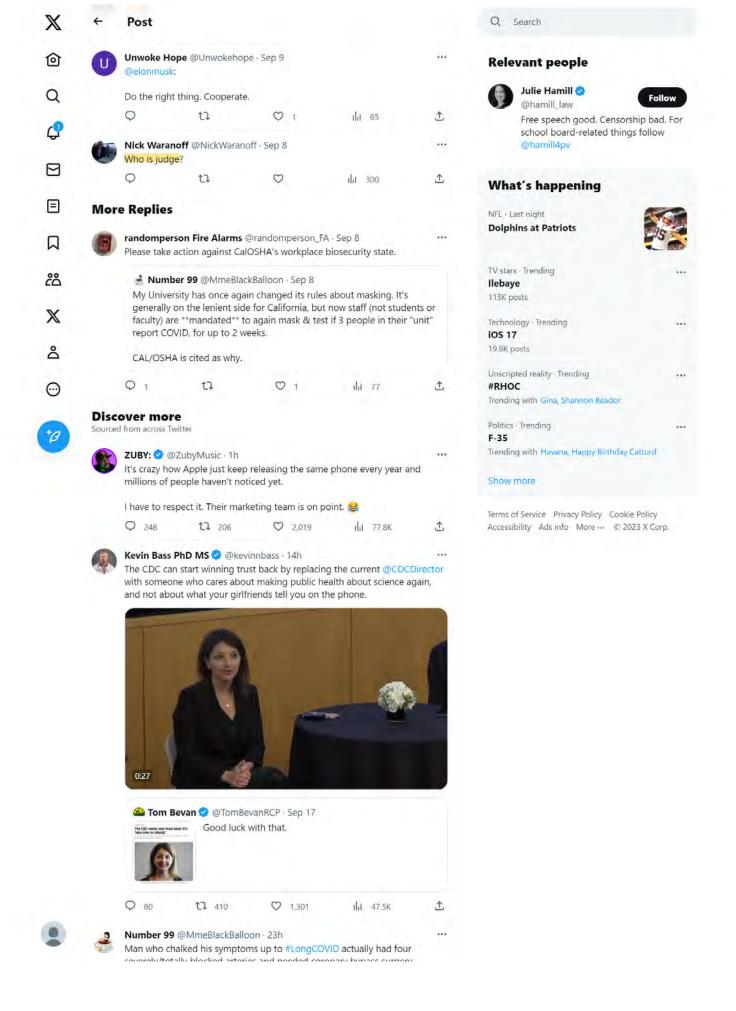


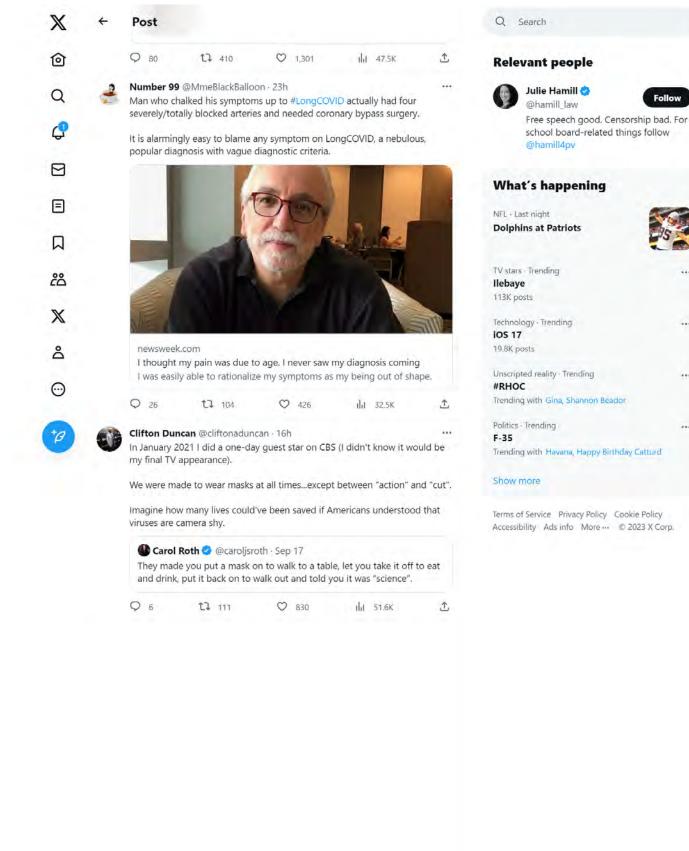


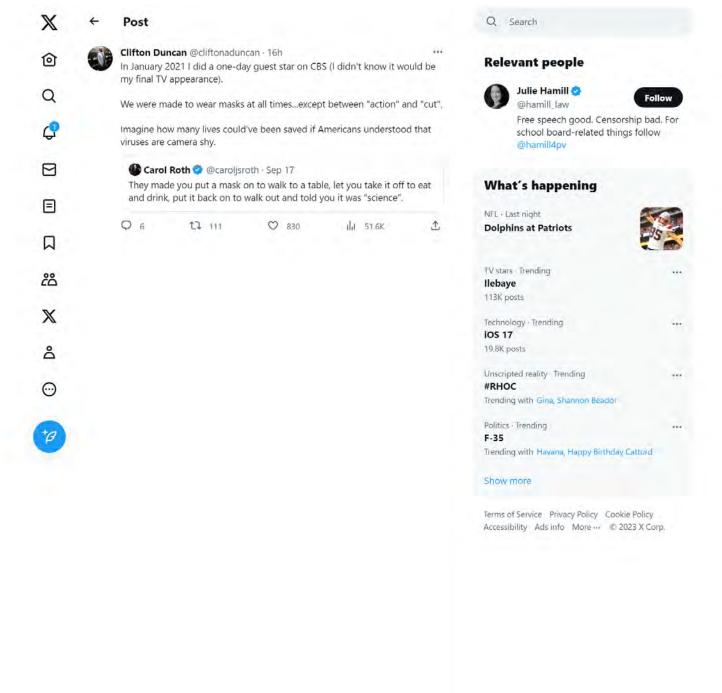
Document title: (1) Julie Hamill on X: "Update in the Alliance case: the County (1) moved to dismiss on the ground that Alliance doesn't exist, (2) is moving to exclude testimony of all witnesses because they claim they were not identified, (3) is moving to exclude evidence of politicians' conduct, (4) is moving to..." / X Capture URL: https://twitter.com/hamill_law/status/1700192957415174406 Page loaded at (UTC): Mon, 18 Sep 2023 18:36:33 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 18:37:32 GMT Capture tool: 10.29.2 54.157.181.49 Collection server IP: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 6 Capture ID: gwaHLYpoDXCFQiAoWdMs6k User: sm-lchu PDF REFERENCE #: vU4FMcKhHNpBCPVMkj23Ya _





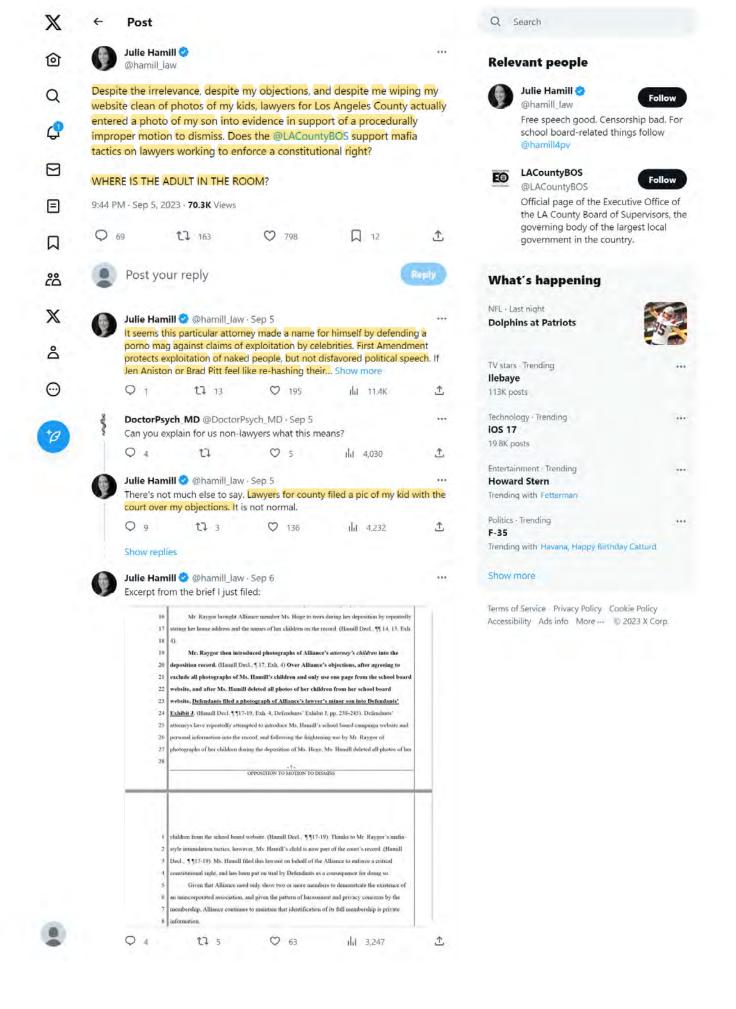


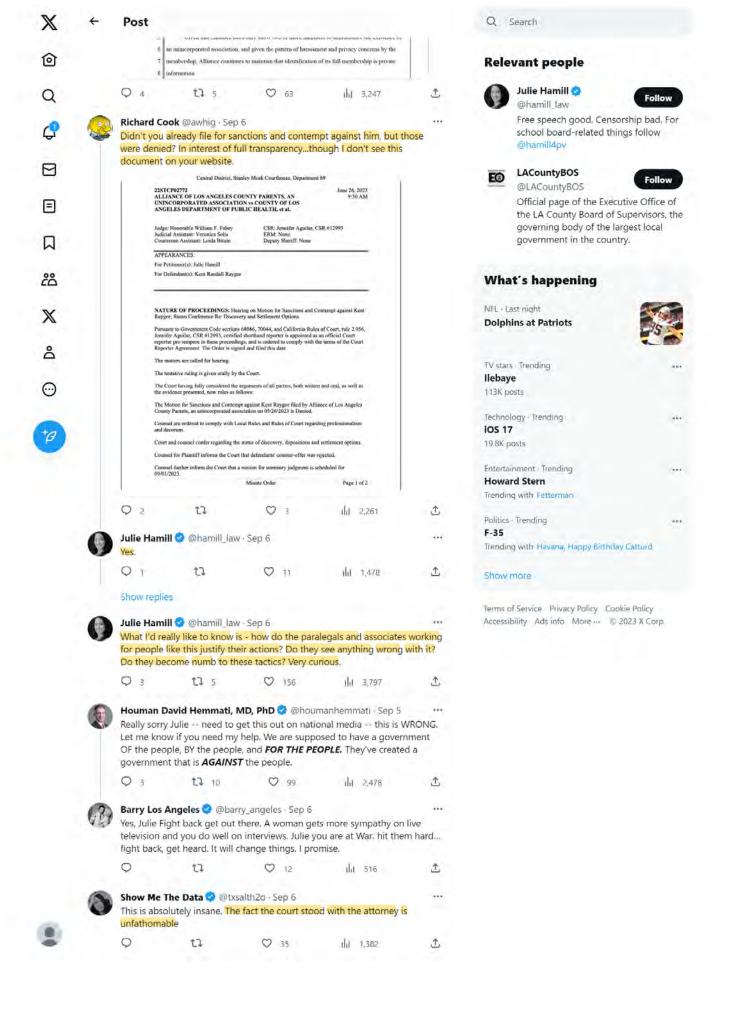


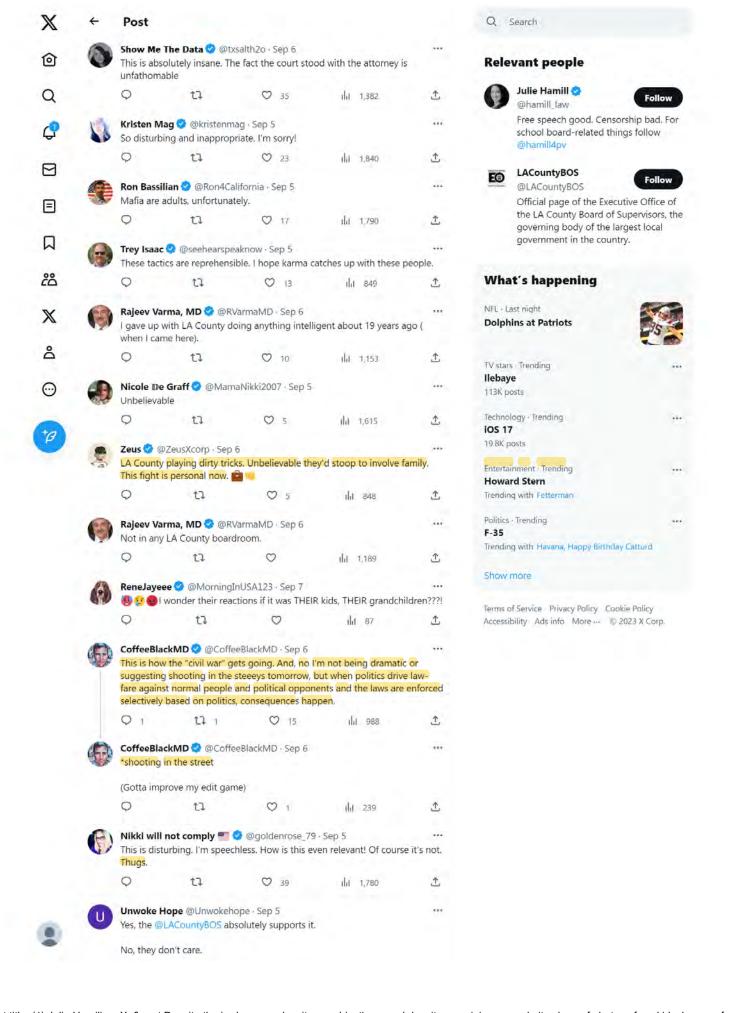


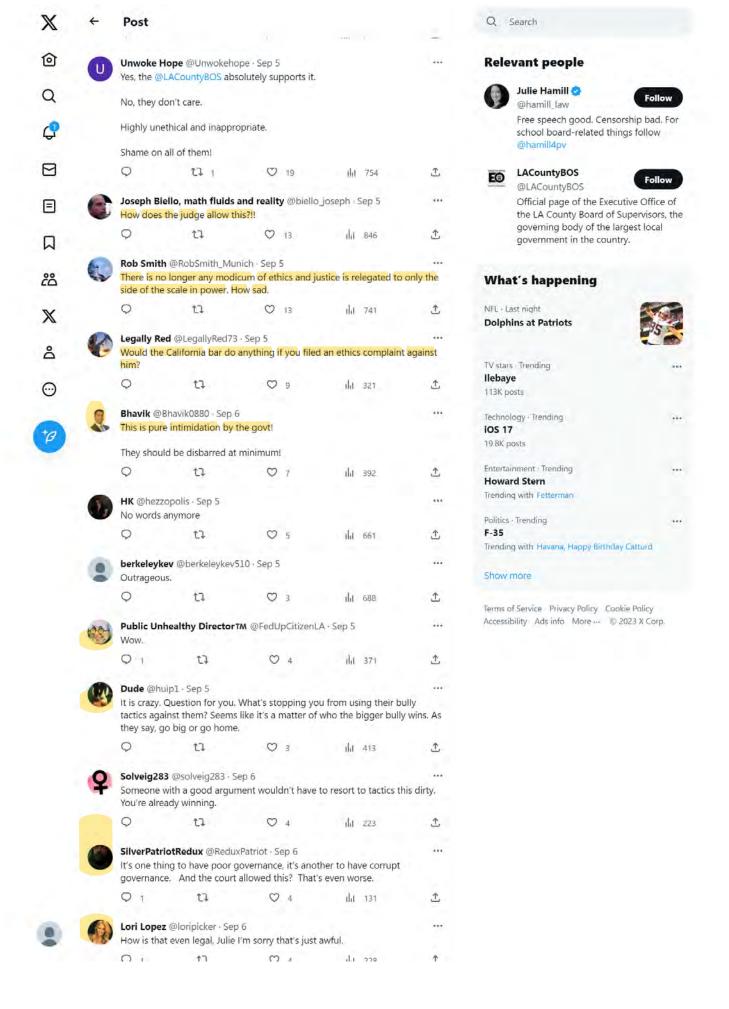


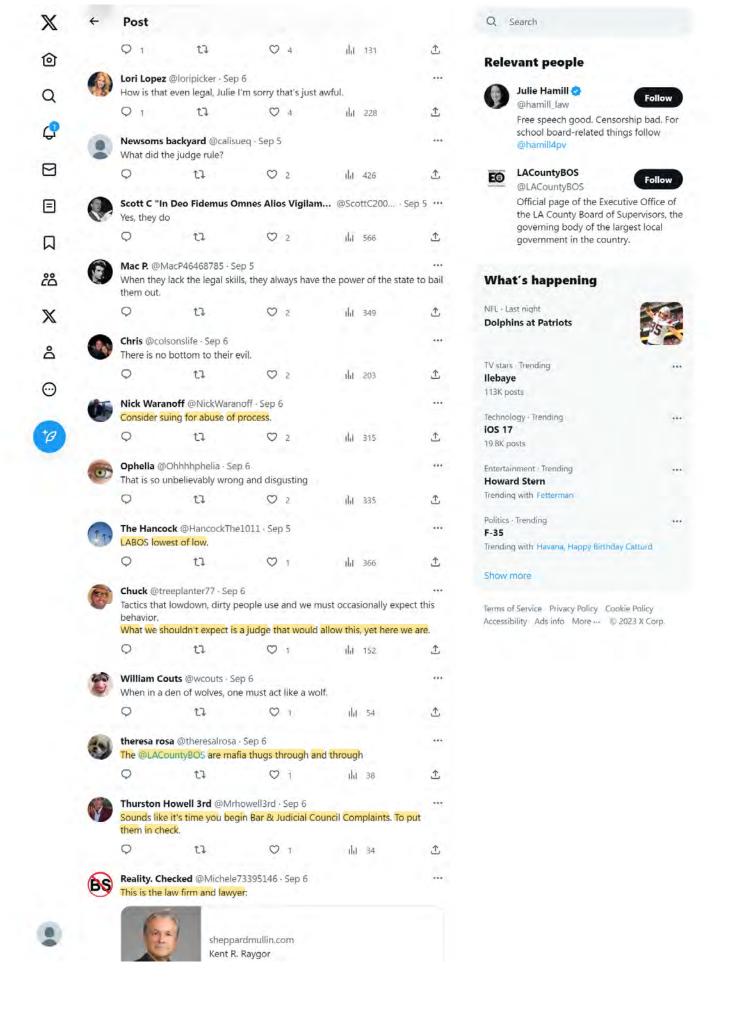
Document title: (1) Julie Hamill on X: "Despite the irrelevance, despite my objections, and despite me wiping my website clean of photos of my kids, lawyers for Los Angeles County actually entered a photo of my son into evidence in support of a procedurally improper motion to dismiss. Does the @LACountyBOS support..." / X Capture URL: https://twitter.com/hamill_law/status/1699176783873274233 Page loaded at (UTC): Mon, 18 Sep 2023 18:37:48 GMT Capture timestamp (UTC): Mon, 18 Sep 2023 18:39:28 GMT Capture tool: 10.29.2 54.157.181.49 Collection server IP: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/108.0.5359.215 Safari/537.36 Operating system: Windows_NT (Node 16.17.1) PDF length: 11 Capture ID: 65tYmqGf2a2ckyXYjjo8C6 User: sm-lchu PDF REFERENCE #: kbZnrj7kJoaigLuHCLBbSd _

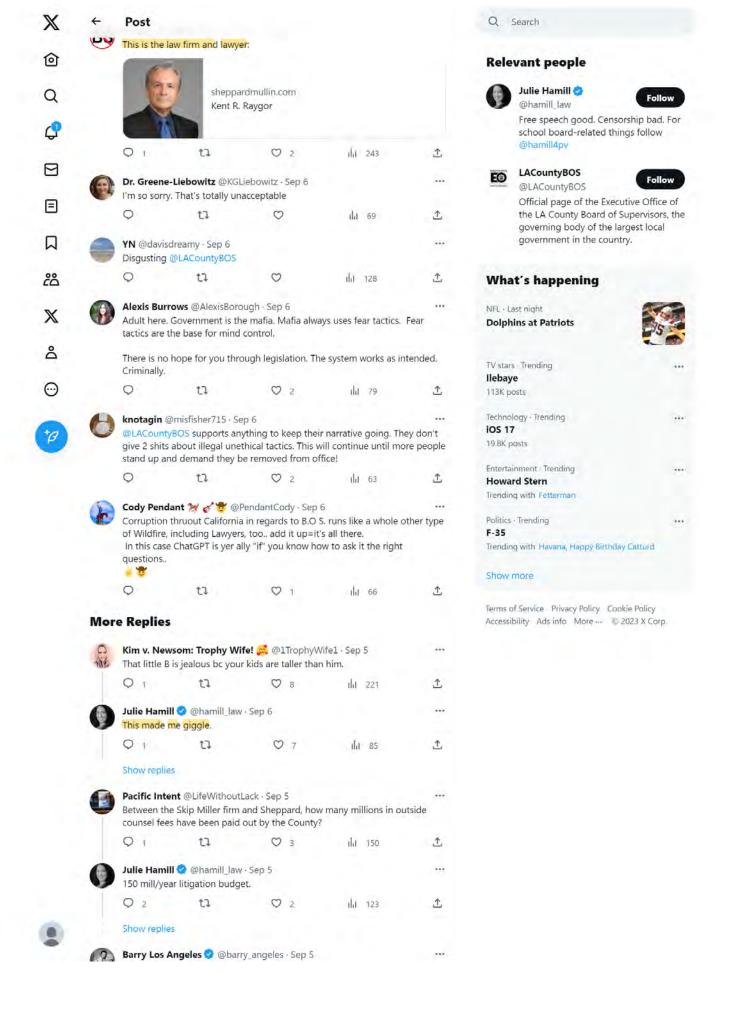


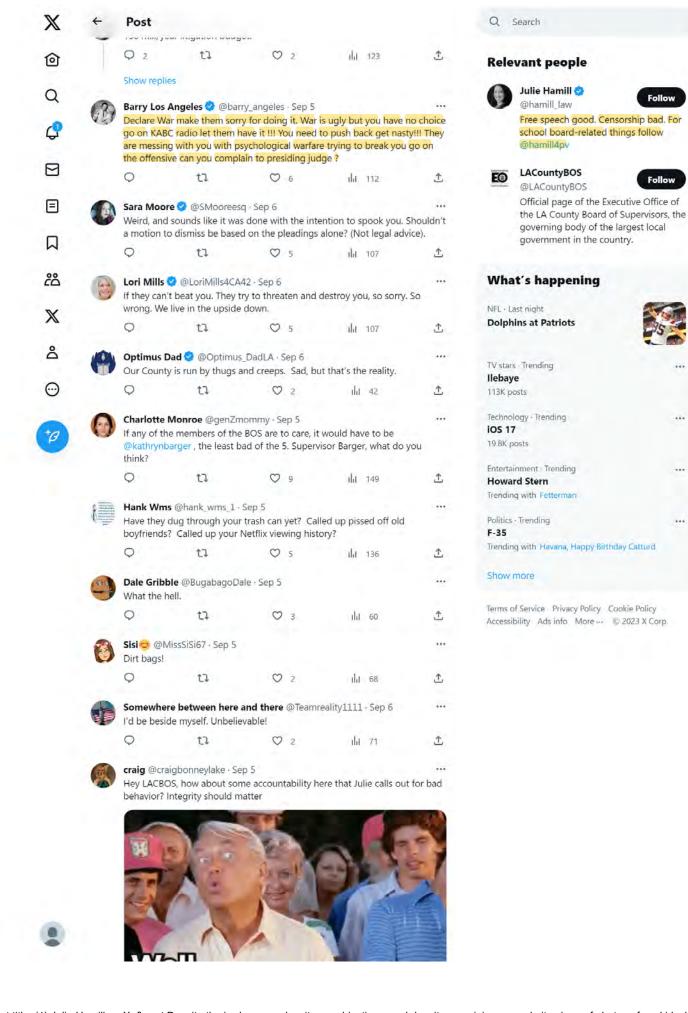


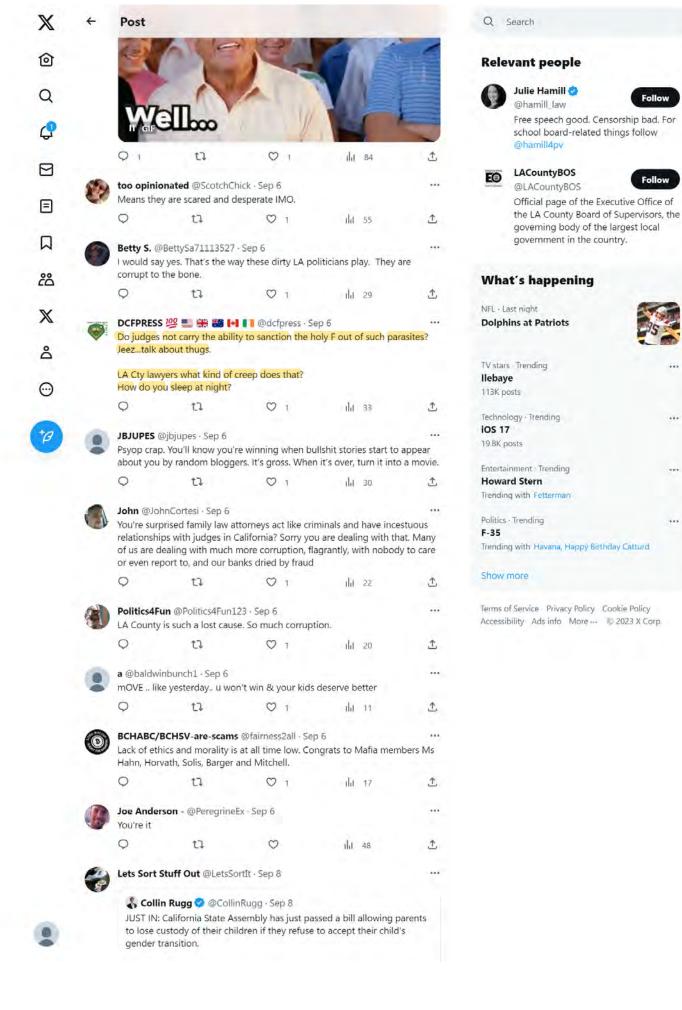












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