

BRAUNHAGEY & BORDEN LLP

San Francisco & New York

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March 25, 2022

SENT VIA U.S. MAIL AND EMAIL

Vern Pierson
Office of the District Attorney of El Dorado County
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Re: California Public Records Act Request

Dear Mr. Pierson:

On July 23, 2021 we sent you a Public Records Act request for the purpose of enforcing the Racial Justice Act. The request sought policy documents, training materials, records relating to the Racial Justice Act, and records regarding *Batson/Wheeler* investigations. You responded, asserting exemptions to the production of some of the requested documents. We sent you a letter on January 25, 2022 addressing the exemptions you asserted in response to our request. In that letter, we offered to formally appeal or to speak with you over the phone about your asserted exemptions in order to avoid unnecessary litigation. We remain willing to do so. As we informed you in our letter of January 25, 2022, however, should we be forced to file suit to obtain records to which we are entitled, you will be liable for our fees and costs.

If you wish to discuss this matter further, please contact our office as soon as possible. Please let us know if you are withholding documents on the basis of the exemptions you assert (as opposed to asserting exemptions to avoid waiver, but without withholding any documents). If you do not respond to our CPRA request, we will have no choice but to initiate litigation to obtain the documents to which we are entitled under the law.

Thank you for your immediate attention to this matter.

Sincerely,



Ellen Leonida