

Margo A. Raison
COUNTY COUNSEL

Kendra L. Graham
ASST. COUNTY COUNSEL

CHIEF DEPUTIES

Gurujodha S. Khalsa
Elizabeth M. Giesick
Marshall S. Fontes



OFFICE OF THE
COUNTY COUNSEL

November 16, 2021

DEPUTIES

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Alexandria M. Ottoman
Gustavo Maya
Christina J. Oleson

Via E-mail Only

Ellen Leonida, Esq., Partner
BraunHagey & Borden, LLP
Via Email Only to Shaw@braunhagey.com and leonida@braunhagey.com

Re: Kern County's August 16, 2021 California Public Records Act Response

Dear Ms. Leonida,

Thank you for your correspondence dated November 10, 2021. I appreciate your offer to allow my client to consider waiving the asserted exemptions, some of which are permissive, to avoid unnecessary litigation. I am writing to let you know that my management is desirous of exploring these options in this case. I would also like to take you up on your offer to provide legal support and explanation as to why you do not believe the exemptions my client has asserted are legally sound in this case.

This matter will be considered by my supervisor, Gurujodha Khalsa, Chief Deputy County Counsel, and Margo Raison, County Counsel, in consultation with Cynthia Zimmer, the District Attorney, and Mark Pafford, Chief Deputy District Attorney.

I hope you can confirm a schedule for providing your explanation of where you think the Claimed Exemptions are incorrect and give my management two weeks to confer with our client before communicating their decision.

Sincerely,

A handwritten signature in blue ink, appearing to be "B. Walters", is written over a faint, larger signature.

Bryan C. Walters
Deputy County Counsel

CC: Margo Raison, Gurujodha Khalsa, Cynthia Zimmer, Mark Pafford