

**From:** [PRA Response](#)  
**To:** [Ferguson, Eric](#)  
**Cc:** [Schultze, Brent](#); [PRA Response](#)  
**Subject:** Re: California Public Records Act Request  
**Date:** Friday, March 11, 2022 12:04:54 PM

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Mr. Ferguson,

Thank you for your response. To answer your initial question, we would like the data as "raw data" in a spreadsheet form.

Thank you for agreeing to provide a cost estimate. Please note, we will only pay for services where fee-shifting is necessary, reasonable, and allowed by statute. Please include a detailed description of the process for collecting the requested data along with your quote.

In order to avoid confusion in the future, we also ask that you provide a written response to each subcategory of our request. In the response, please inform us:

1. If the data is tracked in any form by your office.
2. If the data is tracked, what method would be necessary to produce the data to us (searching through paper files, manually searching individual electronic files, running a report in your case management system, writing code to extract the data because it is not available in a report, etc.)
3. If the data could be produced, whether you will produce it or plan to withhold it subject to a legal exemption. Please provide the specific exemption you plan to use to withhold the data for that subcategory.

Let me know if you have any additional questions.

Regards,

Joshua Wilner

**BRAUNHAGEY & BORDEN LLP**

**San Francisco**

351 California Street, 10<sup>th</sup> Floor  
San Francisco, CA 94104  
Tel: (415) 599-0210

**New York**

7 Times Square  
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**From:** Ferguson, Eric <EFerguson@sbcda.org>  
**Sent:** Thursday, March 10, 2022 10:23 AM  
**To:** Ellen Leonida <Leonida@braunhagey.com>  
**Cc:** Caitlin Shaw <Shaw@braunhagey.com>; Schultze, Brent <BSchultze@sbcda.org>  
**Subject:** RE: California Public Records Act Request

**\*\*\* EXTERNAL MESSAGE \*\*\***

Ms. Leonida and Ms. Shaw –

Good morning. Please find attached our preliminary response to your new CPRA, which seeks clarification of the request. Upon further instruction from you, we will be happy to proceed with obtaining an estimated cost of data-assembly for such records as we can properly provide, and will also give you an item-by-item explanation as to those we cannot.

Let me also advise you that we have received your February 10, 2022 letter concerning your July 23, 2021, request, and are considering the arguments and authority you have offered. I hope to have a response to you by the end of next week.

Regards,  
Eric

**Eric M. Ferguson**

Deputy District Attorney - Appellate Services Unit  
San Bernardino County District Attorney  
909-382-7737

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**From:** Ferguson, Eric  
**Sent:** Tuesday, February 22, 2022 3:16 PM  
**To:** Ellen Leonida <leonida@braunhagey.com>  
**Cc:** Caitlin Shaw <shaw@braunhagey.com>; Schultze, Brent <BSchultze@sbcda.org>  
**Subject:** RE: California Public Records Act Request

Ms. Leonida and Ms. Shaw –

This is to acknowledge receipt of your latest CPRA, and to advise you that there will be a short delay in formally responding, because I will be out of the country for the next eight days due to a family emergency. We will strive to get a response to you the week of March 7, 2022.

Regards,  
Eric

**Eric M. Ferguson**

Deputy District Attorney - Appellate Services Unit

San Bernardino County District Attorney  
909-382-7737

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**From:** Caitlin Shaw <[Shaw@braunhagey.com](mailto:Shaw@braunhagey.com)>  
**Sent:** Friday, February 18, 2022 2:15 PM  
**To:** DA Internet <[DAInternet@sbcda.org](mailto:DAInternet@sbcda.org)>; Ferguson, Eric <[EFerguson@sbcda.org](mailto:EFerguson@sbcda.org)>  
**Cc:** Ellen Leonida <[Leonida@braunhagey.com](mailto:Leonida@braunhagey.com)>; PRA Response <[praresponse@braunhagey.com](mailto:praresponse@braunhagey.com)>  
**Subject:** California Public Records Act Request

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Dear Counsel,

Please see the attached request for additional records pursuant to California's Public Records Act (Gov't Code §§ 6250 et seq.).

Regards,

Caitlin Shaw

Litigation Legal Assistant

**BRAUNHAGEY & BORDEN LLP**

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