



Maricela E. Marroquin

T 213.626.8484  
F 213.626.0078  
E mmarroquin@rwglaw.com

355 South Grand Avenue  
40th Floor  
Los Angeles, CA 90071-3101  
rwglaw.com

September 30, 2019

Martin Truitt  
martin117a@gmail.com

Re: Public Records Act Request dated September 20, 2019

The City of Pasadena (“City”) has retained our firm to respond to Public Records Act requests. I am writing on behalf of the City regarding your public records request dated September 20, 2019, and received by the City on that same date. Your request seeks “All Richards Watson Gershon billing records from July 1 th[r]ough the date of production including but not limited to invoices detailing time spent responding to public records act requests.”

The City has records responsive to your request, however, all of the responsive records are exempt from disclosure.

The Public Records Act permits a local agency to withhold from disclosure records that are exempt from disclosure, or portions of such records that are covered by an exemption. (Gov. Code, § 6250 et seq.) The City is withholding records from disclosure pursuant to one or a combination of the exemptions listed below:

- A. Privileged communications are exempt from disclosure pursuant to attorney-client privilege, Section 954 of the California Evidence Code, incorporated into the Public Records Act through California Government Code Section 6254(k). These privileged communications include invoices received by the City for active or recently closed legal matters. See *LA County Board of Supervisors v. Superior Court* (2016) 2 Cal.5th 282.
- B. Writings that are attorney work product are exempt from disclosure pursuant to the California Evidence Code and Section 2018.030 of the California Code of Civil Procedure, incorporated into the Public Records Act through California Government Code Section 6254(k).
- C. The records contain information that is exempt from disclosure under Section 6255 of the California Government Code, as the public interest served in not disclosing the

information clearly outweighs the public interest served by disclosure. (See *Times Mirror Co. v. Superior Court* (1991) 53 Cal. 3d 1325; *City of Citizens for Open Government v. City of Lodi* (2012) 205 Cal. App. 4th 296; *California First Amendment Coalition v. Superior Court* (1998) 67 Cal. App. 4th 159; *City of Santa Cruz v. Superior Court* (1995) 40 Cal. App. 4th 1146; *Rogers v. Superior Court* (1993) 19 Cal. App. 4th 469; and such other cases as cited therein or that cite these cases.)

Should you have any questions, please contact our office at (213) 626-8484.

Very truly yours,



Maricela Marroquin

11131-0081\2341675v3.doc