

From: [PRA Response](#)
To: [Susan Krones](#)
Cc: [PRA Response](#)
Subject: Re: California Public Records Act Request
Date: Tuesday, May 10, 2022 5:40:23 PM

Ms. Krones,

The end of the month will be fine. Our office can meet with you at that time and discuss deadlines going forward.

Regarding the February request for data, we are interested in what information is stored digitally and how it can be extracted. We have found that many offices need to consult with their IT departments before informing us what can be produced.

Please let me know if you have any additional 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: Susan Krones <Susan.Krones@lakecountyca.gov>
Sent: Tuesday, May 10, 2022 5:12 PM
To: PRA Response <praresponse@braunhagey.com>
Subject: RE: California Public Records Act Request

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

I am so sorry. I know you sent an email suggesting I pick a date to respond to the things I can provide and then we can clarify other items that I may have objections to or may not have a way to retrieve the information requested. Could I have until the end of the month? I told you about a family emergency. I have been dealing with that for the past 3 weeks. I will have the next few weekends to work on your request.

Susan

From: PRA Response [mailto:praresponse@braunhagey.com]
Sent: Tuesday, May 10, 2022 8:39 AM
To: Susan Krones <Susan.Krones@lakecountyca.gov>; Lloyd Guintivano <Lloyd.Guintivano@lakecountyca.gov>
Cc: PRA Response <praresponse@braunhagey.com>
Subject: [EXTERNAL] Re: California Public Records Act Request

Ms. Krones,

We have tried for over six months to resolve our two open CPRA requests without litigation. You have not responded, and we have not been able to meet with you, despite repeated attempts. You are well beyond the time allowed by statute to respond. If you wish to avoid litigation, we ask that you contact us immediately.

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: PRA Response <praresponse@braunhagey.com>
Sent: Friday, April 22, 2022 1:42 PM
To: Susan Krones <Susan.Krones@lakecountyca.gov>; PRA Response <praresponse@braunhagey.com>; Lloyd Guintivano <Lloyd.Guintivano@lakecountyca.gov>
Cc: Sarah Salomon <Salomon@braunhagey.com>; Caitlin Shaw <Shaw@braunhagey.com>
Subject: Re: California Public Records Act Request

Ms. Krones,

Would it be possible to reschedule this call? Alternatively, you can respond to this email. Here is the situation on our end: we have two CPRA requests currently open with your office. We would like to agree on a deadline to produce the requested documents and data and to deal

with any legal disagreements regarding withheld records as soon as possible. We are asking that you 1. suggest a deadline to produce responsive records and 2. inform us if you intend not to produce records based on one or more legal exemptions. Because both requests are now many months old, we ask that you respond to this initial request as soon as possible.

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: Susan Krones <Susan.Krones@lakecountyca.gov>

Sent: Thursday, April 7, 2022 8:18 PM

To: PRA Response <praresponse@braunhagey.com>; Lloyd Guintivano <Lloyd.Guintivano@lakecountyca.gov>

Cc: Sarah Salomon <Salomon@braunhagey.com>; Caitlin Shaw <Shaw@braunhagey.com>

Subject: RE: California Public Records Act Request

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

I will need to reschedule this appointment set for 4/8/ at 10:00 pm. I have a family emergency that may take me out of the office on 4/8/ with very little notice.

Thanks for your understanding. I can reschedule for next week once I know more about the situation.

Susan

From: PRA Response [<mailto:praresponse@braunhagey.com>]
Sent: Tuesday, April 5, 2022 5:43 PM
To: Susan Krones <Susan.Krones@lakecountyca.gov>; Lloyd Guintivano <Lloyd.Guintivano@lakecountyca.gov>
Cc: PRA Response <praresponse@braunhagey.com>; Sarah Salomon <Salomon@braunhagey.com>; Caitlin Shaw <Shaw@braunhagey.com>
Subject: [EXTERNAL] Re: California Public Records Act Request

Ms. Krones,

We would like to schedule a phone meeting with you to discuss our requests. Are you available to speak with us Friday (4/8) at 10am? If you are not available at that time, please let us know three times you are available, and we will pick one.

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: Josh Wilner <Wilner@braunhagey.com>
Sent: Tuesday, March 22, 2022 8:49 AM
To: Susan Krones <Susan.Krones@lakecountyca.gov>; Lloyd Guintivano <Lloyd.Guintivano@lakecountyca.gov>
Cc: PRA Response <praresponse@braunhagey.com>
Subject: Re: California Public Records Act Request

Ms. Krones,

Thank you for your assistance with our request. Please let us know when we can expect your response. We are happy to schedule a phone meeting if you need assistance or clarification.

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: Susan Krones <Susan.Krones@lakecountyca.gov>
Sent: Thursday, March 10, 2022 4:30 PM
To: Josh Wilner <Wilner@braunhagey.com>; Lloyd Guintivano <Lloyd.Guintivano@lakecountyca.gov>
Cc: PRA Response <praresponse@braunhagey.com>
Subject: RE: California Public Records Act Request

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

I have been out of the office and hope to be back the week of 3/14/22. I will contact you then.

Susan

From: Josh Wilner [<mailto:Wilner@braunhagey.com>]
Sent: Friday, March 4, 2022 5:19 PM
To: Susan Krones <Susan.Krones@lakecountyca.gov>; Lloyd Guintivano <Lloyd.Guintivano@lakecountyca.gov>
Cc: PRA Response <praresponse@braunhagey.com>
Subject: [EXTERNAL] Re: California Public Records Act Request

Counsel,

You are now beyond the statutorily allowed time to respond to our request. We ask that you respond immediately and signal your intention to produce the requested data.

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: Winni Yan <yan@braunhagey.com>
Sent: Wednesday, February 23, 2022 4:42 PM
To: susan.krones@lakecountyca.gov <susan.krones@lakecountyca.gov>;
Lloyd.guintivano@lakecountyca.gov <Lloyd.guintivano@lakecountyca.gov>
Cc: PRA Response <preresponse@braunhagey.com>; Ellen Leonida <Leonida@braunhagey.com>
Subject: RE: California Public Records Act Request

Counsel,

Please see the attached corrected version of our February 10, 2022 request. The new version corrects two typos in paragraph 3 and does not alter the scope of the records we request.

Regards,

Winni Yan

Litigation Paralegal

BRAUNHAGEY & BORDEN LLP
Direct: (415) 256-7731

From: Winni Yan
Sent: Thursday, February 10, 2022 12:54 PM
To: susan.krones@lakecountyca.gov; Lloyd.guintivano@lakecountyca.gov
Cc: PRA Response <preresponse@braunhagey.com>; Ellen Leonida <Leonida@braunhagey.com>
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,

Winni Yan

Litigation Paralegal

BRAUNHAGEY & BORDEN LLP

Direct: (415) 256-7731

San Francisco (Main Office)

351 California Street, 10th Floor

San Francisco, CA 94104

Tel. & Fax: (415) 599-0210

New York

7 Times Square

27th Floor

New York, NY 10036-6524

Tel. & Fax: (646) 829-9403

This message is intended only for the confidential use of the intended recipient(s) and may contain protected information that is subject to attorney-client, work product, joint defense and/or other legal privileges. If you are not the intended recipient, please contact me immediately at the phone number listed above and permanently delete the original message and any copies thereof from your email system. Thank you.