

From: [Josh Wilner](#)
To: [Roth, Kimberly](#); [Winni Yan](#)
Cc: [PRA Response](#)
Subject: Re: California Public Records Act Request [PRA 21-104]
Date: Wednesday, November 30, 2022 4:13:20 PM

Ms. Roth,

Thank you for your response. Please inform us if an email search was performed and, if so, how many of the emails were withheld. No email communications were produced in your previous batches of documents.

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: Roth, Kimberly <Kimberly.Roth@sdcd.org>
Sent: Wednesday, November 30, 2022 4:05 PM
To: Josh Wilner <Wilner@braunhagey.com>; Winni Yan <yan@braunhagey.com>
Cc: PRA Response <praresponse@braunhagey.com>
Subject: RE: California Public Records Act Request [PRA 21-104]

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

Hello,

Part 1, Request 3, sought the following records:

Records concerning the Racial Justice Act:

- a. Implementation of and compliance with the RJA;
- b. Communications concerning the RJA; or
- c. Trainings related to the RJA.

At the time of this request, this office conducted a reasonable search for the requested records, and produced all non-exempt responsive records with our April 29, 2022 response. As noted in

that response letter, to the extent certain records produced were exempt from disclosure, the District Attorney waived the applicable exemptions for those records only. However, there are additional responsive records that were not produced because they remain exempt from disclosure pursuant to the core work product privilege and deliberative process exemption.

Thank you,

Kimberly Roth

From: Josh Wilner <Wilner@braunhagey.com>
Sent: Monday, November 28, 2022 10:19 AM
To: Roth, Kimberly <Kimberly.Roth@sdcdca.org>; Winni Yan <yan@braunhagey.com>
Cc: PRA Response <praresponse@braunhagey.com>
Subject: Re: California Public Records Act Request [PRA 21-104]

[EXTERNAL SENDER]

Ms. Roth,

Please respond to the inquiries below. We are happy to speak with you on the phone, if that would be helpful.

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: Friday, November 18, 2022 4:18 PM
To: Roth, Kimberly <Kimberly.Roth@sdcdca.org>; Winni Yan <yan@braunhagey.com>
Cc: PRA Response <praresponse@braunhagey.com>
Subject: Re: California Public Records Act Request [PRA 21-104]

Thank you, Ms. Roth. I reviewed the April production this morning and did not see any emails or other communications. Did your office run an email search? Are you in possession of any policies or directives regarding the RJA?

From: Roth, Kimberly <Kimberly.Roth@sdcd.org>
Sent: Friday, November 18, 2022 4:14 PM
To: Josh Wilner <Wilner@braunhagey.com>; Winni Yan <yan@braunhagey.com>
Cc: PRA Response <praresponse@braunhagey.com>
Subject: RE: California Public Records Act Request [PRA 21-104]

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

Hello,

Records responsive to Part 1, Request 3, were provided with Response Letter #2, emailed on April 29, 2022. These records, along with additional responsive records, were provided in a single PDF file that contained 1684 pages. Per your email on October 26, 2022, you received this PDF file. However, here is a link to re-download the response and records: <https://transfer.sdcd.org/?ShareToken=5D0431AACDC302548E11AE8D96555444A0C973B3>

Thank you,

Kimberly Roth
Deputy District Attorney
Appellate and Training Division

From: Josh Wilner <Wilner@braunhagey.com>
Sent: Friday, November 18, 2022 3:26 PM
To: Roth, Kimberly <Kimberly.Roth@sdcd.org>; Winni Yan <yan@braunhagey.com>
Cc: PRA Response <praresponse@braunhagey.com>
Subject: Re: California Public Records Act Request [PRA 21-104]

[EXTERNAL SENDER]

Ms. Roth,

In the letter attached below, your office agreed to waive exemptions and produce records responsive to Category 3 of the request. We have still not received any communications regarding the Racial Justice Act or documents concerning the implementation of the Act. Please produce these records as soon as possible.

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: Roth, Kimberly <Kimberly.Roth@sdcca.org>
Sent: Friday, April 29, 2022 4:18 PM
To: Winni Yan <yan@braunhagey.com>
Cc: Ellen Leonida <Leonida@braunhagey.com>; PRA Response <praresponse@braunhagey.com>
Subject: RE: California Public Records Act Request [PRA 21-104]

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

Hello,

Please see the attached response letter. Here is the link to download the records:
<https://transfer.sdcca.org/?ShareToken=C109A4D8290B71F7761A391BA5A4740859938335>

Please let me know if you have any difficulty accessing the records.

Thank you,

Kimberly Roth
Deputy District Attorney
Appellate and Training Division

From: Roth, Kimberly
Sent: Wednesday, April 13, 2022 4:39 PM
To: Winni Yan <yan@braunhagey.com>
Cc: Ellen Leonida <Leonida@braunhagey.com>; PRA Response <praresponse@braunhagey.com>
Subject: RE: California Public Records Act Request

Hello,

This correspondence is to confirm receipt of your letter dated March 29, 2022, titled "2022-03-29 – Legal Argument Letter to San Diego (Policy)." This office is considering the legal arguments asserted in your letter and will provide a written response by April 29, 2022.

Thank you,

Kimberly Roth
Deputy District Attorney
Appellate & Training Division

From: Winni Yan <yan@braunhagey.com>
Sent: Tuesday, March 29, 2022 4:11 PM
To: San Diego DA <SanDiegoDA@sdcca.org>; San Diego DA <SanDiegoDA@sdcca.org>; Roth, Kimberly <Kimberly.Roth@sdcca.org>
Cc: Ellen Leonida <Leonida@braunhagey.com>; PRA Response <praresponse@braunhagey.com>
Subject: California Public Records Act Request

[EXTERNAL SENDER]

Dear Counsel,

Please see attached correspondence on behalf of Ms. Leonida regarding our July 23, 2021 CPRA request.

Regards,

Winni Yan
Litigation Paralegal
BRAUNHAGEY & BORDEN LLP
Direct: (415) 256-7731

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