

RE: January 20th Call Follow Up

Kory DeClark <declark@braunhagey.com>

Fri 2/11/2022 3:13 PM

To: Eric Havens <EricHavens@co.imperial.ca.us>; Josh Wilner <Wilner@braunhagey.com>

Cc: PRA Response <praresponse@braunhagey.com>; Kevin Cayton <KevinCayton@co.imperial.ca.us>

Eric and Kevin,

Thanks for the call today. Just to memorialize what we discussed, Kevin will be working with his office to produce a letter by **February 25** that explains, for each subcategory of our September 7, 2021, PRA request, whether the data in that subcategory (1) exists and is digitally accessible for 2015 to present; (2) exists, but is not digitally accessible, and so would require someone to manually pull the data from each case file; or (3) does not exist because it is not tracked in any form by your office.

We have tentatively set **March 4** as the date to produce, in **excel format**, all of the data from our request that falls into the first category above, with the understanding that your office may need a one-to-two-week extension to produce everything. Your February 25 will update us on your progress and let us know if you need that extension.

Once we receive your letter, we'll schedule another call to discuss any data that exists but is not digitally accessible. At that point, we'll want to know whether (1) a computer expert could be hired to collect it and how much that would cost, or (2) there is no option but to have someone manually collect it.

At that point, I believe we'll have all the information we'll need to make a determination about how to proceed.

Thank you both again for your time.

Kory DeClark

BRAUNHAGEY & BORDEN LLP

Direct: (415) 869-6487

From: Eric Havens <EricHavens@co.imperial.ca.us>**Sent:** Friday, February 11, 2022 1:59 PM**To:** Josh Wilner <Wilner@braunhagey.com>**Cc:** Kory DeClark <declark@braunhagey.com>; PRA Response <praresponse@braunhagey.com>;

Kevin Cayton <KevinCayton@co.imperial.ca.us>

Subject: FW: January 20th Call Follow Up***** EXTERNAL MESSAGE *****

Good afternoon Mr. Wilner,

In a few minutes, Kevin & I will call the conference call number used before:

“

Dear Eric Havens,

Excellent. Thank you for your flexibility.

The call-in number is 857-444-6280 and the password is 883420#.

Regards,

Joshua Wilner

BRAUNHAGEY & BORDEN LLP

San Francisco

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San Francisco, CA 94104

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New York

7 Times Square

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New York, NY 10036-6524

Tel: (646) 829-9403

From: Eric Havens

Sent: Friday, January 21, 2022 4:53 PM

To: Josh Wilner <Wilner@braunhagey.com>

Cc: Kory DeClark <declark@braunhagey.com>; PRA Response <praresponse@braunhagey.com>;

Kevin Cayton <KevinCayton@co.imperial.ca.us>

Subject: RE: January 20th Call Follow Up

Good evening Mr. Wilner,

Thank you for your follow up email below. I have included Senior Deputy District Attorney Kevin Cayton by way of cc.

Yes, I believe Friday, February 11, 2022 at 2pm will be a good time to teleconference again.

If you have any questions, please don't hesitate to contact me.

Sincerely,

Eric Havens

County Counsel

County of Imperial

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From: Josh Wilner <Wilner@braunhagey.com>
Sent: Friday, January 21, 2022 2:08 PM
To: Eric Havens <EricHavens@co.imperial.ca.us>
Cc: Kory DeClark <declark@braunhagey.com>; PRA Response <praresponse@braunhagey.com>
Subject: January 20th Call Follow Up

CAUTION: This email originated outside our organization; please use caution.

Dear Eric Havens,

Thank you, again, for meeting Kory and me yesterday. I am writing to memorialize our agreed upon next steps in advance of our meeting scheduled for February 11th.

Because we were not able to speak with the Senior Deputy District Attorney, we could not determine what data we request is tracked by the Imperial County District Attorney's Office or in what format it is kept. You agreed to speak with the District Attorney's Office and confirm whether the Office tracks each category of data in our request. For the categories of data that are tracked, you will determine the format the data is kept in and the process to compile it. You will also give us an estimate of how long it will take to produce all the data responsive to our request tracked by the District Attorney's Office.

Thanks again for the productive call.

Regards,

Joshua Wilner
BRAUNHAGEY & BORDEN LLP

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