

**From:** [Kory DeClark](#)  
**To:** [Eric Havens](#)  
**Cc:** [PRA Response](#); [Caitlin Shaw](#); [Winni Yan](#)  
**Subject:** RE: Summary of 7/21/21 call  
**Date:** Thursday, July 21, 2022 11:29:27 AM

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Eric,

Sorry—I forgot to include:

4. You will discuss with your client our proposal to withdraw our request for names/birthdates so that the county can provide the remaining statistical demographic data we request.

Kory DeClark

**BRAUNHAGEY & BORDEN LLP**

Direct: (415) 869-6487

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**From:** Kory DeClark  
**Sent:** Thursday, July 21, 2022 11:27 AM  
**To:** Eric Havens <EricHavens@co.imperial.ca.us>  
**Cc:** PRA Response <praresponse@braunhagey.com>; Caitlin Shaw <Shaw@braunhagey.com>; Winni Yan <yan@braunhagey.com>  
**Subject:** Summary of 7/21/21 call

Eric,

Thanks to you and Jose for talking today. To summarize:

### **Data Request**

We looked over the table you provided in your 5/24 letter to our office, in response to our 9/7/21 data request. After talking with Jose, we learned that some of the categories marked as “3” should in fact be “2,” since the information is collected but is not easily accessible.

For next steps, you said that by **August 8**, you will:

1. Review the table with Jose (a staff person at the DA’s office) to confirm that all the cells marked as “3” are in fact “3s.”
2. For all categories properly marked as “2,” you will subcategorize them as either “2.A.” (which means that the IT department (or third-party vendor) can write a code (or create a similar automated process) to pull the data) or “2.B.” (which means that the data can only be pulled manually).
3. You will provide a cost estimate and estimated production deadline for all data that falls into the “2.A.” category.

## **Policy Request**

Regarding our 7/23/21 policy request, it appears from our records that you provided a letter on 12/10/21 claiming to provide all responsive records in the county's possession. However, that production included a single email with a one-page attachment. It seems implausible that a county of any size would have zero records responsive to the request we sent. Can you please confirm?

Thanks,

Kory DeClark

**BRAUNHAGEY & BORDEN LLP**

Direct: (415) 869-6487

### **San Francisco (Main Office)**

351 California Street, 10<sup>th</sup> Floor

San Francisco, CA 94104

Tel. & Fax: (415) 599-0210

### **New York**

118 W 22nd Street, 12<sup>th</sup> Floor

New York, NY 10011

Tel: (646) 829-9403

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