

From: [Forte, Sandra](#)
To: [PRA Response](#)
Subject: RE: 20400-140 RE: California Public Records Act Request
Date: Tuesday, April 5, 2022 3:06:02 PM

***** EXTERNAL MESSAGE *****

I have forwarded your email to the department. We will be in touch. Thank you.

From: PRA Response <praresponse@braunhagey.com>
Sent: Tuesday, April 5, 2022 12:39 PM
To: Forte, Sandra <Sandra.Forte@countyofmerced.com>
Cc: PRA Response <praresponse@braunhagey.com>
Subject: Re: 20400-140 RE: California Public Records Act Request

Ms. Forte,

Thank you for your response. To clarify, we are requesting the "raw" data in your possession. This means we wish to obtain a spreadsheet with a row for each case and columns for each category of data we request. The information you provided is helpful but will not allow for all the analysis we hope to do. You also must be specific about which data is subject to legal exemptions.

To remedy these issues, we ask that you respond in writing to each subcategory of data we request. For each subcategory, please inform us whether the data is 1. not tracked in any form by your office, 2. is only tracked in paper files or photographic images that cannot be extracted digitally, or 3. Is tracked digitally. For the data in category 3, please inform us whether you plan to produce the data or if you plan to withhold it based on a legal exemption. Please provide the specific legal exemption you believe justifies nondisclosure. Finally, please provide a timeline for when you will produce the requested data.

We are happy to speak with someone from your office on the phone if that would be helpful. Please let me know if you have any questions.

Regards,

Joshua Wilner
BRAUNHAGEY & BORDEN LLP

San Francisco

351 California Street, 10th Floor
San Francisco, CA 94104

Tel: (415) 599-0210

New York

7 Times Square

27th Floor

New York, NY 10036-6524

Tel: (646) 829-9403

From: Forte, Sandra <Sandra.Forte@countyofmerced.com>

Sent: Monday, April 4, 2022 4:46 PM

To: Ellen Leonida <leonida@braunhagey.com>; PRA Response <praresponse@braunhagey.com>

Subject: RE: 20400-140 RE: California Public Records Act Request

***** EXTERNAL MESSAGE *****

See attached letter.

Sandra Forte

Legal Assistant, Merced County Counsel

2222 M Street, Room 309

Merced, CA 95340

Tel--(209) 385-7564 ext. 4470

Fax-(209) 726-1337

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From: PRA Response <praresponse@braunhagey.com>

Sent: Tuesday, March 15, 2022 10:53 AM

To: Forte, Sandra <Sandra.Forte@countyofmerced.com>

Cc: PRA Response <praresponse@braunhagey.com>; Smith, Melanie

<Melanie.Smith@countyofmerced.com>

Subject: Re: 20400-140 RE: California Public Records Act Request

Ms. Forte,

Thank you for your response. Our office agrees to a two-week extension. At that time, we ask that you inform us which categories of the requested data you intend not to produce. Please specify whether this is because the data is not tracked in any form by your office or because you plan to assert a legal exemption to withhold the data. If you are doing the latter, please give your legal justification for nondisclosure.

Regards,

Joshua Wilner
BRAUNHAGEY & BORDEN LLP

San Francisco

351 California Street, 10th Floor
San Francisco, CA 94104

Tel: (415) 599-0210

New York

7 Times Square

27th Floor

New York, NY 10036-6524

Tel: (646) 829-9403

From: Forte, Sandra

Sent: Monday, March 14, 2022 4:43 PM

To: Caitlin Shaw

Cc: Ellen Leonida ; PRA Response ; Smith, Melanie

Subject: 20400-140 RE: California Public Records Act Request

***** EXTERNAL MESSAGE *****

Good afternoon,

Our office has been notified that the records you are seeking are still in the process of being retrieved. Given the retrieval process is ongoing, we anticipate that the review of said records will

begin within the next two weeks. We will keep you updated on the status of when the records will be made available.

Sandra Forte

Legal Assistant, Merced County Counsel

2222 M Street, Room 309

Merced, CA 95340

Tel: (209)385-7564

Fax: (209)726-1337

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From: Smith, Melanie

Sent: Friday, March 4, 2022 4:19 PM

To: 'Caitlin Shaw'

Cc: Ellen Leonida ; PRA Response

Subject: RE: California Public Records Act Request

Please see the attached.

Thank you,

Melanie Smith

Legal Office Manager

Merced County Counsel

2222 "M" Street, Room 309

Merced, CA 95340

Ph: (209) 385-7564 Ext. 4474

Fax: (209)726-1337

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From: Caitlin Shaw

Sent: Friday, February 18, 2022 2:05 PM

To: Information, District Attorney's Office ; Lewis, Kimberly ; Smith, Melanie

Cc: Ellen Leonida ; PRA Response

Subject: California Public Records Act Request

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

Direct: (415) 651-5763

San Francisco (Main Office)

351 California Street, 10th Floor

San Francisco, CA 94104

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