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8 Attorneys for Petitioners and Plaintiffs

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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF LOS ANGELES**

12 KATHERINE MCNENNY and ADRIAN
13 RISKIN,
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15 Petitioners and Plaintiffs,
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17 vs.

16 LOS ANGELES CHINATOWN BUSINESS
17 COUNCIL, a non-profit corporation,
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19 Respondent and Defendant.

) Case No.: BS174784

) **PETITIONERS' SPECIAL**
) **INTERROGATORIES (SET ONE) TO**
) **RESPONDENT LOS ANGELES**
) **CHINATOWN BUSINESS COUNCIL**

) **Department: 86**
) **Judge: Hon. Mitchell L. Beckloff**

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22 Propounding Party: PETITIONERS/PLAINTIFFS KATHERINE MCNENNY AND
23 ADRIAN RISKIN

24 Responding Party: RESPONDENT/DEFENDANT LOS ANGELES CHINATOWN
25 BUSINESS COUNCIL, a non-profit corporation

26 Set Number: One

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28 TO RESPONDENT/DEFENDANT LOS ANGELES CHINATOWN BUSINESS COUNCIL

1 AND ITS ATTORNEYS OF RECORD HEREIN:

2 **DEMAND IS HEREBY MADE** pursuant to California Code of Civil Procedure Section
3 2030.010 *et seq.*, Petitioners/Plaintiffs KATHERINE MCNENNY AND ADRIAN RISKIN
4 (“PETITIONERS”) request that Respondent/Defendant LOS ANGELES CHINATOWN BUSINESS
5 COUNCIL (“RESPONDENT”) answer fully, in writing, and verified within thirty (30) days of the
6 service hereof, pursuant to California *Code of Civil Procedure* Section 2030.010 *et seq.* Petitioners
7 request that your response be submitted via email to Petitioners’ counsel at
8 anna@vonherrmannlegal.com, or at another place as may be mutually agreed upon, within thirty (30)
9 days.

10 In answering these interrogatories, you are requested to provide all information which is
11 available to you, your agents, representatives, employees, attorneys and investigators, and not just
12 such information as in your personal possession or knowledge. If you are unable to answer any
13 interrogatory after exercising due diligence in attempting to do so, please answer to the extent of your
14 ability and indicate the reason for your inability to answer the remainder.

15 If objections are interposed to any interrogatory, the complete basis should be stated. If it is
16 contended that any information sought is privileged by the attorney-client privilege or work product
17 doctrine, it is requested that the factual basis of such privilege be stated and that the same not be
18 asserted in conclusory terms.

19 **DEFINITIONS**

20 Unless otherwise indicated, the following definitions apply to these Requests as used herein:

21 1. “YOU”, “YOUR,” and “RESPONDENT” shall mean the party to whom the following
22 requests are addressed and any AGENT or representative of the party.

23 2. “AGENT” shall mean and refer to any employee, owner, partner, director, officer,
24 attorney, representative or other person with a relationship to a government agency, firm, person,
25 corporation, or business association, who has the express, implied, or legal authority to act on behalf
26 of that government agency, firm, person, corporation, or business association.

27 3. “PERSON” shall mean and refer to a natural person, firm, association, organization,
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1 partnership, business, trust, limited liability company, corporation, or public entity.

2 4. "ADDRESS" shall mean the street address including the city, state, zip code, and
3 telephone number.

4 5. The term IDENTIFY, when used in reference to a PERSON, means to set forth the
5 PERSON's full name, current or last known address(es), telephone number(s), employer, position
6 with employer and area of responsibility. The term IDENTIFY, when used in reference to an entity
7 that is not an individual, means to set forth the entity's full name, current or last known address(es)
8 and telephone number(s). The term IDENTIFY, when used in reference to DOCUMENTS means
9 to describe with specificity such DOCUMENTS and to state the quantity of such DOCUMENTS.

10 6. "DOCUMENT" or "DOCUMENTS" or "DOCUMENTATION" shall be construed in the
11 most comprehensive and inclusive sense permitted. This definition shall mean without limitation
12 any written, typed, printed, recorded, or graphic matter, however preserved, produced, or
13 reproduced, of any type or description, regardless of origin or location, including without limitation
14 any binder, cover note, certificate, letter, correspondence, record, table, chart, analysis, graph,
15 schedule, report, test, study, memorandum, note, list, diary, log, calendar, telex, e-mail, message
16 (including, but not limited to, interoffice and intra-office COMMUNICATIONS), questionnaire,
17 bill, purchase order, shipping order, contract, memoranda of contract, agreement or understanding,
18 assignment, license, certificate, permit, ledger, ledger entry, book of account, check, order, invoice,
19 receipt, statement, financial data, acknowledgement, computer or data processing card, computer or
20 data processing tape or disk, computer-generated matter, photograph, photographic negative,
21 phonograph recording, transcript or log of any such recording, projection, videotape film,
22 microfiche, and all other data compilations from which information can be obtained or translated as
23 well as reports and/or summaries of investigations, drafts, and revisions of drafts of any
24 DOCUMENTS, and original preliminary notes or sketches, no matter how produced or maintained,
25 in your actual or constructive possession, custody, or control, or the existence of which you have
26 knowledge, and whether prepared, published, or released by you or by any other person. If a
27 DOCUMENT has been prepared in several copies, or additional copies have been made, and some
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1 copies are not identical (by reason of subsequent modification through the addition of notations,
2 etc.), each non-identical copy should be produced as a separate DOCUMENT.

3 7. "RECORD" or "RECORDS" shall carry the same definition as "Writing" under California
4 Government Code §6252(g).

5 8. "REFER," "REFERS TO," "REFERRING TO," OR "RELATING TO" shall mean
6 pertaining to, mentioning, commenting on, connected with, discussing, describing, analyzing,
7 explaining, showing, reflecting, dealing with, comprising of, consisting of, containing, constituting,
8 resulting from, or recording a particular subject in whole or in part either directly or indirectly.

9 9. "ANY" shall also mean "ALL" and vice versa.

10 10. "AND" shall mean "OR" and vice versa.

11 **SPECIAL INTERROGATORIES**

12 **SPECIAL INTERROGATORY #1.**

13 Please state ALL actions YOU took prior to August 15, 2018 to locate ALL of the RECORDS that
14 Petitioners requested.

15 **SPECIAL INTERROGATORY #2.**

16 Please IDENTIFY ALL DOCUMENTS which support YOUR response to Special Interrogatory #1.

17 **SPECIAL INTERROGATORY #3.**

18 Please state ALL actions YOU took prior to August 15, 2018 to review ALL of the RECORDS that
19 Petitioners requested to determine their disclosability under the California Public Records Act
20 ("CPRA").

21 **SPECIAL INTERROGATORY #4.**

22 Please IDENTIFY ALL DOCUMENTS which support YOUR response to Special Interrogatory #3.

23 **SPECIAL INTERROGATORY #5.**

24 If YOU CONTEND that YOU lawfully withheld ANY of the RECORDS that Petitioners requested,
25 please state ALL facts which YOU contend justify YOUR withholding.

26 **SPECIAL INTERROGATORY #6.**

27 If YOU CONTEND that YOU lawfully withheld ANY of the RECORDS that Petitioners requested,
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1 please IDENTIFY ALL DOCUMENTS which YOU contend justify YOUR withholding.

2 **SPECIAL INTERROGATORY #7.**

3 Please IDENTIFY ALL members of the Board AND Staff of the Greater Chinatown Business
4 Improvement District (AKA the “Chinatown Business Improvement District”) (“BID”) from January
5 1, 2015 forward.

6 **SPECIAL INTERROGATORY #8.**

7 Please state ALL facts which YOU contend support YOUR response to Special Interrogatory #7.

8 **SPECIAL INTERROGATORY #9.**

9 Please IDENTIFY ALL DOCUMENTS which support YOUR response to Special Interrogatory #7.

10 **SPECIAL INTERROGATORY #10.**

11 Please list ALL email addresses of the BID’s Board AND Staff (including both formal BID email
12 addresses AND personal email addresses from which ANY BID activity has ever been conducted)
13 that have been used to conduct ANY BID activity from January 1, 2015 forward.

14 **SPECIAL INTERROGATORY #11.**

15 Please state ALL facts which YOU contend support YOUR response to Special Interrogatory #10.

16 **SPECIAL INTERROGATORY #12.**

17 Please IDENTIFY ALL DOCUMENTS which support YOUR response to Special Interrogatory #10.

18 **SPECIAL INTERROGATORY #13.**

19 Please IDENTIFY ALL email services (e.g., Outlook, Gmail, Yahoo, etc.) used by each member of
20 the BID’s Board AND Staff from January 1, 2015 forward.

21 **SPECIAL INTERROGATORY #14.**

22 Please state ALL facts which YOU contend support YOUR response to Special Interrogatory #13.

23 **SPECIAL INTERROGATORY #15.**

24 Please IDENTIFY ALL DOCUMENTS which support YOUR response to Special Interrogatory #13.

25 **SPECIAL INTERROGATORY #16.**

26 Please IDENTIFY who has managed the email account for info@chinatownla.com from May 1,
27 2017 forward.

1 **SPECIAL INTERROGATORY #17.**

2 Please IDENTIFY ALL DOCUMENTS which support YOUR response to Special Interrogatory #16.

3 **SPECIAL INTERROGATORY #18.**

4 Please IDENTIFY ALL individuals who have participated in responding to CPRA requests from
5 January 1, 2017 forward.

6 **SPECIAL INTERROGATORY #19.**

7 Please IDENTIFY ALL DOCUMENTS which support YOUR response to Special Interrogatory
8 #18.

9 **SPECIAL INTERROGATORY #20.**

10 Please IDENTIFY ALL instances from January 1, 2016 forward where YOU have received a
11 request for public RECORDS from ANY PERSON.

12 **SPECIAL INTERROGATORY #21.**

13 Please IDENTIFY ALL DOCUMENTS which support YOUR response to Special Interrogatory
14 #20.

15 **SPECIAL INTERROGATORY #22.**

16 Please IDENTIFY ALL instances from January 1, 2016 forward where YOU have provided public
17 RECORDS to a requestor OR communicated to a requestor that his or her request would not result
18 in the disclosure of RECORDS.

19 **SPECIAL INTERROGATORY #23.**

20 Please IDENTIFY ALL DOCUMENTS which support YOUR response to Special Interrogatory
21 #22.

22 **SPECIAL INTERROGATORY #24.**

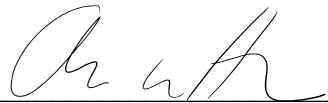
23 Please IDENTIFY ALL instances from January 1, 2016 forward where YOU have failed to provide
24 public RECORDS to a requestor through non-response.

25 **SPECIAL INTERROGATORY #25.**

26 Please IDENTIFY ALL DOCUMENTS which support YOUR response to Special Interrogatory
27 #24.

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1 Dated: January 20, 2019

By: 
Anna von Herrmann, Esq.,
Attorney for Petitioners and Plaintiffs

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