



LAW OFFICES OF YOUNG, MINNEY & CORR, LLP

SACRAMENTO ■ LOS ANGELES ■ SAN DIEGO ■ WALNUT CREEK

NOVEMBER 18, 2016

VIA EMAIL: CHANGETHELAUSD@GMAIL.COM

REPLY TO SACRAMENTO OFFICE

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Carl Petersen

Re: Your Public Records Act Request Dated October 16, 2016

Dear Mr. Petersen:

This correspondence is in response to your email date October 28, 2016. El Camino Real Alliance (“ECR”) continues to assert the exemptions stated in its October 26, 2016 response to your Public Records request dated October 16, 2016. Furthermore, ECR clarifies its responses as follows:

- ***Any invoice, bill, e-mail, memo, letter, statement or other correspondence from Oracle Investigations Group.***

As stated in ECR’s October 26, 2016 correspondence, as legal counsel for ECR our firm retained the services of Oracle Investigations Group, Inc. This retention is consistent with the motion that was passed by the ECR Board of Directors on June 22, 2016 “to direct legal counsel to contract with Oracle for the investigation.” Therefore, any emails, memos, letters or other correspondence between ECR and Oracle Investigations Group, Inc. are exempt from disclosure pursuant to the attorney-client privilege as they reflect confidential communications between ECR and our office. (Govt. Code § 6254(k)) There are no invoices, bills, statements responsive to your request in the possession of ECR.

- ***Any invoice, bill, e-mail, memo, letter or other correspondence that includes the word “Oracle”***

As stated in ECR’s October 26, 2016 correspondence, as legal counsel for ECR our firm retained the services of Oracle Investigations Group, Inc. This is consistent with the motion that was passed by the ECR Board of Directors on June 22, 2016 “to direct legal counsel to contract with Oracle for the investigation.” Therefore, any emails,

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Carl Petersen
Re: Your Public Records Act Request Dated October 16, 2016
November 18, 2016
Page 2 of 2

memos, letters or other correspondence relating to Oracle Investigations Group, Inc. are exempt from disclosure pursuant to the attorney-client privilege as they reflect confidential communications between ECR and our office. (Govt. Code § 6254(k)) There are no invoices or bills responsive to your request in the possession of ECR.

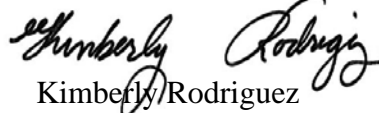
- ***Any invoice, bill or statement from Law Offices of Young, Minney & Corr, LLP***

Confidential communications are defined broadly by Evidence Code section 952. (*Fireman's Fund Ins. Co. v. Superior Court* (2011) 196 Cal. App. 4th 1263, 1273) Further, the attorney-client privilege attaches to a confidential communication between the attorney and the client and bars discovery of the communication irrespective of whether it includes unprivileged material. (*Costco Wholesale Corp. v. Superior Court* (2009) 47 Cal. 4th 725, 734.) As counsel for ECR, the invoices from our office are communications confidentially transmitted in the course of our attorney-client relationship with ECR and are therefore exempt from disclosure pursuant to section 952. (Govt. Code § 6254(k))

Please contact me if you have any further questions or concerns.

Sincerely,

**LAW OFFICES OF
YOUNG, MINNEY & CORR, LLP**



Kimberly Rodriguez
ATTORNEY AT LAW