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August 30, 2021

Ellen Leonida

Braun Hagey & Borden LLP

leonida@braunhagey.com

RE: PRA request for Batson-Wheeler records
Our File No.: 20191407

Dear Ms. Leonida:

This letter is a follow-up to our correspondence dated August 16, 2021. Please be advised that nothing in this response should be considered as a waiver of the right of the County to assert any and all claims of exemptions or privileges to the inspection of the whole or any part of the records.

The Tulare County District Attorney's Office ("Department") has located one additional record responsive to the requests 2(c – d). Attached to this response is a PDF titled "Mr Wheeler Goes to Washington".

The Department continues to review and search for records which may be responsive to your request. We will provide an update on or by September 13, 2021.

Pursuant to *Ardon v. City of Los Angeles* (2016) 62 Cal.4th 1176, inadvertent disclosure of documents in response to Public Records Act requests do not waive attorney-client and work product privileges. If you have any additional questions in the interim, please contact the undersigned at 559-636-4950, or by e-mail at bfigueroa@tularecounty.ca.gov.

Very truly yours,
JENNIFER M. FLORES
County Counsel

By 
Brenda G. Figueroa
Paralegal

cc. Dan Underwood

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