THOMAS R. BURKE (State Bar No. 141930)
    thomasburke@dwt.com
DAVIS WRIGHT TREMAINE LLP
505 Montgomery Street, Suite 800
San Francisco, California 94111-6533
Telephone: (415) 276-6500
Facsimile: (415) 276-6599

KAREN A. HENRY (State Bar No. 229707)
    karenhenry@dwt.com
BRENDAN N. CHARNEY (State Bar No. 293378)
    brendancharney@dwt.com
DAVIS WRIGHT TREMAINE LLP
865 S. Figueroa Street, Suite 2400
Los Angeles, California 90017-2566
Telephone: (213) 633-6800
Facsimile: (213) 633-6899

Attorneys for Petitioner
MUSLIM ADVOCATES

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

MUSLIM ADVOCATES,
 	
                    Petitioner,
 	
    v.
 	
THE CITY OF LOS ANGELES; THE LOS ANGELES POLICE DEPARTMENT; DOES 1 THROUGH 10, INCLUSIVE,
 	
                    Respondents.
	Case No. BS163755
	Assigned to the Hon. James C. Chalfant
	Dept.: 85
	
	SUPPLEMENTAL DECLARATION OF BRENDAN N. CHARNEY IN SUPPORT OF REPLY OF VERIFIED PETITION FOR WRIT OF MANDATE; EXHIBITS DDDD - GGGG
	
	[Petitioner's Reply in Support of Verified Petition for Writ of Mandate; Petitioner Muslim Advocates' Objections to Evidence concurrently filed]
	
	Action Filed: July 25, 2016

SUPPLEMENTAL DECLARATION OF BRENDAN CHARNEY IN SUPPORT
OF REPLY OF VERIFIED PETITION FOR WRIT OF MANDATE
4830-1495-6625v.1 0200879-000001

SUPPLEMENTAL DECLARATION OF BRENDAN N. CHARNEY

I, BRENDAN N. CHARNEY, declare:

1.   I am an associate with the law firm Davis Wright Tremaine, LLP, and one of the attorneys representing Petitioner Muslim Advocates in this matter. I submit this declaration in support of Muslim Advocates' Reply in support of Verified Petition for Writ of Mandate. The matters stated in this declaration are true based on my personal knowledge and if called to testify I could and would testify competently thereto.

2.   On January 26, 2017, I took the deposition of Rachel McClain in her capacity as the person designated by the Los Angeles Police Department ("LAPD") as most qualified to testify concerning the LAPD's e-mail backup system and undue burden claim thereto. Attached hereto as **Exhibit DDDD** are true and correct copies of excerpts from Volume Two of the transcript of that deposition.

3.   On March 23, 2017, I took the continued deposition of Ms. McClain in her capacity as the LAPD's person-most-qualified designee concerning the LAPD's e-mail backup system and undue burden claim thereto. Attached hereto as **Exhibit EEEE** are true and correct copies of excerpts from Volume Four of the transcript of that deposition.

4.   On May 10, 2017, I took the deposition of Ms. Raymona Moussa. Attached hereto as **Exhibit FFFF** are true and correct copies of excerpts from the transcript of that deposition.

5.   On May 8, 2017, I caused to be printed from the LAPD's website a summary that purports to describe the functions of Planning and Research Division. Attached as **Exhibit GGGG** is a true and correct copy of the summary as available as of May 8, 2017 on the LAPD's website. No representation is made as to the truth or correctness of the representations in the summary. This summary was marked as Exhibit 9 at the deposition of Raymona Moussa.

This declaration was executed on the 4th day of October, 2017, in Los Angeles, California. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Brendan N. Charney

EXHIBIT DDDD

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

MUSLIM ADVOCATES,

          Petitioner,

    vs.   Case No. BS163755

THE CITY OF LOS ANGELES; THE LOS
ANGELES POLICE DEPARTMENT; DOES
1-10, INCLUSIVE,

          Respondents.

_____

DEPOSITION OF PERSON MOST QUALIFIED

AT LOS ANGELES POLICE DEPARTMENT

RACHEL MCCLAIN

VOLUME II

Thursday, January 26, 2017

10:15 a.m. - 3:08 p.m.

865 South Figueroa Street, Suite 2400

Los Angeles, California

REPORTED BY:

Jean F. Holliday

CSR No. 4535, RPR, CRR

1   something that was that old. But if I can get through

2   all that and the post office is up and I pointed at this

3   data, and I attempt to bring up the post office and it

4   seems to be working, then I need to go to, like, a

5   workstation, like an old Windows workstation and install

6   the client for that version that is going to be talking

7   to the server so that I can try to say, okay, let me see

8   if I can get into this post office now.

9   Q.   So just backing up a little bit, am I right

10   that you identified one potential roadblock, which is

11   the same issue we talked about before, the fact that the

12   server onto which your -- in which you're viewing the

13   data has to be -- has to have the right IP address and

14   the right name and that can't be the same as one that's

15   currently being used?

16   A.   That's true.

17   Q.   Other than that issue with the right IP address

18   and the right name, are there any other roadblocks that

19   you would reasonably expect to encounter?

20   A.   I'm not sure. I can't think of all the other

21   parts of the installation that might be a problem.

22   That's what comes to mind right now.

23   Q.   So nothing else as you sit here today?

24   A.   There might be other -- other things but I'm

25   not sure right now.

1   Q.   What would you have to do to find out what

2 those other things are?

3   A.   Probably have to talk to the Novell consultant

4 and ask him his experience.

5   Q.   Anything else?

6   A.   I could also try to talk to my supervisor. He

7 has more experience with actually creating a post

8 office.

9   Q.   Once you get past the step of viewing the post

10 office in the right software, what's the next step?

11   A.   After the post office -- you're saying the post

12 office is up and alive and it has the data from 2008 in

13 it?

14   Q.   Yes.

15   A.   Once that happens then you -- then you're going

16 to want to have a client -- it would be separate from

17 the server and you create this workstation, and then

18 you'd put in a GroupWise client on it, and then you

19 would tell it what path to go and look for that post

20 office, and that's another reason why I need the IP

21 address, and tell it this is where I want you to look on

22 this port number, with your credentials, your serial

23 number and the password for your GroupWise account, and

24 then it should be able to open up the account for me.

25   Q.   And how long would it take to set up that

1 workstation?

2   A.   You would need to just have a workstation with

3 an operating system that could talk to that client from

4 that year. I think some of the Windows workstations

5 might be backward compatible so that might not be as

6 difficult as a server. And then once you install that

7 client then you should be able to talk to it. If you

8 have the wrong client it will tell you, it will say I

9 can't talk to the server.

10   Q.   So setting up the workstation is sort of kind

11 of a standard process that wouldn't take very long?

12   A.   No, I don't think that would take very long. I

13 could ask -- I used to work for the installation unit so

14 they used to have images. I don't know if they still

15 have images from that far back, but I could at least

16 ask.

17   Q.   So it's basically the process we talked about

18 on the first day where you put in a disk containing an

19 image onto a computer that has a monitor and the

20 software runs and installs the image and then you're

21 good to go?

22   A.   Yeah, for that time period, yes.

23   Q.   So you mentioned a client, so after you have

24 the workstation ready there is a client you have to

25 install?

1   A.   Well, if I had an image from that time frame,

2 then that client would already be installed.

3   Q.   Oh, so that's baked into the workstation part?

4   A.   That image, yes, from that time frame.

5   Q.   And so once you have the client -- is the

6 client like an e-mail viewer?

7   A.   Yes.

8   Q.   And so once you have the client ready, you have

9 to put in a path which is, like, an IP address and some

10 other naming data, and once that's -- how long does that

11 take?

12   A.   Oh, just to type that in?

13   Q.   Yeah.

14   A.   Doesn't take very long, just a few minutes if

15 you know where you're going.

16   Q.   And once that's done are you ready to view the

17 e-mail?

18   A.   Yes. There is only one -- there is only one

19 roadblock for that and that is the password.

20   Q.   And how would -- I assume you mean the user's

21 password --

22   A.   Yes.

23   Q.   -- has to be entered?

24   A.   Yes.

25   Q.   And how would you obtain that password?

1   A.   Well, I wouldn't. So I would try to get the --

2   that ConsoleOne that we've discussed earlier with the WP

3   domain file, I would try to clear the password using the

4   ConsoleOne administration tool, to see if I can get into

5   the account.

6   Q.   Without the password?

7   A.   Without the password.

8   Q.   So you have an administrative tool that allows

9   you to bypass the user's password and access the data?

10   A.   In a live system it works very well but in this

11   type of system not so much.

12   Q.   How do you know?

13   A.   Well, some of the GroupWise servers from 2010

14   to 2013, my supervisor had put some of those files on a

15   server to try to get into some of those post offices

16   from that time frame, and it is kind of hit or miss me

17   trying to clear a password from there.

18   Q.   Why is it hit or miss?

19   A.   I think it's just because it's not a real

20   system, it's not a full system. So I think that's

21   probably part of the problem.

22   Q.   Does the LAPD maintain a log of the passwords

23   used by its personnel?

24   A.   No, it doesn't.

25   Q.   Would -- so assuming that the ConsoleOne bypass

1   process doesn't work, that you can't clear the password

2   as an administrator, could you go to the person who owns

3   the account and say hey, what's your password or what

4   was your password at that time and then put that in?

5   A.   Normally we don't -- if we're doing audits on

6   someone we don't normally let them know that they are

7   being audited, but in a case such as this, then yeah, we

8   could try to ask them, if they are still working there,

9   try to ask them what their password was in that time

10   frame.

11   Q.   And if they could provide that password to you,

12   you would be able to clear the credential hurdle and get

13   into the account?

14   A.   Yes.

15   Q.   And once you're in the account what can you do

16   in terms of searching the e-mail?

17   A.   I can search who it was sent to. I can search

18   who it was sent from. I can search the subject line.

19   Today in GroupWise -- well, we have GroupWise 2012 and

20   20 -- I think just 2012 right now. On that one I can

21   search some of the e-mail body but I'm not sure if in

22   2004 to 2008 exactly what the search -- if we can do

23   that same kind of thing that we can do in 2012 because

24   every update of the client and the server, you know,

25   gets better and you have more tools. So for sure I know

```
 1   STATE OF CALIFORNIA      )
                              ) SS
 2   COUNTY OF LOS ANGELES    )

 3

 4        I, Jean F. Holliday, a Certified Shorthand

 5   Reporter, do hereby certify:

 6        That prior to being examined, the witness in the

 7   foregoing proceedings was by me duly sworn to testify to

 8   the truth, the whole truth, and nothing but the truth;

 9        That said proceedings were taken before me at the

10   time and place therein set forth, and were taken down by

11   me in shorthand and thereafter transcribed into

12   typewriting under my direction and supervision;

13        I further certify that I am neither counsel for,

14   nor related to, any party to said proceedings, nor in

15   anywise interested in the outcome thereof.

16        In witness whereof, I have hereunto subscribed my

17   name.

18

19   Dated:  February 4, 2017

20   [signature: Jean Holliday]

21   _____
     Jean F. Holliday
22   CSR No. 4535, RPR, CRR

23

24

25
```
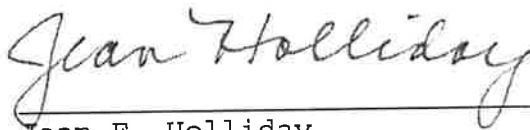
EXHIBIT EEEE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

MUSLIM ADVOCATES,

          Petitioner,

    vs.   Case No. BS163755

THE CITY OF LOS ANGELES; THE LOS
ANGELES POLICE DEPARTMENT; DOES
1-10, INCLUSIVE,

          Respondents.

DEPOSITION OF PERSON MOST QUALIFIED

AT LOS ANGELES POLICE DEPARTMENT

RACHEL MCCLAIN

VOLUME IV

Thursday, March 23, 2017

9:58 a.m. - 1:57 p.m.

865 South Figueroa Street, Suite 2400

Los Angeles, California

REPORTED BY:

Jean F. Holliday

CSR No. 4535, RPR, CRR

1   A.   I know of the GroupWise 6 guide, but this is

2 just the -- this looks like just the table of contents.

3   Q.   That's right. I'll represent that I excerpted

4 the table of contents from the guide.

5   A.   Yeah. It's not the whole guide. It's just the

6 table of contents.

7   Q.   That's right. And do you know if within this

8 table of contents any -- let me rephrase.

9   Do you know if this table of contents

10 references any of the steps that we've discussed in

11 order to retrieve the LAPD's e-mail backups from 2004 to

12 2008?

13   A.   Probably installing the POA.

14   Q.   Where do you see that?

15   A.   No. 47, Page 15. Yeah, it's Page 15 on your

16 thing.

17   Q.   When you say Page 15 are you referring to the

18 Bates numbers or the page numbering?

19   A.   Both. It's the same, 00015 or 15.

20   Q.   And which -- I'm sorry. Can you remind me

21 which particular --

22   A.   47, installing the POA.

23   Q.   And what does that refer to?

24   A.   Oh, when we need to -- when we bring up the

25 server we need to install the post office software, so

1   this part talks about installing the POA software.

2   Q.   Are there any other portions of this table of

3   contents that refer to steps that you would need in

4   order to restore e-mail backups?

5   A.   Talking about me personally?

6   Q.   Well, the LAPD.

7   A.   Okay.   The LAPD, I mean if you don't know how

8   post offices are set up and organized, you could use

9   this guide to understand the folders and what folders

10   you would need to restore from the post office backup,

11   like we were discussing before, the ofuser, the ofmsg,

12   the offiles.   If you don't know what those are, what

13   they do, you don't know that you need it, you might not

14   restore something.   So there is some parts in here that

15   talk about the folders.

16   Q.   And which parts are those?

17   A.   Okay.   On Page 13, so you can read about

18   understanding the database.

19   Q.   And is that Chapter 37?

20   A.   It is.

21   What else?   Page 14, No. 45, the GWcheck, I

22   think that's what I'm referring to when I say GWtools,

23   it's a part of -- it's one tool that you can use to --

24   I'm not sure if it's the GWcheck or not, but it might

25   be -- where you can try to take the password out.

1   Q.   Is that the process by which you can bypass

2   credentials and avoid having to enter a user's password?

3   A.   Right. Yeah. You need the GWtools to even

4   attempt it.

5   Q.   Is that what you've been referring to as

6   ConsoleOne?

7   A.   No. ConsoleOne is the application. The

8   GWtools is like the -- I don't want to say driver

9   because that's not really the right term, but they kind

10   of all work together. So in ConsoleOne there are

11   GWchecks inside of it. There is a lot of different

12   things you can do in ConsoleOne. So the GWtools are a

13   part of ConsoleOne but ConsoleOne is not part of the

14   GWtools. Does that make sense?

15   Q.   Sounds like a logic problem.

16   A.   Yeah. It's like ConsoleOne does a lot of

17   things, including GWchecks.

18   Q.   Okay.

19   A.   But specifically the piece that you'd need to

20   try to clear the password is the GWcheck that's inside

21   of ConsoleOne. So this talks about GWcheck on here.

22   Q.   So the GWcheck function is what you've been --

23   you've previously referred to that in connection with

24   ConsoleOne; correct?

25   A.   Right. Yeah. They are together but they are

1   not the same.

2   Q.   Okay.   Are there any other sections or

3   subsections of this table of contents that refer to

4   steps you would need to take in order to retrieve e-mail

5   backups from 2004 to 2008?

6   A.   I think I would probably use one of these

7   startup switches in the client, that's on Page 24,

8   No. 66-C, and that's just to get to -- from the client

9   to get to the post office because it's not live.

10   Q.   Which switches are you referring to?

11   A.   There is a bunch of different switches listed

12   here, but specifically it will be the -- it might be

13   user, user switch, slash user.   It might be the user

14   switch.   I'm not sure.   It's been a while since I've

15   tried to do this with a client.

16   Q.   And when you say "user switch," is there a page

17   number associated with that on the right-hand side of

18   the table of contents?

19   A.   Yeah.   There is a -- from Page 24 to Page 26

20   lists a bunch of startup switches.   And this is just

21   when -- while I'm in the client and I want to point at

22   the server that I just created with the post office and

23   I want to go to a specific user on that server.

24   And I think that's it for this.   So the rest of

25   it's about web access, and we're not talking about that,

1   STATE OF CALIFORNIA   )
) SS
2   COUNTY OF LOS ANGELES   )

3

4   I, Jean F. Holliday, a Certified Shorthand

5   Reporter, do hereby certify:
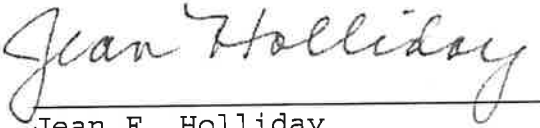
6   That prior to being examined, the witness in the

7   foregoing proceedings was by me duly sworn to testify to

8   the truth, the whole truth, and nothing but the truth;

9   That said proceedings were taken before me at the

10 time and place therein set forth, and were taken down by

11 me in shorthand and thereafter transcribed into

12 typewriting under my direction and supervision;

13   I further certify that I am neither counsel for,

14 nor related to, any party to said proceedings, nor in

15 anywise interested in the outcome thereof.

16   In witness whereof, I have hereunto subscribed my

17 name.

18

19 Dated: March 25, 2017

20 *Jean Holliday*

21 _____
    Jean F. Holliday
22 CSR No. 4535, RPR, CRR

23

24

25

EXHIBIT FFFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

MUSLIM ADVOCATES,

          Petitioner,

    vs.   Case No. BS163755

THE CITY OF LOS ANGELES; THE LOS
ANGELES POLICE DEPARTMENT; DOES
1-10, INCLUSIVE,

          Respondents.

DEPOSITION OF RAYMONA MOUSSA

Wednesday, May 10, 2017

10:00 a.m. - 3:56 p.m.

865 South Figueroa Street, Suite 2400

Los Angeles, California

REPORTED BY:

Jean F. Holliday

CSR No. 4535, RPR, CRR

1   not trust. It's just, you know, more trying to be as

2   much -- you know, giving the requester what they need or

3   what they -- we're not trying to hide anything, you

4   know.

5   BY MR. CHARNEY:

6   Q. Sure. But in double checking the staff

7   member's work you assume that the search terms you are

8   using are the same search terms they use; right?

9   A. Yes.

10   Q. But you don't know that for sure?

11   A. Yes.

12   Q. Are there any -- and I'm sorry if this is a

13   little duplicative, but just to confirm, are there any

14   written protocols or any guidance that you provide to

15   your staff about how to search in response to a CPRA

16   request?

17   A. No.

18   Q. And there is no documentation that's, you know,

19   more generally available within the department for your

20   staff to tell them what to do in response to a CPRA

21   request; right?

22   A. No.

23   MR. JOHANSEN: So Brendan, it's close to 11:30.

24   Is this a good time for a short break?

25   MR. CHARNEY: Sure. Let's go off the record.

1   (Recess)

2   BY MR. CHARNEY:

3   Q.   Sergeant Moussa, do you understand that you're

4   still under oath?

5   A.   Yes.

6   Q.   I'm going to back up and just go back to the

7   Planning and Research Division's work generally. Am I

8   right that there is a Special Projects Section within

9   the Planning and Research Division?

10   A.   Yes.

11   Q.   Are you under the auspices of that section?

12   A.   Yes.

13   Q.   And what does the Special Projects Section do?

14   A.   Well, there is two units. Right now -- it

15   changed. There is a Manuals and Orders Section, or

16   Unit, that's -- there is another supervisor over that

17   unit, and there is my unit, Special Research Unit, where

18   I'm the supervisor. And for what I -- you know what I

19   do. So the other section, they handle manual changes,

20   so all the special orders to change a manual or

21   operations orders, they handle that in that unit.

22   MR. CHARNEY: And I'm going to ask the court

23   reporter to mark for identification a document that I'll

24   represent to be a printout from the Los Angeles Police

25   Department's website.

1   (Exhibit 9 marked)

2   BY MR. CHARNEY:

3   Q.   Sergeant Moussa, if you could just take a look

4   at this and let me know when you've had a chance to

5   familiarize yourself.

6   A.   Yes.

7   Q.   Have you seen this document ever before?

8   A.   No.

9   Q.   Is the content in it accurate?   And in

10   particular I mean the content that appears under the

11   heading "Planning and Research Division."

12   A.   It must be old because we've changed names and

13   even the sections have kind of -- what's the word I'm

14   looking for?   Commingled, I guess.   Special Projects

15   Section used to be that but now they -- under Special

16   Projects Section we used to have SPU, Special Projects

17   Unit and the Special Research Unit.   Now we have the

18   Manual and Orders Unit and my unit, so that's a little

19   bit -- but here it doesn't really specify what's under

20   each section, but it talks about special projects.

21   Yeah, I'm not sure.   I guess that could be anything.

22   Q.   When did this change?   When did the

23   organization change?

24   A.   It's still the same division, it's just -- we

25   just -- just staff changes a little bit, but I want to

1   say a year ago maybe.

2   Q.   So would this have been accurate as of 2013?

3   A.   Yes.

4   Q.   And in 2013 -- in 2013 you were the -- you were

5   a supervisor in this section; right?

6   A.   Yes.

7   Q.   In 2013 what did -- what did it refer to where

8   it says that the "Special Projects Section is

9   responsible for any special projects requested by the

10   Chief of Police," what would that consist of?

11   A.   They could be surveys. Sometimes the Chief of

12   Police gets surveys from different, you know, entities,

13   outside agencies, that he delegates to us. It could be

14   reviewing somebody's written document or contracts maybe

15   because we had, you know, MOAs, they were under Special

16   Projects Section, that's the SPU unit. So anything to

17   do with contracts between the LAPD and outside agencies,

18   whether it's federal or state or universities, or even

19   within the city of Los Angeles, so that could be --

20   that's a special project.

21   Q.   And you mentioned SPU, does that refer to the

22   Special Projects Unit that used to be one of the units

23   within the Special Projects Section?

24   A.   Yes.

25   Q.   And am I right that your responsibility is for

1   the Special Research Unit?

2   A.   Yes.

3   Q.   Which is distinct from the Special Projects

4   Unit?

5   A.   Yes.   But I did work Special Projects Unit

6   before.

7   Q.   And when did you work the Special Projects

8   Unit?

9   A.   When I first got to Planning and Research as a

10   staff researcher.

11   Q.   And so am I right that the Special Projects

12   Unit has responsible for keeping track of the Memorandum

13   of Agreement?

14   A.   Yes.

15   Q.   What else do they do?

16   A.   They are most -- when I was there we did CPRAs

17   and we did product evals, so besides MOAs and MOUs, but

18   for the most part they were MOAs handling, whether

19   coordinating with the City Attorney or with Fiscal

20   Operations Division on negotiating the different

21   contracts.

22   Q.   When you were in the Special Projects Unit were

23   you a supervisor or were you -- and by supervisor I mean

24   an active supervisor of other people?

25   A.   There was a -- before they created my unit --

```
 1   STATE OF CALIFORNIA      )
                              ) SS
 2   COUNTY OF LOS ANGELES    )

 3

 4        I, Jean F. Holliday, a Certified Shorthand

 5   Reporter, do hereby certify:

 6        That prior to being examined, the witness in the

 7   foregoing proceedings was by me duly sworn to testify to

 8   the truth, the whole truth, and nothing but the truth;

 9        That said proceedings were taken before me at the

10   time and place therein set forth, and were taken down by

11   me in shorthand and thereafter transcribed into

12   typewriting under my direction and supervision;

13        I further certify that I am neither counsel for,

14   nor related to, any party to said proceedings, nor in

15   anywise interested in the outcome thereof.

16        In witness whereof, I have hereunto subscribed my

17   name.

18

19   Dated:  May 18, 2017

20   Jean Holliday

21   _____
     Jean F. Holliday
22   CSR No. 4535, RPR, CRR

23

24

25
```
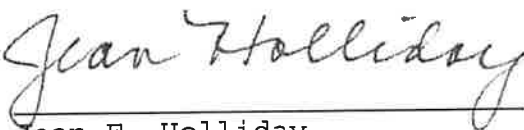
EXHIBIT GGGG

Los Angeles Police Department

Official Site of **The LOS ANGELES POLICE DEPARTMENT**

home (/home) / search results (/search_results)

Planning and Research Division

100 West First Street, Room 868
Los Angeles, CA 90012
213-486-0400

Planning and Research Division (PRD) provides administrative staff support to the Chief of Police and the Chairs of Department-wide standing committees whose responsibilities substantially transcend the Chairman's regular organizational responsibilities such as the Operations Committee, Administration Committee and Risk Management Committee. The Commanding Officer of Planning and Research Division is Captain Duane Hayakawa (/lapd_command_staff/comm_bio_view/37805).

In addition to the above, Planning and Research Division oversees the following sections:

Special Projects Section is responsible for any special projects requested by the Chief of Police.

Procedures and Directives Section deals with the update and maintenance of the Los Angeles Police Department Manual.

I WANT TO KNOW

Do you have an internship program? (/our_communities /content_basic_vie w/7711)

How can I volunteer for the LAPD? (/our_communities /content_basic_vie w/733)

What LAPD programs are available for teenagers? (http://www.lapdon line.org /youth_programs)

What community events are happening in my area? (/our communities

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Davis Wright Tremaine LLP, Suite 2400, 865 South Figueroa Street, Los Angeles, California 90017-2566.

On October 4, 2017, I served the foregoing document(s) described as: **SUPPLEMENTAL DECLARATION OF BRENDAN N. CHARNEY IN SUPPORT OF REPLY OF VERIFIED PETITION FOR WRIT OF MANDATE; EXHIBITS DDDD - GGGG** by placing a **true copy** of said document(s) enclosed in a sealed envelope(s) for each addressee named below, with the name and address of the person served shown on the envelope as follows:

Michael N. Feuer, City Attorney
Carlos De La Guerra, Managing Assistant City Attorney
Linda N. Nguyen, Deputy City Attorney
Soraya C. Kelly, Deputy City Attorney
200 N. Main Street, City Hall East, Room 800
Los Angeles, CA 90012

X (VIA PERSONAL DELIVERY) to be served on all other parties to this action by requesting that a messenger from *GLOBAL NETWORK LEGAL SERVICES* deliver true copies of the above-named documents, enclosed in sealed envelopes addressed indicated above.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on October 4, 2017, at Los Angeles, California.

_____
Yvette M. Merino
Print Name

_____
Signature

SUPPLEMENTAL DECLARATION OF BRENDAN CHARNEY IN SUPPORT
OF REPLY OF VERIFIED PETITION FOR WRIT OF MANDATE
4830-1495-6625v.1 0200879-000001