

**From:** [Nisha K. Dale](#)  
**To:** [Josh Wilner](#); [PRA Response](#); [Kory DeClark](#); [Caitlin Shaw](#)  
**Cc:** [Mariela Cantoriano](#)  
**Subject:** RE: (917) Public Records Act Request  
**Date:** Tuesday, December 6, 2022 2:39:31 PM

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**\*\*\* EXTERNAL MESSAGE \*\*\***

Good afternoon Mr. Wilner,

After speaking with the County, there are no additional responsive records the County has regarding your request. Any context you can provide regarding this meeting would be helpful in determining how we should proceed forward.

Thank you,



**Nisha K. Dale | Attorney At Law**

7404 North Spalding Avenue, Fresno, CA 93720-3370

T: [559.431.5600](tel:559.431.5600) F: [559.261.9366](tel:559.261.9366)

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**From:** Nisha K. Dale  
**Sent:** Friday, December 2, 2022 12:34 PM  
**To:** Josh Wilner <[Wilner@braunhagey.com](mailto:Wilner@braunhagey.com)>; PRA Response <[praresponse@braunhagey.com](mailto:praresponse@braunhagey.com)>; Kory DeClark <[declark@braunhagey.com](mailto:declark@braunhagey.com)>; Caitlin Shaw <[Shaw@braunhagey.com](mailto:Shaw@braunhagey.com)>  
**Cc:** Mariela Cantoriano <[mcantoriano@lozanosmith.com](mailto:mcantoriano@lozanosmith.com)>  
**Subject:** RE: (917) Public Records Act Request

Good afternoon Mr. Wilner,

We received the voicemail you left earlier this afternoon regarding this Public Records Act request. We will provide a further respond on Monday as we are coordinating with our client.

Thank you,



**Nisha K. Dale | Attorney At Law**

7404 North Spalding Avenue, Fresno, CA 93720-3370

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**From:** Josh Wilner <[Wilner@braunhagey.com](mailto:Wilner@braunhagey.com)>  
**Sent:** Monday, November 28, 2022 11:44 AM  
**To:** Nisha K. Dale <[ndale@lozanosmith.com](mailto:ndale@lozanosmith.com)>; PRA Response <[praresponse@braunhagey.com](mailto:praresponse@braunhagey.com)>; Kory DeClark <[declark@braunhagey.com](mailto:declark@braunhagey.com)>; Caitlin Shaw <[Shaw@braunhagey.com](mailto:Shaw@braunhagey.com)>  
**Subject:** Re: (917) Public Records Act Request

**CAUTION:** External E-Mail:

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Ms. Dale,

Are you available for a phone meeting next Monday (12/5) at 9:30am? If not, please provide 3 times you are available, and we will pick one.

Regards,

Joshua Wilner

**BRAUNHAGEY & BORDEN LLP**

**San Francisco**

351 California Street, 10<sup>th</sup> Floor  
San Francisco, CA 94104

Tel: (415) 599-0210

**New York**

7 Times Square

27<sup>th</sup> Floor

New York, NY 10036-6524

Tel: (646) 829-9403

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**From:** Josh Wilner <[Wilner@braunhagey.com](mailto:Wilner@braunhagey.com)>

**Sent:** Friday, November 18, 2022 3:15 PM

**To:** Nisha K. Dale <[ndale@lozanosmith.com](mailto:ndale@lozanosmith.com)>; PRA Response <[praresponse@braunhagey.com](mailto:praresponse@braunhagey.com)>

**Subject:** Re: (917) Public Records Act Request

Ms. Dale,

Thank you for your response. I would like to schedule a phone meeting to discuss this request. Are you available on Tuesday or Wednesday next week?

Regards,

Joshua Wilner

**BRAUNHAGEY & BORDEN LLP**

**San Francisco**

351 California Street, 10<sup>th</sup> Floor  
San Francisco, CA 94104

Tel: (415) 599-0210

New York

7 Times Square

27<sup>th</sup> Floor

New York, NY 10036-6524

Tel: (646) 829-9403

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**From:** Josh Wilner <[Wilner@braunhagey.com](mailto:Wilner@braunhagey.com)>

**Sent:** Wednesday, November 16, 2022 5:03 PM

**To:** Nisha K. Dale <[ndale@lozanosmith.com](mailto:ndale@lozanosmith.com)>; PRA Response <[praresponse@braunhagey.com](mailto:praresponse@braunhagey.com)>

**Subject:** Re: (917) Public Records Act Request

Ms. Dale,

Excellent. We look forward to your response.

Regards,

Joshua Wilner

**BRAUNHAGEY & BORDEN LLP**

San Francisco

351 California Street, 10<sup>th</sup> Floor  
San Francisco, CA 94104

Tel: (415) 599-0210

New York

7 Times Square

27<sup>th</sup> Floor

New York, NY 10036-6524

Tel: (646) 829-9403

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**From:** Nisha K. Dale <[ndale@lozanosmith.com](mailto:ndale@lozanosmith.com)>

**Sent:** Wednesday, November 16, 2022 2:10 PM

**To:** Josh Wilner <[Wilner@braunhagey.com](mailto:Wilner@braunhagey.com)>; PRA Response <[praresponse@braunhagey.com](mailto:praresponse@braunhagey.com)>

**Subject:** Re: (917) Public Records Act Request

**\*\*\* EXTERNAL MESSAGE \*\*\***

Good afternoon Mr. Wilner,

We are reviewing our file for this PRA request and anticipate providing a response in writing no later than this Friday.

Thank you,

Nisha Dale



**Nisha K. Dale | Attorney At Law**

7404 North Spalding Avenue, Fresno, CA 93720-3370

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**From:** Josh Wilner <[Wilner@braunhagey.com](mailto:Wilner@braunhagey.com)>

**Sent:** Wednesday, November 16, 2022 1:01 PM

**To:** Mariela Cantoriano <[mcantoriano@lozanosmith.com](mailto:mcantoriano@lozanosmith.com)>

**Cc:** Shaun R. Ardemagni <[sardemagni@lozanosmith.com](mailto:sardemagni@lozanosmith.com)>; PRA Response <[praresponse@braunhagey.com](mailto:praresponse@braunhagey.com)>

**Subject:** Re: (944) Public Records Act Request - Racial Justice Act (2)

**CAUTION:** External E-Mail:

Hello,

Please provide an update on the inquiry below.

Regards,

Joshua Wilner

**BRAUNHAGEY & BORDEN LLP**

**San Francisco**

351 California Street, 10<sup>th</sup> Floor  
San Francisco, CA 94104

Tel: (415) 599-0210

**New York**

7 Times Square

27<sup>th</sup> Floor

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Tel: (646) 829-9403

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**From:** Josh Wilner <[Wilner@braunhagey.com](mailto:Wilner@braunhagey.com)>

**Sent:** Tuesday, November 8, 2022 10:28 AM

**To:** Mariela Cantoriano <[mcantoriano@lozanosmith.com](mailto:mcantoriano@lozanosmith.com)>

**Cc:** Shaun R. Ardemagni <[sardemagni@lozanosmith.com](mailto:sardemagni@lozanosmith.com)>

**Subject:** Re: (944) Public Records Act Request - Racial Justice Act (2)

Ms. Cantoriano and Ms. Dale,

Thank you for your response. We are still seeking information regarding our July 23, 2021 CPRA request to Madera County, which seeks policy documents, trainings, communications, and *Batson/Wheeler* records. You never informed us whether any documents were in fact withheld and, if so, on what legal basis, despite our repeated attempts to contact you. Please inform us immediately whether any responsive documents were withheld for any reason. We note that the county produced no office policies, memoranda, training slides, or communications regarding the Racial Justice Act, despite claiming no specific legal exemptions for those materials.

As we have communicated several times, we remain willing to speak on the phone to resolve these issues. However, should you continue to withhold records without asserting a specific legal exemption, we will be forced to litigate at your expense to obtain the records to which the public is entitled. We ask that you schedule a phone meeting with us or respond in writing no later than **November 11, 2022**.

Regards,

Joshua Wilner

**BRAUNHAGEY & BORDEN LLP**

**San Francisco**

351 California Street, 10<sup>th</sup> Floor  
San Francisco, CA 94104

Tel: (415) 599-0210

**New York**

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27<sup>th</sup> Floor

New York, NY 10036-6524

Tel: (646) 829-9403

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**From:** Mariela Cantoriano <[mcantoriano@lozanosmith.com](mailto:mcantoriano@lozanosmith.com)>

**Sent:** Monday, November 7, 2022 4:19 PM

**To:** Ellen Leonida <[Leonida@braunhagey.com](mailto:Leonida@braunhagey.com)>

**Cc:** Shaun R. Ardemagni <[sardemagni@lozanosmith.com](mailto:sardemagni@lozanosmith.com)>

**Subject:** (944) Public Records Act Request - Racial Justice Act (2)

**\*\*\* EXTERNAL MESSAGE \*\*\***

Dear Ms. Leonida,

On behalf of Madera County, attached please find the County's supplemental response to your Public Records Act request, referenced above.

Thank you.



**Mariela Cantoriano | Code Enforcement Legal Assistant & Legal Secretary to  
David J. Wolfe, Matthew M. Lear, Nisha K. Dale  
& Jack Jackson II**

7404 North Spalding Avenue, Fresno, CA 93720-3370

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